

## NOTICE OF MEETING

# PLANNING SUB COMMITTEE

**Monday, 8th November, 2021, 7.00 pm - Tottenham Green Leisure Centre, 1 Philip Lane, Tottenham, N15 4JA (watch it [here](#))**

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

**Quorum:** 3

### 1. FILMING AT MEETINGS

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

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

### 2. PLANNING PROTOCOL

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

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

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

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

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

### **3. APOLOGIES**

To receive any apologies for absence.

### **4. URGENT BUSINESS**

The Chair will consider the admission of any late items of urgent business. Late items will be considered under the agenda item where they appear. New items will be dealt with at item 11 below.

### **5. DECLARATIONS OF INTEREST**

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

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

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

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

### **6. PLANNING APPLICATIONS**

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

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

**7. HGY/2021/1604 - 10 FORDINGTON ROAD, N6 4TJ (PAGES 1 - 54)**

**Proposal:** Demolition of existing garages and shed and erection of dwelling house over three storeys (plus excavation to form a basement level); Erection of rear garden outbuilding; Associated cycle and bin storage; Associated hard and soft landscaping.

**Recommendation:** GRANT

**8. HGY/2021/1771 - 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) (PAGES 55 - 422)**

**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

**9. PRE-APPLICATION BRIEFINGS**

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

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

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

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

participating in determining the application or leave any decision in which they have subsequently participated open to challenge.

**10. PPA/2021/0026 - FLORENTIA CLOTHING VILLAGE STORAGE PARK, VALE ROAD, N4 1TD (PAGES 423 - 438)**

**Proposal:** Provision for five new blocks of light industrial floor space (GEA equates to circa 9,880sqm).

**11. NEW ITEMS OF URGENT BUSINESS**

To consider any items admitted at item 4 above.

**12. DATE OF NEXT MEETING**

To note the date of the next meeting as 6 December 2021.

Fiona Rae, Principal Committee Co-ordinator  
Tel – 020 8489 3541  
Email: [fiona.rae@haringey.gov.uk](mailto:fiona.rae@haringey.gov.uk)

Fiona Alderman  
Head of Legal & Governance (Monitoring Officer)  
River Park House, 225 High Road, Wood Green, N22 8HQ

Wednesday, 10 November 2021

Planning Sub Committee – 8 November 2021

Item No. 7

## REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

### 1. APPLICATION DETAILS

**Reference No:** HGY/2021/1604

**Ward:** Fortis Green

**Address:** 10 Fordington Road N6 4TJ

**Proposal:** Demolition of existing garages and shed and erection of dwelling house over three storeys (plus excavation to form a basement level); Erection of rear garden outbuilding; Associated cycle and bin storage; Associated hard and soft landscaping.

**Applicant:** Mr John Attree

**Ownership:** Private

**Case Officer Contact:** Conor Guilfoyle

**Date received:** 27/05/2021

1.1 The application has been referred to the Planning Sub-committee for decision as it was called in by Cllr Chenot.

#### 1.2 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- Planning policy recognises the important role and contribution that small sites such as this play in meeting an identified need for new housing in the borough. In land-use terms, the proposal is supported in principle.
- The site is within an established neighbourhood and a plot comparable to others in the area. The development would be of a high-quality design that responds appropriately to the local context.
- The quality of accommodation exceeds relevant standards and would result in a high quality dwelling house.
- The proposal has been designed to minimise harm to neighbouring residential amenity and conditions are imposed to protect neighbouring amenity and privacy.
- No trees of amenity value would be lost and measures to protect neighbouring trees are secured by condition as well as a hard and soft landscaping scheme.
- The proposed development would not result in any significant adverse impacts on parking due to the limited impact of one dwelling and the retention of an off-street parking space.
- The basement works were reviewed and considered acceptable by the Council's Building Control Service with conditions imposed to manage and control the impacts of such basement development works.

- The building's fabric is designed to be energy efficient with appropriate on-site renewable energy technology to be used in the form a ground source heat pump system.

## **2 RECOMMENDATION**

- 2.1 That the Committee resolve to GRANT planning permission and that the Head of Development Management is authorised to issue the planning permission and impose conditions and informatives.
- 2.2 That delegated authority be granted to the Head of Development Management or the Assistant Director Planning, Building Standards & Sustainability to make any alterations, additions or deletions to the 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 (the full text of recommended conditions is contained in Appendix 1 of this report)

- 1) Development begun no later than three years from date of decision
- 2) In accordance with approved plans
- 3) Materials submitted for approval
- 4) Details of hard and soft landscaping
- 5) Details of bin stores
- 6) Basement method statement
- 7) Structural Engineer to oversee basement works
- 8) Hydrological information/ drainage mitigation
- 9) Construction Management Plan
- 10) Tree protective fencing
- 11) Cycle parking
- 12) Outbuilding incidental to dwelling house
- 13) Development in accordance with Energy Report
- 14) Carbon offset payment
- 15) M4(2)/ Accessibility
- 16) Removal of permitted development rights
- 17) Obscured glazing to windows
- 18) Green/living roof

### **Informatives**

- 1) Co-operation
- 2) CIL liability
- 3) Hours of construction
- 4) Party Wall Act
- 5) Street Numbering

6) Thames Water

**Presumption in Favour of Sustainable Development**

- 2.3 In the event that members choose to make a decision contrary to the Officer recommendation it will be necessary to consider the presumption in favour of sustainable development in the NPPF. This is because the Council's delivery of housing over the last three years is substantially below its housing target and so paragraph 11(d) of the NPPF is engaged by virtue of footnote 7 of the NPPF. Members must state their reasons including why it is considered that the presumption is not engaged.

## **CONTENTS**

3. PROPOSED DEVELOPMENT AND SITE LOCATION DETAILS
4. CONSULTATION RESPONSE
5. LOCAL REPRESENTATIONS
6. MATERIAL PLANNING CONSIDERATIONS
7. COMMUNITY INFRASTRUCTURE LEVY
8. RECOMMENDATION

## **APPENDICES:**

- Appendix 1 Planning Conditions and Informatives
- Appendix 2 Plans and Images
- Appendix 3 Consultation Responses
- Appendix 4 Representations
- Appendix 5 Pre-application Advice Note

## **3 PROPOSED DEVELOPMENT AND LOCATION DETAILS**

### **Proposed development**

- 3.1 This is an application for the redevelopment of the site comprising the demolition of the existing garages and shed and the erection of a single detached dwelling house.
- 3.2 The house would be over three storeys with a basement. The proposal also seeks to erect an outbuilding in the rear garden, and provide associated cycle storage, bin storage and hard and soft landscaping within the site.

### **Site and Surroundings**

- 3.3 The application site is a plot occupied by two brick garages with pitched roofs and a shed located at the end of a row of semi-detached 1920's houses. The surrounding area is characterised by residential development predominantly comprising detached and semi-detached dwelling houses with deep rear gardens.
- 3.4 The site is a similar plot to those surrounding it, with a frontage on Fordington Road to the north-west. No.12 and its rear gardens bound to the north/north-east side. To the west/south-west, Fordington Road turns a 90 degree corner so the site bounds the rear of the gardens of Nos 2-8 Fordington Road which site perpendicular to this plot. To the east/south-east, the site bounds the rear gardens of Nos 9 and 11 Woodside Avenue.
- 3.5 The site contains two brick garages with a pitched roof and a shed facing Fordington Road none of which are statutorily or locally listed. There is also a



similarly brick garage adjacent in the rear garden of No.8 which fronts the same section of Fordington Road.

- 3.6 The site is not in a conservation area but lies within the boundary of the area covered by the Highgate Neighbourhood Plan (2017).

#### **Relevant Planning and Enforcement history**

- 3.7 The planning history in relation to this site is as follows:

None relevant.

### **4 CONSULTATION RESPONSE**

- 4.1 The following responses were received:

Internal:

- 1) LBH Transportation Group – No objection subject to conditions
- 2) LBH Building Control – No objection subject to conditions

External:

- 3) Thames Water – No objection

### **5 LOCAL REPRESENTATIONS**

- 5.1 The application has been publicised by way of 12 letters. 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: 35

Objecting: 28

Supporting: 2

Others/neither: 5

- 5.1 The following local groups/societies made representations:

- The Highgate Society (objection)

- 5.2 The following Councillor made representations:

- Cllr Chenot (objection)

- 5.3 The issues raised in representations which are material to the determination of the application are set out in Appendix 4 and summarised as follows:

## Principle/land-use

- Support: site is suitable for a house rather than the current garages which occupy the same plot size as surrounding houses.
- Objection: to the principle of a residential development on the site.

## Design/Appearance/Character

- Concerns about design, appearance, and impact on character of the area.
- Hipped corner overbearing as seen from No 6 & 8.
- Rear extension does not respect the rear building line of the neighbouring houses.
- 'Over-development' of site.
- Side chimney is an unattractive feature.
- Excessive size/scale of the building.
- Impact on streetscape, including interruption of the built form and roofscape rhythm along the south-east edge of Fordington Road and the gable one on side.
- Reducing views of greenery and open space.
  
- Size would be similar to neighbours (support).
- Proposal would be in keeping with the road (support).

## Amenity Impacts

- Impact on amenity of neighbouring occupiers – overlooking, noise, loss of privacy, loss of outlook and light, overbearing impact.
- Amenity impact of rear outbuilding and concern over its intensified use on neighbouring occupiers/ amenity.
- Amenity impact from use of outbuilding.

## Transport impacts

- Parking & highway safety

## Other

- Impact on local hydrology and local flooding.
- Extensive history of problems with surface water and drainage and a network of streams.
- Basement concerns including the extent up to boundaries and practice and structural issues arising from this, percentage increases of hardstanding on the plot, and impacts on underground watercourses, water table, water drainage and associated flood risk.
- Request for independent expert assessment of the Basement Impact Assessment.
- Impact on trees and landscaping.
- No need for a chimney/undesirable due to pollution impacts.

5.4 The following issues raised are not material planning considerations:

- Civil matters relating to boundary.
- Loss of views.
- Temporary disturbance from construction activity.

## **6 MATERIAL PLANNING CONSIDERATIONS**

### Statutory Framework

- 6.1 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.

### Considerations

- 6.2 The main planning issues raised by the proposed development are as follows:

1. Land use/ principle of development;
2. Design and appearance;
3. Standard and quality of residential accommodation;
4. Inclusive access;
5. Impact on neighbouring amenity;
6. Transport considerations;
7. Trees and nature conservation;
8. Energy and sustainability;
9. Basement development and flood risk; and
10. Waste and recycling.

### **Land use/ principle of development**

#### Delivery of new housing

- 6.3 Government policy as set out in the NPPF 2021 requires Local Planning Authorities to significantly boost the supply of housing (para. 60). Paragraph 69 supports approval on small sites and outlines that such sites can make an important contribution to meeting the housing requirement of an area, as they often can be built out relatively quickly.
- 6.4 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. Policy H1 'Increasing housing supply' states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites.
- 6.5 London Plan (2021) Policy H2A outlines a clear presumption in favour of development proposals for small sites (below 0.25 hectares in size) and sets out a

minimum target in Table 4.2 for boroughs (Haringey –10 year target is 2,600). 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.

- 6.6 Policy SC1 of the Highgate Neighbourhood Plan (HNP) (2017) states that the Plan will help to facilitate delivery of a minimum of 300 net additional housing units in Highgate up to 2026. It states that planning applications for new residential development will be required to demonstrate how they are contributing towards a range of housing types and tenures to meet the identified needs of the Plan area and help achieve a balanced, inclusive and sustainable community.

#### Garden/ infill development

- 6.7 Policy DM7 of the Development Management DPD states that there will be a presumption against the loss of garden land unless it represents a comprehensive redevelopment of a number of whole land plots. It also sets out a number of design considerations discussed further on in this report.
- 6.8 Policy DH10 of the HNP continues the approach of DM7 above, stating that garden land development will be subject to the following conditions; existing mature trees and landscaping shall be retained wherever possible and that any increases in hard surfacing on front garden should be accompanied by satisfactory mitigating measures such as landscaping. These matters are considered in detail below. The policy also refers to the need for new development to take account of existing front and rear building lines.
- 6.9 The site appears to be a plot originally set out to accommodate a dwelling house, consistent with other plots in this planned residential street. The supporting documentation outlines the unusual history of the site, whereby the initial intention to develop the site for housing changed due to rising car ownership and demand for garage space. As such, these two garages were built to accommodate two car owners on the street who did not benefit from adjoining garages on their own properties.
- 6.10 Mindful of this unique circumstance the resulting layout of the proposed new dwelling and the existing dwellings adjacent would respect and reflect the general pattern of development within the immediate locality and can therefore be considered to comply with Policy DM7.
- 6.11 A substantial sized domestic garden would remain in existence to serve the proposed dwelling house. The resultant development would therefore be consistent with the prevailing character and appearance of the surrounding residential area.

- 6.12 On the basis that only a limited element of garden land would be removed and a large remaining portion of garden and landscaped land retained in keeping with the original plot layout of the area, Officers do not find direct conflict with Policy DM7 insofar as this policy relates to garden land. Given the above considerations, the principle of a new house is acceptable in terms of planning policy and land-use.

### **Design and appearance**

- 6.13 London Plan (2021) policies emphasise the importance of high-quality design and seeks to optimise site capacity through a design-led approach. Policy D3 'Delivering good design' states that development proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to street hierarchy, building types, forms and proportions.
- 6.14 Local Plan Policy SP11 (2017) and Development Management Development Plan Document (DPD) Policy DM1 seek to secure the highest standard of design which respects local context and character to contribute to the creation and enhancement of Haringey's sense of place and identity. DPD Policy DM1 'Delivering High Quality Design' requires development proposals to meet a range of criteria having regard to the following: building heights; form, scale and massing prevailing around the site; urban grain; sense of enclosure and where appropriate following existing building lines; rhythm of neighbouring or local regular plot and building widths; active, lively frontages to public realm; and distinctive local architectural styles, detailing and materials.
- 6.15 DPD policy DM7 requires proposals for infill, backland and garden land to relate appropriately and sensitively to the surrounding area, providing a site specific and creative response to the built and natural features of the area and to incorporate at least one street frontage.
- 6.16 Policy DH10 of the HNP ('Garden land and Backland Development') refers to the need for new development to take account of existing front and rear building lines.
- 6.17 The surrounding area was developed for housing in the 1920's and is a pleasant suburban area displaying Arts and Crafts style dwellings; incorporating pitched roofs, bay windows, masonry with brick and rendered panelled walls. Fordington Road consists of different building types, detached and semi-detached houses in a range of design and materials. House frontages are set back behind well-planted front gardens and sit parallel to the road, with the road having a pleasant and verdant character. Gaps between houses vary reflective of the fact that there are different building types – i.e., some houses with attached garages and some with integral garages. The pattern of development in this area in terms of the arrangement of plots and houses on corners/ road junctions is varied.

- 6.18 As outlined above, the application site was a plot originally planned to accommodate a residential unit, but instead it was occupied by two garages and a shed, which date back to the original development of the road in the 1920's. A garage at No. 12 Fordington Road is built along the boundary with the application site. To the other side is a shed between the garages and the boundary with No. 8. The garage for the corner plot at No. 8 is parallel with the boundary of No. 10 but set a small distance away.
- 6.19 The Design & Access Statement submitted with the application shows in detail how the new dwelling responds to the streetscape, character, and qualities of the area, specifically identifying and picking up on key design principles and features.
- 6.20 The front elevation of the dwelling represents a contextual contemporary interpretation of the 1920's houses found on this side of Fordington Road, strongly responding to the proportions, rhythm and materiality of adjacent properties. Specifically, the design to the front elevation will be asymmetrical and consist of a projecting gabled roof over a two-storey bay with brickwork and render used as well as timber subframes to the windows, set within brick frames to add texture and detail.
- 6.21 While accepting this house will be a 21st century addition to the street it would not be decidedly different to the majority of traditional 1920's dwellings in the area, with the design here reinforcing and responding to the streetscape of Fordington Road.
- 6.22 The proposed dwelling would align with the front and rear building lines of the adjacent dwellings Nos. 12-18 Fordington. There would be a 4m flat roofed single storey extension projecting beyond the rear building line but pulled in from the side boundaries and is subordinate in nature. A condition is being attached to secure a green/living roof to this part of the development, to visually soften its appearance and to provide biodiversity value and help water retention on site during rainfall.
- 6.23 The roof form and ridge height of the dwelling are respectful of the immediate context. Specifically, the ridge height is derived from extrapolating a line from the ridges of the adjacent Nos.18-12 and following this to the ridge of No. 8.
- 6.24 The scheme is designed to respond to its surrounding, with the presence of planting and trees within neighbouring gardens also helping to soften and integrate the development into its surroundings when viewed from outside the site. The concerns about the chimney stack on the side elevation are also noted however the presence of such a feature is not uncharacteristic to housing within this area, with such a feature serving to break up this elevation and add interest.
- 6.25 It is accepted that the siting of a detached new house here does diminish the open nature in relation to the current end of street houses found on this corner of Fordington Road and would introduce a high gable to one. However the specific circumstances of this site which was intended to accommodate a house, as well

as the remaining gaps between buildings, mean the construction of a detached house here would not be unduly prominent or harmful to the character and visual amenities of the area. The layout of the street as well as the scale and design of existing houses, does allow for such a house to sit comfortably within its setting, without harming the character of the area. Given the location at the end of the street a gabled 'bookend' to the south-western elevation is considered a good design solution.

- 6.26 The proposed dwelling is set back from the flank elevation of the adjacent house by the width of the existing garage of No. 12, in keeping with the pattern of the street.
- 6.27 The proposal includes the construction of a garden room/outbuilding at the rear. The structure will be pulled in from the shared boundaries by approximately 2-2.6m at the rear and over 2m at the sides. The structure will be approximately 2m in height at eaves and 3.4m at the highest part of the roof/ridge level. While accepting the footprint of the outbuilding is large, and the fact that typically such structures can be built under 'permitted development' and viewed within the context of a large garden the size of the structure is considered to be acceptable. It will have a timber-clad external finish, in keeping with its surroundings and is viewed appropriate for an outbuilding in a rear garden setting.
- 6.28 Overall, while there will be some change to the streetscene with the introduction of a new detached house and outbuilding, for the reasons given above, the degree of change is not significant or harmful to the character of the area. Rather the design of the dwelling relates appropriately to its immediate context and would not harm the character and appearance of the area.
- 6.29 A condition requiring further details of the proposed materials are required to be reviewed and approved by the Local Planning Authority prior to works commencing on site.
- 6.30 Landscaping will be integral to the success of this development and as such a detailed hard and soft landscaping scheme will be required to be submitted, as secured by way of a planning condition. Subject to the submission of satisfactory materials and landscaping details, Officers consider that the proposal would be acceptable with regards to design and the policy considerations outlined above.

### **Standard and quality of residential accommodation**

- 6.31 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 storage space as well as outdoor amenity space. Table 3.1 of the London Plan sets out the internal minimum space standards for new developments, including minimum gross internal areas (GIA), while Table 3.2

provides qualitative design aspects that should be addressed in housing developments.

- 6.32 The approximate 491 sq.m GIA of the proposed house considerably exceeds the largest minimum GIA in the London Plan which is 138 sq.m for a 6 bedroom/ 8 person house.
- 6.33 The proposed unit would be dual aspect and would provide sufficient levels of outlook and daylight for the future occupiers. The future occupiers would benefit from a generous rear garden. As such, the proposed development would provide a high quality and spacious environment for future occupiers.

### **Inclusive access**

- 6.34 London Plan Policy D5 requires all new development to achieve the highest standard of accessible and inclusive design, seeking to ensure new development can be used easily and with dignity by all. London Plan Policy D7 require that 10% of new housing is wheelchair accessible and that the remaining 90% is easily adaptable for residents who are wheelchair users. DPD Policy DM2 also requires new developments to be designed so that they can be used safely, easily and with dignity by all.
- 6.35 The new dwelling would meet the M4(2) Category 2: Accessible and adaptable dwelling standard and a condition is to be attached to ensure compliance and delivery in line with such a standard.

### **Impact on neighbouring amenity**

- 6.36 London Plan Policy D6 outlines that design must not be detrimental to the amenity of surrounding housing, in specific 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.
- 6.37 DPD Policy DM1 'Delivering High Quality Design' 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 resident.
- 6.38 The different concerns about amenity impacts raised in the representations received are noted.
- 6.39 While sited to the south/south-west of No.12, the building would be of similar scale (albeit higher to a limited degree) and hipped on that side to reduce its impact on



No.12. It would be aligned with No.12 and separated by the single storey garage attached to this property. On the other side, it would be sited to the north/far north-east of the rear gardens of Nos.6 & 8 and set back approximately 1.3m from their rear garden boundaries.

- 6.40 In terms of outlook and aspect from Nos. 6 & 8, it is accepted that the proposed development would have some impact, given the increase in height compared to the current garages on site. However, mindful of the gaps and distances (approximately 25m) in question the height and presence of such a dwelling would not be injurious to the amenity to the occupiers of these two neighbouring properties. There would be a generous gap between the side of new dwelling and the rear of No 8.
- 6.41 The rear facing windows would result in some overlooking of neighbouring properties but no more than expected in a suburban area of this nature. Moreover, any overlooking is unlikely to be appreciably greater than the existing levels from neighbouring properties. The side elevation windows proposed above ground level would be obscure glazed below 1.7m in relation to finished floor level as such preventing overlooking and loss of privacy
- 6.42 The height, siting and scale of the outbuilding would not impact on light or outlook to any neighbouring occupants, given the distances in question, the relatively low height of the building and manner in which it is pulled in from garden boundaries. The structure would only be partially visible, projecting above boundary fences with views of it also restricted by the existence of mature trees and shrubs within neighbouring gardens.
- 6.43 Residents have raised concerns regarding potential noise and disturbance from the use of such a garden building. However, on the basis of the indicated use of the building as being incidental to the enjoyment of dwelling house (as secured by way of a planning condition), Officers do not consider that such a use would be materially harmful to living conditions of nearby occupant of dwellings.
- 6.44 Overall, there will be no unacceptable harm to the living conditions of neighbouring residents and the proposal is therefore acceptable in this regard.

### **Transport considerations**

- 6.45 London Plan Policy T1 requires all development to make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and to ensure that any impacts on London's transport networks and supporting infrastructure are mitigated. Policies T4, T5 and T6 set out key principles for the assessment of development impacts on the highway network in terms of trip generation, parking demand and cycling provision.

- 6.46 Local Plan Policy SP7 'Transport' states that the Council aims to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by promoting public transport, walking and cycling and seeking to locate major trip generating developments in locations with good access to public transport. This is supported by DPD Policy DM31 'Sustainable Transport'.
- 6.47 The site has a public transport accessibility level (PTAL) of 1b which is considered 'very poor' access to public transport services. There are three bus services accessible from the site, within a six-minute walk. Highgate Underground Station is an eighteen-minute walk from the site. While this distance is outside of the PTAL walk criteria, it is a walking distance many would consider still consider acceptable for accessing Underground services.
- 6.48 This is a small development proposal, which would remove two garages capable of accommodating parked cars but which are instead used for storage. There is also space in front of the garages to accommodate one parked vehicle.
- 6.49 The Council's Transportation Officers have reviewed the application and note that the 2021 London Plan references provision of up to 1.5 spaces per unit for houses of this size in areas with this PTAL.
- 6.50 The off-street parking proposed (1 space) would likely cater for the parking demands arising from the new house, however with 5 bedrooms Officers acknowledge it could well be the case that there would be more than one car registered and kept there. However, as the existing garages are currently used for storage, there would not be displaced parking by their loss and on this basis one off-street parking space, and potentially another vehicle parked on-street, would not lead to a significant uplift in on-street parking pressure.
- 6.51 Transportation Officers note that two cycle parking space are proposed in the rear garden room, which would meet the requirements of the London Plan (2021). As requested, a condition is attached to secure full details of these to ensure they are satisfactory and are provided.
- 6.52 Transportation Officers also note that as the site lies adjacent to other residential properties, and includes a basement construction, a detailed draft of a construction logistics plan or similar such report, should be included that detail how the development will be built out, and how impacts on adjacent neighbours and the safe, smooth operation of the public highway will be managed, minimised and mitigated. A condition securing the submission of a construction management plan is being imposed.
- 6.53 Subject to the above conditions, the transportation impacts of the proposal are acceptable and can be managed, and it is therefore acceptable in this regard.

### **Trees and nature conservation**

Impact on Trees

- 6.54 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. DPD Policy DM1 requires that proposals demonstrate how landscaping and planting are integrated into a development as a whole, responding to trees on and close to the site. Policy DH10 of the HNP states in such garden land/infill development, existing mature trees and landscaping shall be retained wherever possible.
- 6.55 An Arboricultural Impact Statement has been submitted with the application. The statement includes a tree survey that identifies 18 trees within and around the site. Of these trees, none of those outside the site would be removed or harmed, with a methodology outlined to protect these. A total of 7 on-site specimens would be removed as a result of the proposal, most of which are fruit trees or trees in poor health, ivy covered and decaying etc. They are not subject to protection orders or considered specimens of high amenity value, and could be removed without the need for consent.
- 6.56 The proposal seeks to carry out new hard and soft landscaping and as part of this, details of new tree, shrubs, plants etc. will be secured by way of condition. The condition specifically asks for appropriate compensatory tree planting, for which there is ample space on site, specifically along the boundaries of the site. This can ensure a high quality soft landscaping scheme is implemented to ensure a long-term, viable planting on-site and to protect the verdant character of the area. On this basis, the proposal is considered acceptable in terms of amenity.

**Energy and sustainability**

- 6.57 The London Plan sets out detailed policies in relation to energy efficiency, renewable energy, climate change and water resources. Local Plan Policy SP4 promotes and requires all new developments to take measures to reduce energy use and carbon emissions during design, construction and occupation. Low- and zero-carbon energy generation are required with all new development, specifically to achieve a reduction in predicted carbon dioxide emissions through on-site renewable energy generation. The dwelling would need to achieve a 'zero carbon' target in terms of its regulated CO2 emission, and a minimum site-wide regulated CO2 emissions reduction of at least 35% against a Building Regulations Part L1A (2013) compliant scheme, in line with London Plan policy S1 2.
- 6.58 DPD Policy DM21 also requires new development to consider and implement sustainable design, layout and construction techniques, with proposals required to apply the energy hierarchy to minimise energy use in order to meet/ exceed, minimum carbon dioxide reduction requirements.

6.59 The proposed scheme is shown to achieve a site-wide regulated CO2 emissions reduction of 51%, via a combination of an energy efficient building fabric and appropriate renewables systems. Therefore, it is set to exceed the minimum regulated CO2 emissions reduction target of at least 35%, set for major developments within the London Plan. The measures are set out as follows:

### ***Passive measures***

- Improved U-values: through high levels of insulation for all solid elements and high performance glazing beyond Part L 2013 targets and notional building specifications, in order to reduce the demand for space conditioning (heating and cooling) as far as possible.
- Air tightness: the proposed development will aim to improve upon the Part L1A (2013) minimum standard for air tightness of 10m<sup>3</sup>/m<sup>2</sup>.h at 50Pa, by targeting an air permeability rate of 5m<sup>3</sup>/m<sup>2</sup>.h at 50Pa for all areas.
- Thermal bridging: it is envisaged that the construction details for the proposed dwelling will be designed to comply with a similar performance to Accredited Construction Details, minimising heat losses through the junctions of the building. Therefore, a y-value of 0.08 has been assigned within the SAP calculations for the proposed scheme.
- Reducing the need for artificial lighting: the development has been designed to maximise daylight as much as possible. All habitable areas will benefit from large areas of glazing to increase the amount of daylight within the internal spaces where possible.

### ***Active design measures***

- Mechanical Ventilation with Heat Recovery: mechanical ventilation systems utilising heat recovery in order to achieve ventilation in the most energy-efficient way.
- Energy efficient lighting.
- Building energy monitoring: smart meters monitoring the consumption of energy and water.
- Reducing overheating risks: through passive and active design measures in line with London Plan Policy SI 4 cooling hierarchy.
- Energy efficient pipework.
- External and internal shading.
- Thermal mass: the internal floors of the building will provide a degree of thermal massing to absorb and store excess heat during the hottest periods of a day. The building will release its heat in the cooler times of a day to dampen the peak diurnal weather conditions.
- Natural ventilation: main strategy for providing fresh air and dissipating heat across the proposed scheme.

- 6.60 In addition to the above measures, the proposal would include the installation and use of a ground source heat pump system (GSHP). This would include a closed ground loop where a liquid passes through the system, absorbing heat from the ground and relaying this heat via an electrically run heat pump into the building. The report outlines that this would result in a regulated CO2 emission saving of approximately 50.7% (and a total CO2 reduction from baseline of approximately 39.5%). This would exceed the requirements of planning policy.
- 6.61 A further increase to a 62% reduction can be achieved by carbon offsetting. To achieve a 'Zero Carbon' status the remaining regulated CO2 emissions following the application of the energy hierarchy strategies would need to be offset through a financial payment contribution to the LPA. Such an offset amount is calculated at £6,170 based on a rate of £95/tonne over a period of 30 years in line with the London Plan, and is to be secured by way of a Unilateral Undertaking.
- 6.62 In conclusion, the proposed scheme exceeds the minimum regulated CO2 emissions reduction target of at least 35%, set for major developments (this is a 'minor' development) within the 2021 London Plan and complies with Haringey Local Plan policy SP4 aim for 'zero carbon' for all new residential developments by reducing regulated CO2 emissions as far as possible. The above measures go above and beyond the minimum expectations in this regard. A condition is imposed to secure the identified CO2 emission savings and to secure a financial payment contribution to offset the remaining carbon emissions. The proposal is therefore acceptable in this regard.

### **Basement development and flood risk**

- 6.63 Policy SP11 of Haringey's Local Plan requires that new development should ensure that impacts on natural resources, among other things, are minimised by adopting sustainable construction techniques.
- 6.64 DPD policy DM18 ('Residential Basement Development and Light Wells') requires householder extensions for basement development to demonstrate that a proposal will not adversely affect the structural stability of the application building and neighbouring buildings; does not increase flood risk to the property and nearby properties; avoids harm to the established character of the surrounding area and not to adversely impact the amenity of adjoining properties or the local natural and historic environment. Policy DM24 reiterates the requirement of new development to manage and reduce surface water runoff.
- 6.65 London Plan 2021 policy relates more specifically to large-scale basement development but in paragraph 3.10.6 it is recognised and outlined that small-scale basement excavations, where they are appropriately designed and constructed, can contribute to the efficient use of land, and provide extra living space. Paragraph 3.10.5 equally highlights the need to manage sensitively through the

planning application process potential impact on the local environment and residential amenity.

- 6.66 The new dwelling will have a basement which will extend under the footprint of the property, including the terrace at the rear with a stair providing access from the basement to the rear garden.
- 6.67 The site currently comprises a double garage with a lean-to wooden shed on the southern side, with tarmac providing car parking on the north-western side of the garages extending to Fordington Road. The site has a gentle slope reflecting that the site is located within a wider hillside setting with the land rising in a south-westerly direction and falling towards the north-east.
- 6.68 The resulting site surface area will be 52% hardstanding, with 29% of the total area being the footprint of the property with the garden room and cycle store comprising 5% and lastly 18% being external hardstanding. It is accepted the new hard surfacing associated with this development represents a noticeable change compared to current on-site conditions, namely a site surface area currently 29% impermeable consisting of the double garages, various sheds and the tarmacadam. It is accepted however, that the use of permeable paving and landscaping within the site will aid surface water drainage across the site.
- 6.69 A Basement Impact Assessment (BIA) was submitted with the application. The BIA provides desktop information on geology, local hydrology/ hydrogeology conditions, surface water flood risk as well as information on historical streams and current surface water drains.
- 6.70 The information provided outlines that the site is underlain by London Clay Formation with it likely to be >40m thick, with this being an unproductive stratum. At this stage no on-site investigation and borehole tests have been carried out, however satisfactory examination of baseline data and understanding of the potential risks and impacts have been identified within the BIA.
- 6.71 The site is not within an area at risk from flooding as defined by the Environmental Agency and in terms of flooding from surface water is in an area of very low / low risk of flooding. The site is also not within a Critical Drainage Area as defined in Policy DM26. No current surface water features are identified on mapping records within 500m of the site.
- 6.72 An examination of historic mapping records as set out in the BIA show a number of surface water features in the broader area, namely streams in the vicinity of Fordington Road, Woodside Avenue and Lanchester Road, which were subsequently diverted into underground pipes in the early twentieth century prior to development of the area for housing, with these now forming part of the Thames Water Drainage network. As also reflected in maps provided in the BIA risks of

surface water flooding are typically localised to the routes of such historic streams which are beyond and not in immediate proximity to the application site.

- 6.73 The BIA recognises that construction and excavation activities may cause some ground movements that have the potential to damage existing, neighbouring structures. It is equally highlighted that subject to the works being designed and constructed accordingly, specifically using good workmanship and following well engineered construction sequences and temporary excavation support etc., the risk of damage to neighbouring structures can be minimised and mitigated. The method for constructing the basement floor are outlined in the BIA and are considered acceptable.
- 6.74 The expected engineering design and methodology for constructing the basement will be contiguous piled retaining wall, thereby negating the need for temporary propping and minimising the risk of ground movement associated with neighbouring structures, such as the adjoining garage at No 12.
- 6.75 Using contiguous piling and following industry best standard practices the excavation and basement works here are not viewed to represent a risk in terms of structural stability, ground slip or movement in connection with neighbouring buildings and structures. The BIA has been reviewed by the Council's Building Control Service, which raises no objection.
- 6.76 Overall, the level of information provided at the planning application stage is considered acceptable. However, as a matter of course more detailed on-site investigations will take place to feed into the detailed foundation design and the construction phase of the development.
- 6.77 A condition will be imposed to require the submission of the on-site investigations as well as a final/ detailed method statement for the construction of the basement, which requires that the predicted Burland Scale at the time of the construction phase of the basement is no more than 'Burland Scale 1'. A condition can be imposed to ensure that the structural side of the basement/ excavation works are overseen by a suitably qualified chartered engineer. The submission of a construction management plan (CMP) is also required prior to the commencement of works on site. This will provide further information on the broader programme of works associated with the construction of this new dwelling. Details of the permeable surfaces to be used on site as well as a landscaping scheme for the site are also to be secured by way of planning conditions.
- 6.78 Other areas of legislations, the Party Wall Act and Building Regulations etc., also provide further safeguards to identify and control the nature and magnitude of the effect on neighbouring properties. The necessary party-wall agreements with adjoining owners would need to be in place prior to commencement of works on site.

- 6.79 Subject to the related conditions outlined in Appendix 1, the proposal is acceptable in this regard.

### **Waste and Recycling**

- 6.80 Local Plan Policy SP6 Waste and Recycling and DPD Policy DM4., requires development proposals make adequate provision for waste and recycling storage and collection.
- 6.81 Waste and recycling storage is shown to be located at the front of site, although exact details of the enclosure are not provided. A condition is being imposed requiring such design details of the enclosure to be submitted to and approved by the LPA.

### **Conclusion**

- 6.82 The position, scale, mass, detail and alignment of the proposed dwelling is considered to be acceptable. The proposal does not diminish/ harm the visual amenity or the character of the area. The proposal will not cause unacceptable harm to the living conditions of neighbouring residents. The proposal would provide an acceptable layout and standard of accommodation meeting the necessary internal floorspace standards. The scheme will have no adverse impact on the surrounding highway network or on car parking conditions in the area.
- 6.83 All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted for the reasons set out above. The details of the decision are set out in the RECOMMENDATION

## **7 COMMUNITY INFRASTRUCTURE LEVY CIL**

- 7.1 In this particular case the application is accompanied by a 'Self Build Exemption Claim Form (Form 7 - Part 1)' to qualify for self-build exemption. This requires that within 6 months of completion of the development the applicant must submit a 'Self Build Exemption Claim Form: Part 2. If however personal circumstances change and the applicant decides to dispose of the property before the three year occupancy limit expires then they must notify the charging authority (Haringey Council) as the full charge amounts would apply. (Mayoral CIL charge would be £27,730.05 (491 sqm x £60.55) and the Haringey CIL charge would be £181,291.83 (491 sqm x £369.23 (Indexation included)).

## **8.0 RECOMMENDATIONS**

GRANT PERMISSION subject to conditions and informatives in Appendix 1

Applicant's drawing No.(s) 10A1003; 10A1002; 00A3002; 00A3001; 00A1002; 00A2001; 00A1001; 10A1005; 10A1004; 10A2002; 10A2001; 10A1007; 10A1006; 10A2003; 10A3002; 10A3003; 10A3001; 10A3000; 10A3004; Arboricultural Impact Assessment



dated 18/05/2021; Basement Impact Assessment (Desk Study, Screening and Scoping Stage) dated April 2021 and accompanying documentation; Design and Access Statement dated 25/05/2021; Energy Statement, May 2021.

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## **Appendix 1 Planning Conditions and Informatives**

### **CONDITIONS**

#### **1) Development begun no later than three years from date of decision**

The development hereby authorised must be begun not later than the expiration of 3 years from the date of this permission, failing which the permission shall be of no effect.

Reason: This condition is imposed by virtue of the provisions of the Planning & Compulsory Purchase Act 2004 and to prevent the accumulation of unimplemented planning permissions.

#### **2) In accordance with approved plans**

The approved plans comprise drawing nos; 10A1003; 10A1002; 00A3002; 00A3001; 00A1002; 00A2001; 00A1001; 10A1005; 10A1004; 10A2002; 10A2001; 10A1007; 10A1006; 10A2003; 10A3002; 10A3003; 10A3001; 10A3000; 10A3004; Arboricultural Impact Assessment dated 18/05/2021; Basement Impact Assessment (Desk Study, Screening and Scoping Stage) dated April 2021 and accompanying documentation; Design and Access Statement dated 25/05/2021; Energy Statement, May 2021. The development shall be completed in accordance with the approved plans except where conditions attached to this planning permission indicate otherwise or where alternative details have been subsequently approved following an application for a non-material amendment.

Reason: In order to ensure the development is carried out in accordance with the approved details and in the interests of amenity.

#### **3) Materials submitted for approval**

Samples of materials to be used for the external surfaces of the development shall be submitted to, and approved in writing by, the Local Planning Authority before any above ground development is commenced. Samples should include sample panels or brick types and a roofing material sample combined with a schedule of the exact product references. Only the approved details shall be implemented and retained thereafter.

Reason: In order for the Local Planning Authority to retain control over the exact materials to be used for the proposed development and to assess the suitability of the samples submitted in the interests of visual amenity consistent with Policy D3 of the London Plan 2021, Policy SP11 of the Haringey Local Plan 2017 and Policy DM1 of The Development Management DPD 2017.

#### **4) Details of hard and soft landscaping**

Details of a scheme depicting those areas to be treated by means of hard and soft landscaping shall be submitted to, approved in writing by, and implemented in accordance with the approved details. Such a scheme shall include details of hard surfacing materials, details of planting with a schedule of species, in specific securing appropriate compensatory tree planting in the form of a semi-mature tree to be planted to the front of the site, with a minimum of 6 trees planted elsewhere within the site.

The approved landscaping scheme shall thereafter be carried out and implemented in strict accordance with the approved details in the first planting and seeding season following the occupation of the building or the completion of development (whichever is sooner). Any trees or plants, either existing or proposed, which, within a period of five years from the completion of the development die, are removed, become damaged or diseased shall be replaced in the next planting season with a similar size and species. The landscaping scheme, once implemented, is to be maintained and retained thereafter to the satisfaction of the Local Planning Authority.

Reason: In order for the Local Planning Authority to assess the acceptability of any landscaping scheme in relation to the site itself, thereby ensuring a satisfactory setting for the proposed development in the interests of the visual amenity of the area consistent with Policy G7 of the London Local Plan 2021, Policy SP11 of the Haringey Local Plan 2017 and Policy DM1 of The Development Management DPD 2017.

#### **5) Details of bin stores**

Notwithstanding the approved plans details of the design of the refuse and recycling bins enclosure shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development hereby approved and shall be maintained as such thereafter.

Reason: In order to protect the amenities of the locality and to comply with Policy DM4 of The Development Management DPD 2017 and Policy SI7 of the London Plan 2021.

#### **6) Basement method statement**

Notwithstanding the information submitted with the application no development shall take place until a final Method Statement for the construction of the basement has been submitted to and approved in writing by the local planning authority.

The Method Statement shall demonstrate that the predicted Burland Scale at the time of the construction phase is no more than Burland Scale 1 in relation to neighbouring buildings/ structures within the zone of influence. The development thereafter shall be carried out in accordance with this approved methodology and detail.

Reason: To ensure that the proposed development would have no undue impact on the structural integrity of adjoining and neighbouring buildings, in accordance with Policy DM18 of the Haringey Development Management DPD 2017.

### **7) Structural Engineer to oversee basement works**

No development shall commence until a Chartered Civil Engineer (MICE) or Chartered Structural Engineer (MI Struct.E) has been appointed, and such appointment confirmed in writing to the local planning authority, to supervise the construction works throughout their duration. In the event that the appointed engineer ceases to perform that role for whatever reason before the construction works are completed, those works will cease until a replacement chartered engineer of the afore-described qualification has been appointed, and such appointment confirmed in writing to the local planning authority, to supervise their completion. At no time shall any construction work take place unless an engineer is at that time currently appointed and their appointment has been notified to the local planning authority in accordance with this condition.

Reason: To ensure that the proposed development would have no undue impact on the structural integrity of adjoining and neighbouring buildings, in accordance with Policy DM18 of the Haringey Development Management DPD 2017.

### **8) Hydrological information/ drainage mitigation**

The development hereby approved other than demolition and clearance of the site shall not commence until a site specific assessment of the hydrological and hydro-geological impact of the development, has been submitted to and approved in writing by the Local Planning Authority. The scheme shall also include: details of permeable surface to be agreed in writing by the Local Planning Authority. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.

Reason: To ensure the development provides satisfactory means of drainage on site and to reduce the risk of localised flooding.

### **9) Construction Management Plan**

No development shall take place until a Construction Management Plan, to include details of:

- A. a programme of works (including measures for traffic management);
- B. details of vehicle routing, parking and management of vehicles of site personnel, operatives and visitors;
- C. loading and unloading of plant and materials;
- D. storage of plant and materials;
- E. provision of boundary hoarding behind any visibility zones;
- F. wheel washing facilities;

- G. measures for the control and reduction of dust;
- H. measures for the control and reduction of noise and vibration.

have been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented and retained during the demolition and construction period.

Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality in accordance with paragraph 174(e) of the NPPF 2021, Policy SD1 and SI 1 of the London Plan 2021, and Policy DM23 of The Development Management DPD 2017.

### **10) Tree protective fencing**

The erection of fencing for the protection of trees shall be undertaken in accordance with the Arboricultural Impact Assessment (prepared by r.howorth & co.ltd) before any equipment, machinery or materials are brought on to the site for the purposes of the development, and shall be maintained until all equipment, machinery and surplus materials have been removed from the site. Nothing shall be stored or placed in any area fenced in accordance with this condition.

Reason: In order to ensure the safety and well-being of the trees on the site during constructional works that are to remain after building works are completed consistent with Policy G7 of the London Plan 2021, Policy SP11 of the Haringey Local Plan 2017 and Policy DM1 of The Development Management DPD 2017.

### **11) Cycle parking**

The development shall not be occupied until a minimum of 2 long-stay cycle parking spaces for users of the development, have been installed in accordance with the approved details and the London Cycling Design Standards. Such spaces shall be retained thereafter for this use only.

Reason: To promote sustainable modes of transport in accordance with policy T5 of the London Plan 2021 and Policy SP7 of the Haringey Local Plan 2017.

### **12) Outbuilding incidental to dwelling house**

The rear garden outbuilding hereby approved shall be used only in connection with the dwelling house on the application site and for purposes incidental to their enjoyment, and for no other purpose, without the benefit of planning permission from the Local Planning Authority.

Reason: To ensure that the occupants of nearby properties are not adversely affected by the development in accordance with Policy D14 of the London Plan (2021) and Policy DM1 of the Haringey Development Management DPD (2017).

### **13) Energy Strategy**

The development hereby approved shall be constructed in accordance with the Energy Statement by 'greenbuildconsult' (dated May 2021) delivering a 51% improvement on carbon emissions over 2013 Building Regulations Part L.

(a) Prior to above ground construction, details of the proposed ground source heat pump (GSHP) system shall be submitted to the Local Planning Authority. This must include:

- Specification and efficiency of the proposed GSHP (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the location of the GSHP and pipework;

(b) Prior to the occupation of development, evidence that the GSHP complies with other relevant issues as outlined in the Microgeneration Certification Scheme Heat Pump Product Certification Requirements shall be submitted to and approved by the Local Planning Authority.

The final agreed energy strategy shall be installed and operation prior to the first occupation of the development. The development shall be carried out strictly in accordance with the details so approved and shall be operated and maintained as such thereafter.

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 Policy SP4 and DM21.

### **14) Carbon offset payment**

No development works shall take place until a Unilateral Undertaking has been completed and submitted to the Local Planning Authority securing a payment of £6,170.00 to fund offsetting the remaining carbon emissions from this development.

Reason: In the interest of climate change and to help achieve zero carbon development across the borough and in compliance with Local Plan Policies SP4 and DM21.

### **15) M4(2)/ Accessibility**

The residential unit hereby approved shall be designed to meet Part M4 (2) 'accessible and adaptable dwellings' of the Building Regulations 2015 (formerly Lifetime Homes Standard) unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure that the proposed development meets the Council's Standards in relation to the provision of accessible and adaptable dwellings.

### **16) Removal of permitted development rights**

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (and any order revoking and re-enacting the order) no extensions or further outbuildings shall be built and no new window or door openings inserted into any elevation of the building (other than that development expressly authorised by this planning permission), unless otherwise agreed in writing by the Local Planning Authority.

Reason: To safeguard the amenities of neighbouring occupiers and the general locality.

### **17) Obscured glazing to windows**

Before the first occupation of the building hereby permitted, the first-floor side elevation windows shall be fitted with obscured glazing and any part of the window that is less than 1.7 metres above the floor of the room in which it is installed shall be non-opening and fixed shut. The window shall be permanently retained in that condition thereafter.

Reason: To avoid overlooking into the adjoining properties and to comply with Policy SP11 of the Haringey Local Plan 2017 and Policy DM1 of The Development Management DPD 2017.

### **18) Green/living roof**

Notwithstanding the approved plans no development shall commence until details of a scheme for a "vegetated" or "green" roof for the flat roof of the 4m rear element to the development hereby permitted has been submitted to and approved in writing by the Local Planning Authority. The details shall include its (their) type, vegetation, location and maintenance schedule. The development shall be implemented in accordance with the approved scheme prior to its first occupation and the vegetated or green roof shall be retained thereafter. No alterations to the approved scheme shall be permitted without the prior written consent of the Local Planning Authority.

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 Policies G1, G5, G6, SI1 and SI2 of the London Plan (2021) and Policies SP4, SP5, SP11 and SP13 of the Haringey Local Plan (2017).

## **INFORMATIVES**

- 1) Co-operation



In dealing with this application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our pre-application advice service and published development plan, comprising the London Plan 2021, the Haringey Local Plan 2017 along with relevant SPD/SPG documents, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

## 2) Community Infrastructure Levy

In this particular case the application is accompanied by a 'Self Build Exemption Claim Form (Form 7 - Part 1)' to qualify for self build exemption. Within 6 months of completion of the development hereby permitted the applicant must submit a 'Self Build Exemption Claim Form: Part 2' together with the following appropriate supporting evidence:

- Proof of completion (Building control compliance/completion certificate)
- Proof of ownership (title and deeds)
- Proof of occupation of the dwelling (Council tax certificate, and two further proofs of evidence e.g. utility bill, electoral roll, bank statement)

And one of the following:

- An approved claim for a VAT refund for DIY house builders
- A self-build warranty
- An approved self-build mortgage

Failure to submit the appropriate form and evidence within six months of completion of the development will result in the withdrawal of the exemption and the need for payment of the full charge amounts (Mayoral and Local CIL).

If however personal circumstances change and the applicant decides to dispose of the property before the three year occupancy limit expires then they must notify the charging authority (Haringey Council) as the full charge amounts would apply. (Mayoral CIL charge would be £27,730.05 (491 sqm x £60.55) and the Haringey CIL charge would be £181,291.83 (491 sqm x £369.23 (Indexation included)). Failure to notify the charging authority will result in enforcement action and surcharges would become payable. Further details in respect of CIL are available on Council's website.

## 3) Hours of construction

**INFORMATIVE: Hours of Construction Work**

The applicant is advised that under the Control of Pollution Act 1974, construction work which will be audible at the site boundary will be restricted to the following hours:-

8.00am - 6.00pm      Monday to Friday  
8.00am - 1.00pm      Saturday

and not at all on Sundays and Bank Holidays.

4) Party Wall Act

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

5) Street Numbering

The new development will require numbering. The applicant should contact the Local Land Charges at least six weeks before the development is occupied (tel. 020 8489 3472) to arrange for the allocation of a suitable address.

6) Thames Water

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.

7) Positive Pumped Device (Thames Water)

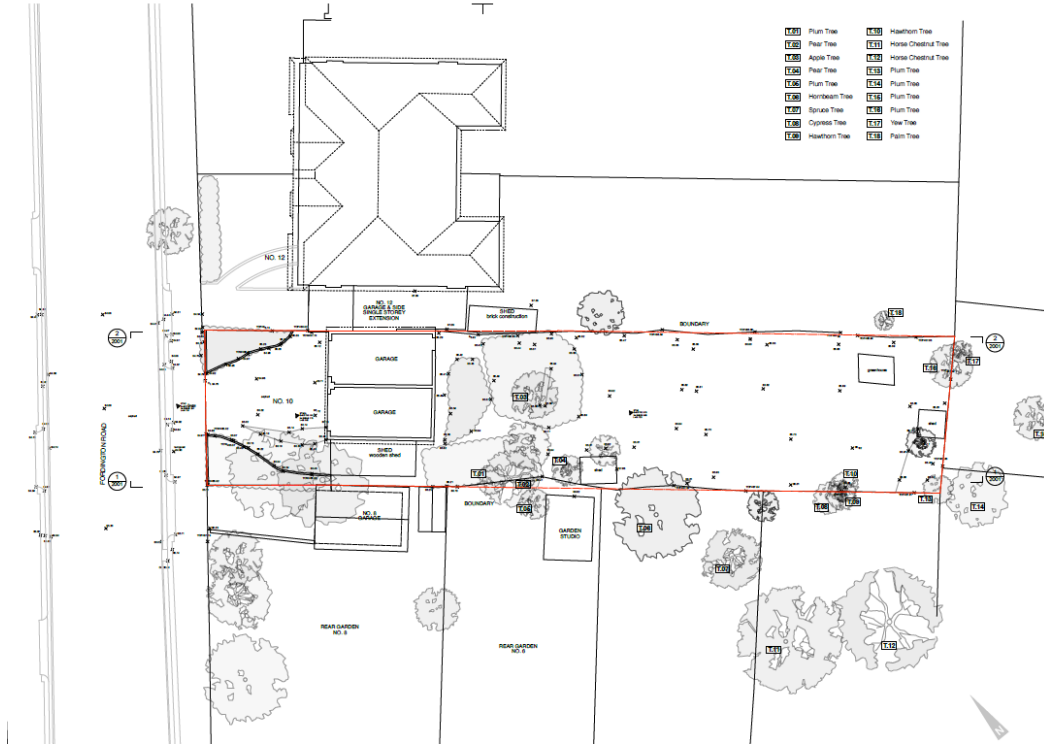
Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing a positive pumped device (or equivalent reflecting technological advances) to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions. Fitting only a non-return valve could result in flooding to the property should there be prolonged surcharge in the public sewer.

**Appendix 2 Plans and Images**

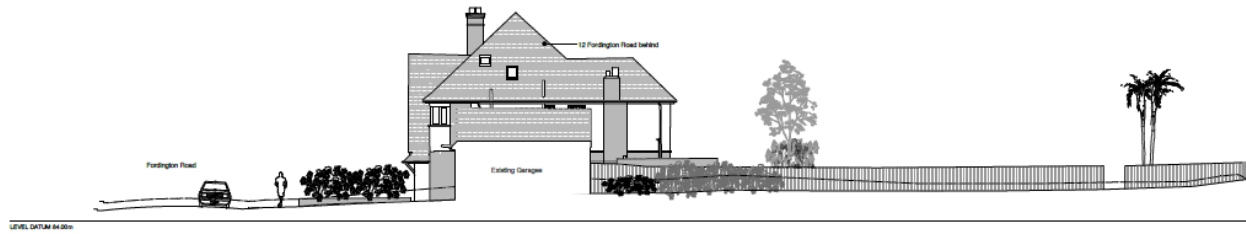
**Location Plan**



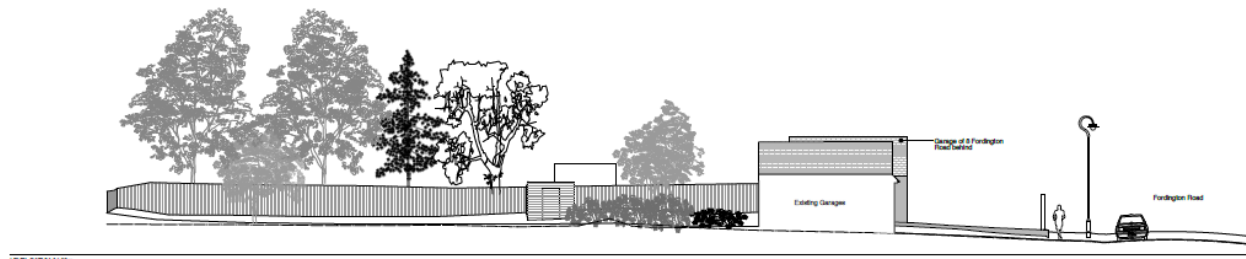
**Existing Site Plan**



Existing sections

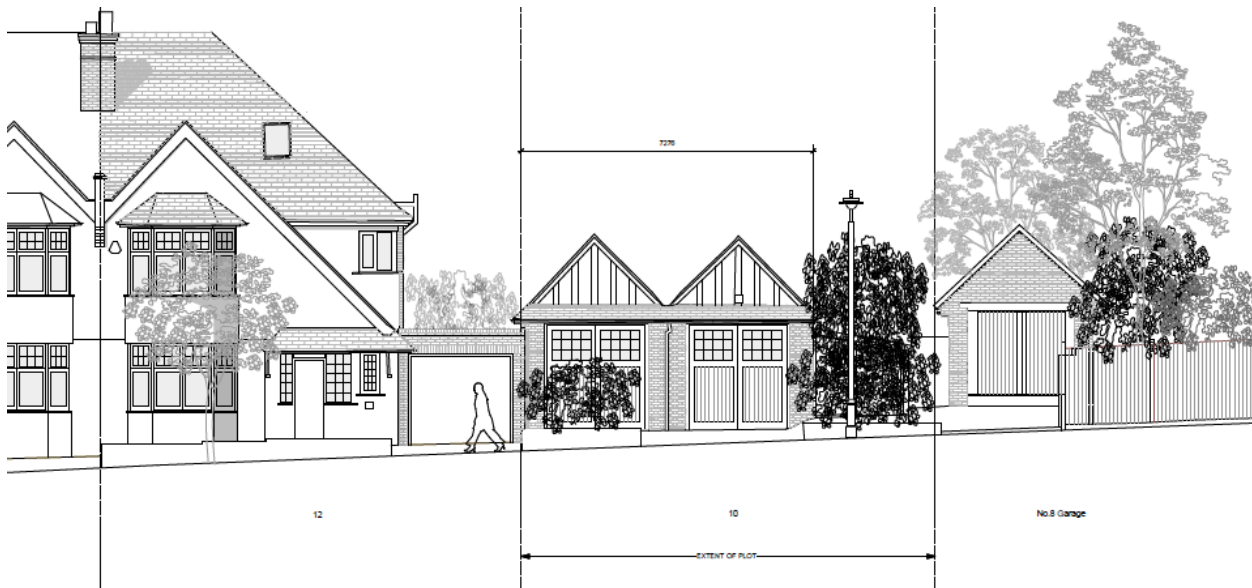


1 site section A

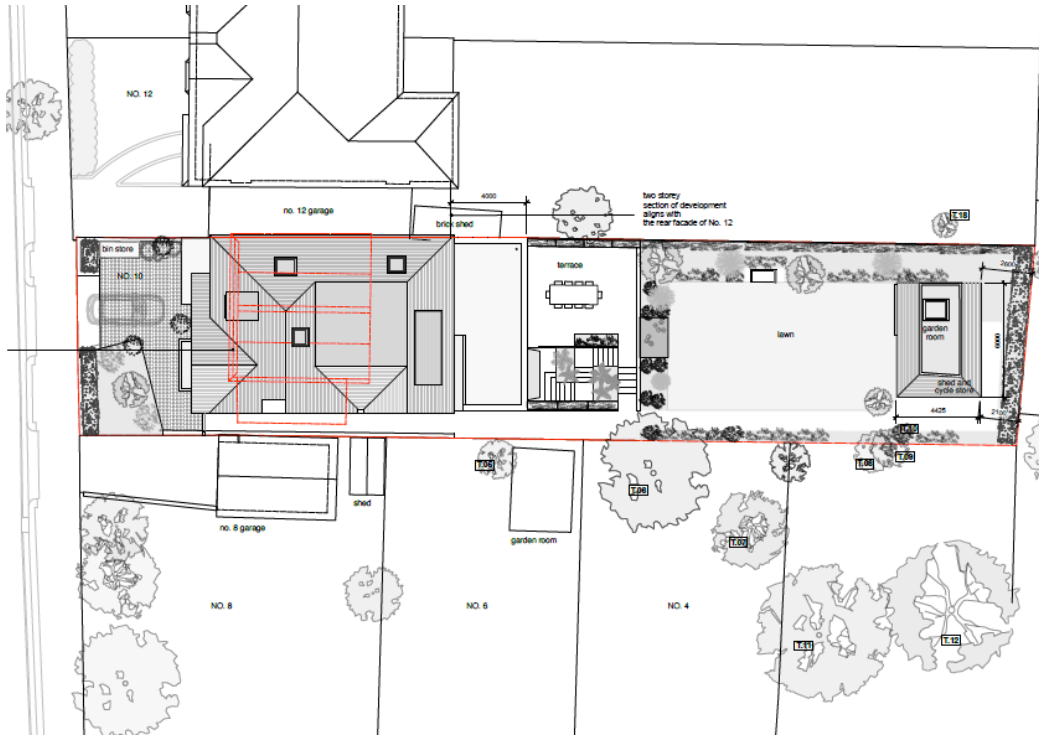


2 site section B

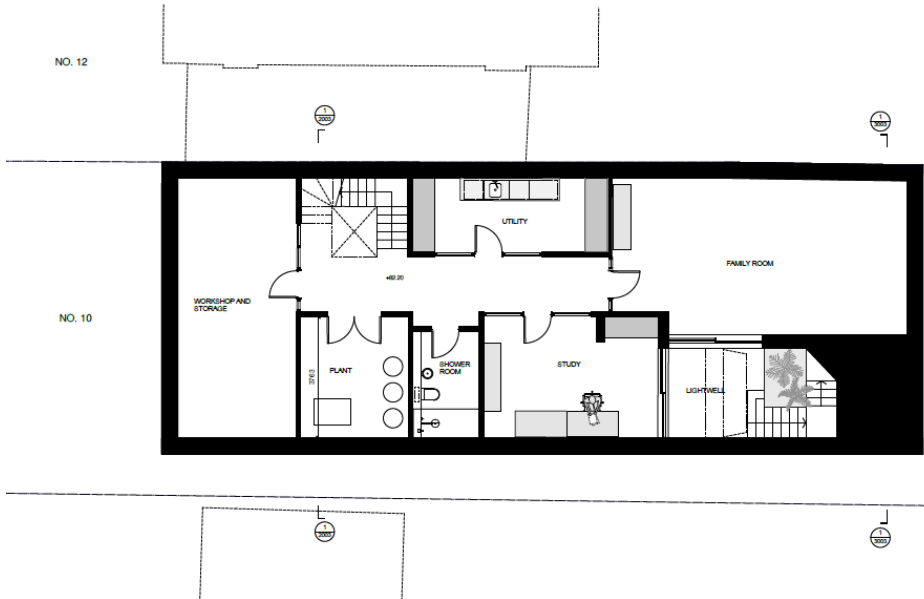
Existing street elevations



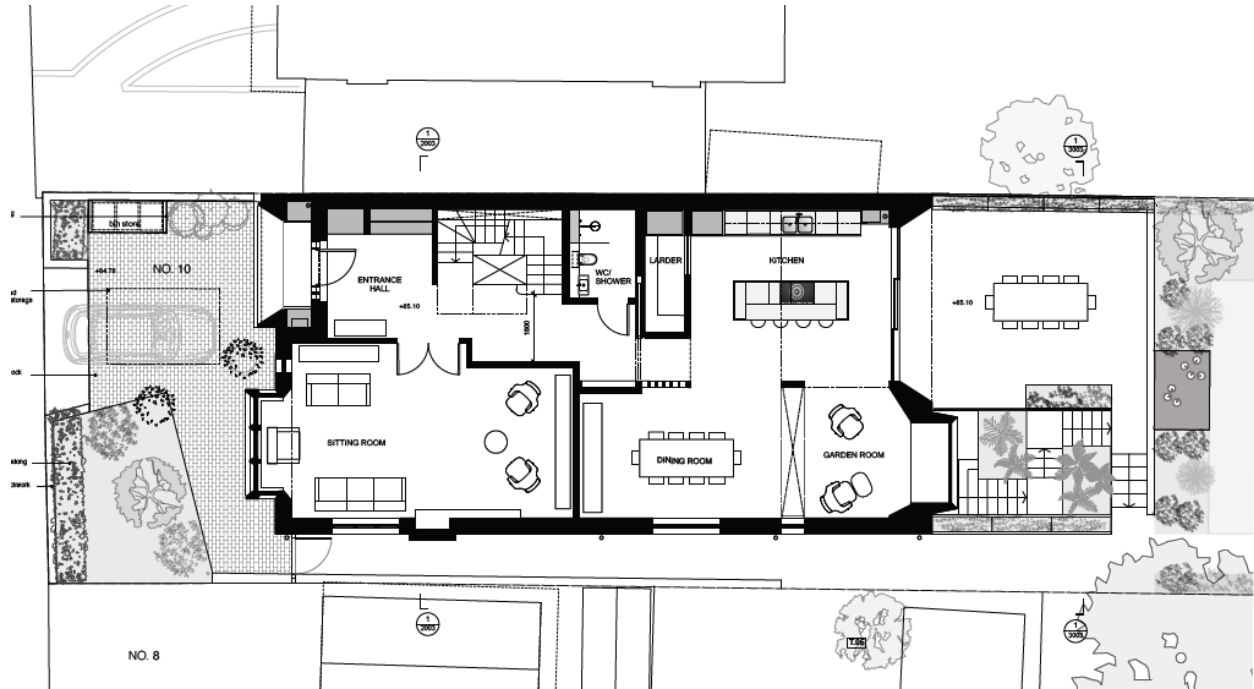
**Proposed site plan**



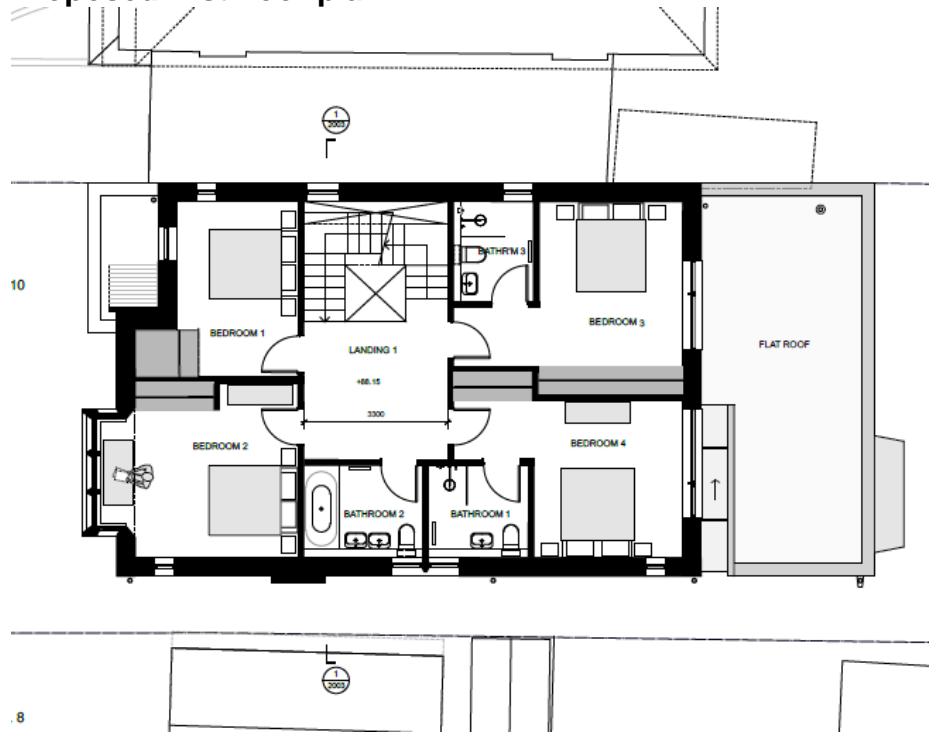
**Proposed basement plan**



**Proposed ground floor plans**

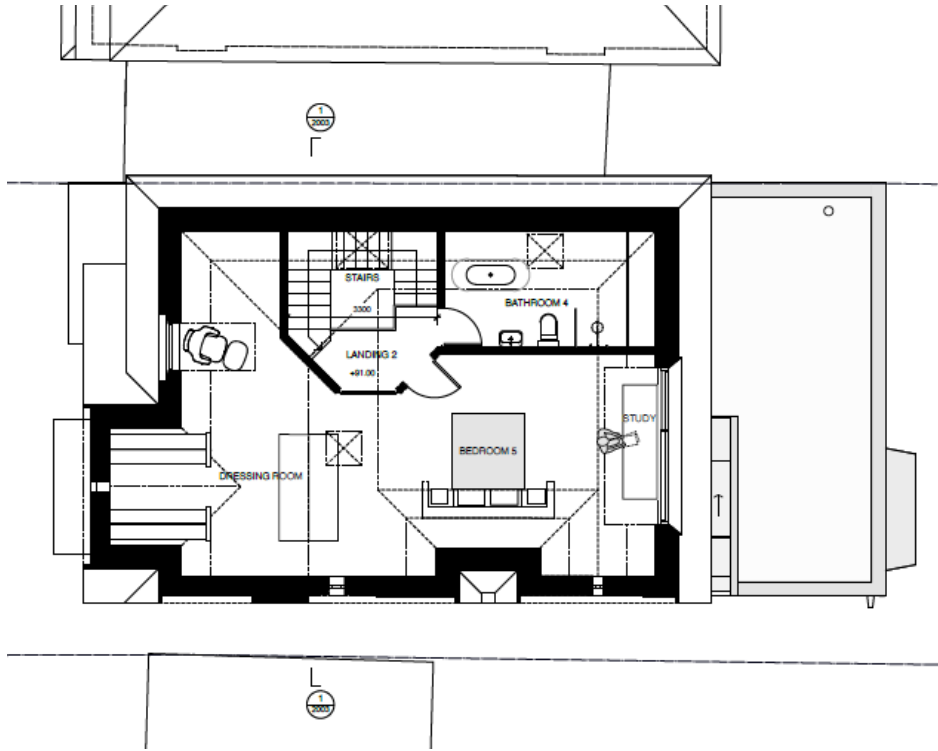


Proposed first floor plan

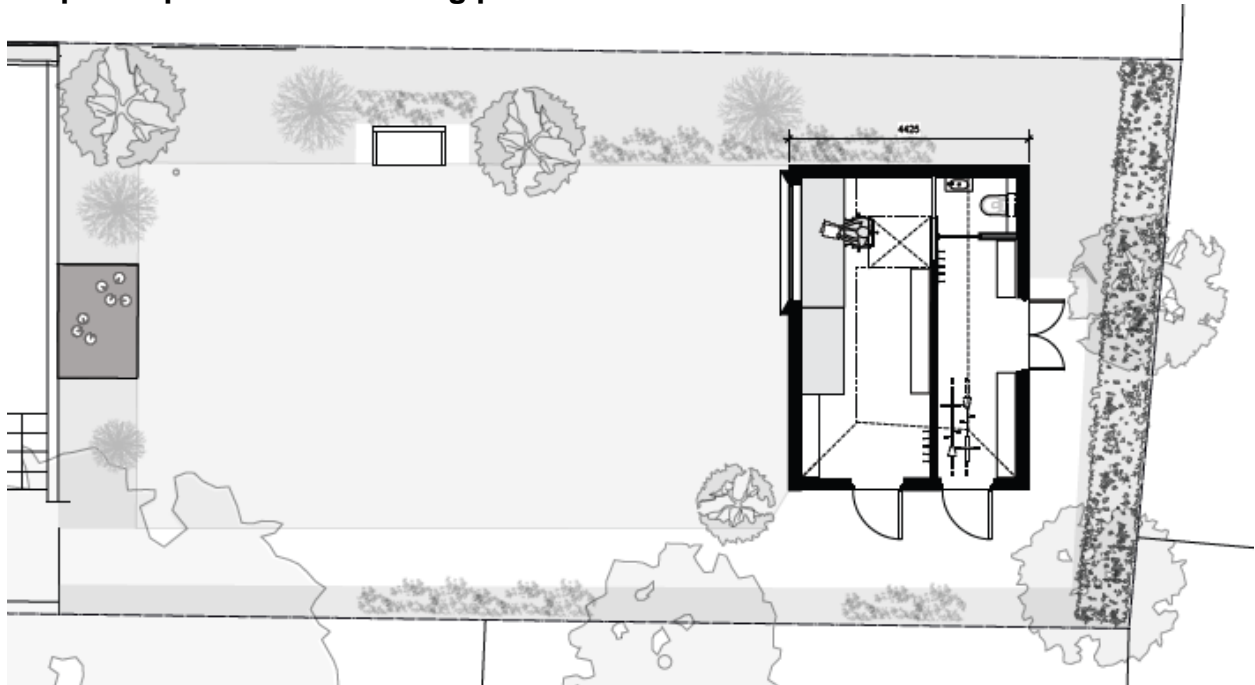


Proposed second floor plan





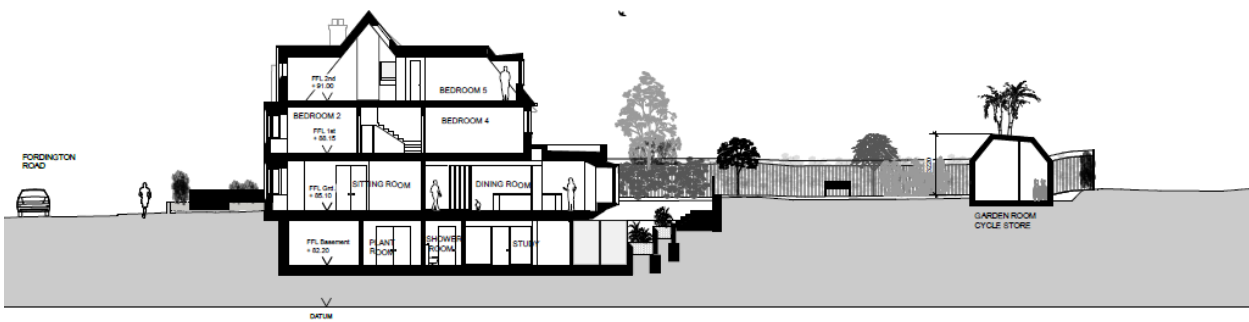
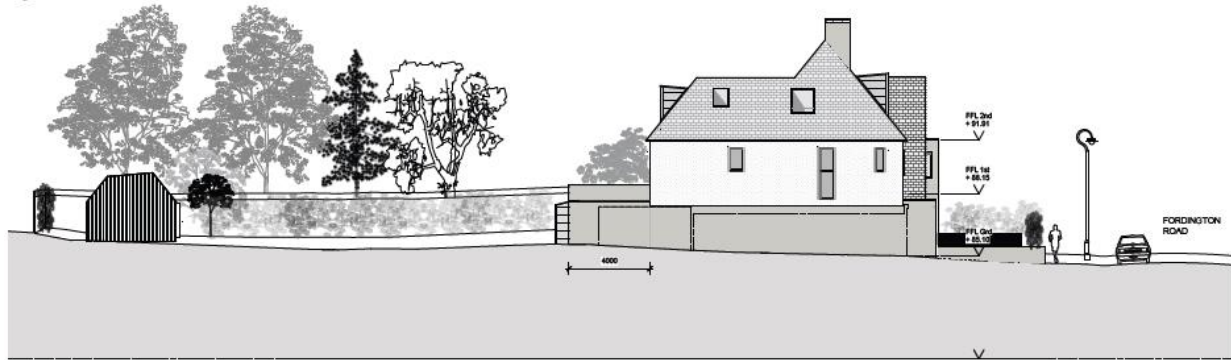
**Proposed pavilion/outbuilding plan**



**Proposed sections**



1 elevational site section A

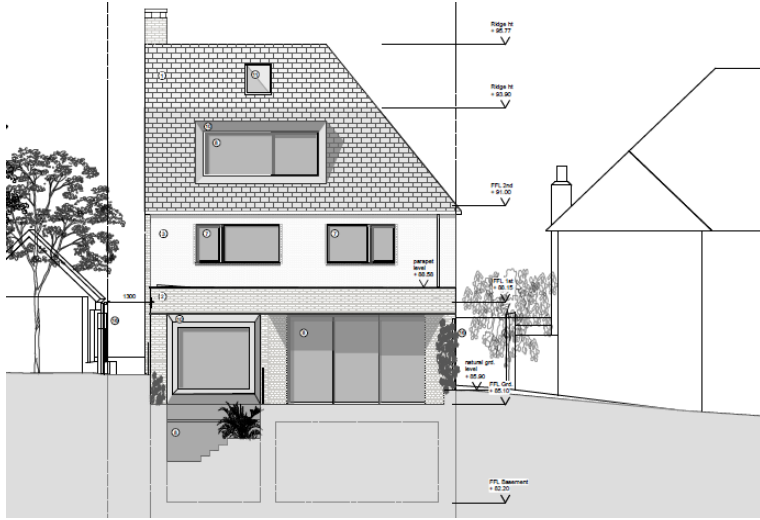


Proposed street elevation

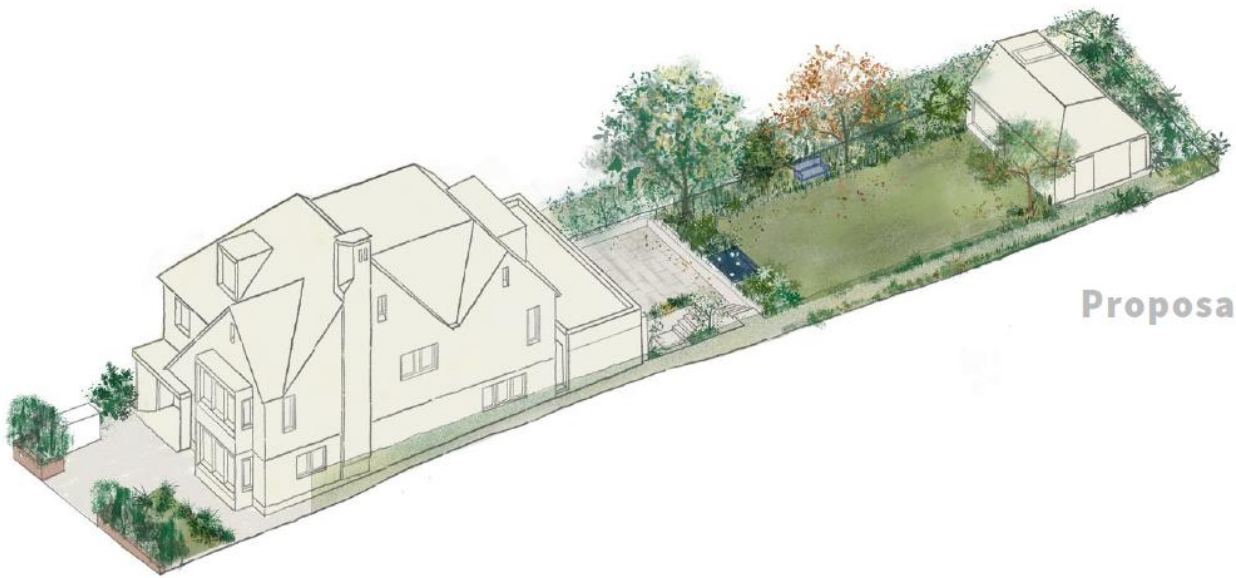


Proposed elevations





**Proposed visualisations**





**Proposed materials**



red clay tiles



first floor render



red brick to ground floor and corner walls



pigmento red zinc



weathered timber cladding



oak window framing





**Appendix 3 Consultation Responses – Internal and External Consultees**

Stakeholder	Question/Comment	Response
<b>INTERNAL</b>		
<b>Transportation Group</b>	<p>HGY/2021/1604 – 10 Fordington Road London N6 4TJ</p> <p>Location and access The site is located to the south eastern side of Fordington Road, at a point north of the junction of Fordington Road with The Drive. No. 10 Fordington Road accommodates the two garages and shed, which provide off street parking for No. 7 Fordington and another local resident, there is no existing dwelling on the plot of No. 10.</p> <p>The site has a PTAL value of 1b, considered ‘very poor’ access to public transport services. Within the WEBCAT/PTAL walk distances considered for inclusion into the PTAL value, there are three bus services accessible from the site, within a 6 minute walk. Highgate Underground Station is an 18 minute walk from the site, outside of the PTAL walk criteria however a walking distance many would consider to access Underground services.</p> <p>The site is not within any of the Borough’s formal CPZ’s so there are no formal parking controls at or in the immediate locality of the site.</p> <p>Proposal This application seeks to redevelop the existing garages and outbuildings in the garden to provide a new five-bedroom detached house, three-storey plus basement, with a gross internal area of 491.2m<sup>2</sup> and off street parking for one car. Cycle parking for two cycles is proposed for a store within a garden room proposed for the rear garden.</p> <p>Transportation considerations This is a small development proposal, which will take out of use two garages currently able to accommodate parked cars. There is also space in front of the garages to accommodate one or two</p>	Comments noted and considered in report.

Stakeholder	Question/Comment	Response
	<p>parked vehicles. It isn't clear whether these garages are still in use or not.</p> <p>The proposal is for a new detached family sized house with 1 off street parking space. There is an existing crossover which it is assumed will remain as existing, if any changes are proposed details will be required with any new formal application, and the applicant would need to liaise with and enter into the appropriate Highways Act Agreement with the Highway Authority to cover any physical changes to the Highway.</p> <p><b>Car Parking</b> The London Plan references provision of up to 1.5 spaces per unit for houses of this size in areas with this PTAL. The off street parking proposed (1 space) would likely cater for the parking demands arising from the new house, however with 5 bedrooms it could well be the case that there would be more than one car registered and kept there.</p> <p>It is detailed that the existing garages are currently used for storage, so it is not expected that there will be any displaced parking. Therefore, the potential for any on street parking issues arising is effectively negligible.</p> <p><b>Cycle Parking</b> Two spaces are proposed for the garden room proposed for the rear garden. This will meet the numerical requirement of the London Plan.</p> <p>Full details should be provided to detail the fixings/system to be used, and dimensioned drawings showing the proposed arrangements along with the manufacturer's installation specifications. This can be covered by condition.</p> <p><b>Construction period</b> Given that the site is adjacent to other residential properties, and includes a basement construction, a detailed draft of a construction logistics plan or similar should be included that details how the development will be built out, and how impacts on</p>	

Stakeholder	Question/Comment	Response
	<p>adjacent neighbours and the safe, smooth operation of the public highway will be managed, minimised and mitigated.</p> <p>In particular, this document will need to detail any temporary arrangements proposed for the highway such as temporary suspension of footways and parking bays to facilitate the movement of materials into and out of the site, if necessary, plus the quantity of construction vehicles attending the site during the build.</p> <p>Summary This application is for redevelopment of the existing garages, garden and outbuildings at the site to provide a new five-bedroom detached house, three-storey plus basement, with a gross internal area of 491.2m<sup>2</sup> and off street parking for one car. Cycle parking for two cycles is proposed for a store within a garden room proposed for the rear garden.</p> <p>From the transportation perspective this is a very small development. There is off street parking which roughly accords with the London Plan and any additional on street parking demands will be negligible. 2 cycle parking spaces will be provided within the garden room.</p> <p>Subject to conditions relating to satisfactory provision of cycle parking details and a construction logistics plan or similar, both pre commencement, Transportation do not object to this application.</p>	
<b>Building Control</b>	<p>The BiA provided is meets your requirements. There are 4 areas that need to be further addressed by pre commencement condition:</p> <p>Soil investigation must be carried out;</p> <p>Monitoring movement, especially on the attached garage that is likely to have shallow foundations;</p> <p>Construction management and;</p>	<p>Matters considered in detail in 'basement' section of report and conditions attached as considered appropriate.</p>

Stakeholder	Question/Comment	Response
	<p>The amount of hard standing coupled with the removal of trees and other vegetation is a concern identified in the BiA, where the author suggests that there may be 'ponding' in the garden after heavy rainfall needs to be further addressed.</p>	
<b>EXTERNAL</b>		
Thames Water	<p>Dear Sir/Madam</p> <p>Re: 12, FORDINGTON ROAD, LONDON, -, N6 4TJ WASTE:</p> <p>As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. 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 will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing <a href="mailto:trade.effluent@thameswater.co.uk">trade.effluent@thameswater.co.uk</a> .</p> <p>Application forms should be completed on line via <a href="http://www.thameswater.co.uk">www.thameswater.co.uk</a>. Please refer to the Wholesale; Business customers; Groundwater discharges section.</p>	<p>Noted.</p> <p>Informative attached.</p> <p>A 'positive pumped device; is not being requested by condition because this is a single dwelling house, and the living area would not be in the basement. They are typically sought for larger residential schemes with part or whole-accommodation in the basement level.</p> <p>Report discusses flooding in basement section.</p>

Stakeholder	Question/Comment	Response
	<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 Policy SI 13 Sustainable drainage of the London Plan 2021.</p> <p>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.</p> <p><a href="https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewaterservices">https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewaterservices</a>.</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 excavations, basement infiltration, borehole installation, testing and site remediation.</p> <p>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</p>	

Stakeholder	Question/Comment	Response
	<p>emailing <a href="mailto:trade.effluent@thameswater.co.uk">trade.effluent@thameswater.co.uk</a> . Application forms should be completed on line via <a href="http://www.thameswater.co.uk">www.thameswater.co.uk</a>. Please refer to the Wholesale; Business customers; Groundwater discharges section.</p> <p>Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>WATER: If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at <a href="http://thameswater.co.uk/buildingwater">thameswater.co.uk/buildingwater</a>. On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends 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>	

<b>Stakeholder</b>	<b>Question/Comment</b>	<b>Response</b>

**Appendix 4 Public representations**

<b>Comment</b> ( <u>Material</u> Planning considerations)	<b>Response</b>
<b><u>Principle/land-use</u></b>	
Support: site is suitable for a house rather than the current garages which occupy the same plot size as surrounding houses	The principle of the development is addressed in section 6 of the report.
Objection: to the principle of a residential development on the site	
<b><u>Design/Appearance/Character</u></b>	
Concerns about design, appearance, and impact on character of the area	These issues are discussed in the 'design and appearance' section (section 6) of the report which outlines why the proposal is considered acceptable with respect to these considerations.
'Over-development' of site	
Excessive size/scale	
Impact on streetscape, including interruption of the built form & roofscape rhythm along the south-eastern edge of Fordington Road and the gable one on side.	
Size would be similar to neighbours (support)	
Proposal would be in keeping with the road (support)	
<b><u>Amenity Impacts</u></b>	
Impact on amenity of neighbouring occupiers – overlooking, noise, loss of privacy, loss of outlook and light, overbearing	These amenity impacts are considered in the 'Impact on neighbouring amenity' section (section 6) of the report.
Amenity impact of rear outbuilding and concern over its intensified use on neighbouring occupiers	
Amenity impacts from use of outbuilding	
<b><u>Transport Impacts</u></b>	
Parking	These impacts are considered in the 'Transport Considerations' section (section 6) of the report.
Highway safety	
<b><u>Other</u></b>	



<b>Comment</b> ( <u>Material</u> Planning considerations)	<b>Response</b>
Basement concerns including the extent up to boundaries and practice and structural issues arising from this, percentage increases of hardstanding on the plot, and impacts on underground watercourses, water table, water drainage and associated flood risk	Considered in the 'Basement Development' section (section 6) of the report.
Impact on trees and landscaping	Considered in the 'Trees and nature conservation' section (section 6) of the report.
No need for a chimney/undesirable due to pollution impacts	Not a materially significant issue which would influence the grant of planning permission.

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Planning Sub Committee

## REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

### 1. APPLICATION DETAILS

**Reference No:** HGY/2021/1771

**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), 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

**Case Officer Contact:** Graham Harrington

**Site Visit Date:** 23/07/2021.

**Date received:** 21/06/2021 **Last amended:** 28/10/2021.

**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 is a well-designed, residential-led mixed-use scheme providing a range of residential accommodation and 1,870sqm (GIA) 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 101 Low Cost Rented homes and 196 Shared Ownership homes, representing a 34% provision of affordable housing by unit number and 35.9% 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.
- Following revision, 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.
- Financial contributions towards social infrastructure and CIL payments mean the proposed scheme would make a proportionate and reasonable contribution to the infrastructure that is needed to support growth.

## 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 **11 February 2022** 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 (2.3) 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)
- 48) Non-Road Mobile Machinery 1 (PRE-COMMENCEMENT)
- 49) Non-Road Mobile Machinery 2 (PRE-COMMENCEMENT)
- 50) Impact Piling Method Statement (PRE-COMMENCEMENT)
- 51) Business and Community Liaison Construction Group (PRE-COMMENCEMENT)
- 52) Telecommunications

**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 (914 habitable rooms).
- Minimum of 40% by habitable room (1,018 habitable rooms) 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).

*Infrastructure Provision*

**6) Social Infrastructure financial contributions:**

- Library: £756,000
- Community space: £693,000
- Public Realm: £157,457
- The above being subject to review if an approved scheme is liable to pay an increased Borough CIL above £15 per square metre (indexed), so that if the underlying CIL rate increases, the infrastructure contribution shall decrease by a corresponding amount.

*Open Space Management*

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



- 8) **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*

- 9) **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.

10) **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.

- 11) **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.

12) **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.

13) **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*

14) **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*

**15) 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

**16) Carbon offsetting:**

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

*Telecommunications*

**17) Ultrafast broadband infrastructure** and connections to be provided.

*Construction*

**18) Commitment to Considerate Constructors Scheme.**

*Monitoring*

**19) 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.

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

**Presumption in Favour of Sustainable Development (PFSD)**

- 2.6 In the event that members choose to make a different decision to that recommended it will be necessary to consider the presumption in favour of sustainable development in the National Planning Policy Framework (NPPF). This is because the Council's delivery of housing over the last three years has been substantially below its housing target and so paragraph 11(d) of the NPPF is engaged by virtue of footnote 7 of the NPPF. Members must state their reasons including why it is considered that the presumption is not engaged.
- 2.7 That, in the absence of the agreement referred to in resolution (2.1) above being completed within the time period provided for in resolution (2.2) above, the planning application be refused for the following reasons:
- 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 77 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.

- 2.8 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.

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- 3.0 PROPOSED DEVELOPMENT AND SITE LOCATION DETAILS
- 4.0 CONSULTATION 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

### 3. PROPOSED DEVELOPMENT AND LOCATION DETAILS

#### Proposed Scheme

##### Layout & Access

- 3.1. The proposed scheme locates a north-south street (Embankment Lane) away from the western boundary with the railway, with this 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. Embankment Lane would be against the eastern boundary of the Goods Yard part of the site (next to the Peacock Industrial Estate) and form the interface with future development plots in the wider High Road West area. The proposed east-west street (Pickford Lane) across The Depot part of the site and the proposed location of Blocks D and E next to existing buildings fronting Cannon Road would be similar to the approved Depot scheme. However, the proposed configuration of Block ABC would be significantly different from Blocks A, B and C in the approved scheme (discussed in detail in Section 6).

Figure 01: The proposed layout



- 3.2. There would be three open spaces along the proposed north-south route on the Goods Yard: Southern Square opposite Block F (approx. 20m x 40m), an intermediate Pocket Square next to the proposed tall Block B and a Northern Square (approx. 25m x 25m) next to the proposed tall Block A and linking with the proposed Peacock Park (approx. 34m x 47m) on The Depot. 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, street trees, seating areas, 'play on-the-way' spaces and limited in parallel 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.
- 3.3. 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 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 and, following revision, 2m footways either side. This would reduce to 3.7m wide from proposed Block B northwards to Block A (to cater just for refuse collection, loading/unloading and emergency access) and just emergency access north of proposed Block A).
- 3.4. 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, to prohibit rat-running traffic, although there would be good connectivity for pedestrians and cyclists.

#### *Buildings and uses*

- 3.5. 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 2930) and the proposed conversion would rely on this extant Listed Building Consent.
- 3.6. 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, waste storage and parking). 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 A, B, C 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.

<b>Total floorspace</b>	<b>92,217sqm (GIA)</b>	
Residential	Goods Yard 141 x 1-bed 268 x 2-bed 84 x 3-bed 7 x 4-bed	The Depot 97 x 1-bed 214 x 2-bed 52 x 3-bed 4 x 4-bed
	867 homes 77,758sqm (GIA)	
Commercial (Use Class E)	1,870sqm (GIA)	
Ancillary & parking	11,649sqm (GIA)	
Open Space	15,650sqm, of which Publicly accessible open space – 8,870sqm Managed access open space – 6,780sqm	
Car parking	Residential: 145 spaces (87 x 'accessible', 52 x 'standard') (0.16 spaces per home) plus 4 x car club & 2 x 'accessible' visitor spaces Commercial: 10 spaces (2 x 'accessible' and 8 x 'standard' spaces)	
Cycle parking	1,617 long-stay residential spaces, 15 x long-stay commercial spaces & 78 short-stay visitor	

- 3.7. Based on the most up-to-date GLA Population Yield Calculator, the estimated future resident population once the proposed scheme is completed would be 1,810 people (including approx. 261 children). This is 472 additional people (69 more children) than the consented schemes. Chapter 6 of the ES states that the applicant expects the proposed scheme to be delivered over a six-year construction period starting in June 2022 as set out in Table 02 below. The expected on-site population would increase incrementally over this period.

Table 02: Proposed phasing

	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>
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*

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

Table 03: Proposed building heights and use(s)

Block	Storey height	Metres AOD height	Basement	Use(s)
Goods Yard				
A	32	97.33 to 114.23	Single level	209 homes
B	27	79.33 to 98.03		189 homes
C	6	34.33		16 homes
D	6	34.33		10 homes
E	7	37.63		24 homes & 199sqm commercial
F	7	28.33 to 36.43		35 homes & 149sqm commercial
G	5	32.72 to 39.64	None	17 homes & 210sqm commercial
H	3	24.23		699sqm commercial
Station Master's House	2	21.40		220sqm commercial
The Depot				
A	29	84.60 to 104.00	Single level	277 homes & 170sqm commercial
B	9	42.60		
C	5	32.50		
D	6	32.70	None	38 homes
E	6	26.70 to 32.60		22 homes
F (Nos. 867 & 869 High Road)	2	23.91 to 25.21		6 homes
G	6	24.71 to 35.19		24 homes & 231sqm commercial

*Nature of application and Environmental Impact Assessment*

- 3.9. 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.
- 3.10. 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.
- 3.11. The scope of the ES reports 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’ and the Northumberland Development Project. 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**

- 3.12. 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. The site is approx. 500sqm (0.05ha) larger than the combined site area for the extant Goods Yard and Depot consents, following the applicant’s acquisition of additional land along the railway edge.

#### *Depot part of the site*

- 3.13. 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.
- 3.14. 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.

- 3.15. 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*

- 3.16. 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.
- 3.17. 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.
- 3.18. 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*

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

Table 04: Existing uses

<b>Use (Use Class)</b>	<b>Existing Floorspace (GIA)</b>
<b>Depot part of site</b>	
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
<b>Goods Yard part of site</b>	
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*

- 3.20. The existing northern boundary comprises a brick wall of varying height from between approx. 21.m 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 that come up to the boundary and anticipate future connection on to the application site. The eastern arm of Cannon Road includes a games/outdoor learning space that is connected with the school.
- 3.21. Further to the north, in the London Borough of Enfield, is the Langhedge Lane Industrial Estate and the Joyce and Snells Estate, where Enfield Council is looking to bring forward an estate renewal scheme comprising approx. 1,992 homes and associated social infrastructure and open space.
- 3.22. 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.
- 3.23. 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.
- 3.24. 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.
- 3.25. 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.
- 3.26. The site is fairly close to Cycle Superhighway 1, which runs from Old Street to the Stadium, well served by bus services (Routes 149, 259, 279, 349 and N279) on the High Road) and is between about 50 and 300m away from White Hart Lane Overground Station and the W3 bus route on 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). It is within the Tottenham North Controlled Parking Zone (CPZ) and the Stadium Event Day CPZ.

- 3.27. 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. Existing uses on the site are set out below.

### **Relevant Planning and Enforcement History**

#### *The site*

- 3.28. 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.
- 3.29. Goods Yard - 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.
- 3.30. Depot – 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.
- 3.31. Goods Yard - Planning permission (HGY/2020/3001) granted in March 2021 for ground works to facilitate the temporary use (18 months to September 2022) for car parking (approx. 415 spaces).
- 3.32. High Road West (including the site) (HGY/2021/2960) current request by Lendlease for a formal EIA Scoping Opinion in relation to proposals.

#### *The wider area*

- 3.33. 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).

- 3.34. 807 High Road – Planning permission granted in September 2021 (HGY/2021/0441) for the demolition of the existing buildings and the erection of a replacement building up to four storeys to include residential (C3), retail (Class E, a) and flexible medical/health (Class E, e) and office (Class E, g, i) uses; hard and soft landscaping works including a residential podium; and associated works.
- 3.35. Northumberland Terrace – Planning permission (HGY/2020/1584) and Listed Building Consent (HGY/2020/1586) granted in April 2021 for the erection of a four-storey building with flexible A1/A2/A3/B1/D1/D2 uses and change of use and alterations and extensions to a number of existing buildings (Nos. 799 to 814 High Road).
- 3.36. White Hart Lane Station – Planning permission (Ref: HGY/2016/2573) granted in November 2016 for a new station entrance, ticket hall, station facilities and station forecourt (completed).
- 3.37. Northumberland Development Project – Planning permission (HGY/2015/3000) and Listed Building Consent (HGY/2015/3000) granted in April 2016 for demolition of existing buildings, works to Warmington House and comprehensive phased redevelopment for a 61,000 seat stadium, with hotel (180-bed plus 49 serviced apartments), Tottenham Experience (sui generis), sports centre (Class D2); community (Class D1) and/or offices (Class B1); 585 homes; and health centre (Class D1) – towers up to 36-storeys.
- 3.38. Former Cannon Road Rubber Factory – Planning permission (HGY/2012/2128) granted in February 2013 for 222 residential units, a 2-form entry primary school and three commercial units (including a 22-storey tower) and subsequent approval of details. The development was completed in 2015.
- 3.39. **Fall-back Position**
- 3.40. 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 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. Both constituent parts of the application site are owned by the applicant, with, it is understood, a lease hold 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.

3.41. 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.

3.42. This application is in ‘full’, whereas the extant Goods Yard consent is wholly in ‘outline’ and the extant Depot consent is partly in ‘outline’ and partly in ‘full.’ This makes direct comparison difficult. Account has been taken of approved ‘control documents’ (Development Specifications, Parameter Plans and Design Codes) and planning conditions and s106 planning obligations associated with the extant schemes and recommended conditions and obligations in relation to the application scheme.

3.43. **Partial implementation and mixing and matching**

3.44. 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 approved in response to this application. Such ‘mixing and matching’ could result in unacceptable separation distances between tall buildings (Approved Block B on the Depot part of the site and Block A on the Goods Yard part of the site approved as part of this application (HGY/2021/1771). If permission were to be granted, it would be possible to use a s106 planning obligation to prevent the this.

3.45. **Consultation and Community Involvement**

3.46. The applicant’s Statement of Community Involvement (SCI) sets out the consultation it undertook in April and May 2021, at pre-application stage. This includes: letters, adverts in 2 x local newspapers and leaflet to 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.



- 3.47. In total, 10 people responded formally using an online feedback form. Of these, 2 left positive comments or expressed support for the plans, 2 would be considered neutral and 6 were generally negative about the proposals. Others visited the consultation website (1,867 unique site visitors) and downloaded PDF 'exhibition boards' with detailed information for each site (127 times for the Goods Yard and 85 times for The Depot).
- 3.48. Emerging proposals were considered by Haringey's Quality Review Panel (QRP) on 15 December 2020 and 18 May 2021 and the application scheme was considered by the Panel on 8 September 2021. The QRP Reports following these reviews are attached as **Appendices 7, 8 and 9**.
- 3.49. Emerging proposals were presented to the Planning Sub-Committee at pre-application stage on 24 May 2021. The minutes of this item are attached as **Appendix 5**.
- 3.50. Emerging proposals were presented at a Development Management (DM) Forum on 25 May 2021. A summary of responses from the Forum are attached as **Appendix 6**.

4. **CONSULTATION RESPONSE**

4.1. The following were consulted regarding the applications:

Internal Consultees

- LBH Building Control
- LBH Carbon Management
- LBH Conservation Officer
- LBH Design Officer
- LBH Drainage
- LBH Ecology
- LBH 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)

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

Internal:

**Building Control** – The submitted Fire Statement meets the requirements of London Plan Policies D5 and D12 and is suitable for determining the planning application.

**Carbon Management** – The proposed scheme would achieve a reduction of 64% carbon dioxide emissions on site and connect to the Decentralised Energy Network, which is supported. Appropriate planning conditions have been recommended following a range of clarifications and amendments to improve the fabric efficiencies and reduce overheating risk.

**Conservation Officer** – Comments can be summarised as follows:

- The proposed scheme is supported in principle from conservation grounds as it provides an opportunity to improve the historic fabric and bring back in to beneficial use both listed Houses at 867-869 High Road and the Locally Listed Station Masters House as well as providing an opportunity to enhance the setting of the North Tottenham Conservation Area.
- However, the visual prominence of the proposed towers raises concerns as they dominate in the view of a number of locally listed and statutorily listed heritage assets and the less than substantial harm caused by the towers should be tested against the public benefits provided by the scheme as per NPPF requirements.

**Design Officer** – Comments can be summarised as follows:

- These proposals are a well thought through and elegantly designed response to a significant site. The 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, particularly the former. 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 development are generally 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.

- The proposed mix of heights include three tall building at 27, 32 and 29 storeys; 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, 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.
- 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. Daylight, sunlight and wind assessments show only minor effects compared to the expectation of development previously agreed.

**Ecology Officer** – Request that the applicant consolidates in a single document a description of actual and potential ecological issues and opportunities and recommendations for mitigation of adverse effects and ecological enhancement.

**Lead Local Flood Authority** – The SuDS hierarchy has been followed, resulting in an acceptable controlled run-off rate (a comprehensive maintenance schedule is provided). Consent is needed from the Environment Agency for any connection to the Moselle culvert and from Thames Water for connection to its network.

**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.

**Transportation** – Commercial car parking should be based on London Plan standards (up to 1 space per 600sqm GIA), or 3 spaces. Justification needed for proposed 4 Car Club spaces. Electric Vehicle Charging Points should be marked up on the plans. Additional swept path analysis needed. A detailed Car Parking Management Plan should be secured by condition (including phasing of provision). Cycle parking details should be secured by condition. Further information on trip generation needed. Framework Travel Plan should include increased cycling mode target. Specific conditions and s106 obligations recommended.

**Tree Officer** – The proposals involve the loss of 20 trees (15 of these are low quality Category C and are not an obstacle to development) and 4 are Category B. 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. The proposed landscaping includes a significant number of additional trees.

**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** – 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) – Acknowledgement, but 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 (the same comment made in relation to the scheme as revised).

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

**London Fire Brigade** – Subject to compliance with Section 7 of the Fire Statement, 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, 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 25 to 31);
- 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. However, further discussion is required to verify the appropriate blended affordable housing threshold for the site, in accordance with the London Plan. Further details are required to confirm the affordability of intermediate housing (paragraph 33 to 57);
- Urban design - The layout, landscaping, density and residential quality is supported. The legibility and quality of the southern entrance should be improved, with pedestrian access provided on both sides of the footway (paragraph 58 to 95);
- Tall buildings - 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. However, the design and materiality of the tops of the towers should be reconsidered to ensure they have a positive townscape impact (85 to 91);

- 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 (73 to 80);
- Transport - Clarification is required on the trip generation assessment to enable officers to establish the impact (and cumulative impacts) on public transport (London Overground and bus services) in the context of the High Road West Masterplan site. 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 97 to 107); 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 (paragraph 108 to 123). Additional energy efficiency measures were also encouraged (paragraph 110).

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 & Materials, Track Support Zone, Overhead Line Equipment and Site Layout).

**NHS Clinical Commissioning Group** – A planned health centre as part of the THFC stadium development is not guaranteed. In advance of this opening, further capacity is needed and Somerset Gardens Family Health Centre could help. There is no guarantee that CIL receipts will be allocated towards increasing capacity – hence a s106 contribution of £449,510 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. On 23 June 2021, notification was sent to the following:

- 1,916 Letters to neighbouring properties
- 11 site notices erected in the vicinity of the site

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

No of individual responses: 22.

Objecting: 19 (Cannon Road Residents' Association and Love Lane Residents' Association and 17 individuals).

Supporting: 3.

Others: 0.

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

5.4. 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. 30m 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 from the Langhedge Industrial Estate or adequate account of noise and vibration from the railway tracks.
- Noise Impact Assessment does not adequately assess likely mechanical plant noise on residents of River Apartments.
- Proposed air quality monitoring locations are inadequate.
- 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.
- Design of proposed lower buildings are rather generic.
- Façade treatment of the proposed towers is of insufficient quality and proposed 2 x contrasting coloured tiles is not supported.
- Proposed heights are excessive and would lead to other tall buildings being proposed for the High Road West site.
- Excessive density
- More pressure on local transport/crowds on stadium event days.

- Insufficient affordable housing (including inadequate support for regeneration of Love Lane Estate and Shared Ownership offer).
- Insufficient green space.
- Disruption during demolition and construction phase.
- Increase in on-street car parking pressures in the Durban Road area.
- Additional pressure on local services (including schools and GPs).

Support:

- More direct route to White Hart Lane Station from Cannon Road area.
- 2 x general support.

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

- Loss of views.

5.6. Following receipt of revisions to the external appearance of the proposed towers, those local individuals and groups that made representations with respect to the application as originally submitted were notified and given 14 days to make any further comments (until 4 November).

5.7. At the time of finalising this report, the following additional comments had been received:

Objections:

- Insufficient consultation on revisions.
- Very concerned at change in proposed external material a dark matt terracotta.
- Updated rendered images are misleading.
- Additional tall buildings.

Support:

- General support

5.8. Any further comments that are received will be included in an Update Report.

## 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 is intending to submit a planning application for alternative proposals in Site Allocation NT5 (including the application site).

### 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.

6.3.2 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.

6.3.3 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 1,870sqm (GIA) 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 application is accompanied by Counsel Opinion that this part of the site does not comprise 'industrial land' and officers agree. The applicant's Regeneration Statement (3.2) identifies the existing occupied floorspace is estimated to support approx. 30 FTE jobs.
- 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 1,870sqm (GIA) of flexible commercial uses (Class E). This would include the conversion of the Station Masters House (both floors) and the provision of a number of ground floor commercial units (ranging between 149 and 699sqm (GIA)) around the site as follows:

- GY Station Master's House – approx. 220sqm;
- GY Block H – approx. 699sqm (facing White Hart Lane and proposed north/south street);
- GY Blocks E, F and G – three units (approx. 149, 199 and 210sqm) (facing the proposed southern square and north/south street);
- D Block B – approx. 170sqm (facing the proposed northern square and Peacock Park); and
- D Block G – approx. 223sqm (facing the proposed Peacock Park).

6.3.15 The proposed conversion of the School Masters House is as a café/restaurant (Use Class E(a)) and is appropriate for this locally listed building. 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 (representing 43% of requirements, where the site is approx. 20% of the Site Allocation) 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 867 new homes. The proposed conversion of the Station Master's House (No. 52 White Hart Lane) (currently vacant) would result in the loss of one family-sized home and one 1-bed flat. The proposals would therefore result in a net gain of 865 homes. This is 221 more homes than the extant permissions would provide and represent 5.4% of the number of homes required to be delivered within the current London Plan 10-year housing target timeframe.
- 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.
- 6.3.23 The Government's 2020 Housing Delivery Test (HDT) results were published in January 2021. In Haringey 2,636 homes were delivered in the past 3 years (2018-2020) against a target of 4,379 net additional homes. This amounts to 60% delivery against the target. Those LPAs failing to meet 75% of their housing targets in the preceding 3 years have been placed into a "presumption in favour of sustainable development" category and paragraph 11(d) of the NPPF is relevant.
- 6.3.24 Paragraph 11 of the NPPF states that plans and decisions should apply a presumption in favour of sustainable development and paragraph 11 (d) makes clear that for decision taking this means where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless there are specific reasons not to.

*Principle of Comprehensive Development*

- 6.3.25 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.

- 6.3.26 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”.
- 6.3.27 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.
- 6.3.28 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.
- 6.3.29 Paragraph 4.9 of the AAP states that a comprehensive approach to development will often be in the public interest within the Tottenham AAP area. It goes on to state that whilst incremental schemes might be more easily delivered, the constraints proposed by site boundaries, neighbouring development or uses and below-ground services all have potentially limiting consequences for scale, layout and viability.
- 6.3.30 Although the 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 decision to grant permission for the extant Depot consent in September 2020.
- 6.3.31 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 Site Allocation NT5. The applicant is understood to have had some discussions with adjoining landowners and the Council’s development partner, Lendlease, which is bringing forward planning proposals for the majority of Site Allocation NT5 (including this site).

6.3.32 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*

6.3.33 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.

6.3.34 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.

6.3.35 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.

6.3.36 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).

6.3.37 In-principle support remains for flexible commercial uses in proposed scheme, although changes to the Use Classes Order means that the proposed scheme would provide greater flexibility of use than the extant consents do. The amount of proposed non-residential commercial uses in the proposed scheme (1,870sqm GIA) is slightly more than in the combined extant consents (1,720sqm GIA) and, subject to a planning condition, the same minimum 400sqm industrial uses would be secured.

6.3.38 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. The proposed scheme would deliver 221 more homes than the combined extant consents (867 homes as opposed to 646).

*Development Density*

6.3.39 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.

6.3.40 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 Goods Yard consented scheme has a density of 746 habitable rooms/hectare (270u/ha) and the extant Depot consented scheme has a density of 798 habitable rooms/hectare (275 units/hectare).

6.3.41 The proposed scheme would have a density of 1,116 habitable rooms/ha (353 units/ha). This just exceeds 350u/ha, which is the definition of 'higher density' development in the London Plan. It is, therefore, particularly important that physical, social and green infrastructure issues for this part of the proposed scheme are fully considered. 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.

6.3.42 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.

6.3.43 Fall-back Position. The extant Goods Yard consented scheme has a density of 746 habitable rooms/hectare (270u/ha) and the extant Depot consented scheme has a density of 798 habitable rooms/hectare (275 units/hectare). Both schemes were considered acceptable in relation to the density factors listed above.

#### *Dwelling Unit Mix*

6.3.44 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.

6.3.45 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.

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

Table 05: Proposed dwelling mix

<b>Bedroom Size</b>	<b>No. of Units</b>	<b>% by unit</b>
1 bed 2 person	238	27
2 bed (3 & 4person)	482	55.6
3 bed (4, 5 & 6 person)	136	15.7
4 bed (6 person)	11	1.3
<b>Total</b>	<b>867</b>	<b>100%</b>

6.3.47 The proposed dwelling mix is 82.6% 1 and 2 bed units and 17.4% 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.

6.3.48 Fall-back Position. The proposed scheme would deliver more family homes than the extant Goods Yard and Depot consents, resulting in an uplift of 69 family-sized homes. This is 17%, compared with 13% for the Goods Yard and 11% for The Depot.

## 6.4 **Affordable Housing**



*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).
- 6.4.6 Haringey's Housing Strategy 2017-22 (and Haringey's Intermediate Housing Policy statement 2018) provide guidance on the preferred tenure mix for affordable housing across the borough in order to deliver the overall aims of the Local Plan and meet housing need.
- 6.4.7 Revisions to the Housing Strategy agreed by Cabinet in February 2019 set out that the Council's preference for General Needs affordable housing is Social Rent or London Affordable Rent and the preference for intermediate rented housing is London Living Rent or Discount Market Rent, at rent levels equivalent to London Living Rent.

*Amount, type, location and phasing of Affordable Housing*

- 6.4.8 Following discussions at the pre-application stage, the proposed scheme is promoted on the basis 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, Site Allocation NT5 (including Site Requirements and Development Guidelines) and the legal Counsel Opinion submitted by the applicant, officers accept this interpretation. Following a query in the Mayor of London's Stage 1 Report, GLA officers have since confirmed that they too accept this approach.
- 6.4.9 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%

6.4.10 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.

6.4.11 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	571	1,630	64.1%
Affordable	296 (34.1%)	914	35.9%
Total	867	2,544	100%

6.4.12 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	101	366	40%
Intermediate	196	548	60%
Total	296	914	100%

6.4.13 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	15	37	38	11	101
	15%	37%	38%	11%	100%
Intermediate	58	117	20	0	195
	30%	60%	10%	0%	100%

6.4.14 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	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%)

6.4.15 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	Low-Cost Rent	Intermediate	Total
<b>Goods Yard</b>				
Block A	205	4	0	209
Block B	112	0	77	189
Block C	0	16	0	16
Block D	0	10	0	10
Block E	24	0	0	24
Block F	12	22	0	35
Block G	0	17	0	17
<b>The Depot</b>				
Block ABC	173	4	102	277
Block D	0	22	16	38
Block E	20	2	0	22
Block F	4	2	0	6
Block G	22	2	0	24
	571	101	195	867
		296		

\* Including those homes that have 'independent access' from the street, but are within the Block

6.4.16 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. Officers understand that the applicant is in confidential discussion with a potential Registered Provider.

6.4.17 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*

6.4.18 The proposed Low Cost Rent homes would be London Affordable Rent, apart from where the Council took up the option to purchase some of the proposed homes (discussed below). 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. Any additional such homes, up to the 77 on offer, would be at London Affordable Rent.

- 6.4.19 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.
- 6.4.20 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.
- 6.4.21 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.
- 6.4.22 The applicant's affordable housing offer is in line with the amended Housing Strategy and Intermediate Housing Policy (June 2018), which prioritises social, affordable and London Living Rent levels, and is in accordance with the Tottenham Hale 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*

- 6.4.23 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.
- 6.4.24 As outlined in Section 7 below, the Council is proposing to increase the current Haringey CIL charge rate for the Eastern Zone of the borough from £15 to £50

per square metre and recently submitted a Draft Charing Schedule for examination. An approved development would be liable to pay the Haringey CIL rate that is in effect at the time that a permission is granted.

*Contribution towards regeneration*

- 6.4.25 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.
- 6.4.26 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.
- 6.4.27 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.
- 6.4.28 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 77 of the proposed 101 Low Cost Rent homes. At 76% of such homes, this is the same percentage that was secured in relation to the extant Goods Yard and Depot schemes (combined). 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*

- 6.4.29 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.
- 6.4.30 Fall-back Position. Compared with the two extant consents for the site, the proposed scheme would deliver:
- 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); and
- The Council to have first right to purchase on 77 of the proposed Low Cost Rent homes (16 more than for the extant schemes, although these additional homes would be at London Affordable Rent).

## 6.5 Development Design

### *Policy Background*

- 6.5.1 The recently published NPPF (July 2021) makes beauty and placemaking a strategic national policy, includes an expectation that new streets are tree-lined and places an emphasis on granting permission for well-designed development and for refusing it for poor quality schemes, especially where it fails to reflect local design policies and government guidance contained in the National Design Guide (January 2021) and, where relevant, National Model Design Code (July 2021).
- 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 Policy SP11, and Policies DM1 and DM6. 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.

*Quality Review Panel Comments*

- 6.5.9 Haringey's Quality Review Panel (QRP) has assessed the scheme in full at pre-application stage twice (on 15 December 2020 and 18 May 2021). The QRP also considered the application scheme as originally submitted on 8 September 2021.
- 6.5.10 The full QRP Report of the review on 8 September 2021 is attached in **Appendix 9**. The Report's summary is as follows:

*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.*

6.5.11 The detailed QRP comments from the most recent review together with the officers' comment are set out in Table 12.

Table 12: QRP comments & officer response

QRP Comment	Officer Response
<b>Massing and development density</b>	
At a strategic level, the panel feels that the overall organisation of the site and the street network works well in general.	QRP support noted.
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.	QRP support noted.

QRP Comment	Officer Response
<p>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.</p>	<p>The application scheme includes 15,650sqm of open space (8,870sqm of publicly accessible open space).</p> <p>This is 4,470sqm more open space than the consented schemes, increasing provision from approx. 17.3sqm per home to 18.1sqm per home in the application scheme (with the proposed Peacock Park being 300sqm larger than the illustrative scheme for the Depot).</p> <p>As discussed under Child Play Space below, the proposed amount of on-site play space (2,900sqm) is more than the 2,616sqm required by policy.</p>
<i>Conservation area and heritage assets</i>	
<p>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.</p>	<p>This is discussed in detail under Heritage Conservation below. In summary, officers identify 'less than substantial harm' to the setting and significance of a number of heritage assets, but conclude that this would be outweighed by the proposed public benefits.</p>
<p>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</p>	<p>Officers consider that revisions to the application in response to officer, QRP and GLA comments mean that the design of the proposed towers is now of sufficiently high quality.</p> <p>See above.</p>

QRP Comment	Officer Response
benefit will be. This requires further consideration by the project team and Haringey officers.	
<i>Massing and development density</i>	
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.	See comments above and below.
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.	<p>The applicants Design &amp; Access Statement Addendum demonstrates that the footprint of the proposed 'full' application towers is all smaller than the 'outline' maximum parameters for the extant schemes (Goods Yard – 780sqm compared to 887sqm &amp; 685sqm compared to 888sqm and Depot – 816sqm compared to 861sqm).</p> <p>The DAS Addendum shows that a proposed evening out of spaces between buildings would result in:</p> <ul style="list-style-type: none"> <li>• GY Block A &amp; B 'sky gap' increased from 28.4m to 30m;</li> <li>• GY Block A &amp; Depot Block A reduced 'sky gap' from 45.8m to 28m; and</li> <li>• Depot Block A &amp; River Apartments reduced 'sky gap' from 51.4m to 30-35m.</li> </ul>
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	This is discussed in detail below. In summary, whilst the 'sky gaps' between the proposed tall buildings would be less in some cases than in the consented schemes, the towers would be more evenly spaced. The applicant

QRP Comment	Officer Response
being perceived as one entity when viewed from certain angles.	has been able to further demonstrate (in their DAS Addendum) that incidence of coalescence from the north and south would be less in the application scheme than in the consented schemes (approx. 75% less overall), and places where coalescence would be observed are generally less sensitive, less well used public spaces.
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.	Officers consider that the architectural expression of the towers as revised justify the proposed form and height and that, overall, the proposed towers are now acceptable. In particular, by increasing the contrast between the “jacket” and “core” elements of the architectural expression and elevational composition of the middle parts of the towers, their apparent width, when viewed from the east and west, is substantially mitigated.
<i>Architectural expression and building configuration</i>	
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.	Revisions to the proposed design simplify the cores as they protrude above the proposed ‘jackets’ by reducing number of verticals & using a darker more singular colour material.  This, together with other revisions, means that officers consider that the proposed towers now have a more defined & attractive base, middle & top, and to have responded satisfactorily to both these concerns of the QRP.
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	A minor adjustment to the geometry of the northern elevation of proposed Depot Block A increases spacing to the stepped terrace below & better aligns the towers profile with the other proposed towers.  Of greater significance, other changes to the proposed design include: <ul style="list-style-type: none"> <li>• Vertical alignment of windows &amp; balconies;</li> </ul>

QRP Comment	Officer Response
<p>inelegant when seen from the east and west.</p>	<ul style="list-style-type: none"> <li>• Reduced proportion of glazing;</li> <li>• Simplification of terracotta &amp; bronze materials; and</li> <li>• Simplified grid into 3 &amp; 4-storey groupings</li> <li>• More solid base to balconies.</li> </ul> <p>Officers are satisfied that the much-improved architectural expression of the proposed towers respond to these QRP concerns and make their proposed height and width acceptable.</p>
<p>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.</p>	<p>Revisions in response include:</p> <ul style="list-style-type: none"> <li>• Change to geometry of proposed Depot Block A;</li> <li>• Introduction of a storey-height ‘shadow gap’ where towers interface with their base building/shoulder/podium;</li> <li>• Changes to base buildings so that they co-ordinate with revised tower design; and</li> <li>• Introduction of double height &amp; more clearly legible entrances, formed of an extension of the “core” architectural element down to the ground.</li> </ul> <p>Officers consider the relationship between proposed towers, lower buildings and streets and spaces is now acceptable, and that these QRP concerns have been successfully addressed.</p>
<p>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</p>	

QRP Comment	Officer Response
<p>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.</p>	
<p>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.</p>	<p>Officers are satisfied that the much-improved architectural expression of the proposed towers makes their proposed height and width acceptable.</p> <p>Housing design, including aspect, is discussed in detail under Residential Quality below. In summary, officers are satisfied that the number of units per floor and proportion of dual+ aspect homes has been optimised and that the proposed flats within all three towers would provide good quality homes.</p>
<p>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.</p>	<p>The colours used in the "jacket" elements of the three towers have been amended from terracotta, green and blue to three close tones of earthy matt, as well as the simplification of these coloured panels, responding fully to this QRP concern. The applicants have also been able to provide further detail on how the façade design helps in environmental aspects such as overheating. See comments above.</p>
<p>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</p>	<p>The proposed towers now comprise of three tones of earthy matt (as opposed to glazed) terracotta tiling.</p> <p>Officers are satisfied that the change results in a more subtle and calmer external appearance and also better connects the proposed towers with the proposed base and lower buildings.</p>

QRP Comment	Officer Response
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.	Amendments to the architectural expression, composition and fenestration of the “core” element are considered by officers to successfully respond to this concern of the QRP. See also comments above.
<i>Low / zero carbon design and environmental sustainability</i>	
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.	<p>Revisions to the tower design address aesthetic, environmental performance &amp; residential quality in tandem. Key changes that improve energy performance include:</p> <ul style="list-style-type: none"> <li>• Adjusting U-values of solid elements;</li> <li>• Reducing window size;</li> <li>• Changing balconies &amp; detailed façade treatment to increase shading; and</li> <li>• Increasing ‘roughness’ to reduce flow.</li> </ul> <p>As discussed under Energy, Climate Change &amp; Sustainability below, the changes mean that the London Plan Policy S12 objective of meeting at least 10% (residential) carbon reduction by building fabric is now met.</p>

### *Site Layout*

6.5.12 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.

6.5.13 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.

6.5.14 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 (Pickford Lane) and a north-south street (Embankment Lane), both running across the site, the former very much following the HRWMF alignment, the latter in approximate alignment, 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, at the northern end of Embankment Lane, 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.

6.5.15 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.

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

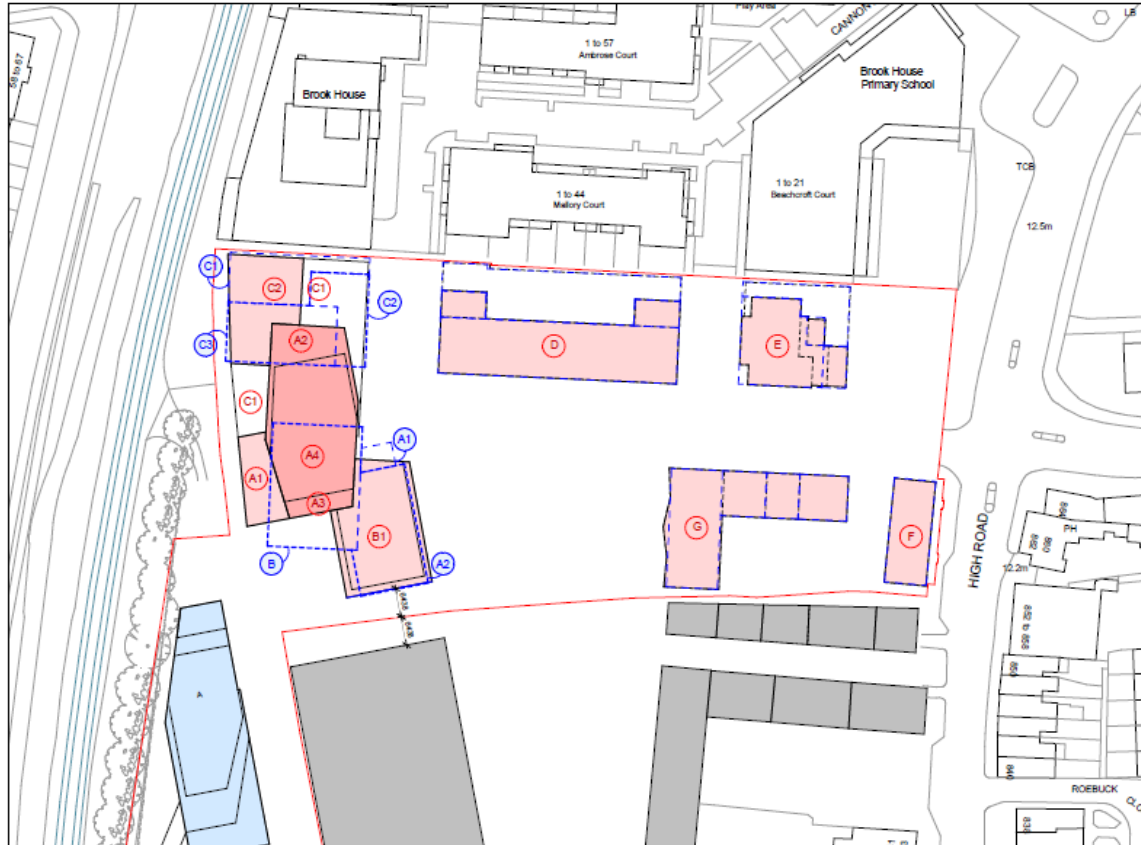
i. The western edge. The HRWMF envisages a north-south street running along the western boundary of the Goods Yard part of site, next to the railway. The proposed scheme moves this proposed street (Embankment Lane) to the east and proposes a private communal garden (Goods Yard Walk) along this edge, 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.

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 Goods Yard Walk which would bring welcome gains in urban greening and biodiversity. Following revisions, the proposed Embankment Lane would have footways on both sides of its carriageway, including all the way down to where it meets White Hart Lane to create a safe and welcoming southern gateway into the site.

This would result in some homes being closer to the railway than 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 it should be stressed that proposed Block A is a similar distance away from the railway as the approved tower in the extant consent. 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 (in the latter case, this means that the proposed tower would be between approx. 30m to 35m to the south, rather than the approved approx. 51.4m). However, the proposed Depot Block C immediately to the south of Rivers Apartments would be lower than the approved Block C in the extant consent. See Figure 02 below.

Figure 02: approved and proposed tower relative to River Apartments



Site Wide Block Plan  
 10/04/11 - 2011

**EXTANT CONSENT BUILDING STOREY HEIGHTS**

**BLOCK A (OUTLINE):**

A1 UP TO 3 STOREYS MAX. +22m AOD  
 A2 UP TO 9 STOREYS MAX. +43m AOD

**BLOCK B (OUTLINE):**

B1 UP TO 29 STOREYS MAX. +106m AOD

**BLOCK C (OUTLINE):**

C1 UP TO 1 STOREY MAX. +18m AOD  
 C2 UP TO 7 STOREYS MAX. +37m AOD  
 C3 UP TO 9 STOREYS MAX. +43m AOD

**PROPOSED BUILDING STOREY HEIGHTS**

**BLOCK ABC (DETAIL):**

A1 UP TO 6 STOREYS +35.50m AOD  
 A2 UP TO 23 STOREYS +93.60m AOD  
 A3 UP TO 28 STOREYS +93.60m AOD  
 A4 UP TO 29 STOREYS +104.50m AOD  
 B1 UP TO 9 STOREYS +42.60m AOD  
 C1 UP TO 1 STOREY +18.60m AOD  
 C2 UP TO 5 STOREYS +32.50m AOD



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 A to their homes. The applicant has highlighted the following design considerations that distinguish the proposed scheme from that which has been approved as part of the extant consent:

- The floor plan geometry of the proposed tower has been faceted to present its most slender storey 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 would be further away from Rivers Apartments by an additional 5m taken at the centre of the facade. The terrace formed by the proposed stepped

'top' would be at 83.5m AOD, which is very similar to the top most storey of Rivers Apartments (84.5 AOD); and

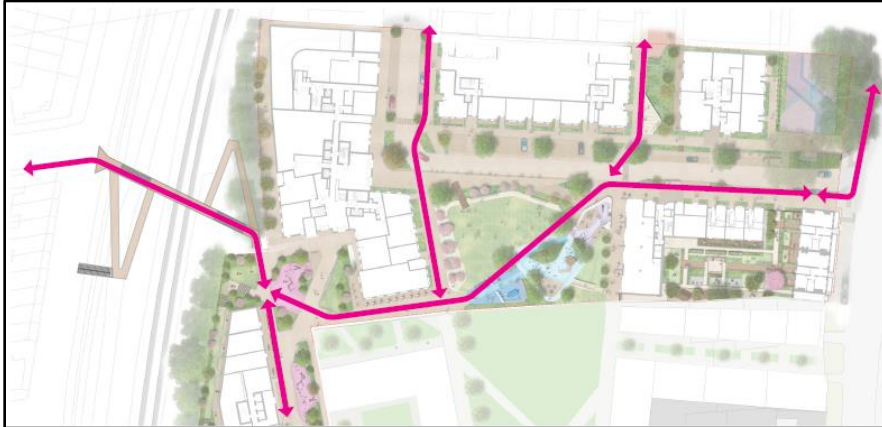
- The lower portion of the proposed tower base and shoulder blocks have been developed to allow for the replacement of the previously approved 9-storey Block C (set 17m/ 25m from the south façade of Rivers Apartments) with a lower and narrower massing of the currently proposed 5-storey Block C (reducing the amount of mass and façade immediately facing the lower 7 floors of Rivers Apartments)

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. 100m north-west of The Grange Listed Building (Grade II). The approved 18-storey Goods Yard Block B in the extant scheme would be approx. 86.5m to the north-west.

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 proposed conjoined Depot Blocks ABC in the proposed scheme 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 ABC) that would provide an east-west pedestrian/cycle connection across the site (See Figure 03 below). 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



*Relationship with existing and future development*

6.5.17 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. 15.5m;
- GY Block D – approx. 16m;
- GY Block E – approx. 16m;
- GY Block F – approx. 41m; and
- GY Block G – approx. 3m (the eastern flank, with fixed obscure glazing) and 19m.

6.5.18 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. 25m;
- 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. 47-54m;
- 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.

6.5.19 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.

6.5.20 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.

6.5.21 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.

6.5.22 Proposed Depot Block B would be approx. 6.5m north of the boundary with the existing Peacock Industrial Estate, to enable a one-sided narrow route in the interim condition (with the proposed building being in a similar position to an approved building in the extant consent for the Depot). The applicant’s illustrative masterplan shows a new building on a redeveloped Peacock Industrial Estate being off-set by a similar amount, giving a separation distance of approx. 13m. 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.

6.5.23 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 the approved extant consent, 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 the proposed 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.

6.5.24 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.

6.5.25 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*

6.5.26 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%).

6.5.27 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.

6.5.28 The proposed scheme includes provision for 15,565sqm 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 15,650sqm 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.

6.5.29 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. 468sqm;
- Southern Square – approx. 840sqm;
- Central Court – approx. 190sqm;
- Northern Square – approx. 630sqm;
- Peacock Park – approx. 1,995sqm; and
- Brook House Yard - 350sqm outside of the school day (subject to management & maintenance agreement).

6.5.30 Based on the estimated on-site population of 1,810 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.

6.5.31 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 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. However, the issue remains as to whether this would be sufficient for the proposed on-site population and the contribution it would make towards delivering Ste Allocation NT5/HRWMF requirements.



- 6.5.32 As discussed in more detail under the Social and Community Infrastructure heading below, it would be possible to mitigate the shortfall in proposed on-site publicly accessible open space by using s106 planning obligations to secure a financial contributions 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).
- 6.5.33 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*

- 6.5.34 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.
- 6.5.35 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.
- 6.5.36 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.
- 6.5.37 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.

6.5.38 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.

6.5.39 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 and 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*

6.5.40 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).

6.5.41 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.

6.5.42 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.

- 6.5.43 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 CABE/English Heritage “Guidance on Tall Buildings” (2007 since superseded in 2015).
- 6.5.44 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.
- 6.5.45 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.
- 6.5.46 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

<b>Proposed</b>		<b>Fall-back Position – Extant Consented Schemes</b>		
<b>New Block</b>	<b>Heights</b> (‘full’ details)	<b>New Block</b>	<b>Heights</b> (‘Full’ details & ‘Outline’ maximums)	<b>HRWMF Indicative heights</b>
<b>Goods Yard</b>				
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 998.03m AOD)	B2/C1/ C2	Part 7/18/7-storeys (39/75.5/40m AOD)	10-18-storeys

Proposed		Fall-back Position – Extant Consented Schemes		
New Block	Heights ('full' details)	New Block	Heights ('Full' details & 'Outline' maximums)	HRWMF Indicative heights
C	6-storeys (34.33m)	B3	3-storey (33m AOD)	2-3 & 5-8-storeys
D	6-storeys (34.33m)	C4	5-storey (34m AOD)	3-5-storeys
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)	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)	E1	5-storey (31.5m AOD)	3-5-storeys
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)	B	29-storeys (106m AOD)	10-18-storeys
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	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 (29.65m to 32.70m AOD)	5-8-storeys
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	Part 3/4/5 & 6-storeys (24.70m/27.36m/30.25m AOD)	3-5 & 5-8-storeys

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

#### *Proposed Tall Buildings*

6.5.48 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.'

6.5.49 The application scheme proposes significantly taller buildings than those approved in the extant consents for the Goods Yard and Depot (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 consents).

They would also be in different locations along the western edge of the site (see Site Layout above), have a different configuration (being wider in east-west views and slimmer in north-south views) and be of a different architectural design (although it should be noted that the towers approved by the extant consents were in 'outline' only and the architecture was indicative only).

6.5.50 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.

6.5.51 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.

6.5.52 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 as revised 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 application scheme has been revised to respond to officer and QRP concerns and officers consider that revised proposals for the towers means that they would 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 application scheme has been revised to respond to officer and QRP concerns, with the resulting architectural expression of the proposed towers being calmer and the proposed matt tiling is welcome.

*(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 buildings should positively contribute to the character of the area. 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 lighting for this site.

6.5.53 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 submitted Fire (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.*

The London Plan (supporting text 3.4.9 for Policy D4) stresses the importance of these issues for higher density developments, those with a density of 350 units per hectare or more. Vehicular servicing is discussed under Transportation & Parking below 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 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, which is considered acceptable, and has been somewhat improved (Block A) as part of revisions made during the application process. Revisions to the proposed scheme also make the proposed entrance and lobby areas more prominent and legible, which is welcomed. [\*tower lobby to The Depot tower, Depot Block A, is not double height, but has a larger floor area and double entrance, from both the south, from the northern Square, & east, Peacock Lane]

- *(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).

6.5.54 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).

6.5.55 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.

6.5.56 As outlined in Section 3, the ES 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 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.

6.5.57 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. 30m 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. 15.5 and 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 proposed detailed location, of the proposed tall buildings mean that incidences of coalesce would be limited. The applicant's DAS Addendum includes an assessment which demonstrates that there would be no overlap of the proposed towers for 65.5% of directions around the site, with 2 x towers overlapping in 17% of locations (north-west, north-east, south-west and south-east) and 3 x towers overlapping in 17.5% 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.*

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

### *Townscape and Visual Effects*

6.5.58 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.

- 6.5.59 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 9 views (4, 5, 6,10, 11, 12, 24,25 and 27) to show the proposed revised tower architecture.
- 6.5.60 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).
- 6.5.61 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.' The application scheme as revised is a significant improvement on the originally submitted application. 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.
- 6.5.62 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.

6.5.63 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)

<b>Visual Receptors- Verified views</b>	<b>Residual permanent effect</b>	<b>Cumulative permanent effect</b>
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

<b>Visual Receptors- Verified views</b>	<b>Residual permanent effect</b>	<b>Cumulative permanent effect</b>
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

6.5.64 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.

6.5.65 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.

6.5.66 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.

6.5.67 Officers consider that the application scheme as revised would read well in long-distance views and provide positive additions to the skyline when viewed with the existing River Apartments. The proposed ceramic areas of cladding have been simplified and broadened out to create a greater expanse of colour, smoother cladding and greater proportion of solid to void, to contrast more with the framed skeletal form of the core (that would extend to form the top). Furthermore, the proposed colours have been simplified so that each tower has a similar tone of terracotta to contrast with the proposed white-grey core.

6.5.68 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.

6.5.69 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 now 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.

6.5.70 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.

6.5.71 The proposed towers, with their rich detailing and use of terracotta tiles, would be most characterful in close/immediate views. Officers consider that the application scheme as revised would now 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.

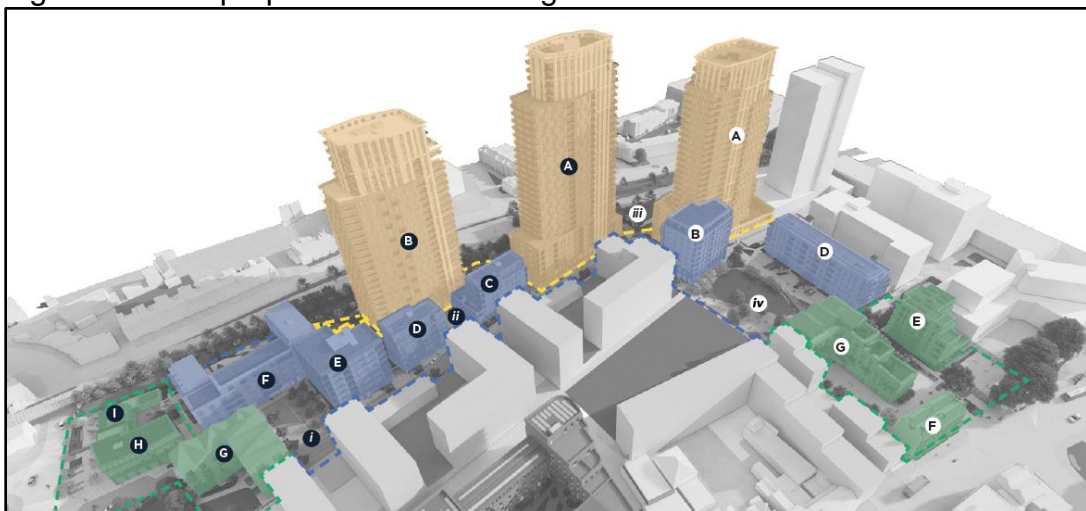
6.5.72 An assessment of the likely effects of the proposed scheme on neighbour amenity is set out below.

6.5.73 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*

6.5.74 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



6.5.75 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. It would be a part 3, 4, 5 and 6-storey varied brick-clad building, framing the proposed Pickford Yard Gardens to the rear;
- Block E – 6-storey ‘calm’ 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. 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;
- 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.

6.5.76 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 (with the drawings indicating a restaurant/café);
- Block H - Part 2/part 3-storey non-residential ‘L’ shaped mid-grey brick building, with arched ground floor windows to reflect railway arches;



- Block G – Part 4/part 5-storey mixed-use ‘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;
- Block F – Part 4/Part 5/Part 7 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);
- Block E – 7-storey lightweight frame building, including expressed external columns and expressed floor plates with a bronze coloured metal finish;
- 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 calm and simple red brick buildings that would help provide a ‘plinth’ along Embankment Lane to the tall buildings beyond.

6.5.77 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*

6.5.78 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.

6.5.79 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.

#### *Secured by Design*

6.5.80 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.

6.5.81 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.

6.5.82 The applicant's DAS sets out a number of detailed access features and gates that are intended to be incorporated in to the scheme. The DOCO raises no objection in principle, subject to conditions. 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*

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

6.5.84 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, particularly the former. 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 Hart Lane to the proposed taller blocks.

- 6.5.85 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.
- 6.5.86 Officers consider that the QRP's concerns have been successfully addressed. Proposed communal entrance doors are all now designed to be clear, legible and inviting, all flats would have acceptable aspect, outlook and private amenity spaces, with balconies or terraces always available off living rooms and designed to provide privacy and hide residents' clutter.
- 6.5.87 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 recently adopted Public London Charter (October 2021). It is also recommended that that landscaping details are reserved by way of planning conditions.
- 6.5.88 Fall-back Position. Compared with the two extant consents 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).

6.5.89 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 scale to those approved in 'full' or 'outline' as part of the extant consents for the Goods Yard and Depot parts of the site.

## 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

	<b>1-bed</b>	<b>2-bed</b>	<b>3-bed</b>	<b>4-bed</b>	<b>Total</b>
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 three 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.

#### *Indoor and Outdoor Space Standards*

- 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 applicant's Daylight and Sunlight Report (October 2021) report on an assessment of 98 (11%) of the proposed homes (400 proposed habitable rooms), including all proposed homes on the lowest two residential floor levels of each of the proposed Blocks, as revised
- 6.6.12 The full nature of the application, with detailed proposed floor plans, allows Average Daylight Factor (ADF) to be used to consider daylight. The assessment found that 80% of proposed habitable rooms tested would satisfy the relevant ADF figures for different room types (with this increasing to 85% if the less stringent living room target of 1.5% is applied to Living/Kitchen/Dining and Living/Dining Rooms). The assessment of sunlight used Average Potential Sunlight Hours (APSH). This found that 59% of the main living rooms with a

southerly aspect satisfy the BRE guidelines. Given that the assessment was focussed on homes on the lower floors of the proposed buildings, where the levels of daylight and sunlight would be lower, officers consider that this demonstrates an overall acceptable level of daylight and sunlight for the proposed homes.

- 6.6.13 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*

- 6.6.14 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*

- 6.6.15 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. Noise from the Peacock Industrial Estate and crowd/concert noise from the Tottenham Hotspur stadium is not 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.
- 6.6.16 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 be installed for these blocks, so that windows can be kept closed. 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 condition.

- 6.6.17 The Cannon Road Residents Association and some individual residents have raised concerns that the submitted Noise Impact Assessment does not take account of noise caused by an existing business (CO2 Gas) in the Langhedge Industrial Estate to the north of the site. The applicant has clarified that the glazing specified in its Noise Assessment includes takes is based on appropriate maximum noise levels and that intermittent noise sources, such as a gas compressor, are factored in to the proposed specification.
- 6.6.18 The Cannon Road Residents' Association and some individual residents have also raised concerns about noise and vibration from the railway and query whether this has been satisfactorily taken in to account. The applicant has clarified that vibration and ground borne noise levels are such that there is a low probability of adverse comment. The 'clickity clack' noise generated by trains as they pass the site has been taken into account in the proposed glazing specification.
- 6.6.19 The applicant has clarified that the sound levels across the proposed podium and roof level amenity areas would range between LAeg, T 50-55 dB, in line with the desirable noise levels for gardens and outdoor spaces as set out in BS 8233: 2014 and World Health Organisation guidelines.
- 6.6.20 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*

- 6.6.21 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.
- 6.6.22 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.

**6.7 Social and Community Infrastructure**



*Policy Background*

- 6.7.1 The NPPF (Para. 57) makes clear that planning obligations must only be sought where they meet the tests of necessity, direct relatability and are fairly and reasonably related in scale and kind to the development. This is reflected in Community Infrastructure Levy (CIL) Regulation 122.
- 6.7.2 London Plan Policy S1 states adequate provision for social infrastructure is important in areas of major new development and regeneration. This policy is supported by a number of London Plan infrastructure related-policies concerning health, education and open space. London Plan Policy DF1 sets out an overview of delivering the Plan and the use of planning obligations.
- 6.7.3 Strategic Policy SP16 sets out Haringey's approach to ensuring a wide range of services and facilities to meet community needs are provided in the borough. Strategic Policy SP17 is clear that the infrastructure needed to make development work and support local communities is vital, particularly in the parts of the borough that will experience the most growth. This approach is reflected in the Tottenham 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.
- 6.7.4 The Council expects developers to contribute to the reasonable costs of new infrastructure made necessary by their development proposals through the use of planning obligations addressing relevant adverse impacts and through CIL, which is required to be paid by law. The Council's Annual Infrastructure Funding Statement (December 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*

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

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

6.7.7 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*

6.7.8 The ES (Chapter 7) 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.

6.7.9 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.

6.7.10 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, where an overall package of £1,000,000 contributions was agreed for 316 dwellings (£3,165 per dwelling) (£463,060 towards a new Library, £424,471 towards Community Space and £112,469 towards Highways and Public Realm). The issue was re-visited when determining what is now the extant Depot consent, where, given proposed provision of a significant part of Peacock Park (1,695sqm) and connectivity with streets in the Cannon Road area, it was considered unreasonable to require financial contributions towards Highways and Public Realm. This reduced the total infrastructure financial contributions that were secured to £926,640 for 330

dwellings (£2,808 per home) (£483,450 towards a new Library and £443,190 towards Community Space).

6.7.11 In total, the extant schemes would deliver on-site public realm and publicly accessible open space (including a park of approx. 1,695sqm) and financial contributions of £1,926,640 towards a new library, community space and highways/public realm for 646 new homes (54% of the minimum 1,200 net additional homes called for in Site Allocation NT5).

6.7.12 The development context has since changed and the emerging Lendlease scheme is proposing approx. 2,615 new homes across Site Allocation NT5. So, whilst the number of new homes in the proposed application scheme would increase from 646 to 867 (+221), as a percentage of the proposed overall number of new homes for the Site Allocation, this reduces from 54% to 33%. At the same time, the social infrastructure requirements in the Council's Infrastructure Delivery Plan (IDP) has not increased; with the IDP Update (April 2016) referring to costs of a Library as £1,800,000 and the cost of additional community space as £1,650,000 – although applying the BCIS All-in Tender Price Index to these costs to take account of inflation increases them to approx. £2,291,000 and £2,100,000 respectively.

6.7.13 Given the above and the proposed on-site provision of a slightly larger park (+ 300sqm) and, taking account of officer recommendation that the highway contributions are stripped out and secured under s278 agreements in relation to tying in with the High Road and White Hart Lane, the following financial contributions have been agreed:

- Library: £756,000 (33% of 2016 IDP index linked cost);
- Community space: £693,000 (33% of 2016 IDP index linked cost);
- Public Realm: £157,457 (agreed Goods Yard Highways and Public Realm contribution, increased by 34% in proportion with the number of homes now proposed, but just for Public Realm purposes); and
- Total £1,606,457 (£1,853 per home) + s278 highway costs (to be determined).

6.7.14 Officers consider that, given the changed development context and the proposed in-kind provision of a park, the proposed financial contributions are fairly and reasonably related in scale and kind to the proposed scheme.

6.7.15 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.

- 6.7.16 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.
- 6.7.17 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 Clinical Commissioning Group makes the point that it is not guaranteed that this centre will be provided and that other options are being investigated regarding a new health centre as part of the wider High Road West proposals and that investment is needed in advance of a new facility becoming available and seeks a s106 financial contribution of £499, 510 (with Somerset Gardens Family Health Centre being identified as a possible recipient of such funding). 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.
- 6.7.18 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*

6.7.19 . 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 (with the application scheme likely to contribute approx. £1,140,330 in Borough CIL).

6.7.20 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. The development context has changed since planning permission was granted for the Goods Yard and Depot schemes, with the Council's development partner due to make a planning application for approx. 2,615 new homes across Site Allocation NT5. The proposed financial contributions for the application scheme for a new Library, Community Space, Highways and Public Realm are considered to be fairly and reasonably related in scale and kind to the proposed scheme.

## 6.8 **Child Play Space**

6.8.1 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.

6.8.2 The ES (Chapter 7) 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 is identified.

6.8.3 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 2,616sqm of play space. The Mayor of London Stage 1 Report (para. 55) queries whether the overall child yield should be 309 (requiring 3,090sqm of space). The applicant has clarified that its estimate is based on 'Inner-London' baseline data and officers consider this to be reasonable.

Table 16: Play Space Requirements

Age Group	Requirement (sqm)	Provision (sqm)
0-4	1,138	1,300
5 to11	871	880
12+	607	720
	2,616	2,900

6.8.4 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)



6.8.5 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 reserves details of proposed play space by way of planning conditions.

- 6.8.6 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 Depot permission (HGY/2019/2929), 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.
- 6.8.7 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.

## 6.9 Heritage Conservation

- 6.9.1 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.
- 6.9.2 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.
- 6.9.3 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.
- 6.9.4 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.
- 6.9.5 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.

- 6.9.6 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*

- 6.9.7 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".
- 6.9.8 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."
- 6.9.9 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."
- 6.9.10 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.
- 6.9.11 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.

6.9.12 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.

6.9.13 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*

6.9.14 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.

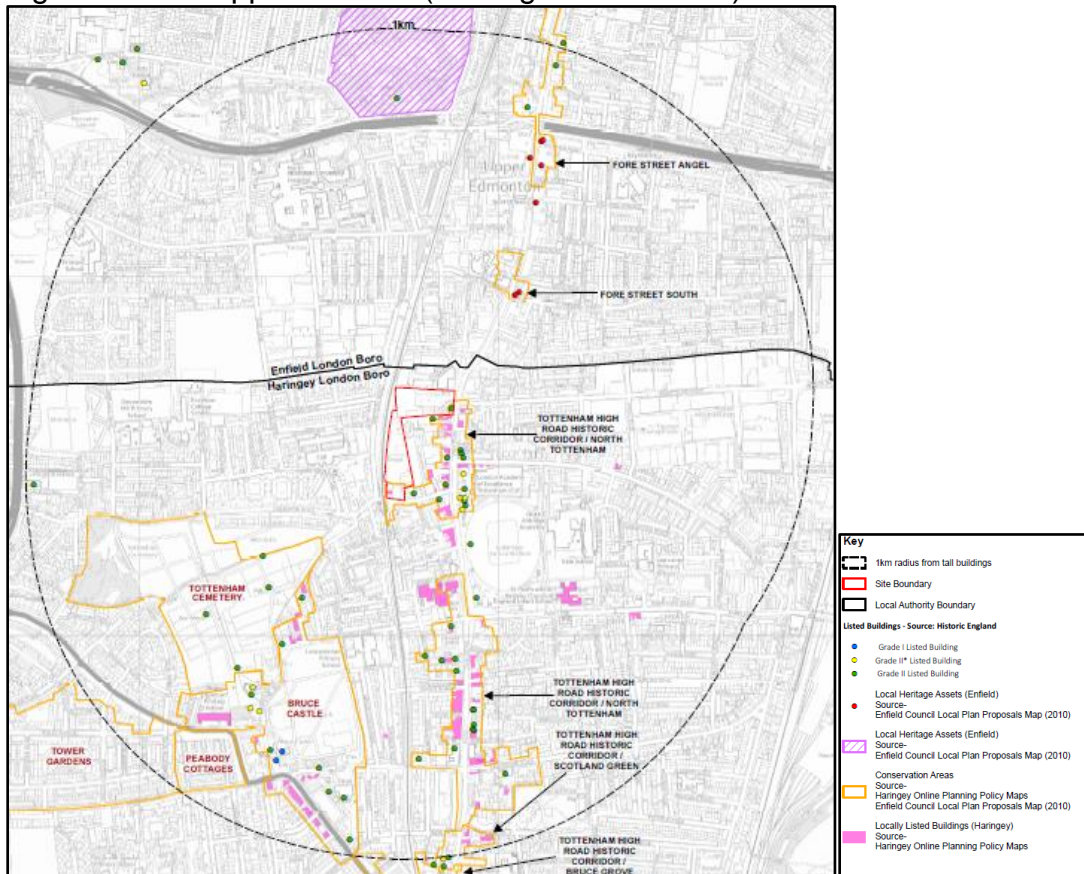
6.9.15 Part of the High Road frontage and all of the White Hart Lane frontage of the site are within the North Tottenham Conservation Area. However, in its current condition, other than the local listed Station Master's House (52 White Hart Lane), the Grade II Listed Buildings at Nos. 867-869 High Road 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.

6.9.16 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. 89m 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.

- 6.9.17 The built and visual context of the listed and locally listed buildings characterising the west side of the High Road has been progressively changing with the erection of some high-rise buildings such as the Rivers Apartment tower locate to the north of the conservation area. 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.
- 6.9.18 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.
- 6.9.19 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.

Figure 06: ES Appendix 11.1 (Heritage Assets Plan)



6.9.20 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);

6.9.21 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);
- Tottenham Cemetery Conservation Area;

- Fore Street Angel (Enfield); and
- Fore Street South (Enfield).

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

6.9.23 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.

6.9.24 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 seriously 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.

6.9.25 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.

6.9.26 The proposed Goods Yard towers (in particular) would be significantly taller and more prominent than the existing River Apartments tall building and officers consider that they would have a negative effect on the setting of these Listed Buildings. As such, they consider that the application scheme, as revised, would cause 'less than substantial harm' to the setting and significance of these Listed Buildings.

- 6.9.27 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.
- 6.9.28 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.
- 6.9.29 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.
- 6.9.30 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.
- 6.9.31 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. As such, they consider that the proposed towers would cause 'less than substantial harm' to the setting and significance of these Listed Buildings.
- 6.9.32 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.

6.9.33 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 and have a positive effect.

6.9.34 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 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.

6.9.35 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.

6.9.36 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.

6.9.37 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 characterised

by its openness, landscaping in the park and small-scale development in long views. As such, officers consider that these proposed tall buildings would cause 'less than substantial harm' to the setting and significance of this Conservation Area.

6.9.38 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.

6.9.39 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.

6.9.40 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 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.

6.9.41 No. 790 High Road (Dial House) (Grade II\* Listed). Officers disagree with the assessment in the ES. 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 contributing 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.

6.9.42 Tottenham Cemetery Conservation Area. Officers disagree with the assessment in the ES and consider that the proposed Goods Yard towers (in particular), would be excessively prominent features when viewed from the open spaces in the Conservation Area, which is characterised by its openness, landscaping in

the park and small-scale development in long views. As such, officers consider that these proposed tall buildings would cause 'less than substantial harm' to the setting and significance of this Conservation Area.

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

6.9.44 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-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;
- Bruce Castle and All Hallows Conservation Area;
- Nos. 790 High Road (Dial House) (Grade II\* Listed); and
- Tottenham Cemetery Conservation Area.

6.9.45 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.

6.9.46 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 867 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. £873,000 alongside c. £1.6m a year in council tax revenue (of which nearly 70% would be retained by the LBH);
- Annual household spending of £13m on goods and services in the area; and
- Approx. £100,000 per year in business rates.

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

#### *Heritage Conclusion*

6.9.48 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.

6.9.49 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.

6.9.50 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, 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.

6.9.51 Taking account of these and all other differences between the application scheme and the extant consents, 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, Brice Castle and All Hallows Conservation Area, No. 790 High Road (Grade II\* Listed) and Tottenham Cemetery Conservation Area. 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.

6.9.52 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:

- 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);

- The Council to have first right to purchase on 77 of the proposed Low Cost Rent homes (16 more than for the extant schemes, although these additional homes would be at London Affordable Rent);
- 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.

6.9.53 Having given significant weight to the identified additional and increased harm identified above, officers consider that this would be outweighed by the likely additional public benefits identified above.

## 6.10 Impact on Amenity of Adjoining Occupiers

6.10.1 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*

6.10.2 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.

6.10.3 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.

- 6.10.4 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.
- 6.10.5 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.
- 6.10.6 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.
- 6.10.7 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).
- 6.10.8 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.
- 6.10.9 Chapter 9 of the ES 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.

6.10.10 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*

6.10.11 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 56 of the 103 buildings assessed would meet the annual and winter APSH numerical guidelines.

6.10.12 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

<b>Receptor</b>	<b>Daylight (Adverse)</b>	<b>Sunlight (Adverse)</b>
River Apartments	Minor	-
Ambrose Court	Moderate	Minor
Mallory Court	Major	Moderate to Major
Brook House Primary School	Minor to Moderate	-
Beachroft House	Minor	Minor
2-7 Pretoria Rd	Minor	-
8-10 Pretoria Rd	Minor	-
11,12/15-17 Pretoria Rd	Minor	-
Lorenco 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 Pretoria Rd		Minor

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

6.10.13 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)
841-843 High Rad	Minor	-
839 High Road	Minor	-
837 High Road	Minor	-
831-833 High Road	Moderate	Minor
813-817 High Road	Moderate	Minor
809-811 High Road	Minor	Minor to Moderate
803-805 High Road	Minor to Moderate	-
6-6a White Hart Lane	Minor	-

6.10.14 Officers have scrutinised the detailed results of the assessment in the ES (including Appendix 9.5), 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*

6.10.15 Chapter 9 of the ES 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.

- 6.10.16 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 consent (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 and a Moderate Adverse effect for the school playground.
- 6.10.17 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 Mallory Court gardens, the lack of a lingering shadow leads to the ES identifying a Minor to Moderate Adverse effect.
- 6.10.18 The supplementary assessment in the ES (Appendix 9.7) comparing the shadowing of the extant Depot and Goods Yard consents with the proposed scheme at 12.00 on 21 March shows a similar Minor to Moderate Adverse overshadowing effect.
- 6.10.19 The applicant has clarified the position with regards to the existing podium level amenity space at Riverside Apartments, as assessed in Appendix 9.7. This open space has an area of approx. 553sqm. The shadow cast by the proposed scheme would cover an area of approx. 483sqm or 87% at noon on 21 March. By comparison, the shadow cast by the extant consent scheme for the Depot site would cover an area of approx. 537sqm, or 97% of the space. of the space, i.e. approx. 54sqm (10%) more than the proposed scheme.
- 6.10.20 The shadows that would be cast by the cumulative schemes would not combine with those that would be cast by the proposed development and these schemes would not increase the magnitude of identifies impacts on any surrounding garden or amenity space.

#### *Glare*

- 6.10.21 Chapter 9 of the ES reports on an assessment of the likely significant effects of solar glare from the proposed towers (which include areas of tiling) 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\_001 – Railway travelling north – Minor Adverse;
- GLR\_002 – Railway travelling north – Minor Adverse;
- GLR\_003 – Railway travelling south – Minor Adverse;
- GLR\_004 – Railway travelling south – Minor Adverse;
- GLR\_005 – High Road travelling southwest – Moderate Adverse;
- GLR\_006 – Brantwood Road travelling west – Major Adverse (see below);
- GLR\_007 – Northumberland Park travelling west – Minor Adverse; and
- GLR\_008 – White Hart Lane travelling northwest – Minor Adverse

6.10.22 The applicant has clarified that revisions to the application scheme, including changing to matt tiling, is likely to reduce adverse effects at GLR-0006 (Brantwood Road travelling west) from 'Major' to 'Moderate' Adverse. This is considered acceptable and no additional assessment or mitigation is considered necessary

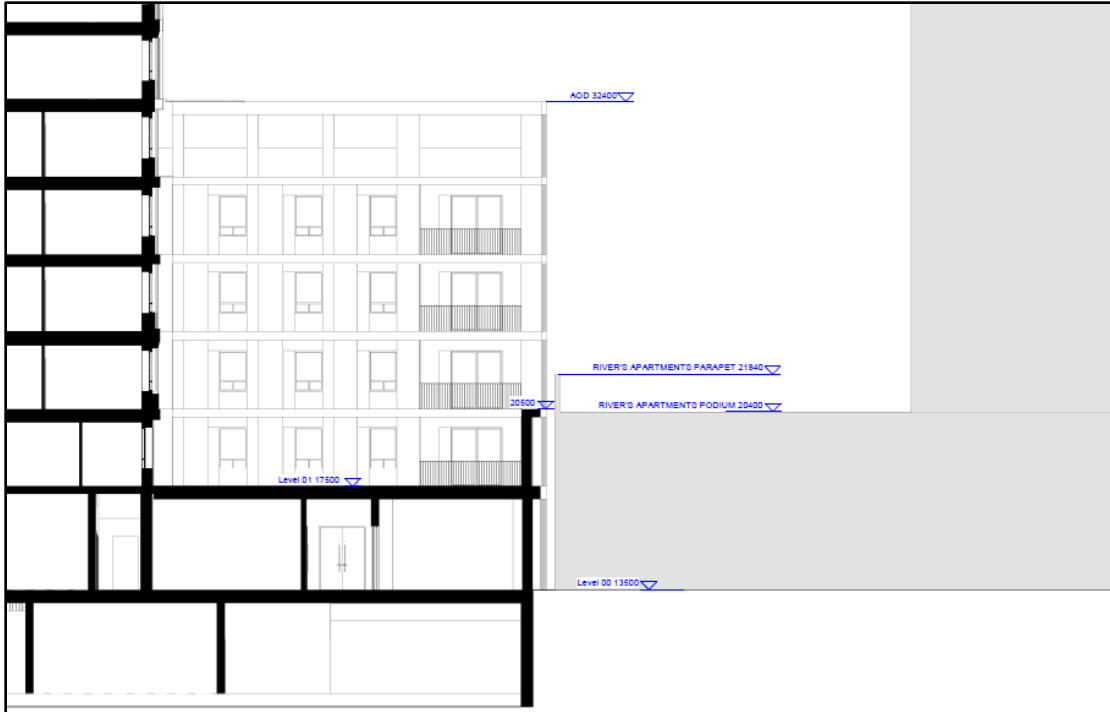
*Boundary treatment/security*

6.10.23 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.

6.10.24 Where it meets the northern boundary, proposed Depot Block C 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 of 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 C boundary with River Apartments





- 6.10.25 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.
- 6.10.26 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.
- 6.10.27 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*

- 6.10.28 The proposed shared amenity space for proposed Depot Block C 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.

- 6.10.29 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).
- 6.10.30 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 wings of the proposed building that would be closer to Mallory Court would be high level and comprise secondary windows to living rooms and bedrooms, with living rooms and bedrooms deriving their outlook from east and west facing windows. In addition, the application has been revised to ensure that these secondary windows would be fitted with obscure glazing. 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.
- 6.10.31 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 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.
- 6.10.32 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.
- 6.10.33 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. 45 to 55m 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. 36m should safeguard privacy

*Wind and Microclimate*

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

*Noise*

6.10.35 The mainly residential nature of the proposed scheme means that, subject to using planning conditions to limit hours of use of any café/restaurant 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*

6.10.36 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.

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

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

<b>Receptor</b>	<b>Daylight – Residual VSC levels</b>	<b>Sunlight – Residual APSH levels</b>
River Apartments	1.4% better to 2% worse/ average 0.3% worse.	Within BRE guidelines.
Ambrose Court	0.3% better to 0.8% worse/average 0.3% worse.	Very similar.
Mallory Court	0.6% better to 1.7% worse/average 0.4% worse.	Very similar.
Brook House School	5.2% better to 1.8% worse/average 0.1% better.	Within BRE guidelines.
Beachroft House	1.6% better to 1.2% worse/average 0.1% worse.	Very similar.
2-7 Pretoria Rd	0.5% better to 0.1% worse/average 0.2% better.	Within BRE guidelines.
8-10 Pretoria Rd	0.9% better to 0.2% worse/average 0.4% better.	Within BRE guidelines.
11 Pretoria Rd	0.9% better to 0.2% worse/average 0.4% better.	
12 Pretoria Rd	1.1% better to 2.5% worse/average the same.	
15 Pretoria Rd	0.9% better to 1.8% worse/average 0.4% worse.	

Receptor	Daylight – Residual VSC levels	Sunlight – Residual APSH levels
16 Pretoria Rd	0.6% better to 2.2% worse/average 1% worse.	
17 Pretoria Rd	0.1% better to 2.5% worse/average 1.5% worse.	
Lorenco House	0.5% better to 3.3% worse/average 1.3% worse.	
36 & 37 Pretoria Rd	3.1% better to 3.5% worse/average 3.9% worse.	Lower overall APSH values, but very similar winter APSH values.
38 & 39 Pretoria Rd	3.1% better to 5% worse/average 3.6% worse.	
40-45 Pretoria Rd	2.7% better to 3.4% worse/average 3% worse.	
46-48 Pretoria Rd	The same to 2.1% worse/average 1.2% worse.	Very similar.
49-51 Pretoria Rd	1.2% worse to 2.1% worse/average 1.4% worse.	slightly lower overall APSH values, but very similar winter APSH values.
52-57 Pretoria Rd	0.6% worse to 2.1% worse/average 0.9% worse.	
58-67 Pretoria Rd	The same to 0.6% worse/average 0.4% worse.	Very similar.
865 HR	0.5% better to 1.5% worse/average 0.4% worse.	Within BRE guidelines.
849 HR	Very similar.	
841-843 HR	Very similar.	
837 HR	Very similar.	
813-817 HR	Very similar.	
831-833 HR	Very similar.	Within BRE guidelines.
6-6a WHL	Very similar.	
30 WHL	Very similar.	

6.10.38 The ES includes an overshadowing assessment for the two 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).

6.10.39 External materials proposed for approved buildings in both extant schemes meant that solar glare was unlikely to be a significant issue and was not assessed for those schemes. This means that the identified likely glare effects associated with external tiling in the application scheme would be an additional adverse effect.

- 6.10.40 The northern boundary treatment with the Cannon Road area in the proposed scheme would be no different from that in the approved Depot scheme 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).
- 6.10.41 There would be a very similar relationship between proposed Depot Blocks D and E and Malory Court and Beachcroft Court respectively as with the approved Depot scheme 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.
- 6.10.42 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.
- 6.10.43 The likely wind/microclimate effects on neighbours from the proposed scheme are generally expected to be similar to those associated with the approved schemes.

## 6.11 Transportation and Parking

- 6.11.1 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).
- 6.11.2 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.

6.11.3 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.

6.11.4 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.

6.11.5 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*

6.11.6 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*

6.11.7 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)

Mode	AM Peak Hour		PM Peak Hour	
	In	Out	In	Out
Total people	279 (+23)	594 (+113)	538 (+66)	443 (+45)
Vehicles	39 (+1)	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	69 (+6)	103 (+24)	86 (+13)	71 (+10)

6.11.8 A revised multi-modal trip generation assessment was undertaken at the Transport Officer's request. The updated results show that the methodology set out in the TA remains the most robust approach overall for assessing the additional impact of the development proposals compared to that of the extant permissions. The alternative methodology does show a greater number of vehicle trips in total (as shown in Table 21 below), which has been considered to assess the net impact of the proposed development and its cumulative impact with local committed schemes.

Table 21: Comparison of the net changes in vehicular trips (TA and alternative methodologies)

Vehicles	AM Peak Hour		PM Peak Hour	
	In	Out	In	Out
TA Methodology	39 (+12)	98 (+30)	74 (+23)	54 (+14)
Alternative Methodology	37 (+10)	117 (+49)	86 (+35)	61 (+21)

6.11.9 The cumulative impact assesses the likely impacts associated with the proposed scheme and key consented nearby schemes plus the proposed Printworks scheme. 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
Vehicle driver and motorcycle	102	175	190	129
Vehicle driver and motorcycle (alternative methodology)	100	194	202	183
Total	642	879	1,115	810

#### *Public transport capacity and protection*

6.11.10 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.

6.11.11 At officer's request, a revised cumulative impact assessment has been carried out. The net impact of the proposed development has been considered in isolation via two different methodologies but also in the context of the local key committed schemes and the proposed Printworks with all proposed development trips.

6.11.12 The Mayor of London Stage 1 Report has raised some detailed concerns about methodology and has asked for further assessment, including of likely rail and bus use. In response, the applicant has undertaken an assessment that takes account of the proposed scheme, committed development and the emerging Lendlease application for approx. 2,600 homes, by factoring an additional 1,966 homes (2,612 assumed for the emerging Lendlease scheme, minus 646 homes in the extant Goods Yard and Depot consents). It should be noted that these are gross figures and do not take account of the existing 297 homes on the Love Lane Estate that would be replaced. 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.

6.11.13 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.

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

#### *Site Access*

6.11.15 Vehicular access to the Depot part of the site would be as approved as part of the extant consent for the Depot – 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.

6.11.16 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. Following revision, 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. This could result in potential conflicts between potential vulnerable road users.

6.11.17 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.

6.11.18 It is important to note that no through route for vehicles (other than cycles) would be created between the High Road and White Hart Lane.

#### *Future Access Points*

6.11.19 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.

6.11.20 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 vehicular function, catering for the proposed commercial uses in the southern part of the site with a commensurate reduction in vehicular flows.

#### *Legal Highway Agreements*

6.11.21 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*

6.11.22 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. Th 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*

6.11.23 The proposal scheme includes the following car parking provision:

- 52 x standard residential spaces;
- 87 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.

6.11.24 Residential car parking. The proposed overall residential parking would be a provision of 0.16:1. 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. The Mayor's Stage 1 Report asks that consideration be given to 5 x Car Club spaces. However, officers consider that the proposed minimum 4 x spaces (2 on each part of the site for use by future residents and commercial tenants) is acceptable – subject to a s106 planning

obligation requiring the actual number to be approved following discussions with a prospective Car Club operator.

6.11.25 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. Officers and the Mayor of London's Stage 1 Report have called for further assessment of access and management arrangements for the two basement car parking areas. It is recommended that planning condition secure detailed arrangements for two-way working of the proposed vehicular ramps before occupation.

6.11.26 Commercial car parking. The proposed commercial spaces would be located in an under-croft space within proposed GY Block 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 1,870sqm 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).

6.11.27 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.

- 6.11.28 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*

- 6.11.29 The proposed scheme makes provision for 1,708 cycle parking spaces, (1,617 residential and 15 commercial) including long and short-stay parking for both. 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*

- 6.11.30 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*

- 6.11.31 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. Following revisions to increase capacity, it is proposed to accommodate these trips at 7 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*

6.11.32 The applicant's Outline 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. The submitted CLP does not address staff travel planning measures or cycle parking and, 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*

6.11.33 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 emerging 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.

6.11.34 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. The additional 221 homes in the proposed scheme would result in an increase in trips across all modes, but, 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.

## 6.12 Energy, Climate Change and Sustainability

6.12.1 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.

- 6.12.2 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).
- 6.12.3 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.
- 6.12.4 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).
- 6.12.5 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.
- 6.12.6 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.
- 6.12.7 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.
- 6.12.8 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*

- 6.12.9 The principal target is to achieve a reduction in regulated CO2 emissions over Part L 2013 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 carbon factors.

- 6.12.10 '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 80.7 tonnes of carbon dioxide per year (a site-wide 8% saving above the Building Regulations 2013). The minimum carbon reduction of 15% is met by the non-domestic floorspace, with a 16% reduction. The residential fabric efficiencies have been improved, and are just below meeting the 10% reduction minimum called for in London Plan Policy SI 2.
- 6.12.11 '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. Energetik currently plan to provide a heat network to Fore Street (closer to the site to the north) by January 2023. 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 485.6 tonnes of carbon dioxide per year (a 47% saving above the Building Regulations 2013).
- 6.12.12 The Council has committed plans to deliver a North Tottenham District Energy Network (DEN) to connect to the Energetik Heat Network.
- 6.12.13 'Be Green.' Photovoltaic (PV) arrays are proposed for the majority of new buildings across the site with a capacity of 213 kWp, amounting to approx. 944sqm. The proposed PV panels are anticipated to save 83.7 tonnes of carbon dioxide per year (an 8% saving above the Building Regulations 2013).
- 6.12.14 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	1,023.1		
Be lean	942.5	80.7	8%
Be clean	456.9	485.6	47%
Be green	372.2	84.7	8%
Total savings		650.9	64%
		CO2 savings off-set (tonnes CO2)	
Off-set		£1,060,787	

6.12.15 '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).

6.12.16 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 372.2 tonnes per year. Based on 30-years of annual carbon dioxide emissions costed at £95 per tonne, this amounts to £1,066,865 (or £1,166, 866 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.

6.12.17 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 557 kgCO2e/m2 (between the GLA's 'aspirational' and 'standard' benchmarks)



and were 304 kgCO<sub>2</sub>e/m<sup>2</sup> for Modules B-C (excluding B6 & B7) ('standard' benchmark). The highest embodied carbon in Modules A1-A5 is attributed to the superstructure (63%) and substructure (25%). 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.

6.12.18 Energy conclusion. The overall anticipated on-site carbon emission reductions over Building Regulations (2013) of 64% 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. Revisions to the architectural expression of the proposed towers has improved expected building performance such that London Plan Policy SI2 requirements for at least 10% for domestic and 15% for non-domestic savings to come from building fabric is now achieved.

6.12.19 The proposed '8% '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*

6.12.20 The applicant's Sustainability and Energy Statement (Rev 07) 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).

6.12.21 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 applicant's Sustainability and Energy Statement has been revised (it initially included an assessment that used the Heathrow weather files) due to the high climate vulnerability and heat risk attributed to this area of Tottenham by the GLA. The application generally meets London Plan Policy SI4, and demonstrates that ceiling fans would help to mitigate future overheating risk. although not best practice in terms of future likely weather conditions. 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*

6.12.22 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.

6.12.23 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.

6.12.24 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.

6.12.25 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).

6.12.26 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.

6.12.27 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.

6.12.28 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

6.12.29 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.

6.12.30 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 64% over Building Regulations (2013) (SAP2012 carbon factors) compares favourably 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. The commercial space in the proposed scheme would just fall short of the 'Excellent' standard secured for the consented schemes.

6.12.31 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.

## 6.13 Flood Risk, Drainage and Water Infrastructure

6.13.1 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.

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

6.13.3 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.

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

*Flood Risk*

6.13.5 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.

6.13.6 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.

6.13.7 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 approx.14l/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.

6.13.8 Foul water from the proposed development is proposed to be discharged to the existing Thame Water foul sewers at a peak rate of approx. 40l/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*

6.13.9 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.

6.13.10 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.

6.13.11 The Council as Lead Local Flood Authority notes that the proposed scheme would result in an acceptable controlled run-off rate and that 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, other than that other consents may be required. Thames water raises no network infrastructure capacity objections in relation to foul water or surface water, but recommend that petrol/oil receptors are fitted to car parking/washing/repair facilities.

6.13.12 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. Condensations are also recommended to safeguard water mains and other underground water assets, as requested by Thames Water.

6.13.13 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.

## 6.14 Air Quality

6.14.1 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.

6.14.2 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).

6.14.3 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.

6.14.4 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.

6.14.5 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.

6.14.6 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.

6.14.7 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.

## 6.15 Wind and Microclimate

6.15.1 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.

6.15.2 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.

6.15.3 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.

6.15.4 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

<b>Effect</b>	<b>Mitigation &amp; monitoring</b>	<b>Residual effect</b>
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'

6.15.5 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.

6.15.6 Fall-back Position. The proposed scheme is significantly different from the Goods Yard and Depot schemes approved by the extant consents 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.

## 6.16 Trees

6.16.1 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.

6.16.2 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).

6.16.3 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.

6.16.4 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.

6.16.5 Fall-back Position. The Goods Yard and Depot schemes approved by the extant consents would (in combination) 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 consented schemes means that the number of proposed trees for those schemes are unknown, making direct comparison impossible.

## 6.17 **Urban Greening and Ecology**

### *Urban Greening*

6.17.1 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.

6.17.2 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.

### *Ecology*

- 6.17.3 London Plan Policy G6 calls for development proposals to manage impacts on biodiversity and to aim to secure net biodiversity gain.
- 6.17.4 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.
- 6.17.5 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.
- 6.17.6 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.
- 6.17.7 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*

- 6.17.8 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").
- 6.17.9 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).
- 6.17.10 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.
- 6.17.11 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.
- 6.17.12 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.
- 6.17.13 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.

6.17.14 Fall-back Position. The Urban Greening Factor (UGF) metric was introduced by London Plan Policy G5 since the extant schemes 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 the extant schemes.

## 6.18 **Waste and Recycling**

6.18.1 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.

6.18.2 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.

- 6.18.3 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.
- 6.18.4 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.
- 6.18.5 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.
- 6.18.6 Fall-back Position. The proposed scheme is significantly different from the Goods Yard and Depot schemes approved by the extant consents in terms of waste and recycling arrangements and no direct comparison can be made.

## 6.19 Land Contamination

- 6.19.1 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.
- 6.19.2 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.

6.19.3 LBH Pollution officers raise no objection, subject to standard conditions on Land Contamination and Unexpected Contamination.

6.19.4 Fall-back Position. If planning permission were granted, it would be possible to secure similar mitigation by way of planning conditions and no material difference in effects between the proposed scheme and the two extant schemes have been identified.

#### 6.19.5 **Basement Development**

6.19.6 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).

6.19.7 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. 5.3m (The Depot) and 5.4m (the Goods Yard). Both basements would be approx. 13m 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.

6.19.8 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 2mm 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 remains in the range negligible to slight.

6.19.9 The magnitude of ground movement predicted at the location of the Peacock Industrial Estate (or future development site) to the east of the Goods Yard part of the site is similarly estimated to be negligible and resulting damage impact assessment is negligible.

6.19.10 Fall-back Position. The extant Goods Yard and Depot schemes include similarly sized separate single-level car parking basements, although the northern basement in the proposed scheme would be closer to the existing River Apartments and Mallory House. 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.

## 6.20 Archaeology

- 6.20.1 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.
- 6.20.2 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.
- 6.20.3 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.
- 6.20.4 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.
- 6.20.5 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.

## 6.21 Fire Safety and Security

- 6.21.1 London Plan Policy D12 makes clear that all development proposals must achieve the highest standards of fire safety and requires all major proposals to be supported by a Fire Statement. The Mayor of London has published draft guidance

of Fire Safety (Policy D12(A), Evacuation lifts (Policy D5(B5) and Fire Statements (Policy D12(B).

- 6.21.2 The application was submitted before the 1 August and so has not been the subject to a Gateway 1 consultation with the Health and Safety Executive. However, it is supported by a Fire Statement that, following revisions, meets the requirements of a Fire Statement required by London Plan Policy D12 (A). The London Fire Brigade has commented that Section 7 of the applicant's Fire Statement complies with the London Fire Brigade's requirements for firefighting access. In accordance with the Mayor of London's draft guidance, it is recommended that a planning condition requires the development to be carried out in accordance with the planning fire safety strategy (included in the Fire Statement).
- 6.21.3 The development would be required to meet the Building Regulations in force at the time of its construction – by way of approval from a relevant Building Control Body. As part of the plan checking process a consultation with the London Fire Brigade would be carried out. On completion of work, the relevant Building Control Body would issue a Completion Certificate to confirm that the works comply with the requirement of the Building Regulations.
- 6.21.4 Fall-back Position. The proposed scheme is significantly different from the Goods Yard and Depot schemes approved by the extant consents in terms of these issues (layout, vehicular access, height materials etc.) and no direct comparison can be made.

## 6.22 Equalities

- 6.22.1 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.
- 6.22.2 As discussed in the Design section, officers consider that, subject to planning conditions and s106 planning obligations to reserve detailed design and landscaping and secure satisfactory management and maintenance, the proposed scheme would provide an accessible and safe environment.



6.22.3 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.

6.22.4 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.

6.22.5 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.

6.22.6 Fall-back Position. 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);
- 20 more Low-Cost Rent homes (+25%);
- 16 more Low-Cost Rent family homes (+49%) (with better alignment with the Council's Housing Strategy);
- The Council to have first right to purchase on 77 of the proposed Low Cost Rent homes (16 more than for the extant schemes, although these additional homes would be at London Affordable Rent);
- Similar employment training arrangements;
- Similar business relocation assistance; and
- 22 X more wheelchair accessible homes (87 as opposed to 65).

## 6.23 Conclusion

6.23.1 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.

6.23.2 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. 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*

6.23.3 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 865 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 commercial child care/health uses.

6.23.4 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.

6.23.5 The affordable housing offer is based on a Fast Track approach (not supported by a Financial Viability Appraisal) of 35.9% 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 be satisfactorily integrated with Market housing across the site. The Council would also have the option of purchasing 77

(76%) of the proposed Low Cost Rent homes to provide at Social Rent levels (61) and London Affordable Rent levels (16) 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.

6.23.6 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.

6.23.7 The proposed scheme is a higher density development (at approx. 380 units/hectare) and warrants careful scrutiny. The overall dwelling mix, at 17.4% x 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 acceptable

6.23.8 The design changes to the proposed tower façades and related revisions to proposed lower buildings directly address several QRP concerns, including: -

- Tower entrance, sequence of approach and interface with the ground – revised low-rise block façade composition and extension of core element to meet ground;
- Colour palette – three tone terracotta now adopted;
- Tower tops and core elements – options presented reduce framing elements within core and utilize infill materials (i.e. grey brick) from low-rise shoulder/ plinth blocks to better unify palette;
- Composition and articulation of the 'cloak' elements – options now offer simplified articulation within the jacket and grouping of storeys; option B offers a horizontal emphasis of the 'cloak' as a counter point to the vertical core; and
- Incremental development across a number of elements within the revised tower facades offer an improvement in the overall energy performance of the scheme to meet the specific criteria of the LEAN targets contained within London Plan Policy SI 2.

6.23.9 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. Following revisions, which take account of comments from officers, QRP and the GLA, 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).

6.23.10 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 867 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. £873,000 alongside c. £1.6m a year in council tax revenue (of which nearly 70% would be retained by the LBH);
- Annual household spending of £13m on goods and services in the area; and
- Approx. £100,000 per year in business rates.

6.23.11 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.

6.23.12 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, committed development and the emerging Lendlease proposals, 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.

6.23.13 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 (although expected carbon savings from built fabric performance is below what policy expects). Planning conditions could secure commitments in relation to water usage, BREEAM 'Very Good' for the commercial units and measures to further the Circular Economy agenda. Subject to s106 planning obligations, the scheme would be connected to the proposed Heat Network and include some roof level PVs to help deliver 64% carbon emissions savings (SAP2012 carbon factors) (with offsetting financial contributions making up the shortfall).

- 6.23.14 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 0.40. 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.
- 6.23.15 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.
- 6.23.16 Officers have taken full account of the findings of the submitted Environmental Statement 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.
- 6.23.17 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.

*The 'fall-back position' established by the extant consents*

- 6.23.18 The policy and development context have changed since the extant schemes were granted permission. Most significantly, the London Plan was published in March 2021 and a revised National Planning Policy Framework (NPPF) was published in July 2021. These provide a different policy context for, amongst other things, optimising residential density, housing targets, tall buildings, the importance of design quality and urban greening. Also, the Government's Housing Delivery Test results were published in January 2021, meaning that Haringey is in a "presumption in favour of sustainable development category." In addition, the Council's development partner, Lendlease, is expected to submit a planning application for the majority of Site Allocation NT5 for a residential-led mixed-use development of approx. 2,615 homes.

6.23.19 The proposed scheme would also result in the same loss of existing uses as would result from the extant consents and provide a very similar range and scale of non-residential uses (but with greater flexibility given changes to the Use Classes Order). It would, however result in an additional 221 homes, which is to be welcomed give the new London Plan housing targets, Housing Delivery Test measures and changes to the NPPF, which all strengthen the policy requirement for additional homes.

6.23.20 The proposed scheme would be denser (approx. 350u/ha as opposed to 270u/ha and 275u/ha for the approved Goods Yard and Depot schemes respectively). However, after careful assessment, officers consider that this higher density scheme would be acceptable in relation to the range of infrastructure, character and amenity factors that inform a design-led approach to optimising density.

6.23.21 In terms of affordable housing, compared with the two extant consents for the site, the proposed scheme would deliver:

- 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); and
- The Council to have first right to purchase on 77 of the proposed Low Cost Rent homes (16 more than for the extant schemes, although these additional homes would be at London Affordable Rent).

6.23.22 In terms of dwelling mix and residential quality, at 17.4%, the proposed scheme would deliver more family homes than the extant consents (13% for the Goods Yard and 11% for The Depot), resulting in an uplift of 69 family-sized homes. The proposed scheme would deliver high-quality accommodation, including an acceptable level of dual aspect homes.

6.23.23 On matters of design, compared with the extant consents for the site, subject to the recommended conditions and s106 obligations, the proposed scheme would:

- Have a significantly better layout, locating the proposed Embankment Lane away from the western boundary (allowing for a two-sided street) and including a private communal green space (Goods Yard Walk) next to the railway;
- Locate the southern-most proposed tall building further away from The Grange, but locate the northern-most building closer to the existing Riverside Apartments;

- Result in a less direct potential pedestrian bridge landing point, ruling-out a direct east-west alignment between Brantwood Road and Durban Road;
- Have a similar relationship with most of Cannon Road, although a closer relationship with River Apartments and a better relationship with Peacock Industrial Estate/future development Plots;
- 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;
- Provide similar sunlight and noise conditions for the proposed Peacock Park and public realm management arrangements;
- Increase the height of the proposed tall buildings (south to north) from 18, 21 and 29-storeys to 27, 32 and 29-storeys, with buildings being slenderer in north-south views, but broader in east-west views;
- Result in less coalescence of the proposed towers when viewed from around the site;
- Be more prominent in some close/immediate (including from River Apartments), medium/mid and Long views
- Represent a significant improvement on the indicative designs for the towers that were approved in 'outline'; and
- Provide similarly good quality inclusive design, with a proportionate increase in the number of proposed 'wheelchair accessible homes' (87 as opposed to 65 in the combined extant schemes)

6.23.24 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. The development context has changed since planning permission was granted for the Goods Yard and Depot schemes, with the Council's development partner due to make a planning application for approx. 2,615 new homes across Site Allocation NT5. The proposed financial contributions for the application scheme for a new Library, Community Space, Highways and Public Realm are considered fairly and reasonably related in scale and kind to the proposed scheme.

6.23.25 In terms of built heritage, the proposed scheme would have some additional harm (where none has been identified in relation to the extant consents) and some increased harm (over and above what has been identified in relation to the extant schemes) to the setting and significance of a number of heritage assets. However, officers consider that the following additional public benefits (some of which are referred to above) outweigh this additional and increased harm:

- Providing an additional 221 homes – making a greater contribution to meeting Haringey's London Plan housing target;
- Delivering 69 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);
- The Council to have first right to purchase on 77 of the proposed Low Cost Rent homes (16 more than for the extant schemes, although these additional homes would be at London Affordable Rent);
- 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.

6.23.26 The detailed assessment under Impact on Amenity of Adjoining Occupiers demonstrates that whilst the proposed scheme would be likely to have some greater adverse effects on neighbouring homes in terms of daylight and sunlight and be closer to existing homes in River Apartments (approx. 30-35m, as opposed to approx. 51.4m), noise, air quality and wind conditions would be similar and officers consider that all neighbours would be left with an acceptable level of amenity

6.23.27 The proposed scheme would, in a similar way to the extant schemes, connect in with the Cannon Road area and improve permeability across the site, whilst preventing rat-running traffic, and provide a similar level of car parking to the approved Depot scheme. The proposed greater number of homes would lead to additional trips across all modes. However, subject to the recommended planning conditions and s106 planning obligations, these likely impacts are considered manageable and acceptable. The recommended conditions would also minimise impacts associated with construction traffic and activity.

6.23.28 Whilst larger and more resource-hungry than the extant schemes, the proposed scheme would. the estimated overall carbon savings for the proposed scheme of 64% over Building Regulations (2013) (SAP2012 carbon factors) compares favourably with those achieved for the consented Goods Yard and Depot scheme. 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.

6.23.29 The proposed scheme would perform in a similar way to the consented schemes in terms of flood risk and drainage, air quality, wind, waste and recycling, contamination, impact from basements and archaeology. However, responding to new Urban Greening Factor policy requirements and benefitting from an improved layout, the proposed scheme would be greener and be likely to result in a greater Biodiversity Net Gain.

6.23.30 Given the proposed additional affordable and accessible homes outlined above, subject to securing similar local employment and training obligations as for the extant schemes, the proposed scheme would have an enhanced positive equalities impact.

*Overall*

6.23.31 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 two extant consents, it is considered that the additional benefits that would be delivered from the application scheme would outweigh additional dis-benefits/harm that the larger 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 be £3,408,103 (56,286 x £60.55) (2021 indexation included) and, based on the current Haringey CIL charge rate for the Eastern Zone of £15 per square metre, the Haringey CIL charge would be £1,140,300 (54,560 x £20.90) (2021 indexation included), giving a total of £4,548,403. Should the formal decision notice be issued after 1 January 2022, then rates indexed for 2022 would be used in accordance with the regulations. 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.

7.1.3

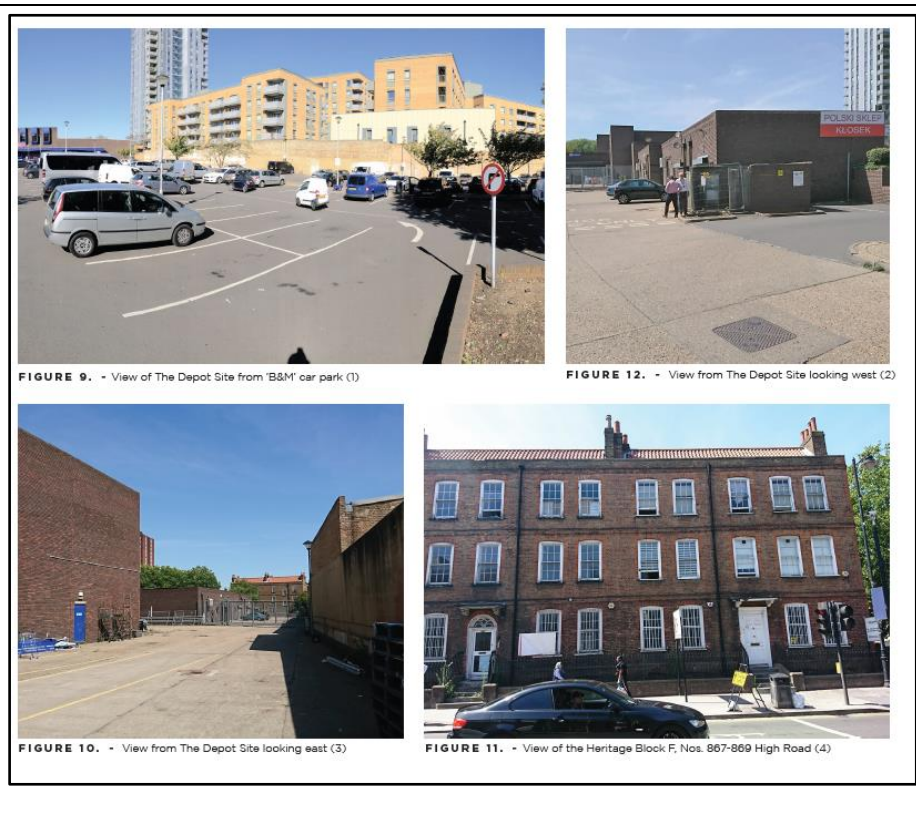
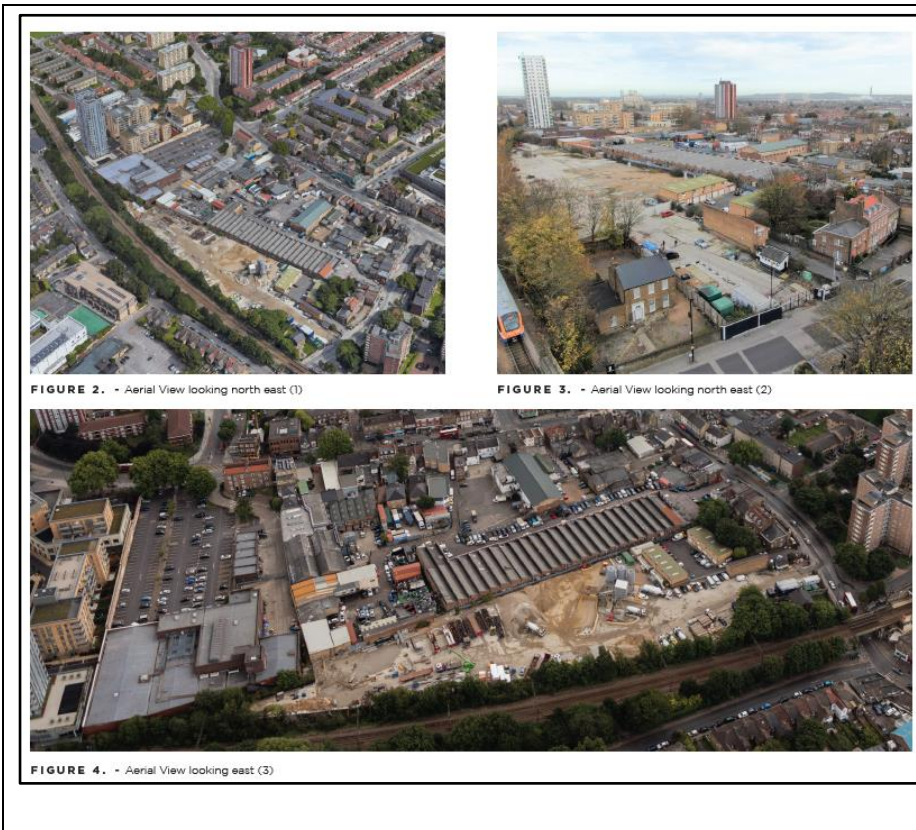
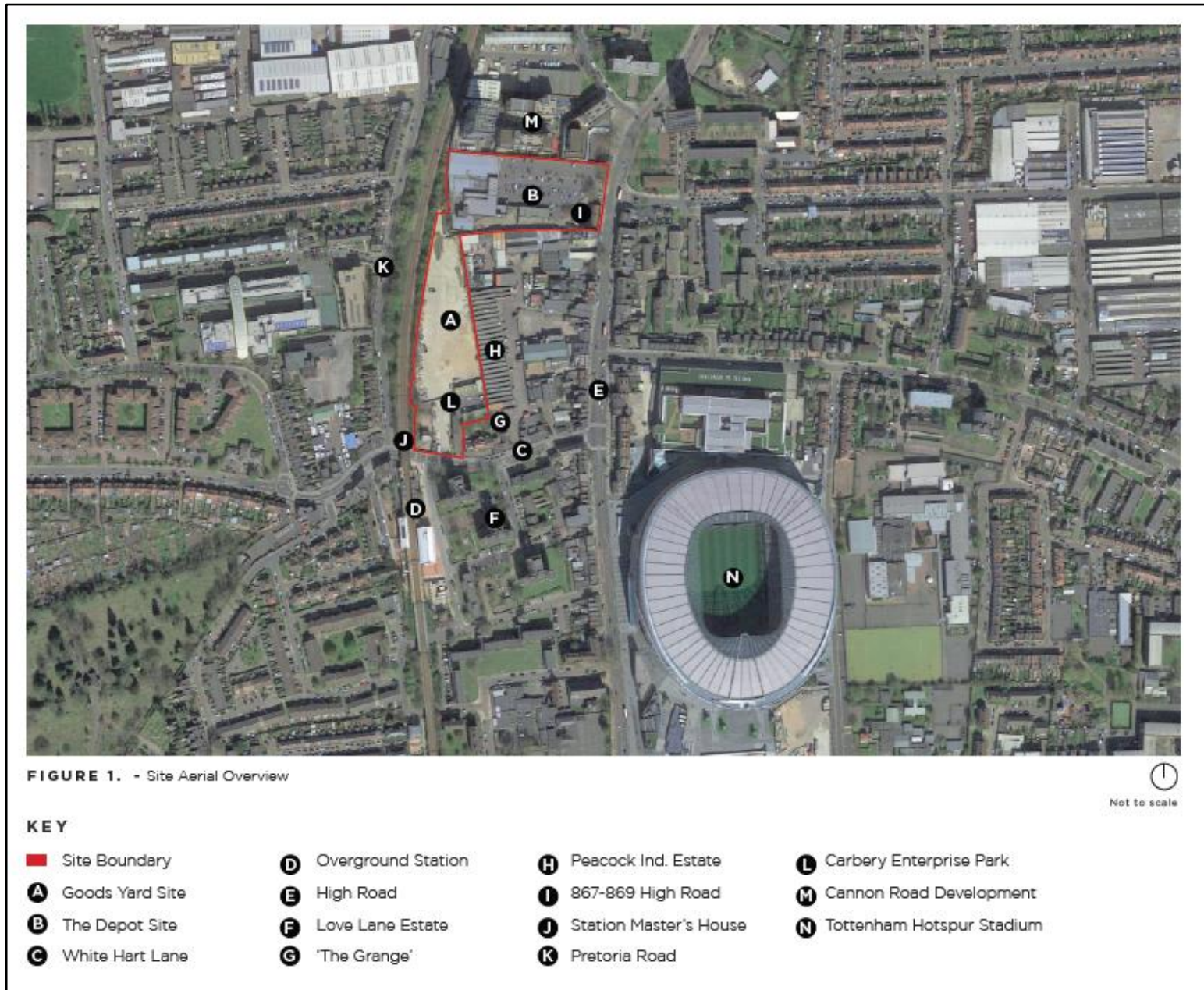
7.1.4 The Council is proposing to increase the current Haringey CIL charge rate for the Eastern Zone of the borough from £15 to £50 per square metre and consulted on a Draft Charging Schedule (DCS) between 18 December 2019 and 11 February 2020. The DCS was submitted for examination in September 2021 and, subject to the outcome of examination and Council adoption, will take effect at some point in 2022. The proposed development would be liable to pay the Haringey CIL rate that is in effect at the time that any permission is granted.

## **8 RECOMMENDATIONS**

8.1 GRANT planning permission for the reasons set out in 1.2 above.

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Appendix 1: Images of the site & proposed scheme



### 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)

**KEY**

- Site Boundary
- - - NT5 Site Boundary
- North Tottenham Conservation Area
- Locally Listed Building
- Grade II Listed Building
- A** Station Master's House
- B** 'The Grange'
- C** 867-869 High Road

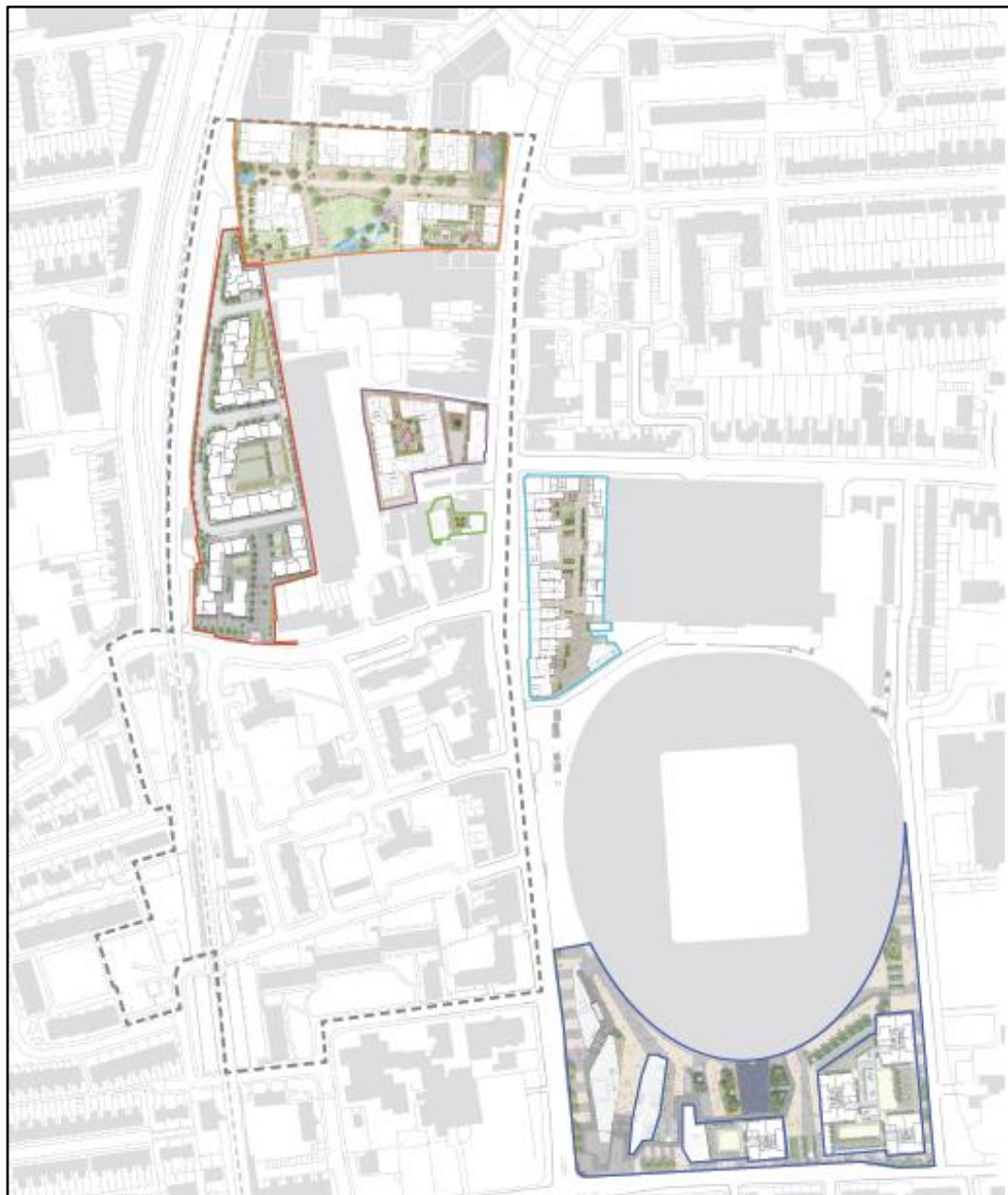
### Site Allocation NT5



### High Road West Masterplan Framework



**Development context – THFC**



Depot - extant consent (HGY/2019/2929) – 330 homes.

Goods Yard - extant consent (HGY/2018/0187) – 316 homes.

Printworks - current application (HGY/2021/2283) – 72 homes.

807 High Road - extant consent (HGY/2021/0441) – 9 homes.

Northumberland Terrace – extant consent (HGY/2020/1584) – ‘cultural quarter.’

Northumberland Development Project – implemented consent (HGY/2015/3000) – 585 homes, 180-bed hotel & 49 serviced apartments, towers up to 36-storeys.

**Development context – Lend Lease (25/10/21 Planning Sub Committee pre-app scheme)**



**Key**

- Ground Floor Residential
- Homes with non-Residential Ground Floor

Physical parameters of the extant Goods Yard & Depot schemes incorporated in to the parameters (N.B. excluding Nos. 867-869 High Road).

**Comparison – Approved & Proposed**

**Extant Goods Yard & Depot schemes**

**Application scheme**

**Overlay of extant & application schemes**



1 SITE VIEW - EXTANT CONSENTS MASSING

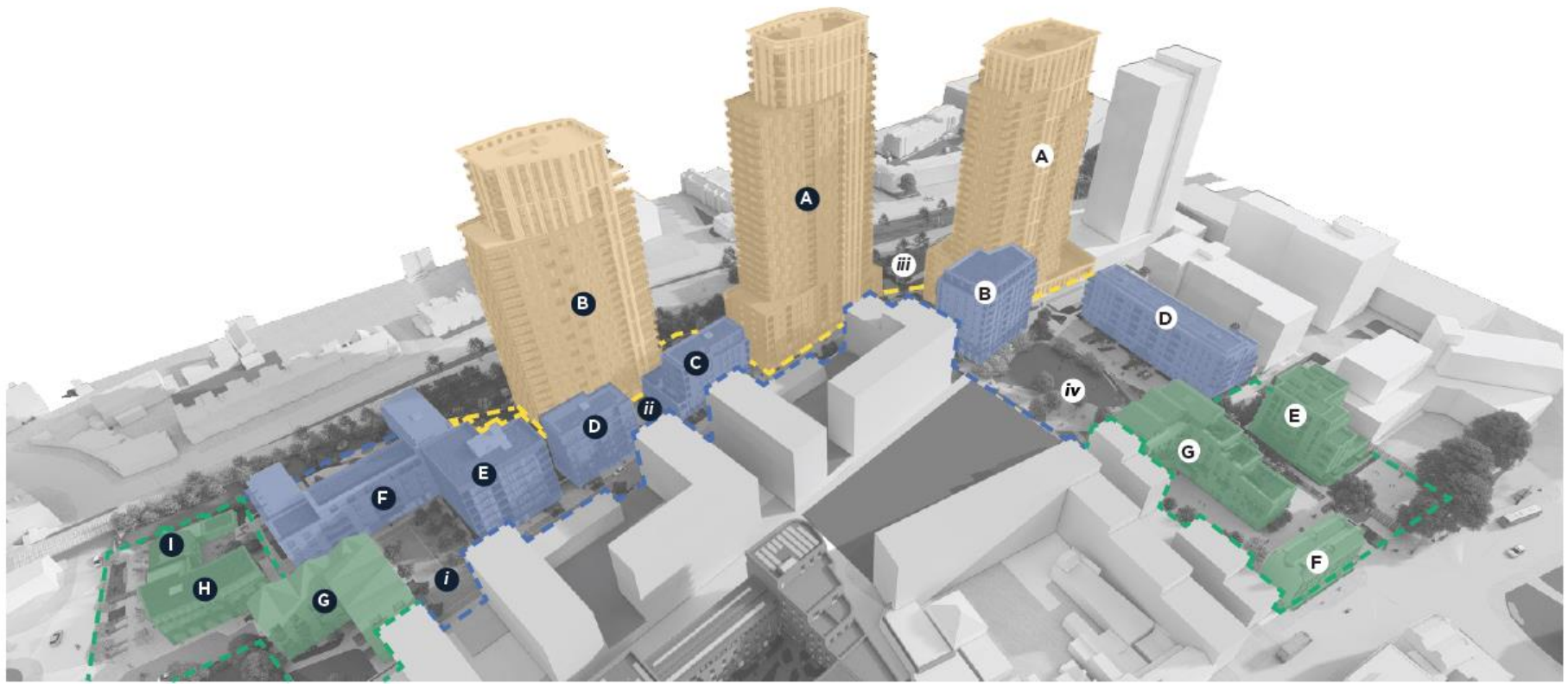


2 SITE VIEW - UPDATED SCHEME





### Scheme Overview



**KEY**

- |                     |                        |                 |
|---------------------|------------------------|-----------------|
| Streets and Squares | Goods Yard Blocks      | Southern Square |
| Railway Landmarks   | The Depot Blocks       | Pocket Square   |
| Heritage Interface  | Station Master's House | Northern Square |
| 867-869 High Road   | Peacock Park           |                 |

### Scheme Overview



- THE DEPOT TOWER BLOCK A
- NORTHERN SQUARE
- GOODS YARD NORTH - BLOCK A
- GOODS YARD WALK
- EMBANKMENT GARDENS NORTH (PODIUM)
- GOODS YARD SOUTH - BLOCK B
- EMBANKMENT GARDENS SOUTH (PODIUM)
- STATION MASTER'S COURT
- STATION MASTER'S HOUSE

- PICKFORD LANE
- NOS. 867-879 HIGH ROAD
- PEACOCK PARK (INITIAL PHASE)
- EMBANKMENT LANE
- INDICATIVE LATER PHASES OF HRWMF
- POCKET SQUARE
- PRINTWORKS YARD\*
- NO. 807 HIGH ROAD (PLANNING APPROVED)
- SOUTHERN SQUARE
- PAINTBOX YARD
- GATEWAY BUILDING



### Depot Block ABC (Levels L01 – L05)

**Level L01 - Block ABC**  
Scale: 1:200

**Level L02, L03 & L04 - Block ABC**  
Scale: 1:200

**Level L05 - Block ABC**  
Scale: 1:200

**KEY PLAN**

**NOTES**

**REVISION HISTORY**

**ARCHITECTURE + INTERIOR**

**Project:** The Goods Yard and The Depot, High Road West  
The Goods Yard: 38 & 44-52 White Hart Lane.  
The Depot: 667-679 High Road.

**Block ABC Proposed GA L01-L05 FLOOR PLANS**

Drawn by	Scale	Phase	Project No.
MR	1:200	A1	190712

**A2 - ISSUED FOR PLANNING A2.P2**

Drawing No: **DEPOT-F3-ZABC-01-GA-A-82102**

### Depot Block ABC (Levels L06 – L07)

**Level L06 - Block ABC**  
Scale: 1:200

**Level L07 - Block ABC**  
Scale: 1:200

**KEY PLAN**

**NOTES**

**REVISION HISTORY**

**ARCHITECTURE + INTERIOR**

**Project:** The Goods Yard and The Depot, High Road West  
The Goods Yard: 38 & 44-52 White Hart Lane.  
The Depot: 667-679 High Road.

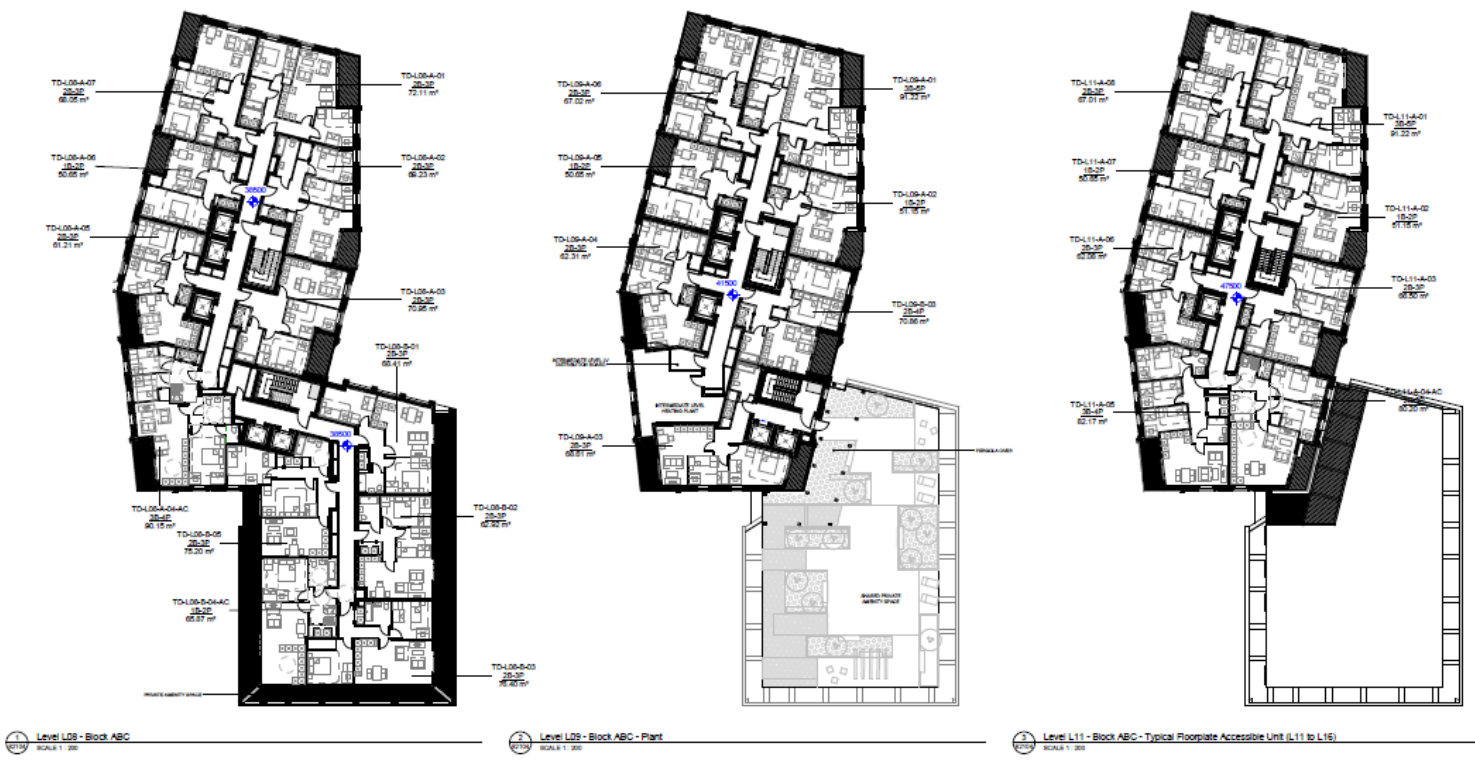
**Block ABC Proposed GA L06-L07 FLOOR PLANS**

Drawn by	Scale	Phase	Project No.
MR	1:200	A1	190712

**A2 - ISSUED FOR PLANNING A2.P2**

Drawing No: **DEPOT-F3-ZABC-06-GA-A-82103**

### Depot Block ABC (Levels L08 – L09)



NO.	REVISION	DATE	BY	CHKD.

**ARCHITECTURE + INTERIOR**  
 A. 6 Northstar House - London - 1997-2000  
 B. 100 White Hart Lane - London - 2001-2003  
 C. 100 White Hart Lane - London - 2004-2006

Noted for Planning purposes, figured dimensions only are to be taken from this drawing.  
 All dimensions are in millimetres unless otherwise stated.  
 All dimensions shall be checked on site prior to works.  
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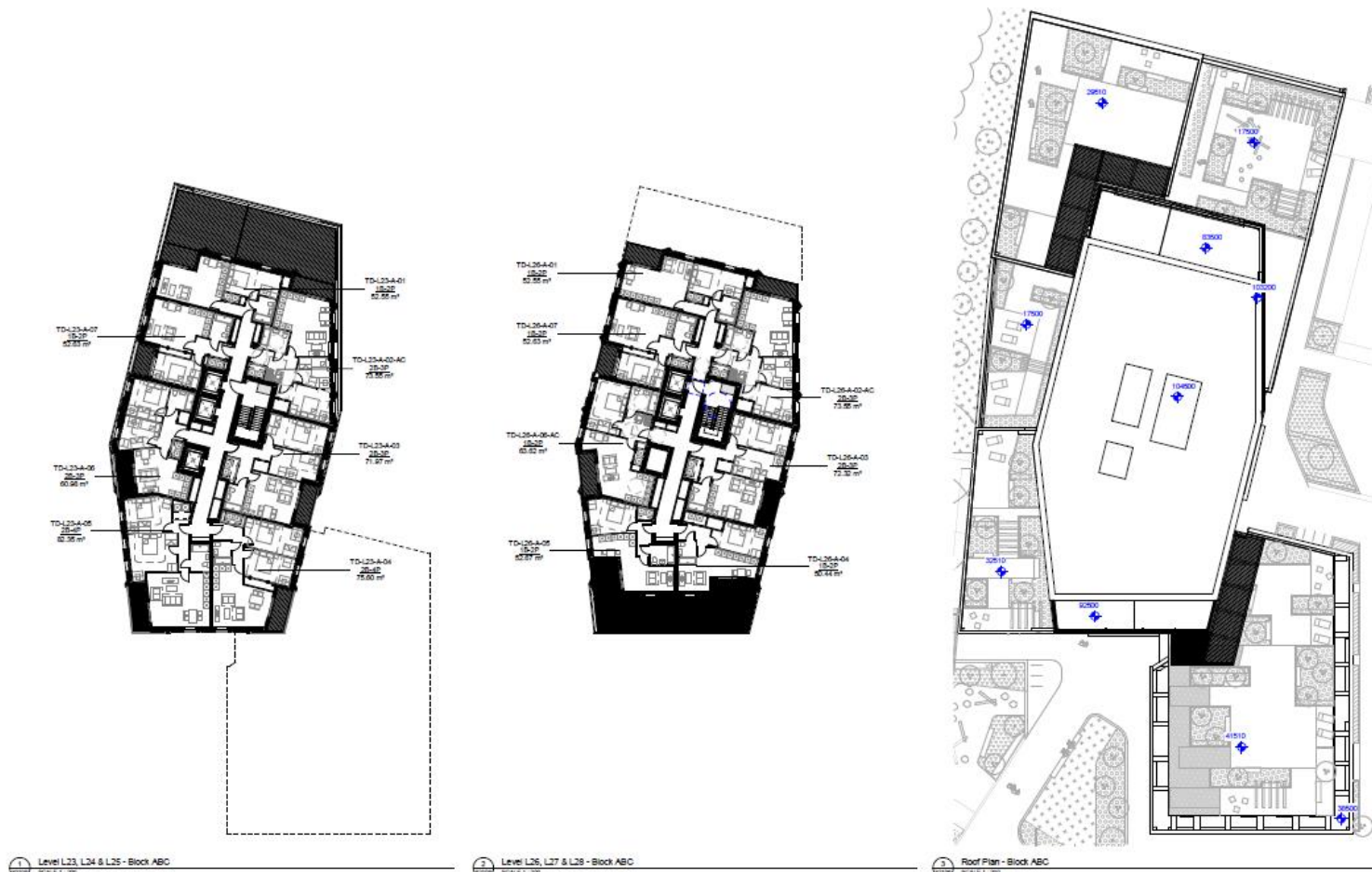
**PROJECT**  
 The Goods Yard and The Depot, High Road West  
 The Goods Yard: 38 & 44-52 White Hart Lane.  
 The Depot: 867-879 High Road.

**BLOCK ABC PROPOSED GA L08-L09, L11+ FLOOR PLANS**

Drawn by	MR	Scale	1:200	Sheet	A1	Project No.	190712
Issue	A2 - ISSUED FOR PLANNING			Revision	A2.P2	Drawing No.	

DEPOT-F3-ZABC-08+GA-A-82104

### Depot Block ABC (Levels L08 – L09)



**KEY PLAN**

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NO.	REVISION	DATE	BY	CHKD.

**ARCHITECTURE + INTERIOR**  
 A. 6 Northstar House - London - 1997-2000  
 B. 100 White Hart Lane - London - 2001-2003  
 C. 100 White Hart Lane - London - 2004-2006

Noted for Planning purposes, figured dimensions only are to be taken from this drawing.  
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**PROJECT**  
 The Goods Yard and The Depot, High Road West  
 The Goods Yard: 38 & 44-52 White Hart Lane.  
 The Depot: 867-879 High Road.

**BLOCK ABC PROPOSED GA L23-ROOF PLAN**

Drawn by	MR	Scale	1:200	Sheet	A1	Project No.	190712
Issue	A2 - ISSUED FOR PLANNING			Revision	A2.P2	Drawing No.	

DEPOT-F3-ZABC-23+GA-A-82106

## Depot Block ABC (Materials Elevation Study)

**MATERIAL DESCRIPTION:**

1. FACADE FINISH - RAIN SCREEN CLADDING  
Single fired ceramic tile system (grey shades)
2. FACADE FINISH - RAIN SCREEN CLADDING  
Single fired ceramic tile system (terracotta shades)
3. FACADE FINISH - BRICK WORK  
Brick type 1: Block ABC (buff shades)
4. FACADE FINISH - BRICK WORK  
Brick type 2: Block ABC (grey shades)
5. FACADE FINISH - PERFORATED PANEL  
Dark bronze coloured perforated metal screen to acoustic ventilation panel
6. BALUSTRADES  
Half-wall balcony treatment (terracotta shades)
7. BALUSTRADES  
Dark bronze coloured vertical metal railings
8. WINDOW FINISH  
Proprietary black PPC aluminium glazing system
9. DOOR FINISH  
Proprietary black PPC aluminium glazing system
10. DOOR FINISH  
Proprietary bronze PPC aluminium system, solid door to ancillary rooms
11. GLAZED SCREEN  
Glazed screen for wind mitigation
12. SLAB EDGE TREATMENT  
Type 1 - Chamfered light grey cast rain screen cladding (light grey shades)
13. SLAB EDGE TREATMENT  
Type 2 - Stepped and recessed to storeys between Type 1 (bronze cladding)
14. SLAB EDGE TREATMENT  
Type 3 - Chamfered profile (terracotta shades)
15. SLAB EDGE TREATMENT  
Type 4 - Stepped and projecting to storeys between Type 3 (terracotta shades)
16. SCALLOPED PARAPET  
Metal window head
17. METAL WINDOW HEAD  
Bronze coloured inset metal window head detail
18. BRICK WINDOW HEAD  
Inset brick lintel detail
19. BRICK CHAMFER  
Chamfered brick detail
20. INSET BRICK PANEL  
Inset brick lintel detail
21. FRAMED PARAPET DETAIL  
Glazed panel for wind mitigation
22. BRICK PIER  
Chamfered brick detail
23. GLAZED BALUSTRADE  
Glazed panel for wind mitigation
24. BALCONY GLAZED PANEL  
Glazed panel for wind mitigation
25. DOOR FINISH  
Natural finish timber door

**PRECEDENT IMAGES**

223 Kingsland Rd, Hoxley Hoxton  
200 St. Pauls, Birmingham  
22 John St, Hoxton, London

**MATERIAL PALETTE**

- Natural terracotta facade design: Combined texture detail
- Natural terracotta facade design: Dark colour tone finish
- Bronze metal frame to acoustic ventilation panel
- Brick type 1 - grey shades
- Half-wall balustrade detail
- Painted metal balustrades
- Proprietary black PPC aluminium glazing system

**KEY PLAN**

**NOTES:**

1. Where no numbered tag in drawing, material description not applicable.

2. Where no numbered tag in drawing, material description not applicable.

**MATERIALS TO BE USED IN CONSTRUCTION:**

DEPOT-F3-ZABC-ZZ-EL-A-82508
DEPOT-F3-ZABC-ZZ-DR-A-82516
DEPOT-F3-ZABC-ZZ-DR-A-82517
DEPOT-F3-ZABC-ZZ-DR-A-82518
DEPOT-F3-ZABC-ZZ-DR-A-82519
DEPOT-F3-ZABC-ZZ-DR-A-82520
DEPOT-F3-ZABC-ZZ-DR-A-82521
DEPOT-F3-ZABC-ZZ-DR-A-82522
DEPOT-F3-ZABC-ZZ-DR-A-82523
DEPOT-F3-ZABC-ZZ-DR-A-82524
DEPOT-F3-ZABC-ZZ-DR-A-82525

**ARCHITECTURE + INTERIORS**

100 The Goods Yard, London - E1 6BB  
100 The Goods Yard, London - E1 6BB  
100 The Goods Yard, London - E1 6BB

**Block ABC Proposed GA Materials Elevation Study**

drawn by: MR 1:200 A1 190712  
date: 19/07/22  
version: A2 - ISSUED FOR PLANNING A2.P3  
drawing no: DEPOT-F3-ZABC-ZZ-EL-A-82508

## Depot Block ABC (Materials Elevation Study)

**MATERIAL DESCRIPTION:**

1. FACADE FINISH - RAIN SCREEN CLADDING  
Single fired ceramic tile system (terracotta shades)
2. FACADE FINISH - RIBBED PANEL  
Single fired ceramic tile system (terracotta shades)
3. FACADE FINISH - WALL CLADDING  
Bronze coloured metal vertical panel
4. FACADE FINISH - RAIN SCREEN CLADDING  
Single fired ceramic tile system (grey shades)
5. FACADE FINISH - ACOUSTIC PANEL  
Dark bronze coloured perforated metal screen to acoustic ventilation panel
6. FACADE FINISH - BRICK WORK  
Brick type 1: Block ABC (grey shades)
7. FACADE FINISH - BRICK WORK  
Brick type 1: Block ABC (buff shades)
8. FACADE FINISH - UPSTAND  
Single fired ceramic tile system (terracotta shades)
9. FACADE FINISH - UPSTAND  
Bronze coloured metal sheet
10. BALUSTRADES  
Dark bronze coloured vertical metal railings
11. WINDOW FINISH  
Proprietary black coloured PPC aluminium glazing system
12. DOOR FINISH  
Proprietary black coloured PPC aluminium glazing system
13. GLAZED SCREEN  
Glazed screen for wind mitigation
14. SLAB EDGE TREATMENT  
Type 1 - Chamfered light grey cast rain screen cladding (light grey shades)
15. SLAB EDGE TREATMENT  
Type 2 - Stepped and recessed to storeys between Type 1 (bronze cladding)
16. SLAB EDGE TREATMENT  
Type 3 - Chamfered profile (terracotta shades)
17. SLAB EDGE TREATMENT  
Type 4 - Stepped and projecting to storeys between Type 3 (terracotta shades)
18. RIBBED PARAPET  
Metal window head
19. METAL WINDOW HEAD  
Bronze coloured inset metal window head detail
20. BRICK WINDOW HEAD  
Inset brick lintel detail
21. PROJECTING GLAZED CANOPY
22. INSET BRICK PANEL  
Grey tiles to terrace
23. TILED FLOOR  
Grey tiles to terrace
24. BRICK PIER  
Inset brick lintel detail
25. BALCONY GLAZED PANEL  
Glazed panel for wind mitigation
26. FRAMED PARAPET DETAIL  
Glazed panel for wind mitigation

**KEY PLAN**

**NOTES:**

1. Where no numbered tag in drawing, material description not applicable.

2. Where no numbered tag in drawing, material description not applicable.

**MATERIALS TO BE USED IN CONSTRUCTION:**

DEPOT-F3-ZABC-ZZ-EL-A-82508
DEPOT-F3-ZABC-ZZ-DR-A-82516
DEPOT-F3-ZABC-ZZ-DR-A-82517
DEPOT-F3-ZABC-ZZ-DR-A-82518
DEPOT-F3-ZABC-ZZ-DR-A-82519
DEPOT-F3-ZABC-ZZ-DR-A-82520
DEPOT-F3-ZABC-ZZ-DR-A-82521
DEPOT-F3-ZABC-ZZ-DR-A-82522
DEPOT-F3-ZABC-ZZ-DR-A-82523
DEPOT-F3-ZABC-ZZ-DR-A-82524
DEPOT-F3-ZABC-ZZ-DR-A-82525

**ARCHITECTURE + INTERIORS**

100 The Goods Yard, London - E1 6BB  
100 The Goods Yard, London - E1 6BB  
100 The Goods Yard, London - E1 6BB

**Block ABC Proposed Elevation Detail - East Articulation**

drawn by: MR 1:50 A1 190712  
date: 19/07/22  
version: A2.P2  
drawing no: DEPOT-F3-ZABC-ZZ-DR-A-82516

**1 BLOCK ABC - EAST ARTICULATION - SECTION 1**  
SCALE 1:50

**2 BLOCK ABC - EAST ARTICULATION - SECTION 2**  
SCALE 1:50

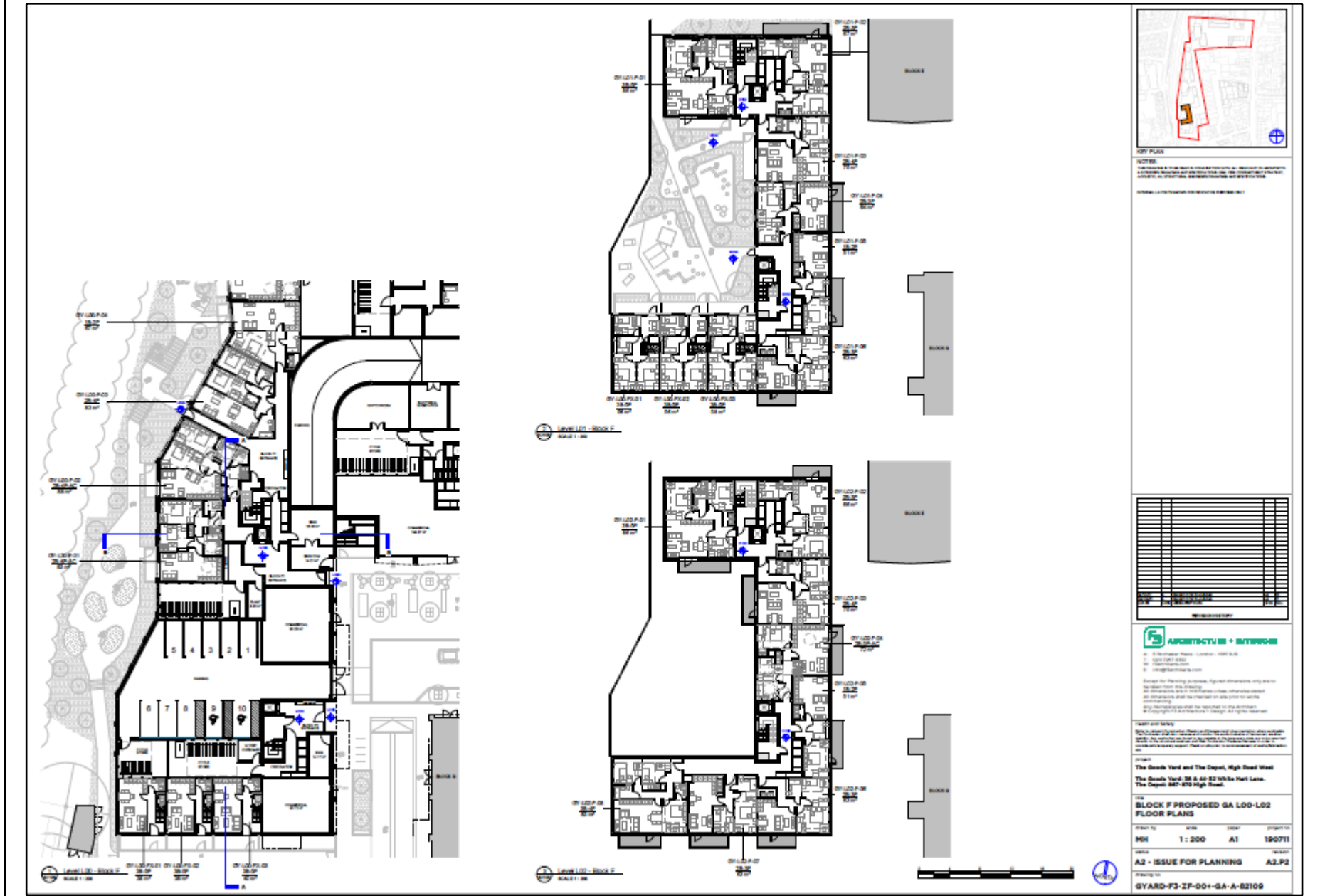
**3 BLOCK ABC - EAST ARTICULATION - ELEVATION**  
SCALE 1:50

**4 BLOCK ABC - EAST ARTICULATION - BAY STUDY**  
SCALE 1:50

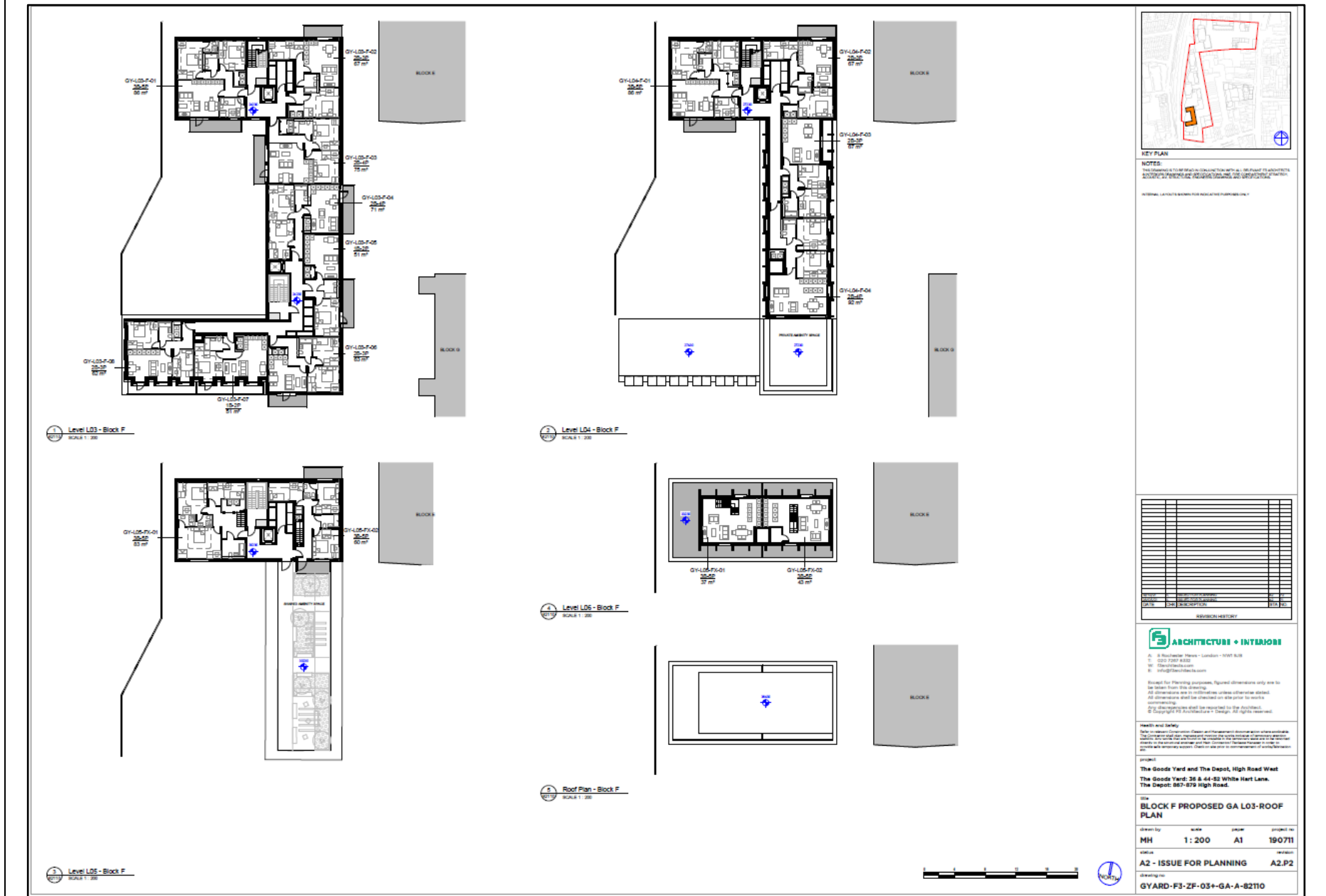




### Goods Yard Block F (Levels L00, L01 + L02)



### Goods Yard Block F (Levels L03 to L06 + Roof Plan)





## Goods Yard Block F (Materials Elevation Study)

**1 BLOCK F - PROPOSED EAST ELEVATION**  
SCALE 1:100

**2 BLOCK F - PROPOSED SOUTH ELEVATION**  
SCALE 1:100

**MATERIAL PALETTE**

- Brick type 1 - red shades
- Brick type 2 - buff shades
- Brick type 3 - grey shades
- Cladding - Bronze coloured
- Acoustic ventilation panel
- Painted metal balustrades
- Critical glazing system

**MATERIAL DESCRIPTION:**

- 1. FACADE FINISH - BRICK WORK**  
Brick type 1 - Block F (red shades)
- 2. FACADE FINISH - BRICK WORK**  
Brick type 2 - Block F (buff shades)
- 3. FACADE FINISH - ARTIFICIAL STONE BAND**  
Grey coloured metal panel
- 4. FACADE FINISH - CLADDING**  
Grey coloured metal panel
- 5. FACADE FINISH - ACOUSTIC PANEL**  
Dark bronze coloured reeded metal screen to acoustic ventilation panel
- 6. BALUSTRADES**  
Dark bronze coloured vertical metal railings
- 7. WINDOW FINISH**  
Proprietary black PPC aluminium glazing system
- 8. DOOR FINISH - SHOP FRONT**  
Proprietary bronze coloured PPC aluminium glazing system
- 9. DOOR FINISH**  
Proprietary black PPC aluminium glazing system
- 10. DOOR FINISH**  
Proprietary bronze coloured PPC aluminium systems add door to ancillary rooms
- 11. DOOR FINISH - DUPLEX**  
Natural finish timber door
- 12. GATE - PARKING**  
Metal gate to access parking
- 13. TERRACE FINISH - GREEN ROOF**  
Intensive green roof
- 14. METAL CLAD COLUMN**  
Bronze coloured painted metal column
- 15. METAL CLAD FASCIA**  
Bronze coloured metal clad slab edge detail
- 16. BRICK PIER**  
Brick type 3 - Block F (grey shades)
- 17. BRICK INSET PANEL**  
Brick type 3 - Block F (grey shades)
- 18. BRICK INSET PANEL**  
Brick type 2 - Block F (buff shades)
- 19. BRICK PARAPET**  
Brick type 3 - Block F (grey shades)
- 20. FACADE FINISH - CLADDING**  
Bronze coloured metal panel
- 21. RECESSED PANEL**  
Self coloured render

**PRECEDENT IMAGES**

32 JOHN HILL, Hawkins Brown Architects, Clapham, London

Stowater, Haverth Tompkins Architects, Walm London

**KEY PLAN**

**NOTES:**

THIS DOCUMENT IS FOR INFORMATION ONLY AND IS NOT TO BE USED FOR CONSTRUCTION. IT IS SUBJECT TO APPROVAL BY THE LOCAL AUTHORITY AND IS NOT TO BE USED FOR CONSTRUCTION WITHOUT THE APPROVAL OF THE LOCAL AUTHORITY.

ALL MATERIALS AND FINISHES TO BE USED SHALL BE APPROVED BY THE ARCHITECT.

**TO BE READ IN CONJUNCTION WITH:**

- GVYARD-F3-ZF-Z2-EL-A-B2515
- GVYARD-F3-ZF-Z2-EL-A-B2515

\*While no coloured tag is showing, material description not applicable

**ARCHITECTURE + INTERIORS**

2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100

**Project:** The Goods Yard and The Depot, High Road West  
The Goods Yard: 36 & 44-52 White Hart Lane, The Depot: 867-879 High Road.

**Block F Proposed GA Materials Elevation Study**

drawn by: AH scale: 1:100 project no: A1 190711

check: A2 - ISSUE FOR PLANNING A2.PS

drawing no: GYARD-F3-ZF-Z2-EL-A-B2515

## Looking west - White Hart Lane to south (left) & River Apartments to north (right)



Looking north up High Road (near Whitehall Street) (View 4)



Looking north up High Road (next to Percy House) (View 5)



Looking west (along Northumberland Park) (View 6)



Looking from eastern side of High Road (near Stellar House) (View 10)



Northern pavement of Brantwood Road (View 12)



Western pavement of Love Lane (outside WHL Station) looking north (View 24)



**William Street, by WHL looking north (View 25)**



**Durban Road looking east (View 27)**



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## Appendix 2: Internal and External Consultee Representations

Stakeholder	Comment	Response									
<b>INTERNAL</b>											
Building Control	Having reviewed the attached fire statement from Buro Happold, I can confirm that it meets the requirements of London Plan D5 and D12 and is suitable for your requirements.										
Carbon Management	<p><b>Summary</b> The development achieves a reduction of 78% carbon dioxide emissions on site, which is supported. A range of important clarifications and amendments must be provided with regard to the Energy Strategy, Overheating, Sustainability Strategy and Circular Economy Statement. Appropriate planning conditions will be recommended once this information has been provided.</p> <p><b>Existing and Proposed Areas/Uses</b> The table below sets out the existing and proposed areas for reference.</p> <table border="1" data-bbox="412 651 1612 960"> <thead> <tr> <th></th> <th>Existing</th> <th>Proposed</th> </tr> </thead> <tbody> <tr> <td>The Goods Yard</td> <td>1,012 m<sup>2</sup> GIA Carberry Enterprise Park 175 m<sup>2</sup> GIA Station Master's House (to be retained)</td> <td>500 dwellings 1,391 m<sup>2</sup> GIA commercial 7,094 m<sup>2</sup> GIA ancillary and parking</td> </tr> <tr> <td>The Depot</td> <td>4,557 m<sup>2</sup> GIA B&amp;M 284 m<sup>2</sup> GIA retail terrace 673 m<sup>2</sup> GIA 867/869 High Road (to be retained)</td> <td>367 dwellings 401 m<sup>2</sup> GIA commercial 3,618 m<sup>2</sup> GIA ancillary and parking</td> </tr> </tbody> </table> <p><b>Environmental Statement</b> This is an EIA development. Climate change has been scoped out for the purpose of this application.</p> <p><u>Action:</u> - Please provide justification why this has been scoped out.</p> <p><b>Energy – Overall</b> Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L (2013)). The London Plan (2021) further confirms this in Policy SI2.</p> <p>The overall predicted reduction in CO<sub>2</sub> emissions for the development shows a site-wide improvement of approximately 78% in carbon emissions with SAP10 carbon factors (79% domestic, 54% non-domestic), from the Baseline development model (which is Part L 2013 compliant). This represents an annual saving of approximately 653.9 tonnes of CO<sub>2</sub> from a baseline of 838.2 tCO<sub>2</sub>/year.</p>		Existing	Proposed	The Goods Yard	1,012 m <sup>2</sup> GIA Carberry Enterprise Park 175 m <sup>2</sup> GIA Station Master's House (to be retained)	500 dwellings 1,391 m <sup>2</sup> GIA commercial 7,094 m <sup>2</sup> GIA ancillary and parking	The Depot	4,557 m <sup>2</sup> GIA B&M 284 m <sup>2</sup> GIA retail terrace 673 m <sup>2</sup> GIA 867/869 High Road (to be retained)	367 dwellings 401 m <sup>2</sup> GIA commercial 3,618 m <sup>2</sup> GIA ancillary and parking	
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	The scheme shows a 2.9-12.4% improvement in the fabric energy efficiency (FEE) for the Goods Yard and 2.5-10.9% improvement for The Depot.																																																

Stakeholder	Comment	Response
	<p>The space heating requirement is 31.4 to 44.5 kWh/m<sup>2</sup>/year. New dwellings should be closer to the 15-20 kWh/m<sup>2</sup>/year target instead.</p> <p><u>Actions:</u> <i>New Build</i></p> <ul style="list-style-type: none"> <li>- Increase the reduction in carbon emissions to 10% for residential and 15% for the non-residential, based on SAP2012 carbon factors.</li> <li>- Confirm the gross efficiency figure of the communal gas boilers.</li> <li>- Confirm that sub-metering will be installed for all non-residential units.</li> <li>- Should consider daylight control and occupancy sensors for communal residential areas.</li> <li>- What is the proportion of glazed area for resi/non-resi?</li> <li>- Confirm the construction of building and the assumed thermal mass.</li> <li>- What has been considered to address the demand side response to reducing energy: smart grids, smart meters, battery storage?</li> <li>- Which windows are proposed with triple glazing, and why?</li> </ul> <p><i>Refurbishment of listed buildings</i></p> <ul style="list-style-type: none"> <li>- Estimate of existing performance of both buildings in unrefurbished condition and outline the source of these assumptions, such as a building condition survey, Energy Performance Certificate (EPC) conventions, industry benchmarks etc.</li> <li>- What will the listed buildings be used for?</li> <li>- Detail what measures will be undertaken to make the retained listed buildings more energy efficient (what type of insulation, how the building will be made more airtight, etc)? And what options have been discounted, for what reasons?</li> </ul> <p>Overheating is dealt with in more detail below.</p> <p><b>Energy – Clean</b> The applicant proposes to connect to the Decentralised Energy Network to supply the development's peak demand, to be built to North Tottenham from the Energy from Waste facility in Edmonton. The model assumes a carbon factor of 0.015 kgCO<sub>2</sub>e/kWh. This would result in a reduction in emissions by 556.7 tCO<sub>2</sub> (66%).</p> <p>Detailed comments will be provided by LBH's Energy Infrastructure Manager.</p> <p><b>Energy – Green</b> 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>	

Stakeholder	Comment	Response															
	<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 37.1 tCO<sub>2</sub> reduction of emissions are proposed under Be Green measures.</p> <p>The solar array peak output would be 168 kWp on Goods Yard with 420 panels of 400W on a roof area of 744 m<sup>2</sup>. The solar yield at The Depot is proposed at 45 kWp at The Depot, with 113 panels of 400W on a roof area of 200 m<sup>2</sup>. The efficiency of the proposed panels is assumed at 22.6%.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> <li>- What is the orientation of the panels, angle and their modelled renewable electricity output?</li> <li>- 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.</li> <li>- Section 5 very briefly mentions that emissions include savings from ‘the high reversible heat pump systems using the SAP10 carbon factors’. Please elaborate on this – are these heat pumps proposed for the non-residential spaces, what type of heat pumps? Where would the heat pumps will be located and how the units will be mitigated in terms of visual and noise impacts and impacts from exhausts? Please demonstrate this on plans. What would the Seasonal Coefficient of Performance (SCOP), the Seasonal Performance Factor (SFP) and Seasonal Energy Efficiency ratio (SEER) be of the heat pumps?</li> <li>- Only 4% savings are reported in the Exec Summary under Be Green, but savings of 79% (resi) and 54% (non-resi) are reported under Be Green in Table 5-13. Please clarify that these savings are for the Be Green section only.</li> </ul> <p><b>Carbon Offset Contribution</b></p> <p>A carbon shortfall of 184.3 tCO<sub>2</sub>/year remains. The remaining carbon emissions will need to be offset at £95/tCO<sub>2</sub> over 30 years. A deferred carbon offset contribution mechanism will apply to this scheme as it is expected to connect to the DEN when this has been built.</p> <p>The applicant should present two carbon reduction scenarios, using the template below:</p> <ul style="list-style-type: none"> <li>• Scenario 1: Carbon Offsetting scenario (residual tCO<sub>2</sub> over 30 years; connection to DEN)</li> <li>• Scenario 2: Base Carbon Offsetting scenario (residual tCO<sub>2</sub> over 30 years; communal gas boilers)</li> </ul> <table border="1" data-bbox="412 1289 1617 1477"> <thead> <tr> <th colspan="2" data-bbox="412 1289 631 1417"></th> <th data-bbox="631 1289 1088 1417">Base Carbon Offsetting Contribution (Communal gas boiler scenario; tCO<sub>2</sub>)</th> <th colspan="2" data-bbox="1088 1289 1617 1417">Carbon Offsetting Contribution (Connecting to DEN scenario; tCO<sub>2</sub>)</th> </tr> <tr> <th data-bbox="412 1417 631 1477"></th> <th data-bbox="631 1417 826 1477">Residential</th> <th data-bbox="826 1417 1088 1477">Non-residential</th> <th data-bbox="1088 1417 1317 1477">Residential</th> <th data-bbox="1317 1417 1617 1477">Non-residential</th> </tr> </thead> <tbody> <tr> <td data-bbox="412 1417 631 1477"></td> <td data-bbox="631 1417 826 1477"></td> <td data-bbox="826 1417 1088 1477"></td> <td data-bbox="1088 1417 1317 1477"></td> <td data-bbox="1317 1417 1617 1477"></td> </tr> </tbody> </table>			Base Carbon Offsetting Contribution (Communal gas boiler scenario; tCO <sub>2</sub> )	Carbon Offsetting Contribution (Connecting to DEN scenario; tCO <sub>2</sub> )			Residential	Non-residential	Residential	Non-residential						
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	Residential	Non-residential	Residential	Non-residential													

Stakeholder	Comment					Response	
	Baseline						
	Total cumulative savings per annum (tCO <sub>2</sub> , %)	( %)	( %)	( %)	( %)		
	Shortfall to offset	X1	Y1	X2	Y2		
	Carbon offset payment due for scenario	$(X1+Y1) \times 30 \times \text{£}95 = \text{£A}$		$(X2+Y2) \times 30 \times \text{£}95 = \text{£B}$			
	<b>Carbon Offsetting Contribution</b> payment due at <u>commencement of development</u>	<b>£B</b>					
	<b>Deferred Carbon Offsetting Contribution</b> (+indexation) payment due <u>if not connecting to the DEN</u>	<b>£A - £B = £C</b>					
<p>Payment due at commencement of development: Carbon Offsetting Contribution (DEN connection, Scenario 1.</p>							
<p>A deferred carbon offset contribution is calculated through the difference in the offset contribution:</p> <ol style="list-style-type: none"> <li>1. If, after 10 years the development has <u>not</u> connected to the DEN, the deferred payment (+indexation) is due (Scenario 2 – Scenario 1 = Deferred Payment)</li> <li>2. If, after 10 years the development has connected to the DEN, the deferred payment would not be due but this amount would be available as a connection charge to the DEN.</li> </ol>							
<p><b>Energy - Seen</b> The applicant is proposing a metering strategy, including the installation of energy meters for all residential dwellings (water, electricity, heat) and per building.</p>							
<p><b>Overheating</b> 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</p>							

Stakeholder	Comment			Response															
	<p>design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.</p> <p>In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 weather files, and the cooling hierarchy has been followed in the design. Results are listed in the table below.</p>																		
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	<p>Almost all rooms pass the overheating requirements for 2020s DSY1, except for Block ABC in the Depot. In order to pass this, the following measures will be delivered built based on:</p> <ul style="list-style-type: none"> <li>- Natural ventilation from 22°C, with 100% (bedroom) and 30% (LKD) of openable area at night</li> <li>- Acoustic louvres for noise attenuated ventilation (30% free area)</li> <li>- Ceiling fans</li> <li>- Glazing g-values of 0.35 and 0.30,</li> <li>- Vertical side fins (not clear where)</li> <li>- MVHR with summer bypass</li> </ul> <p>Only ceiling fans have been modelled to mitigate more extreme weather files. This demonstrates full compliance under 2020s DSY2 and DSY3.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> <li>- Redo the overheating modelling with the Central London weather file, which will more accurately represent the urban heat island effect.</li> <li>- The applicant has not modelled the 2050s and 2080s weather files. Please also model these and ensure the future retrofit plan includes measures that can feasibly be implemented in the future to mitigate overheating.</li> </ul>												

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> <li>- Include top-floor flats as these are particularly prone to overheating.</li> <li>- Model the non-residential spaces, particularly where they will be occupied for a longer period of time. Assuming that active cooling will be provided is not sufficient. If the proposed uses are not yet clear, this aspect can be conditioned to ensure that the modelling is based on the potential future occupiers.</li> <li>- Model additional corridors, and set out what the pipework heat loss assumptions are. This should be limited to circa 50W/dwelling (additional requirements can be sent separately as part of the DEN design spec).</li> <li>- Set out what passive measures have been used to reduce cooling demand, and confirm the energy demand and efficiency for the proposed active cooling required in the non-residential spaces: <ul style="list-style-type: none"> <li>o Energy demand (space cooling, not energy used) area-weighted average demand in MJ/m<sup>2</sup> and total MJ/year</li> <li>o Efficiency of equipment, renewable/free cooling sources</li> </ul> </li> <li>- The attached floorplans in Appendix D are not clear; add a key for the colours used and show which dwellings have been modelled.</li> <li>- How will the mitigation measures required to pass the overheating tests be implemented across the entire development (beyond the sample dwellings)?</li> <li>- Set out what kind of external shading has been proposed, for which orientations and windows? Please provide more detailed spec on plan and in section.</li> <li>- The report assumes 'high ceilings', but the floor to ceiling heights have only been reported at 2.5m. This is the minimum height required in London, so it is recommended that higher floor to ceiling heights are used to increase ventilation and stratification of hot air.</li> <li>- Set out the proposed internal finishes (in relation to thermal mass).</li> <li>- Clarify whether all dwellings are dual aspect. The image (Figure 6-1) shows cross-ventilation between what looks like an inset balcony and a front door. Is that what has been assumed? If so, it should assume that a front door will be closed at all times.</li> <li>- Confirm who will own the overheating risk (this should not be the individual residents).</li> <li>- Identify communal spaces (indoor and outdoor) where residents can cool down if their flats are overheating.</li> </ul> <p><b>Overall Sustainability</b> 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 CO<sub>2</sub> emissions and landscape design.</p> <p><b>Domestic/site-wide</b> <u>Actions:</u> Please clarify:</p>	

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> <li>- How have the open spaces within the red line been planned to be suitable for different types of typical weather for people to enjoy and use the open spaces and how the open spaces will be more resilient in extreme weather (benches in sunny spots in colder months, shading for hot weather, resilience against drought/persistent lack of rainfall, localised flooding, shelter from winds, etc.)? Please annotate this on a plan how the landscaping has been designed appropriately.</li> <li>- How will the development contribute to the wider EV network?</li> <li>- How water demand will be reduced for the maintenance of open/green spaces? Rainwater should be harvested for the use of people maintaining soft landscaping.</li> <li>- Will any food growing opportunities be introduced for residents/the wider community? Please consider, and also ensure that this is facilitated by appropriate water points, composting opportunities, etc.</li> <li>- Will the development achieve a biodiversity net gain? And what is the urban greening factor?</li> </ul> <p><b>Non-Domestic BREEAM Requirement</b> Policy SP4 requires all new non-residential developments to achieve a BREEAM rating 'Very Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable.</p> <p>The applicant has prepared a BREEAM Pre-Assessment as part of the Sustainability and Energy Strategy for the 'Shell and Core' for the proposed non-domestic spaces. Based on this pre-assessment, a score of 55.6 % is expected to be achieved for the retail units, equivalent to 'Very Good' rating. A potential score of 70.8% could be achieved (Excellent rating). The tracker was included in the appendices and the graph provided a helpful overview of the targeted/achievable/unachievable credits per category.</p> <p>The current targeted score is just scraping the 'Very Good' requirement and the applicant is strongly encouraged to target more credits to be certain of the minimum accreditation and also to improve the sustainability of the non-domestic spaces.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> <li>- Clarify what uses will be proposed at the site, and whether only a 'Retail' use assessment has been undertaken? Is it likely that this use will change following permission?</li> <li>- Seek to achieve Mat02, this is an important part in achieving low-carbon and environmentally friendly designs.</li> <li>- Seek to achieve Wst 05 adaptation to climate change, this will improve the resilience for occupiers.</li> <li>- Seek to achieve Wst 06 as this forms an important part in the circular economy principles and commitments as set out in the Circular Economy Statement.</li> </ul> <p><b>Whole Life Carbon</b></p>	



Stakeholder	Comment	Response												
	<p>Policy SI2 requires developments referable to the Mayor of London to submit a Circular Economy Statement and demonstrate actions undertaken to reduce life-cycle emissions. The applicant's whole-life carbon assessment has been included within the Sustainability and Energy Statement.</p> <p>The total calculated emissions based on the GIA is estimated at:</p> <table border="1" data-bbox="412 339 1610 584"> <thead> <tr> <th></th> <th>Estimated whole-life carbon emissions</th> <th>Meets benchmark?</th> </tr> </thead> <tbody> <tr> <td><b>Modules A1-A5</b></td> <td>557 kgCO<sub>2</sub>e/m<sup>2</sup></td> <td>Between aspirational and standard (GLA)</td> </tr> <tr> <td><b>Modules B-C (excl. B6 and B7)</b></td> <td>304 kgCO<sub>2</sub>e/m<sup>2</sup></td> <td>At standard (GLA)</td> </tr> <tr> <td><b>Module D</b></td> <td>-174 kgCO<sub>2</sub>e/m<sup>2</sup></td> <td>N/A</td> </tr> </tbody> </table> <p>The highest embodied carbon in Modules A1-A5 is attributed to the superstructure (63%) and substructure (25%). In Modules B-C (excl B6 &amp; B7) 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.</p> <p><b>Circular Economy</b>  Policy SI7 requires applications referable to the Mayor of London to submit a Circular Economy Statement demonstrating how it promotes a circular economy within the design and aim to be net zero waste. Haringey Policy SP6 requires developments to seek to minimise waste creation and increase recycling rates, address waste as a resource and requires major applications to submit Site Waste Management Plans. The applicant has submitted a Detailed Circular Economy Statement.</p> <p>The principles used for this development are:</p> <ul style="list-style-type: none"> <li>- Designing for longevity, circa 50 years of building life, and disassembly at end of life</li> <li>- Designing for flexibility and adaptability of open spaces and commercial spaces</li> <li>- Retaining and refurbishing Grade II listed buildings</li> <li>- Demolishing and recycling industrial/retail units</li> <li>- Minimise operational waste and provide adequate space for recycling</li> </ul> <p>The report sets out the Key Commitments (Table 4-1), Bill of materials (Table 4-2) and Recycling and waste reporting form (Table 4-3) for the Goods Yard and The Depot. This is a fairly high level of information, and the applicant expects this to become more detailed as the detailed design progresses following permission.</p> <p><u>Comments and actions:</u></p>		Estimated whole-life carbon emissions	Meets benchmark?	<b>Modules A1-A5</b>	557 kgCO <sub>2</sub> e/m <sup>2</sup>	Between aspirational and standard (GLA)	<b>Modules B-C (excl. B6 and B7)</b>	304 kgCO <sub>2</sub> e/m <sup>2</sup>	At standard (GLA)	<b>Module D</b>	-174 kgCO <sub>2</sub> e/m <sup>2</sup>	N/A	
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	<ul style="list-style-type: none"> <li>- Clarify whether the internal floor to ceiling heights have also been reduced based on the floor-to-floor heights reducing? Please weigh this up against the benefit of higher floor to ceiling heights for ventilation purposes and mitigation against overheating.</li> <li>- Provide more detail in relation to the testing done to optimise fenestration size in relation to daylighting, overheating, overlooking and resource efficiency</li> <li>- What solutions have been sought to reduce energy/water use and emissions to produce the proposed concrete structures (including the cement)?</li> <li>- Which buildings may benefit from a CLT structure and what feasibility work has been undertaken? Please indicate this within a plan.</li> <li>- What analysis has been undertaken to choose the right insulation and other construction materials in relation to the energy intensity, water use (and other environmental impacts)?</li> <li>- Do the roofs include a minimum settled substrate depth of 120mm (with varied depths) for extensive living roofs and 250mm minimum for intensive living roofs?</li> <li>- What operational water saving measures will be included in the proposal for the site and operation of individual buildings?</li> <li>- What level of recycled content in building materials is expected to be achieved or is targeted? The use of (almost) fully recycled steel should be prioritised and recycled bricks should also be considered.</li> <li>- Can any existing sub-structure be utilised on the site? What analysis has been undertaken to support that?</li> <li>- The applicant should utilise sources like the Green Guide to Specification (materials of A or better) or Environmental Product Declarations to inform sustainable material choices.</li> <li>- Please include the pre-demolition audit and set out which materials are viable for retention, disassembly and reuse, repurposing (without downgrading!) or recycling.</li> <li>- Materials used for temporary works should fully disassemble and be designed to be reused (without damage).</li> <li>- 'The building footprints have been considered to limit the impact on the site given the number of new homes being provided.' This doesn't make much sense or have much meaning. Please clarify.</li> <li>- What techniques will be incorporated into the design to ensure some materials can be replaced at the end of their life without affecting the surrounding materials (e.g. façade and interiors)?</li> <li>- What has been done to balance the need for transfer slabs and columns with regard to designing for flexible ground floor spaces (and elsewhere, where relevant)?</li> <li>- How long will the building lifespan of the existing buildings be extended by? And what will their enhanced expected lifespan be? What will be done to extend their lifespan, including how the buildings will mitigate the impacts of climate change and adapt to the impacts of climate change?</li> <li>- The emphasis on construction waste seems to be on demolition rather than disassembly</li> </ul>	

Stakeholder	Comment	Response
	<p><b>Living Roofs</b>  All development sites must incorporate urban greening within their fundamental design, in line with London Plan Policy G5. The development is proposing living roofs in the development.</p> <p>All landscaping proposals and living roofs should stimulate a variety of planting species. Mat-based, sedum systems are discouraged as they retain less rainfall and deliver limited biodiversity advantages. The growing medium for extensive roofs must be 120-150mm deep, and at least 250mm deep for intensive roofs (these are often roof-level amenity spaces) to ensure most plant species can establish and thrive and can withstand periods of drought. Living walls should be rooted in the ground with sufficient substrate depth.</p> <p>Living roofs 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><b>Conclusion</b>  Overall, it is considered that the application <b>could be supported</b> in principle from a carbon management and sustainability point of view, subject to resolving the queries and concerns listed above.</p> <p><b>Planning Conditions</b>  To be secured (with detailed wording TBC):</p> <ul style="list-style-type: none"> <li>- Energy strategy</li> <li>- Overheating</li> <li>- BREEAM Certificate</li> <li>- Living roof(s)</li> <li>- Circular Economy</li> <li>- Whole-Life Carbon</li> <li>- Biodiversity</li> </ul> <p><b>Planning Obligations</b></p> <ul style="list-style-type: none"> <li>- Be Seen commitment to uploading energy data</li> <li>- Carbon offset contribution (and associated obligations) of £TBC (indicative), plus a 10% management fee</li> <li>- Connect to the DEN within 10 years of the permission</li> </ul> <p><b>Carbon Management Response 09/09/2021</b></p> <p><b>Overview</b></p>	

Stakeholder	Comment	Response
	<p>The applicant issued a response to the above comments by the Climate Change Officer on 1<sup>st</sup> September 2021. A meeting was subsequently had between the applicant and LBH on 1<sup>st</sup> September 2021. Our response to the applicant's response has been included in a separate document.</p> <p><b>Outstanding Items</b></p> <p>A number of issues are still outstanding, which we understand are currently being considered by the applicant. These are:</p> <ul style="list-style-type: none"> <li>- Reducing emissions further under Be Lean of the Energy Hierarchy. Find opportunities to reduce space heating demand, or seek alternative options that would not necessarily improve the SAP results at Be Lean before a decision is made, but would improve the overall scheme at detailed design stage: <ul style="list-style-type: none"> <li>o Ensuring the air tightness levels are improved and delivered at construction stage with an air tightness plan and airtightness coordinator working with the construction manager</li> <li>o Calculating the detailed thermal bridges and pushing to reduce the heat losses</li> <li>o Committing to exceed the CP1.2 good practice guidance</li> <li>o Improving the thermal performance of the listed buildings</li> </ul> </li> <li>- Remodelling the overheating results with the Central London weather file.</li> <li>- Further modelling of additional internal corridors.</li> <li>- Designation and annotation of communal 'cool spaces' on the proposed plans.</li> <li>- Whether any EV charging points will be provided for public use.</li> </ul> <p>Aspects that were agreed during the meeting to be conditioned (subject to the detailed wording) were:</p> <ul style="list-style-type: none"> <li>- Thermal bridge calculations</li> <li>- Future weather file modelling and the preparation of a retrofit plan to meet the future weather files</li> <li>- Current and future weather file modelling for the non-residential spaces if they are to be used as office/workspace, community, healthcare, or educational uses.</li> <li>- BREEAM assessment for different uses.</li> </ul> <p><b>Planning Conditions</b></p> <p><u>Energy Strategy</u></p> <p>(a) Prior to the commencement of construction works, a revised Energy Strategy must be submitted with Design Stage SAP worksheets. The development will achieve minimum carbon emissions savings of 78% over 2013 Building Regulations Part L <b>with SAP2012 carbon factors</b>, with a minimum solar PV array of 168 kWp on the Goods Yard and minimum 45 kWp on the Depot sites. <b>The revised strategy will further respond to outstanding issues as set out in the committee report:</b></p> <ul style="list-style-type: none"> <li>- <b>Achieve minimum carbon reductions at the Be Lean Stage of 10% for the domestic new build and 15% for the non-domestic new build elements;</b></li> <li>- <b>An air tightness delivery strategy;</b></li> </ul>	

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> <li>- Detailed thermal bridging calculations demonstrating how thermal bridging will be reduced;</li> <li>- Set out detailed design of the heat network within the blocks and how this complies with CIBSE CoP1 and the LBH Generic Specification. This should include detailed calculation of distribution losses (based on pipe routes and lengths, pipe sizes, taking account of F&amp;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;</li> <li>- Set out a strategy for the supply of heat to any phases occupied before the site-wide energy centre is available;</li> <li>- Set out a strategy that ensures a heat can be supplied to the other sites within the High Road West masterplan area via this development site;</li> <li>- Provide further detail of how the developer will 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.</li> <li>- A metering strategy.</li> </ul> <p>(b) 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>The final agreed energy strategy shall be installed and in operation prior to the first occupation of the development. The development shall be carried out strictly in accordance with the details so approved and shall be operated and maintained as such thereafter.</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, SI3, and Local Plan Policy SP4 and DM22.</p> <p><b><u>DEN connection [TBC by Energy Infrastructure Manager]</u></b></p> <p><u>Overheating (non-residential)</u>  Prior to the occupation of each non-residential area, an Overheating Report must be submitted to and approved by the Local Planning Authority if that space is to be occupied for an extended period of time or will accommodate any vulnerable users, such as office/workspace, community, healthcare, or educational uses.</p> <p>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:</p> <ul style="list-style-type: none"> <li>- The proposed occupancy profiles and heat gains in line with CIBSE TM52</li> <li>- The modelled mitigation measures which will be delivered to ensure the development complies with DSY1 for the 2020s weather file.</li> </ul>	

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> <li>- 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.</li> </ul> <p>The mitigation measures hereby approved shall be implemented prior to occupation and retained thereafter for the lifetime of the development.</p> <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 Policy SI4 of the London Plan (2021), and Policies SP4 and DM21 of the Local Plan.</p> <p><u>Future overheating (residential)</u></p> <p>Prior to above ground works, an updated Overheating Report that includes modelling of future weather files must be submitted to and approved by the Local Planning Authority. The submission shall assess the future overheating risk and propose a retrofit plan. This assessment shall be based on the Sustainability and Energy Statement (<b>dated 27 May 2021, Rev P05</b>) <b>UPDATED</b> prepared by Buro Happold.</p> <p>The report shall include:</p> <ul style="list-style-type: none"> <li>- Further modelling of units modelled and the overheating risk with the 2050s and 2080s weather files for central London;</li> <li>- Modelling of mitigation measures required to pass future weather files, clearly setting out which measures will be delivered before occupation (if any), and which measures will form part of the retrofit plan;</li> <li>- 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);</li> <li>- Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.</li> </ul> <p>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"> <li>- Natural ventilation, with 100% (bedroom) and 30% (LKD) of openable area at night</li> <li>- Acoustic louvres for noise attenuated ventilation (30% free area)</li> <li>- Ceiling fans (where identified to be necessary)</li> <li>- Glazing g-values of 0.35 and 0.30</li> <li>- Vertical side fins</li> <li>- MVHR with summer bypass</li> </ul>	

Stakeholder	Comment	Response
	<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 Policy SI4 of the London Plan (2021), and Policies SP4 and DM21 of the Local Plan.</p> <p><u>Living roofs/walls</u></p> <p>a) Prior to the commencement of development, details of any living roofs and/or living walls must be submitted to and approved in writing by the Local Planning Authority. Living roofs and walls 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"> <li>i) A roof plan identifying where the living roofs will be located;</li> <li>ii) A ground floor plan identifying where the living walls will be rooted in the ground, if any;</li> <li>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;</li> <li>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 10m<sup>2</sup> of living roof;</li> <li>v) Roof plans annotating details of the location of semi-buried log piles / flat stones for invertebrates, with a minimum footprint of 1m<sup>2</sup> and at least one feature per 10m<sup>2</sup> of living roof;</li> <li>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. The living roofs will not rely on one species of plant life such as Sedum (which are not native);</li> <li>vii) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and</li> <li>viii) Management and maintenance plan, including frequency of watering arrangements.</li> </ul> <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 roof has been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of sedum, 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.</p>	

Stakeholder	Comment	Response
	<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 Policies G1, G5, G6, SI1 and SI2 of the London Plan (2021) and Policies SP4, SP5, SP11 and SP13 of the Haringey Local Plan (2017).</p> <p><u>Biodiversity</u> [to be signed off by Nature Conservation Officer/Biodiversity Officer]</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, 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 Policies G1, G5, G6, SI1 and SI2 of the London Plan (2021) and Policies SP4, SP5, SP11 and SP13 of the Haringey Local Plan (2017).</p> <p><u>BREEAM (or equivalent)</u></p> <p>(a) A minimum of 6 months prior to commencement on site, a design stage accreditation certificate 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 the development.</p> <p>The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.</p> <p>(b) At least 6 months prior to occupation, a post-construction certificate issued by the Building Research Establishment (or equivalent) for each non-residential use must be submitted to the local authority for approval, confirming this standard has been achieved.</p> <p>In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial</p>	



Stakeholder	Comment	Response
	<p>works must be implemented on site within 3 months of the Local Authority's approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.</p> <p>Reasons: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan Policy SP4 and DM21.</p> <p><u>Circular Economy</u>  Prior to the occupation of any building, a Post Completion Report setting out the predicted and actual performance against all numerical targets in the relevant Circular Economy Statement shall be submitted to the GLA at: <a href="mailto:circulareconomystatements@london.gov.uk">circulareconomystatements@london.gov.uk</a>, along with any supporting evidence as per the GLA's Circular Economy Statement Guidance. The Post Completion Report shall provide updated versions of Tables 1 and 2 of the Circular Economy Statement, the Recycling and Waste Reporting form and Bill of Materials. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation.</p> <p>Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials.</p> <p><u>Whole Life Carbon</u>  Prior to the occupation of each building, the post-construction tab of the GLA's whole life carbon assessment template should be completed accurately and in its entirety in line with the GLA's Whole Life Carbon Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage, including the whole life carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. This should be submitted to the GLA at: <a href="mailto:ZeroCarbonPlanning@london.gov.uk">ZeroCarbonPlanning@london.gov.uk</a>, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation of the relevant building.</p> <p>Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings.</p> <p><b>Carbon Management Response 28/10/2021</b></p> <p><b>Documents submitted:</b></p> <ul style="list-style-type: none"> <li>• Sustainability and Energy Statement prepared by Buro Happold (dated 28 October 2021, Rev P07)</li> <li>• Sustainability and Energy Statement Appendices prepared by Buro Happold (dated 28 October 2021, Rev P02)</li> <li>• Screenshot of GLA Carbon Emission Spreadsheet, v.1.2</li> </ul> <p><b>Response Overview</b></p>	

Stakeholder	Comment	Response
	<p>Two outstanding points were due to be addressed within the amended report: ensuring the Be Lean reduction in emissions meets Policy SI; ensuring the overheating report modelled the overheating risk with the appropriate weather files.</p> <p><b>Energy Strategy</b> The carbon emission figures stated below have been based on the SAP2012 emission factors (not SAP10 as quoted above). It is worth noting that the updated report only refers to SAP10 carbon factors and that emissions with SAP2012 carbon factors are reported separately in the GLA Carbon Emission Spreadsheet, v.1.2.</p> <p><u>Be Lean</u> The following changes were made to increase the fabric efficiencies and reduce energy demand under Be Lean:</p> <ul style="list-style-type: none"> <li>- Window sizes changed from 2300x110 to 1600x1100</li> <li>- Reduced u-value for the external walls (high rise) from 0.15 to 0.12 W/m<sup>2</sup>K</li> <li>- Amended distribution loss factor from 1.1 to 1.05 (in line with SAP default)</li> </ul> <p>The Dwelling Fabric Energy Efficiency ranges from 33 to 44.9 kWh/m<sup>2</sup>/year, with an improvement of at least 4% from the Target Fabric Energy Efficiency.</p> <p>This has resulted in higher carbon savings under Be Lean:</p> <ul style="list-style-type: none"> <li>- Residential: <ul style="list-style-type: none"> <li>o 8% reduction with SAP2012</li> <li>o From 7% to 11% reduction with SAP10</li> </ul> </li> <li>- Non-residential <ul style="list-style-type: none"> <li>o 16% reduction with SAP2012</li> <li>o From 10% to 20% reduction with SAP10</li> </ul> </li> </ul> <p>Although this scheme should be using SAP2012 carbon factors, and should pass Policy SI2 based on this, it is acknowledged the applicant has achieved further savings within the model by improving the fabric efficiencies for both the residential and non-residential elements. The non-residential elements meet the minimum 15% reduction. The residential falls just short of the 10% reduction, but the scheme is able to meet the policy with SAP10 carbon factors with a 11% reduction. This is considered acceptable having regard to the site's constraints.</p> <p><u>Carbon Offset Contribution</u> A revised carbon offset contribution has been calculated as £1,166,847, assuming the development will connect to the DEN without an interim solution.</p>	

Stakeholder	Comment		Response																																	
	<table border="1"> <thead> <tr> <th></th> <th colspan="2">Site-wide</th> </tr> <tr> <th>(SAP2012 emission factors)</th> <th>tCO<sub>2</sub></th> <th>%</th> </tr> </thead> <tbody> <tr> <td><b>Baseline emissions</b></td> <td colspan="2">1,023.1</td> </tr> <tr> <td><b>Be Lean savings</b></td> <td>80.7</td> <td>8%</td> </tr> <tr> <td><b>Be Clean savings</b></td> <td>485.6</td> <td>47%</td> </tr> <tr> <td><b>Be Green savings</b></td> <td>84.7</td> <td>8%</td> </tr> <tr> <td><b>Cumulative savings</b></td> <td>650.9</td> <td>64%</td> </tr> <tr> <td><b>Carbon shortfall to offset (tCO<sub>2</sub>)</b></td> <td colspan="2">372.2</td> </tr> <tr> <td><b>Carbon offset contribution (incl. 10% management fee)</b></td> <td colspan="2">£95 x 30 years x 372.20 tCO<sub>2</sub>/year = £1,060,770 + £106,077 = £1,166,847</td> </tr> </tbody> </table> <p><b>Overheating</b>  The model has been redone with the London Weather Centre files. Updated results are listed below.</p> <p>The mandatory DSY1 weather file for 2020s was passed, based on:</p> <ul style="list-style-type: none"> <li>- Natural ventilation from 22°C, with 100% (bedroom) and 30% (LKD) of openable area at night</li> <li>- Acoustic louvres for noise attenuated ventilation (30% free area)</li> <li>- Ceiling fans</li> <li>- Glazing g-values of 0.35 (low rise) and 0.60 (frosted glass)</li> <li>- Vertical side fins (not clear where)</li> <li>- MVHR with summer bypass</li> <li>- No active cooling</li> <li>- Heat gains of 350W (communal hallways) and 70W (apartment hallways) based on distribution losses of 10W/m</li> <li>- Ventilation rate 1ACH (communal hallways)</li> </ul> <table border="1"> <thead> <tr> <th></th> <th>Number of habitable rooms pass</th> <th>Number of habitable rooms pass (with ceiling fans)</th> </tr> </thead> <tbody> <tr> <td>DSY1 2020s</td> <td>89/89 GY Block A 76/76 GY Block B 15/15 GY Block C 15/16 GY Block D</td> <td>89/89 GY Block A 76/76 GY Block B 15/15 GY Block C 16/16 GY Block D</td> </tr> </tbody> </table>			Site-wide		(SAP2012 emission factors)	tCO <sub>2</sub>	%	<b>Baseline emissions</b>	1,023.1		<b>Be Lean savings</b>	80.7	8%	<b>Be Clean savings</b>	485.6	47%	<b>Be Green savings</b>	84.7	8%	<b>Cumulative savings</b>	650.9	64%	<b>Carbon shortfall to offset (tCO<sub>2</sub>)</b>	372.2		<b>Carbon offset contribution (incl. 10% management fee)</b>	£95 x 30 years x 372.20 tCO <sub>2</sub> /year = £1,060,770 + £106,077 = £1,166,847			Number of habitable rooms pass	Number of habitable rooms pass (with ceiling fans)	DSY1 2020s	89/89 GY Block A 76/76 GY Block B 15/15 GY Block C 15/16 GY Block D	89/89 GY Block A 76/76 GY Block B 15/15 GY Block C 16/16 GY Block D	
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		19/22 GY Block E 31/33 GY Block F 15/15 GY Block G 149/151 Depot Block ABC 11/11 Depot Block D 11/11 Depot Block E 6/6 Depot Block G	22/22 GY Block E 33/33 GY Block F 15/15 GY Block G 151/151 Depot Block ABC 11/11 Depot Block D 11/11 Depot Block E 6/6 Depot Block G	
	DSY2 2020s	2/89 GY Block A 1/76 GY Block B 0/15 GY Block C 0/16 GY Block D 0/22 GY Block E 0/33 GY Block F 0/15 GY Block G 1/151 Depot Block ABC 4/11 Depot Block D 7/11 Depot Block E 1/6 Depot Block G	89/89 GY Block A 76/76 GY Block B 15/15 GY Block C 16/16 GY Block D 22/22 GY Block E 33/33 GY Block F 15/15 GY Block G 151/151 Depot Block ABC 11/11 Depot Block D 11/11 Depot Block E 6/6 Depot Block G	
	DSY3 2020s	0/89 GY Block A 0/76 GY Block B 0/15 GY Block C 0/16 GY Block D 0/22 GY Block E 0/33 GY Block F 0/15 GY Block G 0/151 Depot Block ABC 2/11 Depot Block D 0/11 Depot Block E 0/6 Depot Block G	89/89 GY Block A 76/76 GY Block B 15/15 GY Block C 11/16 GY Block D 22/22 GY Block E 33/33 GY Block F 15/15 GY Block G 151/151 Depot Block ABC 11/11 Depot Block D 11/11 Depot Block E 6/6 Depot Block G	
	DSY1 2050s	61/89 GY Block A 59/76 GY Block B 0/15 GY Block C 1/16 GY Block D 0/22 GY Block E 3/33 GY Block F 0/15 GY Block G 11/151 Depot Block ABC 4/11 Depot Block D 0/11 Depot Block E	89/89 GY Block A 76/76 GY Block B 15/15 GY Block C 16/16 GY Block D 22/22 GY Block E 33/33 GY Block F 15/15 GY Block G 151/151 Depot Block ABC 11/11 Depot Block D 11/11 Depot Block E	

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	DSY1 2080s	1/6 Depot Block G 0/89 GY Block A 0/76 GY Block B 0/15 GY Block C 0/16 GY Block D 0/22 GY Block E 0/33 GY Block F 0/15 GY Block G 0/151 Depot Block ABC 11/11 Depot Block D 11/11 Depot Block E 6/6 Depot Block G	6/6 Depot Block G 89/89 GY Block A 76/76 GY Block B 15/15 GY Block C 16/16 GY Block D 22/22 GY Block E 33/33 GY Block F 15/15 GY Block G 151/151 Depot Block ABC 11/11 Depot Block D 11/11 Depot Block E 6/6 Depot Block G	
	Changes from the previous model:	Goods Yard: 4 less hab rooms Block A; 1 less hab room Block B; 33 new hab rooms Block F; 15 new hab rooms Block G. Depot: 1 less hab room Block ABC.		
	<p><b>Updated planning conditions</b>  <u>Energy Strategy</u>            (a) Prior to the commencement of construction works, an <del>revised</del> <b>updated</b> Energy Strategy must be submitted with Design Stage SAP worksheets <b>based on the approved Sustainability and Energy Strategy by Buro Happold (dated 28 October, P02)</b>. The development will achieve minimum carbon emissions savings of <del>78</del><b>64</b>% over 2013 Building Regulations Part L with SAP2012 carbon factors, with a minimum solar PV array of 168 kWp on the Goods Yard and minimum 45 kWp on the Depot sites. The <del>revised</del> <b>updated</b> strategy will further respond to outstanding issues as set out in the committee report:</p> <ul style="list-style-type: none"> <li>- Achieve minimum carbon reductions at the Be Lean Stage of <del>40</del><b>8</b>% for the domestic new build and <del>15</del><b>6</b>% for the non-domestic new build elements (<b>SAP2012 carbon factors</b>);</li> <li>- An air tightness delivery strategy;</li> <li>- Detailed thermal bridging calculations demonstrating how thermal bridging will be reduced;</li> <li>- Set out detailed design of the heat network within the blocks and how this complies with CIBSE CoP1 and the LBH Generic Specification. This should include detailed calculation of distribution losses (based on pipe routes and lengths, pipe sizes, taking account of F&amp;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;</li> <li>- Set out a strategy for the supply of heat to any phases occupied before the site-wide energy centre is available;</li> <li>- Set out a strategy that ensures a heat can be supplied to the other sites within the High Road West masterplan area via this development site;</li> </ul>			

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Conservation Officer	<p><u>Site:</u> The development site is part of the wider High Road West Masterplan for the area, and it is formed by the north-south oriented sequence of two adjoining sites, starting from the south: the triangular-shaped The Goods Yard and the rectangular-shaped Depot site including the land located immediately at the back of grade II listed buildings at 867-869 Tottenham High Road.</p> <p>There are extant consents, consistent with the key development principles of the published HRW masterplan, both on the Goods Yard site, on the Depot site and on the land at the back of listed houses at 867-869 Tottenham High Road.</p> <p>The Goods Yard site was previously occupied by industrial units and was subsequently used as a temporary construction compound associated with the Tottenham Hotspur stadium redevelopment. Some structures and commercial units still stand in the south-eastern corner of the Goods Yard plot. The Depot plot is currently occupied by retail uses and associated car park.</p> <p>The proposed scheme considers The Goods Yard and the Depot site together, including land at the back of listed 867-869 High Road, to be developed as one extensive site which is framed in anti-clockwise order by White Hart Lane to the south, by the railway line running along Pretoria Road to the west, by modern apartment blocks and school to the north and by the Peacock Industrial Estate site. The Peacock Industrial Estate site, which does not form part of this application but will be separately developed as part of the wider Masterplan, lies between the development site and the western edge of the Conservation Area.</p> <p>The southern part of the Goods Yard site, including the locally listed Station Master's House building, falls within the western branch of the North Tottenham Conservation Area.</p> <p>The development site runs in parallel to the top section of North Tottenham Conservation Area which is here comprised between White Hart Lane and Brantwood Road and is characterised by a well-</p>	

Stakeholder	Comment	Response
	<p>preserved listed and locally listed frontage along Tottenham High Road, although due to cumulative and insensitive alterations and progressive erosion of character occurred over the past decades, the whole North Tottenham Conservation Area is now designated as a “Conservation Area at Risk” by Historic England, is in need of sensitively designed improvements and has been undergoing heritage-funded regenerative interventions over the most recent years.</p> <p>This upper part of the North Tottenham Conservation Area, ideally works as a gateway into the linear Tottenham High Road Historic Corridor which starts to the south at Seven Sisters and runs northwards through five contiguous Conservation Areas including Seven Sisters/ Page green, Tottenham Green, Bruce Grove, Scotland Green and the two stretches of North Tottenham Conservation Area. The characteristic features of the Conservation Area, including the variety and quality of its most valuable architectures are defining components of the Tottenham High Road Historic Corridor.</p> <p>The extensive development site includes both grades II listed Georgian Houses at Nos 867-869 Tottenham High Road and the locally listed and currently vacant Station Master’s House at No. 52 White Hart Lane which also falls within the North Tottenham Conservation Area.</p> <p>The entire site is also immediately surrounded by several other heritage assets, with the nearest, such as the Grade II listed The Grange located at 34 White Hart Lane, being all included in the North Tottenham Conservation Area that extends along the High Road and White Hart Lane with its distinctive historic frontages and rich array of locally listed and statutorily listed buildings including Nos 797 and 799 High Road; 819 and 821 High Road; 859-863 High Road all located on the west side of the High Road and the Grade II* listed Dial House, Percy House, the Grade II listed Nos. 792-794, 798-802 and 808-810 High Road forming altogether the Northumberland Terrace and listed houses further to the north at 816-822 High Road.</p> <p>Within short walking distance, to the south-west of the development site, beyond the railway line are located the contiguous Tottenham Cemetery Conservation Area and Bruce Castle Conservation Area which are characterised by their undeveloped, open and soft landscaped appearance and by their leafy, visually permeable boundaries characterised by low walls surmounted by railings, green edges and deciduous trees, and are visually connected to the development site and North Tottenham area through long views across, into and outside each of the Conservation Areas. Just to the immediate west of the Bruce Castle Conservation Area and within a significant distance of about 1 km from the development site, lie both the Peabody Cottages and The Tower Gardens Conservation Area</p> <p>To the north of the development site, along the High Road and beyond the Borough’s boundary are located the Fore Street Angel and Fore Street South Conservation Areas which lie in the London Borough of Enfield.</p>	



Stakeholder	Comment	Response
	<p>Despite the number and quality of heritage assets located in Haringey and surrounding to various degree the development site, both desk-based research and site visits lead to consider the likely significant effects of the proposed scheme on the following most significantly impacted heritage assets:</p> <ul style="list-style-type: none"> <li>• 34 White Hart Lane (The Grange) (Grade II Listed);</li> <li>• Nos 797-799 High Road (Grade II Listed); and</li> <li>• Nos. 819-821 High Road (Grade II Listed);</li> <li>• Nos. 867-869 High Road (Grade II Listed);</li> <li>• North Tottenham Conservation Area;</li> <li>• Bruce Castle and All Hallows Conservation Area</li> <li>• Station Master's House (52 White Hart Lane) (Locally Listed);</li> <li>• Nos. 790 High Road (Dial House) (Grade II* Listed);</li> <li>• Tottenham Cemetery Conservation Area;</li> <li>• Fore Street Angel (Enfield); and</li> <li>• Fore Street South (Enfield).</li> </ul> <p><u>Tottenham High Road Conservation Area.</u> Tottenham High Road Conservation Area is a linear Conservation Area within a densely built-up urban setting with an almost intact 19th century townscape incorporating notable surviving examples of earlier periods. The areas immediately to the east and west of the High Road have changed dramatically. Despite these changes the townscape retains a high degree of historical continuity, maintaining a contained linear street pattern forming a sequence of linked spaces and sub spaces, and with a notable variety and contrast in architectural styles and materials. The street width and alignment still follow the form established by the mid-19th century. There are good surviving examples of buildings dating from the 18th and 19th centuries including outstanding groups of Georgian houses and mid and late-Victorian shopping parades illustrating the changes to this building type in scale and style, together with examples of the inter-war style of the mid-20th century.</p> <p>The northern part of the Conservation Area, located immediately to the east of the developments site, is the best surviving townscape section of the High Road, containing some outstanding Georgian architectures as part of a built sequence reflecting changing patterns of development from the early/mid-18th century through the 19th to the 20th century. The buildings of varying ages contribute to a cohesive and contained streetscape due to the general conformity in scale, height and materials together with the variation in silhouette or roofline. The section of the High Road between Brantwood Road and White Hart Lane, however, is the most complete part of the Conservation Area in terms of its surviving historic buildings and townscape form, retaining many Georgian and Victorian buildings with their consistency of scale, height and frontage width.</p> <p>The High Road's northern 'entrance' is defined on the west side by listed buildings Nos. 867-869, an imposing group of early-18th century of houses, and by the Coach and Horses public house opposite, of</p>	

Stakeholder	Comment	Response
	<p>early-19th century origins, which announce the predominantly Georgian character of the northern stretch of the High Road. This short entry sequence terminates with a gap site fronting the timber yard (Nos. 855-863), enclosed by unsightly hoardings, and is marked by the mature street tree on the west side of the High Road.</p> <p>Buildings at Nos 867-869 High Road were listed in 1949 because of their architectural interest, well preserved features and townscape value and have been variously used as offices and internally altered. These architectures offer an opportunity for preservation of their special features of interest and for enhancement of their character as well as use.</p> <p>Despite having lost much of its original houses, White Hart Lane is still significant by virtue of the diversity of its surviving historic buildings which are representative of each period from Georgian through mid to late Victorian up to post-war housing. On the north side, among the surviving terraces of C19 modest houses, stands the locally listed house at No.6a which was originally one of a pair of small houses, partly rebuilt and the front elevation has kept its original brick arch over the front door and the two sash windows beneath flat rubbed brick arches.</p> <p>On the same side of the street stands as a building of special interest the grade II listed The Grange at Nos 32-34. It is a mid-18th century house with two wings added to either side in the early to mid-19th century. The house has been restored and has a fine elevation in brown brick with red brick dressings including the rubbed-brick arches over the windows and a good pedimented door case. The later extensions to either side are in a yellow stock brick and have elliptical arched openings deriving from their probable origins as stable and coach house.</p> <p>Another building of interest on the north side is the locally listed Station Master's house, a detached two-storey house that was erected at No 52 White Hart Lane following the opening of White Hart Lane station in 1872. This is a yellow stock brick house 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.</p> <p>On the south side of White Hart Lane, the grade II listed house at No. 7 is a villa dating from c1840 that is set back from the road with steps up to the front door. The building is rendered with incised stucco, and the sash windows together with the panelled front door with fanlight could all be original. The house has been recently refurbished and strongly contributes to the special interest of this part of the Conservation Area.</p> <p>The section of White Hart Lane which falls within the Conservation Area and is comprised between the High Road and the railway station, nowadays reads as a fractured and incomplete townscape due to the loss of many original C18 houses which have been replaced by smaller C19 terraced houses. On the north side, the former gardens of the original villas have been filled in with industrial uses.</p>	

Stakeholder	Comment	Response
	<p>The south side consists of post-war public housing set well back from the street giving an open aspect to the frontage.</p> <p>At the northern end of the Conservation Area, views north and south from Brantwood Road illustrate the open character looking north, contrasting with the enclosed character of the High Road looking south. Views of the Conservation Area along the linear form of the High Street, in both directions are especially important to read the urban and architectural quality of the area. Views in and out of the Conservation Area from junctions with side roads and from some passageways and alleys also contribute to the experience and understanding of the character of the area.</p> <p>Views from the side streets such as Northumberland Park and White Hart Lane each illustrate a distinct change in scale and character from that along the High Road.</p> <p>Key features of the Conservation Area which need to be preserved and enhanced include its most important and original buildings, the historic linear continuity of buildings either side of the High Road, the established 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.</p> <p>The Masterplan promotes retention and enhancement of the historic character of the High Road together with the adaptable reuse of historic buildings and forms, key views and vistas through the area. The development site provides, in line with the vision set out in the Masterplan, an opportunity to enhance both the heritage buildings which will be retained on site, their setting and to improve the setting of the North Tottenham Conservation Area.</p> <p><u>Proposal:</u> It is proposed to demolish the existing buildings and structures so to redevelop the site with a residential led mixed-use scheme with building heights ranging from 6 to 32-storeys and to provide 867 new homes, flexible commercial, business, community, retail and service use with associated parking and hard/soft landscaping, ancillary space, creation of a new public park and a series of private open spaces. It is also proposed to retain and restore the listed buildings at 867-869 Tottenham High Road to reinstate the original residential use and to adaptively restore the locally listed Station Master's house at No 52 White Hart Lane to be converted into a flexible retail, food and beverage use.</p> <p><u>Comments:</u> The principle of redevelopment of the site and the erection of tall buildings along the railway line is accepted and underpins both the Masterplan for the wider area as well as the extant consents for the Goods Yard and Depot which respectively allow to create a mixed use development ranging in height from 3 to 8-storeys plus two residential towers of 18 and 22 storeys stepping up in height from south to north on the Goods Yard plot and a mixed use development with a 29-storey tower to the north, a part 7 and part 9-storey building to the north with the remaining buildings ranging from 6 to 3-storeys and stepping down towards the High Road on the Depot plot.</p>	

Stakeholder	Comment	Response
	<p>These are the approved heights within the context of the average 1-3 storeys of the heritage buildings which characterise the Conservation Area and the historic frontage of Tottenham High Road.</p> <p>The development site is undoubtedly complex, and the proposed scheme has been developed at a relatively fast pace in discussion with the Council Officers and other relevant stakeholders through a design-led approach which aims to provide a bespoke and coherent design response to the whole site and its heritage context based on the parameters established by the High Road West Masterplan and existing planning permissions. The layout of the proposal is acceptable in principle and the increase in new open space is supported as it contributes to the sensitive integration of heritage assets into the scheme design.</p> <p>The development proposal has been successfully informed by a thorough site analysis, contextual analysis and understanding of the various heritage assets affected by the proposed development and responds to the principles of the adopted Masterplan so to ensure that the site can be developed and successfully used compatibly with future development proposals affecting the neighbouring land as part of a whole new area.</p> <p>The pre-application discussion has allowed to achieve an appropriate massing, layout, and height rationale for the group of tall buildings identified within the Masterplan, to provide an appropriate urban grain and sense of enclosure for the public and private uses, to develop a distinctive context driven architectural response recognising the site's rich history and heritage assets. Scale and massing are derived from the principles set out within the Masterplan and have been tested against the existing and emerging townscape and heritage context to assess impact on the existing historic buildings and Conservation Area. The proposed scheme cumulatively considers the emerging context and the extant planning consents while the proposed site layout and street design aim to frame key vistas into the sites from the High Road and White Hart Lane edges and to reinforce movement patterns and access to public according to the masterplan's principles with regards to views and vistas.</p> <p>A balanced assessment of constraints and opportunities, including heritage sensitivities and enhancement opportunities underpins the design process along with the necessary design exploration to create a coherent, legible, and permeable new neighbourhood, well connected with its immediate setting, characterised by high quality open public and communal amenity spaces and designed to respect and unveil key heritage assets, local character, and townscape views.</p> <p>The objectives of the proposed scheme are clear and include, among others, the creation of tall landmarks along the railway line and the retention and integration of the heritage buildings with the new development to unveil their presence along the High Road and White Hart Lane. The proposed parabolic composition of the three slender towers is the result of an intense pre-application discussion which has led to the elimination of a fourth tower originally located to the southern section of the development site – this tower was too close to the Conservation Area and to the Locally Listed Station</p>	

Stakeholder	Comment	Response
	<p>Master's House- and to the reduction of the overall height of the remaining towers. The proposed triplet of towers is intended as a characteristic feature of the new development and aims to create a distinctive landmark feature for the new town along the railway line.</p> <p>By virtue of the detailed design and guiding conservation-led approach to new development, the overall relationship between the proposed scheme, especially its lower buildings and nearby heritage assets is largely positive.</p> <p>The scheme offers indeed an interesting design strategy to protect and enhance the setting and significance of the heritage assets within and around the development site by creating a range of residential typologies and varying heights as a nod to the organic growth of the historic town and to generate an attractive and welcoming neighbourhood which forms a desirable place to live and work. The proposed scheme has been developed as a sequence of attractive and recognizable character areas which complement the character of the adjacent heritage assets and are populated by a range of building typologies to create both a distinct and coherent identity. The design proposal seeks to integrate the new buildings with the heritage buildings and the wider Conservation Area through the formation of new buildings and places designed to mediate between the scale and height of heritage assets and the mid-rise and tall buildings further into the site as well as through the creation of heritage gateways to the site such as the group comprised of Station Master's House, Block G and H within the Goods Yard plot and the new blocks surrounding listed 867-869 High Road within the Depot plot.</p> <p>The design of the White Hart Lane gateway building has been conceived to bring together the surviving heritage assets along white Hart Lane by aligning with the façade of the Station Master's House while revealing the full flank of 'The Grange' so to contribute to repair the street frontage of the Conservation Area along White Hart Lane.</p> <p>The north-eastern entrance to the site from the High Road has been designed as a traditional street, characterised by mature trees and dominated by the fully restored Georgian houses at 867-869 High Road, sitting just on the northern edge of the North Tottenham Conservation Area. The proposed new blocks are well set back from the High Road so to retain the visual prominence of the listed houses and mature trees.</p> <p>However, it is important to note that the unitary development of previously separate sites is mainly aimed at making best use of land, to optimise the capacity of the site and improve overall amount of open and public space with the risk of imposingly try to signpost and define a larger, much more dense and imposing development with a composition of tall buildings powerfully sitting just on the doorstep of the historic town and its listed buildings.</p> <p>Indeed, while the proposed scheme aims to improve and refine the design response to the specific qualities of the wider site and its context it also increases the quantum of residential and non- residential</p>	

Stakeholder	Comment	Response
	<p>floorspace and provides greater public space such as the proposed public Peacock Park within the Depot site, which translates into 8 new blocks ranging in height from 3 to 7 storeys plus two towers of respectively 27 and 32-storeys from south to north on the Goods Yard plot and 6 new blocks ranging in height from 5 to 9 storeys plus a large tower of 29 storeys to mark the Depot site.</p> <p>This means that, in order to increase the residential quantum, and despite the ambition to provide a bespoke and sensitive design response to the various parts of the site, to its heritage buildings as well as to the surrounding Conservation Area, the result of this wider scheme is that the height, perceived prominence and visual impact of the proposed three landmark towers is greater than in the previously consented scheme.</p> <p>It is acknowledged that in principle tall buildings are considered appropriate on the proposed site and that the proposed group of towers is ideally meant to be a defining design feature which accords with the linear characteristic of the Conservation Area and provides visual rhythm to the new development and its area, but despite their relative distance from the Conservation Area and heritage buildings, despite the carefully designed spacing between towers and the carefully designed urban composition, the proposed towers visibly loom above and behind the small scale heritage assets, especially in views along and towards Tottenham High Road and White Hart Lane.</p> <p>The positive effects deriving from the repaired street frontage along White Hart Lane and from the valorisation of the settings of the listed Station's Master's House are somewhat diminished by the dwarfing effect caused by the excessive height of especially the southern towers standing just behind the Station's Master house as clearly shown in view 24 where the gradual increase in height, one floor at a time, of the proposed buildings is abruptly interrupted by the 27 storey tower.</p> <p>The Visual Impact Assessment that accompanies this development proposal clearly illustrates the concerning effects of the proposed scheme on the local and wider townscape: the proposed scheme has been thoroughly tested in views across and into the Conservation Area and especially views 4 (High Road, near Whitehall Street); 5 (High Road, next to Percy House); 6 (Northumberland Park, east of High Road); view 25 (William Street, by White Hart Lane) clearly show how the proposed towers, while creating a new, characteristic landmark composition that signposts the new neighbourhood, at the same time dominate in views of grade II listed The Grange and in views of the historic frontage of North Tottenham Conservation Area, as shown in views 4,5,6, 10 especially due the excessively intricated façade treatment and visual prominence of the tallest central core of the three towers.</p> <p>The same considerations apply to the views of nationally important grade II Listed 867-869 Tottenham High Road, grade II 797 &amp; 799 and 819-821 High Road, and grade II* Dial House which would all be negatively affected by the overwhelming presence of the proposed towers although this negative impact would lead to less than substantial harm to the significance of the listed buildings.</p>	

Stakeholder	Comment	Response
	<p>Also, the locally listed Station Masters House would be overwhelmed by the prominent towers in views taken along White Hart Lane and this would lead to less than substantial harm to the significance of the locally listed building.</p> <p>The proposed towers would undesirably dominate also in views of the development site taken from Bruce Castle Conservation Area and Tottenham Cemetery Conservation Area.</p> <p>Bruce Castle and All Hallows Conservation Area 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 applicant’s assessment suggests that the existing Rivers Apartments tower located to the north-west of the development site and outside the Conservation Area, 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. This position ignores that the proposed towers, especially the Goods Yard towers would very uncharacteristically stand out and be prominent features when viewed from the open spaces in the Conservation Area, which is characterised by its openness, landscaping in the park and small-scale development in long views. It is our opinion that the proposed development would dominate the surrounding of the Conservation Area and would negatively impact on its experience.</p> <p>Tottenham Cemetery Conservation Area is similarly impacted by the tallest elements of the new development since the proposed towers, especially those standing on the Goods yard site, would uncharacteristically dominate in the views across the Conservation Area, especially those views taken from the northern section of the Tottenham Cemetery which is characterised by open spaces, landscaping in the park and small-scale development in long views. It’s therefore felt that the proposed tall buildings would cause ‘less than substantial harm’ to the setting and significance of this Conservation Area.</p> <p>It is interesting to observe that the heritage impact assessment for the approved Goods Yard application tested the same assets currently assessed and came to similar or even less positive conclusions to those drawn in respect of the current, significantly taller scheme.</p> <p>Also interesting that the assessment of impact in relation to the Bruce Castle and Tottenham Cemetery Conservation Areas was that “The remaining Conservation Areas within the Study Zone will not be significantly affected by development on this site, because their identified characteristics and sensitivities do not include wider views, and the Proposed Development will be screened from within the Conservation Areas.”</p> <p>The assessment of the approved Goods Yard scheme quite arguably rested on the assumption that little of the approved scheme was visible from within the Conservation Areas and that these areas are very inward facing and screened by densely vegetated boundaries and the new development wasn’t visible</p>	

Stakeholder	Comment	Response
	<p>from key spaces or in key views. Indeed, the approved Goods Yard scheme was only tested at the time in one view from Bruce Castle Park and one view from Tottenham Cemetery.</p> <p>As part of the current development proposal both council officers and applicants have visited and analysed in depth the characteristic features and experiential quality of these Conservation Areas and have been able to appreciate how especially the Bruce Castle Park and the northern section the Tottenham Cemetery are large, landscaped areas with a high level of public fruition and with a good degree of visual connection with the surrounding mainly low rise, traditional built environment that significantly constitutes the visual background of views across the Conservation Areas and therefore significantly contributes to the peaceful, open and landscaped character of the Conservation Areas.</p> <p>Current view 16 clearly shows the imposing of the proposed towers in views across the Bruce Castle Conservation Area where the trees and nature in general is the domineering, tallest element that blends in with the sky above. Existing buildings appear in the view as subordinate to the landscape, are not imposing architectural gestures such as the tall towers, and in the light of these considerations it is very difficult to accept the position of the applicant's heritage statement that this view across the Conservation Area are not significant just because these are not marked up in the adopted Conservation Area Appraisal, as this would totally ignore that the whole experience of the Conservation Area is a dynamic one and depends on what we see and perceive when we move throughout the area, and view 16 is taken from a junction of paths which lead from the park playground to the northern access to the park, so it's not a secondary or negligible viewpoint in the experience of the park and Conservation Area.</p> <p>Submitted views 18, 19, 20 respectively show how the new development will be uncharacteristically and prominently visible across the northern section of the Tottenham Cemetery, a place of prayer and peace, but also a public space for families and children where the current views are those of the graveyards, rich vegetation, trees and the sky. It is again difficult to accept the applicant's position that the development retains the character and appearance of the Conservation Area and has no or minor effect as suggested in the submitted reports.</p> <p>The current scheme also includes a different and more detailed contextual proposal from the approved one for conversion and extension of the Station Master's House. The extant permission allows for a rear single-storey extension to provide space for future kitchen and bar facilities as part of its change of use to a restaurant. 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 as restaurant/café. The proposed scheme is welcome as it would have a beneficial effect on the locally listed building and will bring it back into beneficial use, however the towers located immediately in the background of the locally listed buildings would dominate in views of the Station Master's House due to their strikingly difference from the proportions of the restored setting of the Master's house along White Hart Lane.</p>	



Stakeholder	Comment	Response
	<p>Grade II* Dial House, located at 790 High Road is the bookend house to the highly significant Northumberland Terrace, as a prominent and valuable corner building in the Conservation Area it benefits even more than others from the well-preserved urban scale and architectural quality of its immediately surrounding stretch of High Road and the proposed Goods Yard towers would definitely dominate in those views of the historic frontage of North Tottenham Conservation Area taken from Dial House, submitted northwards looking views of the High Road show how the proposed towers, especially those on the Goods yard site, would partially obscure the legibility and primacy of the continuous historic roofscape along the west side of the High Road and would loom above the historic buildings views from Dial House, thus adversely affecting the contributing setting of this important building.</p> <p>Although it is acknowledged that the proposed towers as seen on their own successfully read as a unitary group composition tied together by coherent elevational treatments and materiality, and provide positive additions to the skyline when viewed with the existing River Apartments, although the careful design of the application scheme as revised would read well in long-distance views, when considered in the immediate context of the North Tottenham Conservation Area and its listed buildings, their presence in the visual experience of heritage assets is in some cases overwhelming depending on the view points from where the Conservation Area and its heritage asset are experienced.</p> <p><u>Conclusions and Recommendations.</u> The proposed scheme has been carefully thought through and offers great potential for enhancement of both 867-869 High Road, Station Masters' House and related setting as it seeks to retain, reveal the significance and secure the future of the Grade II listed 867-869 High Road and locally listed Station Masters' House while fully integrating these buildings within the new development that will enhance the appearance, character and setting of both the heritage buildings and Conservation Area. However the tested views of the proposed scheme in the context of heritage assets show that due to the uncharacteristic and excessive height of the proposed towers, especially the southern towers located on the Goods Yard site, the proposed scheme would negatively impact on the setting of both locally and nationally important heritage assets in a number of views as discussed in detail above and this would lead to a level of harm at the mid-range of 'less than substantial' affecting a number of designated and undesignated heritage assets and the public benefits associated with the application will need to outweigh this harm according to the tests set at paragraphs 196 and 203 of the NPPF.</p>	
Design Officer	<p><b><u>Summary</u></b></p> <p>These proposals are a well thought through and elegantly designed response to a significant site. The 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, particularly the former. The proposed street layout is particularly improved on the Goods Yard site, where</p>	

Stakeholder	Comment	Response
	<p>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 development are generally 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> <p>The proposed mix of heights include three tall building at 27, 32 and 29 storeys; 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, 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.</p> <p>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. Daylight, sunlight and wind assessments show only minor effects compared to the expectation of development previously agreed.</p> <p><b><u>Principal of Development, Masterplanning and Street Layout</u></b></p> <ol style="list-style-type: none"> <li>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 two previous approvals; for the Goods Yard site and (what is now known as) The Depot site, which together cover the whole of this application site. 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".</li> </ol>	

Stakeholder	Comment	Response
	<p>2. This proposal, therefore, in amending those two previous approvals, takes them 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.</p> <p>3. These proposals particularly improve on the existing 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.</p> <p>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 to soon 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.</p> <p>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</p>	

Stakeholder	Comment	Response
	<p>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.</p> <p>6. Whilst the key north-south street of the development contains two doglegs, preventing it being the <i>ideal</i> 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 <i>marginally</i> 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 in a logical and coherent masterplan consistent to the spirit of the adopted version.</p> <p><b><u>Form, Bulk &amp; Massing</u></b></p> <p>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.</p>	

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	<p>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.</p> <p>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 form, bulk and massing of the lower storey elements, the QRP considered the proposals to be broadly acceptable.</p> <p><b><u>Tall Buildings, especially Height, Form and Composition</u></b></p> <p>10. Three tall buildings are proposed, of 27, 32 and 29 storeys, 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), and chamfered in plan to accentuate their slenderness from the north and south, whilst the gaps between each, including to Rivers Apartments, is each around 30m. 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>	

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	<p>12. From the east and west, the row of 4 towers form a “curve”, specifically a “double curve” formed by each tall building having taller and slightly lower elements forming a “top” or crown to the tall building. 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>13. Considering each criterion from Haringey’s tall building policy is set in SP11 of our Strategic Polices DPD (adopted 2013 (with alterations 2017) and DM6 of our Development Management DPD (adopted 2017), skipping the 3<sup>rd</sup> &amp; 4<sup>th</sup> bullets from the Strategic Policies, that reference the other document and the document used in preparing DM6:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• High quality design especially of public realm is considered above in paras. 1-9, the protection of views below in paras. 18-20. Heritage assets and their settings are covered by the Conservation Officer’s comments;</li> </ul>	

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> <li>• They 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;</li> <li>• They will also be capable of being considered a “Landmark” by being elegant, well-proportioned and visually interesting when viewed from any direction as discussed below;</li> <li>• Consideration of impact on ecology and microclimate encompasses daylight, sunlight and wind, examined in detail from para. 25 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;</li> <li>• 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. They will be sufficiently far apart though, at around 30m from each other, and are slender in width east-west, to avoid detrimental effects of proximity and in any case are a line of aligned, north-south proportioned towers; there would be no canyon effect as their short sides would be the ones facing each other;</li> <li>• 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.</li> </ul> <p>14. 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. 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>	

Stakeholder	Comment	Response
	<p>15. 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>16. 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 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.</p> <p>17. 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.</p> <p><b><u>Local, Wider &amp; Strategic Views</u></b></p> <p>18. 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.</p> <p>19. 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 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). It also needs to be borne in mind that the two previous applications</p>	



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	<p>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 these were assessed as part of those applications and found acceptable. It is therefore relevant to compare the views of this proposal with views of already approved proposals for this site,</p> <p>20. 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.</p> <p><b><u>Residential Quality (flat, room &amp; private amenity space shape, size, quality and aspect)</u></b></p> <p>21. 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.</p> <p>22. All dwellings (excepting flats converted from the listed nos. 867 &amp; 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.</p> <p>23. 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.</p> <p>24. 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</p>	

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	<p>has access to the central park, which will also contain older childrens' play, large lawns, seating and planting.</p> <p><b><u>Daylight, Sunlight and Wind Microclimate</u></b></p> <p>25. The applicants provided Daylight and Sunlight Reports on levels within their development and the effect of their proposals on relevant neighbouring buildings, prepared in accordance with council policy following the methods explained in the Building Research Establishment's publication "Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice" (2nd Edition, Littlefair, 2011), known as "The BRE Guide".</p> <p>26. Their assessment finds good levels of daylight and sunlight achieves throughout the detailed parts of the proposed development, with 81 and 80% of habitable rooms (177 out of 220 &amp; 176 of 220 rooms) meeting the daylight levels recommended for average daylight factor (ADF) and daylight distribution respectively, and 89% of living rooms (57 out of 64) meeting sunlight levels. Those that fall short all fall marginally short, by a few fractions of a percent, for instance with all Living/Dining/Kitchens that do not meet the 2% recommended ADF for kitchens achieving 1.5% which is the recommendation for living rooms.</p> <p>27. In the case of higher density developments, it should be noted that the BRE Guide itself states that it is written with low density, suburban patterns of development in mind and should not be slavishly applied to more urban locations; as in London, the Mayor of London's Housing SPG acknowledges. In particular, the 27% VSC recommended guideline is based on a low-density suburban housing model and in an urban environment it is recognised that VSC values in excess of 20% are considered as reasonably good, and that VSC values in the mid-teens are deemed acceptable. Paragraph 2.3.29 of the GLA Housing SPD supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city. Therefore, full or near full compliance with the BRE Guide is not to be expected.</p> <p>28. 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 unchanged from the approved scheme.</p> <p>29. 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</p>	

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	<p>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>	
Ecology	<p>Having reviewed the Ecological Appraisal Report and understand that <i>“The development should be compliant with relevant legislation without the need for further mitigation, although several recommended enhancements have been provided”</i></p> <ol style="list-style-type: none"> <li>1. Is it possible for Buro Happold Limited to consolidate to one single document the details of the following (to inform those recommendations <i>e.g. pre-works check, net biodiversity gain, sensitively lit etc</i>); <ul style="list-style-type: none"> <li>• Description of the actual or potential ecological issues and opportunities that might arise as a result of the site’s future development; and</li> <li>• Recommendations for mitigation of adverse effects and ecological enhancement, to ensure conformity with policy and legislation listed in Appendix 1.</li> </ul> </li>   <li>2. Has the Tree and Woodland Manager Alex Fraser responded to the following section?</li> </ol>	
Pollution	<p>No objections, but the following planning conditions are recommended should planning permission be granted.</p> <ol style="list-style-type: none"> <li>1. Land Contamination <p>Before development commences other than for investigative work:</p> <ol style="list-style-type: none"> <li>a. Using the information already submitted in 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, 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.</li> <li>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.</li> </ol> </li> </ol>	

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	<p>c. Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and;</p> <p>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.</p> <p>Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p>2. Unexpected Contamination</p> <p>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.</p> <p>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.</p> <p>3. NRMM</p> <p>a. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at <a href="http://nrmm.london/">http://nrmm.london/</a>. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.</p> <p>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.</p> <p>Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ</p>	

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	<p>4. Demolition/Construction Environmental Management Plans</p> <p>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</p> <p>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.</p> <p>The following applies to both Parts a and b above:</p> <p>a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).</p> <p>b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include:</p> <ul style="list-style-type: none"> <li>i. A construction method statement which identifies the stages and details how works will be undertaken;</li> <li>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;</li> <li>iii. Details of plant and machinery to be used during demolition/construction works;</li> <li>iv. Details of an Unexploded Ordnance Survey;</li> <li>v. Details of the waste management strategy;</li> <li>vi. Details of community engagement arrangements;</li> <li>vii. Details of any acoustic hoarding;</li> <li>viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance);</li> <li>ix. Details of external lighting; and,</li> <li>x. Details of any other standard environmental management and control measures to be implemented.</li> </ul> <p>c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on:</p> <ul style="list-style-type: none"> <li>i. Monitoring and joint working arrangements, where appropriate;</li> <li>ii. Site access and car parking arrangements;</li> <li>iii. Delivery booking systems;</li> <li>iv. Agreed routes to/from the Plot;</li> <li>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</li> </ul>	

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	<p>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</p> <p>vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching.</p> <p>d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:</p> <p>i. Mitigation measures to manage and minimise demolition/construction dust emissions during works;</p> <p>ii. Details confirming the Plot has been registered at <a href="http://nrmm.london">http://nrmm.london</a>;</p> <p>iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection;</p> <p>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);</p> <p>v. A Dust Risk Assessment for the works; and</p> <p>vi. Lorry Parking, in joint arrangement where appropriate.</p> <p>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 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>Reason: 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>Informative:</p> <p>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.</p>	
Lead Local Flood Authority (LLFA)	The SuDS, hierarchy has been followed and the proposed SuDS for the sites include the following, below ground attenuation systems, tree pits and permeable paving throughout the	

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	<p>proposed developments with an acceptable controlled run-off rate of 3 x Green Field rate of 5.651 l/s per ha.</p> <p>Where the consultants have proposed connection to the Moselle culvert they must gain the necessary consent/permits from the EA, for any proposed construction that will take place.</p> <p>Consent from Thames Water, will also be required to connect to their network and confirmation that capacity exists in their network to receive the surface water being discharged via attenuation using a flow control device.</p> <p>A maintenance programme has been provided and sets out a comprehensive schedule and frequency of maintenance visits, confirmation of who will be responsible for the maintenance that must be for the lifetime of the developments.</p>	
School Place Planning	<p>Having reviewed them and also checked with Philip Crowther that this development has been included within the annual development trajectory data (which forms part of our school roll projections) I am satisfied that we will have sufficient school capacity. I therefore have no specific comments on the application.</p>	
Transportation	<p><u>Proposed Car Parking.</u> Residential car parking would be provided at a ratio of 0.16 space 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.</p> <p>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. Additionally, as this is a new development, parking provision would be subject to the latest London Plan (2021) car parking standards for office land use. As the site is located within the Upper Lea Valley Outer London Opportunity Area, only up to 1 space per 600sqm GIA could be provided, which would equate to a maximum of 3 spaces across the site. One of these spaces should be wheelchair-accessible.</p> <p>On each site, it is proposed to provide two car club spaces for the use of residents and commercial occupiers. Justification is required for how the proposed provision of 4 car club bays across the whole site has been determined (is the proposed provision based on a demand assessment undertaken by a</p>	

Stakeholder	Comment	Response
	<p>prospective car club provider, or is it a direct re-provision of what was agreed in the consented planning applications?).</p> <p>No details of electric vehicle charging points have been given in the Transport Assessment. In line with the London Plan (2021) standards, all residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20% of spaces should have active charging facilities, with passive provision for all remaining spaces. All non-residential operational parking spaces should be fitted with infrastructure for electric or other Ultra-Low Emission vehicles. This should be marked up on the plans.</p> <p>Overall, WebCAT indicates that the site mostly lies in areas of PTAL 4, with the north western 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 <i>“the starting point for discussions should be the highest existing or planned PTAL at the site”</i>).</p> <p>The Council would not issue any occupiers with on-street resident/business parking permits due to its car-free nature. The Council would use legal agreements to require the landowners to advise all occupiers of the car-free status of the proposed development.</p> <p><u>Car Park Access</u> Swept path analysis has been provided showing vehicles using the basement car park ramp access arrangements. Additional swept paths are required showing vehicles manoeuvring within the two basement car parks, in and out of spaces in key locations. We ask that vehicle swept paths have 300mm safety buffers. Key dimensions should be marked up (aisle and bin widths, parking space dimensions) on the plans.</p> <p><u>Car Parking Management Plan.</u> An outline Car Parking Management Plan has been provided as part of the Transport Assessment. A more detailed and refined plan would be secured 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. Any potential queues on either side of the ramps should be identified and discussed in the context of the proposed measures.</p> <p>The 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</p>	



Stakeholder	Comment	Response
	<p>to maintain the ratio of 0.16 space per dwelling throughout the whole duration of the construction works as buildings become operational and occupied.</p> <p>The 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.</p> <p><u>Proposed Cycle Parking.</u> Cycle parking is proposed in line with the relevant London Plan (2021) standards. The number of cycle parking spaces per cycle store and external location should however be indicated on all relevant plans. A distinction should be made between Sheffield stands and two-tier racks, if not already the case. The adequacy of the long-stay and short-stay cycle parking and access arrangements would 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.</p> <p><u>Trip Generation Assessment.</u> 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. Whilst this approach is not wrong, it directly minimises the effect of the journey purpose disaggregation methodology used in the Transport Assessment and therefore may skew the assessment as the majority of the total proposed trips would still be derived from the consented schemes, which based their modal splits either directly on TRICS or journey-to-work data only. The effect of this is a potential overestimation of mode shares associated with commuting/business in the final total multi-modal trips for the proposed development.</p> <p>We therefore request that the total multi-modal trip generation be assessed first by using the whole proposed floorspace and number of residential units, then the net trip generation be derived by subtracting the consented trip generation from the extant Goods Yard and Depot permissions. Both sets of net multi-modal trips should then be compared and the higher of the two should be utilised for the transport network impact assessment. A short technical note setting out the comparison of the two methodologies and the resultant impact upon net trips across the different transport networks should be prepared.</p> <p>The same comparison should be undertaken for delivery and servicing trips, so that the net trip generation of those vehicles does not end up being underestimated. The loading bay requirement,</p>	

Stakeholder	Comment	Response
	<p>based on the total delivery and servicing trip generation, should be reviewed to ensure that the proposed number of loading bays remains adequate.</p> <p>The transport network impact assessment, which may need to be revised depending on the outcome of the above review, should consider both net trips from the proposed development and net trips plus cumulative trips from local committed schemes.</p> <p><u>Updated Alternative Trip Generation Assessment.</u> Further to my comments, the cumulative impact assessment has been revised due to errors in Table 10. The impact upon the local highway, pedestrian and cycle networks when considering both the total development and local committed trips is not significant and therefore acceptable.</p> <p>Of particular interest is the impact upon the rail and bus networks. The analysis has considered the maximum cumulative directional increases, respectively 71 bus trips departing southbound in the AM peak hour and 217 rail trips arriving northbound in the PM peak hour. These maximum cumulative directional increases have then been divided by numbers of local bus and rail services. However, it is unclear how these numbers have been obtained (respectively 43 buses per hour per direction and 45 trains arriving at the local rail stations) and therefore it is difficult to say whether the directional increases have been divided by the relevant numbers of services (in the same direction as the maximum flows identified) or the total numbers of services (in all directions). There is therefore the possibility that the average increases per bus/rail service derived to establish the impact upon individual buses and trains may have been underestimated and are lesser than what they should be.</p> <p><u>Additional Public Transport Impact Analysis.</u> Whilst I am concerned with the accuracy and robustness of the aforementioned assessment, I am overall satisfied with the assessment undertaken at TfL's request at a more granular level, taking account of the wider High Road West Masterplan trips (including an estimate of the Lendlease residential trips), however I still have some reservations about the cumulative bus trip impact assessment, and I think it needs to be more detailed and look at the impact upon relevant services for all directions, to identify the greatest directional impact. Ultimately, it would be welcome to hear TfL's views on the additional public transport impact analysis.</p> <p>All in all, I will not object on transport grounds, and a resolution to grant by the Council would allow greater scrutiny by the GLA and TfL, notably if mitigations are to be sought as a result of the impact upon certain bus services.</p> <p><u>Framework Travel Plan.</u> 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 <math>2,040 \times 95\% \times 70\% = 1,357\text{sqm NIA}</math>, i.e. 90 employees), a 7% mode share would</p>	

Stakeholder	Comment	Response
	<p>equate to 6 employees cycling, which is roughly 40% of the long-stay cycle parking provision of 15 spaces.</p> <p>Future versions of the Travel Plan should have regard to the emerging Walking and Cycling Action Plan (currently in draft form for public consultation) to ensure walking and cycling targets and measures align with the Borough's aspirations.</p> <p><u>Outline Construction Logistics Plan.</u> A Detailed Construction Logistics Plan (CLP) would be secured by planning condition. In the Outline CLP there is no mention of staff travel planning measures promote on-site cycle parking. This should be picked up in the Detailed CLP.</p> <p><b>Planning Conditions</b></p> <ol style="list-style-type: none"> <li> <p><u>Cycle Parking Details</u></p> <p>No development shall commence in the relevant Phase until details of cycle parking in that Phase have been submitted to and approved in writing by the Local Planning Authority. The details shall demonstrate compliance with the relevant London Plan (2021) standards and the London Cycling Design Standards. The cycle parking provision shall be implemented in accordance with the approved details and retained thereafter for this use only.</p> <p><u>Reason:</u> To promote travel by sustainable modes of transport and to comply with the London Plan (2021) minimum cycle parking standards and the London Cycling Design Standards.</p> </li> <li> <p><u>Delivery and Servicing Plan</u></p> <p>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 approved Transport Assessment) and Transport for London's Delivery and Servicing Plan Guidance (2020). The DSP shall be 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.</p> <p>This process 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. Further surveys and updates of the full DSP shall be discussed and agreed with the Local Planning Authority.</p> <p><u>Reason:</u> To set out the proposed delivery and servicing strategy for the development, including the predicted impact of the development upon the local highway network and both physical infrastructure and day-to-day policy and management mitigation measures. To ensure that</p> </li> </ol>	

Stakeholder	Comment	Response
	<p>delivery and servicing activities are adequately managed such that the local community, the pedestrian, cycle and highway networks and other highway users experience minimal disruption and disturbance. To enable safe, clean and efficient deliveries and servicing.</p> <p>3. <u>Detailed Construction Logistics Plan</u></p> <p>No development shall commence in the relevant Phase until a Detailed Construction Logistics Plan (CLP) for that Phase has been submitted to and approved in writing by the Local Planning Authority. The Detailed CLP for that Phase shall conform with the approved Outline Construction Logistics Plan (within the approved Transport Assessment) and Transport for London's Construction Logistics Planning Guidance (2021).</p> <p><u>Reason:</u> To provide the framework for understanding and managing construction vehicle activity into and out of the proposed development, encouraging modal shift and reducing overall vehicle numbers. To give the Local Planning Authority an overview of the expected logistics activity during the construction programme. To protect of the amenity of neighbour properties and to maintain traffic safety.</p> <p>4. <u>Car Parking Management Plan</u></p> <p>No development in the relevant Phase shall be occupied until a Car Park Design and Management Plan (CPMP) for that Phase has been submitted to and approved in writing by the Local Planning Authority. The CPMP shall include details of the allocation, management and enforcement of the on-site car parking spaces, including the wheelchair-accessible car parking spaces and electric vehicle charging points. The CPMP shall set out 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 and demonstrate their adequacy to manage any vehicle queues. The approved CPMP shall be implemented as approved and retained thereafter.</p> <p><u>Reason:</u> To manage the on-site car parking provision of the proposed development so that it is used efficiently and only by authorised occupiers. To protect the amenity of the site users. To promote sustainable travel.</p> <p>5. <u>Public Highway Condition</u></p> <p>No development shall commence until an existing condition survey has been carried out in collaboration with the Council's Highways Maintenance team with respect to the public highway along the site's boundaries, namely the carriageways and footways. After completion of all development works, including any highway works, similarly, a final condition survey will need to be undertaken. The applicant will need to ensure that any damages caused by the construction works and highlighted by the before-and-after surveys are addressed and the condition of the</p>	

Stakeholder	Comment	Response
	<p>public highway is reinstated to the satisfaction of the Council's Highways Maintenance team. All cost to undertake the surveys and carry out any highway repair works should be paid in full by the applicant.</p> <p><u>Reason:</u> To ensure the construction works do not result in the deterioration of the condition of the public highway along the site.</p> <p>6. Demolition and Construction Environmental Management Plan (including Demolition and Construction Traffic Management Plan) – for consideration, these might be suggested by other officers.</p> <p><b>Section 106 Heads of Terms</b></p> <p>Here are some Section 106 Heads of Terms. I'm sure there is standard text for these so here is a list of what I believe is required. As the proposed development would be phased, the wording of these may need to be adjusted:</p> <ul style="list-style-type: none"> <li>• Residential Travel Plan (including Travel Plan Monitoring Cost)</li> <li>• Commercial Travel Plan (including Travel Plan Monitoring Cost)</li> <li>• Car Club Membership Contributions</li> <li>• Car-Capped Agreement (including Traffic Management Order Contributions)</li> <li>• Highway Works (Section 278 Agreement) – plans showing the proposed highway works (including new access junctions), to be requested from the applicant.</li> <li>• Highway and Public Realm Contributions – these were requested for the previously consented Goods Yard and Depot applications, amount to be determined if this is relevant (unsure what the scope would be).</li> </ul>	
Tree Officer	<p>It is proposed to fell 20 trees to facilitate this large new development. 15 of these are category C trees, which are of low quality and value and should not be an obstacle to development. 4 are category B trees. All 4 category A trees will be retained as will 96% of category B trees.</p> <p>The 4 high quality trees (3001 to 3004) are located along the frontage of the Depot with the High Road. The root protection area of these trees is primarily covered by existing hard surfaces. The development proposal includes changes to the land use within the RPAs, but no significant changes to the surfacing. Robust tree protection measures must be installed to ensure these trees are adequately safeguarded. Close arboricultural supervision will also be required to ensure the successful retention of these trees.</p> <p>The landscaping plans show new tree planting in areas of open space throughout the development site. If these proposals are confirmed, it will result in a significant increase in the number of trees across the</p>	

Stakeholder	Comment	Response
	<p>site. This will also benefit the Northumberland Park ward as a whole, which currently has an existing tree canopy cover of less than 17%.</p>	
Waste	<p>Following the current LBH waste guidance provision the following will be required across the whole development.</p> <ul style="list-style-type: none"> <li>• 144x 1100L refuse containers.</li> <li>• 86x 1100L recycling containers.</li> <li>• 26x 240L food waste containers.</li> <li>• 867x food waste kitchen caddies.</li> </ul> <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. The business owner will need to ensure that they have a cleansing schedule in place and that all waste is always contained. 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 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>	
<b>EXTERNAL</b>		
Cadent Gas	<p>Affected Apparatus</p> <p>The apparatus that has been identified as being in the vicinity of your proposed works is:</p> <ul style="list-style-type: none"> <li>• Low or Medium pressure (below 2 bar) gas pipes and associated equipment. (As a result, it is highly likely that there are gas services and associated apparatus in the vicinity).</li> </ul>	
Clinical Commissioning Group	<p>The socio-economic chapter of the submitted Environmental Statement notes that there are five GP surgeries within approximately 1km of the site (Table 7.10 and Figure 7.6). Three of these practices are in the London Borough of Enfield. Paragraph 7.4.41 correctly identifies that the ratio of FTE GPs per registered patients is above the standard benchmark which indicates</p>	

Stakeholder	Comment	Response
	<p>that the practices have no surplus capacity. This includes the two closest practices - Tottenham Health Centre and Somerset Gardens Family Health Centre.</p> <p>Paragraph 7.7.30 suggests that a new health centre planned as part of the Tottenham Hotspur FC stadium redevelopment project could provide additional capacity. However, this facility has not been secured as a planning obligation and its use as an NHS health centre is not guaranteed. The CCG is not pursuing this option and are in active discussions with the Council regarding new healthcare provision for Tottenham Health Centre as part of the High Road West regeneration plans. It is envisaged that this new facility could come forward in 2028-29, but the timing is uncertain.</p> <p>In advance of a new facility coming forward, investment is needed to increase the capacity of local GP premises. A s106 contribution is required to mitigate the site-specific impact of the development and the CCG has identified that investment at Somerset Gardens Family Health Centre could provide additional capacity. The HUDU Planning Contributions Model has been used to calculate the contribution. The requirement would meet the tests in CIL Regulation 122 as it is considered necessary, reasonable and directly related to the development.</p> <p>Whilst health and wellbeing facilities are included on the Strategic Community Infrastructure Levy 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. To date, no CIL receipts have been allocated towards healthcare infrastructure. Using the proposed housing mix stated in the Planning Statement (Tables 4.1 and 7.2), the HUDU Planning Contributions Model calculates a primary healthcare capital s106 requirement of £449,510.</p>	
Enfield (London Borough of)	Acknowledged, but no comments received.	
Environment Agency	<p>We have assessed this application as having a low environmental risk. We therefore have no comments to make.</p> <p>Non planning consents: Although we have no comments on this planning application, the applicant may be required to apply for other consents directly from us. The term 'consent' covers consents, permissions or licenses for different activities (such as water abstraction or discharging to a stream), and we have a regulatory role in issuing and monitoring them.</p>	

Stakeholder	Comment	Response
Historic England	<p>On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation advisers, as relevant.</p>	
Historic England (GLAAS)	<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 close to the headwaters of the Lea's tributary valleys, in this case the Moselle to the south and Pymmes Brook to the north, and the already mentioned presence of the Roman road.</p> <p>Alongside prehistoric and Roman potential at the site suggested by its geography, hydrology and geology, there are also possible mediaeval and post-mediaeval 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.</p> <p>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.</p> <p><u>Recommended conditions:</u>  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.</p> <p style="padding-left: 40px;">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</p>	



Stakeholder	Comment	Response
	<p>B. The programme for post-investigation assessment and subsequent analysis, publication &amp; 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> <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>Condition: 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>	
London Fire Brigade	If the applicant complies with what they have put in Section 7 (of its Fire Statement), then they would comply with the London Fire Brigades requirements for firefighting access.	
Metropolitan Police (DOCO)	<p>We have met with the project Architects to discuss Crime Prevention and Secured by Design (SBD) for part of the site (NE5279 – 867-879 High Road) and not for the overall site or in the finite detail that has been presented in the planning application. Several requests were made in May 2021 to discuss the details, but due to the architect not being available for discussions further information was not presented to our department.</p> <p>However, it has been noted that the Architects have made significant changes to the overall site design to take SBD into consideration and this is disclosed within the Design and Access Statement with reference to design out crime or crime prevention. The architects have also stated that should it be required; consultation will take place with the MPS Designing Out Crime Team during the “detailed design stage”. At this point it can be difficult to design out all issues identified and at best crime can only be mitigated against, as it does not fully reduce the opportunity of offences.</p>	

Stakeholder	Comment	Response
	<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><u>Section 2 - Secured by Design Conditions and Informative:</u>  In light of the information provided, we request the following Conditions and Informative:  Conditions:  (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.  (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><u>Informative:</u>  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><u>Section 3 - Conclusion:</u>  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.</p> <p>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.</p>	

Stakeholder	Comment	Response
National Planning Case Unit	No comments on the Environmental Statement.	
Natural England	<p>Natural England has no comment on this application with regards to statutory designated sites.</p> <p>Natural England has not assessed this application for impacts on protected species. Natural England has published Standing Advice which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.</p> <p>It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision-making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.</p> <p>Your authority has a duty to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available here.</p>	
Network Rail	<p><u>Demolition</u> Any demolition works on site must be carried out so that they do not endanger the safe operation of the railway, or the stability of the adjoining Network Rail structures and land. The demolition of the existing building, due to its close proximity to the Network Rail boundary, must be carried out in accordance with an agreed method statement. Approval of the method statement must be obtained from the Network Rail Asset Protection Engineer before the development and any demolition works on site can commence.</p> <p><u>Scaffolding, Plant &amp; Materials</u> All operations, including the use of cranes or other mechanical plant working adjacent to Network Rail's property, must at all times be carried out in a "fail safe" manner such that in the event of mishandling, collapse or failure, no plant or materials are capable of falling within 3.0m of the boundary with Network Rail. Any scaffold which is to be constructed within 10 metres of the railway boundary fence must be erected in such a manner that at no time will any poles over-sail the railway and protective netting around such scaffold must be installed. The applicant/applicant's contractor must consider if they can undertake the works and associated scaffold/access for working at height within the footprint of their property boundary.</p>	

Stakeholder	Comment	Response
	<p><u>Track Support Zone</u> Please also note that the 'track support zone' is defined in Network Rail standard NR/L2/CIV/177 and any proposal which may require works to be conducted within this zone must be identified by the outside party and subsequent consultation with Network Rail must take place. Should criteria be met within this standard, a track monitoring plan will have to be agreed with Network Rail.</p> <p><u>Overhead Line Equipment</u> No works may be carried out where there is a risk of any plant or element, temporary or permanent, coming within 3.5m of the Overhead Live Electricity.</p> <p><u>Site Layout</u> It is recommended that all buildings be situated at least 2 metres from the boundary fence, to allow construction and any future maintenance work to be carried out without involving entry onto Network Rail's infrastructure. Where trees exist on Network Rail land the design of foundations close to the boundary must take into account the effects of root penetration in accordance with the Building Research Establishment's guidelines. Existing railway infrastructures should not be loaded with additional surcharge from the proposed development unless the agreement is reached with Network Rail. Stability of the ground / embankment adjacent to the railway should not be loaded with increased surcharge to mitigate the risk of instability of the ground which can cause the settlement on Network Rail infrastructure.</p>	
Sport England	<p><b>Community Sports Facility Provision</b> 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>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>	

Stakeholder	Comment	Response
	<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 2,081 (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 (£504,697), 0.1 swimming pools (£852,922), 0.07 artificial grass pitches (£93,867 if 3G or £85,376 if sand) and 0.1 rinks of an indoor bowls centres (£538,632). 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><b>Active Design</b> Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities</p>	

Stakeholder	Comment	Response
	<p>through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments.</p>	
Thames Water	<p><u>Waste Comments</u>  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>A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths, private swimming pools and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, commercial swimming pools, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc may be required before the Company can give its consent.</p> <p>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><u>Water Comments</u>  Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either: - all water network upgrades required to accommodate the additional flows to serve the development have been completed; or - a development and infrastructure phasing plan have been agreed with Thames Water to allow</p>	

Stakeholder	Comment	Response
	<p>development to be occupied. Where a development and infrastructure phasing plan are agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure 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”</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.</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</p> <p><u>Supplementary Comments</u>  Wastewater: As per response from developer enquiry - Sw from The Good Yard to discharge directly to the culverted watercourse of which Thames Water is not the maintainer. Approval should be sought from the Lead Local Flood Authority. As the development is located on a Brownfield site there may be existing sewers or rising mains crossing the site. Where these sewers or rising mains are to become redundant or have to be diverted the full cost of administering and undertaking the works shall be financed by the developer.</p>	
Transport for London	No comments.	
Waltham Forest (London Borough of)	No comments.	

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### Appendix 3: Internal and External Consultee Representations

Commentator	Comment	Response
<p>Cannon Road Residents' Group</p> <p>(see also re-consultation on design revisions below)</p>	<p>I would like to confirm that Cannon Road Residents' Group strongly object to these new plans. Core reasons for this objection are outlined in sections below.</p> <p><u>High rise positioning and density:</u>  The previously accepted plans, which we had no overall objection to and saw as being balanced and reasonable were at our realistic limit in what level of height and distance we'd be comfortable to have another high rise in relation to the Rivers Apartments building. The previous plans, to confirm, were 50m away, façade to façade. This distance in the new application has now reduced to 30m and will have significant 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 under this new plan.</p> <p>Even though the developer has worked on slim and reflective design for these new buildings, there is nothing they are able to do to make a living room window that is 40% closer not appear 40% closer.</p> <p>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 no regard for this at all - decisions involving light, privacy and south facing views are almost as bad as you could practically choose to make 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 any attempt at this.</p> <p>Given the Goods Yard is cleared and first to be developed, there is plenty of space between the two pieces of land to look at shifting the Depot building (and other high rises) further south in the proposal, to be more similar to the previous planned layout. 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.</p> <p>We don't believe we are being unrealistic here. We know aspects of the area need development. We know Haringey needs more homes and the developer is required as a</p>	

Commentator	Comment	Response
	<p>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 making additional money from this development at the expense of Rivers Apartments leaseholders.</p> <p>As you progress through our other comments you'll notice that are other factors, aside from our light and privacy, which will also make this building more sensible and liveable for new residents if it is further South from the Rivers Apartments building.</p> <p>Having been in pre-application conversation where this positioning change was discussed, the reasoning for putting all the high rises closer together and further towards the North of the site was for what appeared to be only explained as 'heritage reasons'. This does not feel justified given the impact on lives and privacy of both our residents and new residents for as long as these buildings stand (hopefully several generations). The liveability of homes built in the area should surely be a higher priority for both developer and Haringey council than any of these buildings sitting 20m closer to a listed/heritage building, which is visually sheltered from all surrounding buildings by trees anyway. Choosing to make residents live in below BRE recommended light conditions for the sake of some historic bricks not being a bit closer to new tiles and glass seems a poor decision for people that actually live in Haringey, participate in the local community and economy and pay council tax. There is of course a balance to be made here, and if it is required that the South Goods Yard high rise will need to be shorter to accommodate this, then that should be the solution here, especially given the original HRW plan was for buildings that scale down in size drastically more than is being suggested here.</p> <p><u>HRW guidelines and Depot positioning:</u>  Previously on a pre-application call with application architects, the applicant indicated that the Depot high rise positioning had been done in this way (i.e. Not the closest building to the train line or aligned with the other high rises, as would be expected given HRW guidelines) to reduce wind tunnel impact on the Rivers apartments roof garden. We haven't been able to find anything in the wind report files that substantiate this claim, and would expect any reason provided to build against the HRW guidelines would come with robust documentation and a rationale that has a net benefit for the existing community. Our opinion, having looked at previous and updated plans in detail, is that the key change between the previous application and the new application provides ALL south facing windows on ALL three new high rises access to 'profit inducing' views and that is the real driver behind the updated application ' more views' and more flats with these views.</p>	

Commentator	Comment	Response
	<p>The applicant provided images to us, at Rivers Apartments, of what our 'view' would look like with the new buildings. However, they have only provided this view from the very South East corner of our building. We are certain that if the same image was created for the South West corner, what would actually be seen by our residents is TWO high rises, both 29+ stories high. 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.</p> <p>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.</p> <p>The previous 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. It is sensible for safety and security reasons to have moved this in the new application, but to have left the building out of alignment, and build shorter properties in this space instead, this needs correcting.</p> <p><u>Noise impact assessment:</u>  Noise disruption is a significant issue already for residents at Cannon Road, and given our proximity to the new development, especially The Depot tower, in its new position just 30m away, we would expect that our feedback on significant noise issues would have been integrated into the noise impact assessment work so that historical mistakes would at least not be repeated, and at best, might even reduce sound impact on our existing residents. Many residents are already at breaking point with some disruption we deal with, so to find that nothing has been added to the report, even though the applicant AND Haringey Council have been informed in BCLG meetings we find completely unacceptable. (we will happily share more details on this outside of the planning comments in BCLG meetings).</p> <p>To be specific, there are two core issues here that we believe make the noise impact assessment completely null and void.</p>	

Commentator	Comment	Response
	<p>1. Lanhedge Lane industrial estate CO2 Gas Company N18 2TQ:</p> <p>This is a company situated just north of Cannon Road. The nature of their work causes extremely sudden and distressing gas noises which have been known to occur at any time of day, and day of the week (e.g.5.30 am on a Sunday). The sounds are loud enough to be heard and wake someone through closed windows. Knowing that you might be woken at 5am by a noise that resembles someone spraying deodorant in your ear is not a good way to stay healthy, nor an attractive feature for a high end flat to be sold at full market value. I have measured the noises from a bedroom, with window ajar and its often +15dB on the base level sound. Residents on the East side of our development are most impacted, with 90% of those who replied to us saying the business impacts their ability to sleep.</p> <p>Having raised this business and the problems we face with the applicant and councillors (BCLG) in February 2020 and asking why planning permission was granted to convert the Cannon Road site into residential (from industrial) given this type of work there was a bit of an apology and suggestion that sometimes things get missed. This is understandable, but to miss them now, when you've been informed by existing residents is not. Above this, Jennifer Barratt had been in discussion with us about this business since 2020 and when emailed by the noise impact assessor for this application she did not even reply. Anyone with regard for the future residents of the Depot site should have requested the business be included in an assessment, given the East façade of the Depot tower will have direct sight of this noise source too. Although this business is not in Haringey, it has a significant impact and must be considered.</p> <p>Fundamentally, even with the best window systems in the world, the outdoor amenity spaces on the Depot will often be a struggle to enjoy and the best solution for all parties might be to work with the gas company to support relocation, if they are willing.</p> <p>In the previous application this Depot building was 20m further away, which would have reduced the impact. With the previous location Ambrose Court would have also acted as more of a sound blockade and limit direct sound waves from the noise source too. In the new positioning the whole East side of the depot tower will have direct visibility of this business.</p> <p>2. Train stock change in 2020 and impact on both noise and vibrations from trainline:</p> <p>The vibration assessment in section 8 of the document was taken in 2017. On 22nd December 2020 I raised with the applicant (BCLG with Haringey council members present) that in recent</p>	

Commentator	Comment	Response
	<p>months our building had started having physically notable vibration issues. With investigation, we understand this is as a result of the change in train stock on the Overground Line. The new trains are 50% heavier than ones used before 2020, and in combination with a local defect on the rails situated somewhere between our building and where the Depot building would be, it is causing both audibly louder noise with trains passing and these vibrations.</p> <p>With this information, the vibration assessment is clearly inadequate and out of date - Carried out in 2017, but also at a location halfway down the Goods Yard, and nowhere near the local defect that causes vibrations, it does not reflect the current scenario and puts the developer at risk of building homes on the Depot site that vibrate unreasonably, perhaps even worse than ours given the slender design of these new buildings. In personal correspondence with Network Rail to understand the issue, they have implied that the local defect is due to have some work done in ‘a couple of years’, but they can’t say whether this will improve the vibration impact on our building, and therefore the vibration impact on any future buildings either.</p> <p>From our perspective, the vibration calculations need to be redone at the top West corner of the Depot site. If there are concerns about vibration here the council/ applicant will need to work with Network Rail to bring that rail defect fix in as early as possible so accurate checks for the longer term vibration risk can then be undertaken.</p> <p>Noise created at this track defect is also louder now than it has been in the past. Given the noise experienced by our residents at this track defect, we are somewhat surprised that only cat 3 glazing is proposed for the west side of the high rise in the depot site.</p> <p>The previous plans had this building 20m further south, and further away from the local track defect, which would reduce the risk of vibration impact. However, given the significant change in conditions since 2017 we would still suggest this is checked again, even with the previously accepted plans.</p> <p><u>Plant noise limits:</u>  IF this application is approved, it is essential that the definition of ‘affected façade’ here is clarified and aligns with the experience of NSRs. For us, this means measuring the noise impact at a balcony on the south side of Rivers Apartments, 5-14 floors up, and determining that the noise limits of 37 and 34 dB are also held from this position. The current location of ST4 is not adequate at all, especially for the first phases of this development : the B&amp;M building will shelter ground level monitoring from the majority, if not all of the noise from development</p>	

Commentator	Comment	Response
	<p>work. Meanwhile, our residents will be able to actively see the noise sources of all this development work for the next 7 years. (Seeing a noise source makes it significantly more likely you'll be able to hear it, from our basic understanding of physics and living in a high rise in this area for 6 years).</p> <p>Once work on the Depot high rise starts there will be additional impact from noise reflected back at Rivers Apartments from the newly build Goods Yard high rise. The ST4 position probably won't pick up the nature of this either. Measuring must be done fairly and accurately here.</p> <p>We also want to understand over what timeframe the dB Max. Lar threshold is calculated as this doesn't seem to be noted. We would request that this information is recorded and published to us and council at both the minute and hourly level and a minute based reasonable limit is also set, to ensure intermittent very loud noises aren't ignored by an average calculation. You'll be aware from above comments on gas noises that we find this form of sporadic loud noise extremely challenging already.</p> <p>The fact the shipping containers have already been located at the far end of the site implies to us that the developer are expecting to need to mitigate breaches in these noise limits, knowing they will not keep to them at all times. These shipping containers will do basically nothing to protect residents above the second floor of a 21 storey building with direct views of all building areas, so we would like to ask that further mitigation is put in place to allow our residents to continue with their normal activities as much as possible without disruption.</p> <p>There is nothing in the noise document that indicates what mitigation measures would be used during the 2022-2028 construction phases, but we would like to see this and understand how many would work practically for a high rise. Alongside, we would like to propose a suggestion for mitigation - taking two of our ground floor 'business spaces', (which to date have had no business use outside cladding replacement), and converting them into workspaces with noise insulated booths and community space for residents on Cannon Road to use during construction hours. Given the number of residents that expect to work from home at least 40% of the time post-pandemic and the number of years over which this development disruption is going to take place, we are concerned that it will have a lasting impact on the mental, physical and financial health of residents, where career and educational progression is stifled. We also have a number of children on the development that, over the next 7 years will develop into teenagers and need to make decisions about the value of education in their futures. To be able</p>	

Commentator	Comment	Response
	<p>to create a suitable space for them to do homework, away from distractions at home, and make connections with professionals also using the workspace; this would be the kind of investment in the local community we'd expect the developer to consider a valuable long term contribution anyway. Newlon have also suggested recently that the spaces could be used rent free if there was a compelling resident use for them.</p> <p><u>Air quality:</u> The documents suggest at least two locations for air quality monitors - given the SW prevailing wind direction we would expect one of these to be located on the roof of the B&amp;M building, and then during demolition move to the perimeter wall of Mallory court private gardens, at the end closest to the B&amp;M building.</p> <p><u>Concluding Statement:</u> We hope these comments and observations will be helpful in making a decision on this new planning application. We will again 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. We have not seen that in this planning application. We object to this application.</p>	
Lawrence Road resident	<p>Obviously, there are concerns about the viability of future phases because I assume that Spurs have much of the more lucrative residential uses in their section. It'd be disappointing if this application justified its design within a masterplan which couldn't be delivered when ownership is split this way. But I do support the densification of housing and a mix of tenures in this area for reasons of economic, environmental and community sustainability.</p> <p>There is a lack of east/west connection and pedestrian permeability at the north end of the site, which is understandable (due to the railway), but a problem. Ideally something could be done about that with the introduction of a subway at College or Durban Roads.</p> <p>The lower rise buildings vary a lot in styles which is a bit odd, but is presumably an effort to add diversity. Buildings fronting White Hart Lane are the most successful with relevant nods to local historic typologies. Most are decent enough efforts although many are rather generic and Block E in the Depot is probably the worst. Not to say that its form is terrible but it does feel like they had run out of time when they came to designing it. Something of a more tectonic expression, or some mannerism in the treatment of openings might help lift it from being very generic and poor. There's a bit too much reverence for Hawkins Brown and Morris and Co, when you'd</p>	

Commentator	Comment	Response
	<p>hope that the architects might be looking at slightly more interesting work, whether past or present. Stephen Taylor is the better precedent that's shown but the scheme doesn't take any of the lessons of that project (e.g. of detail and specificity).</p> <p>I object to the facade treatment of the three towers, in that they are to read so individually, both from each other and from the rest of the city. Clearly they differentiate themselves anyway by being tall, but that isn't necessarily a problem per se. I quite like the massing, form and clustering (including the modulation of heights) of the towers, but the surface treatments are just that; a shallow, wallpapering exercise which shouts much louder than its substance warrants. The careful form, mass and heights are enough of a statement already, they don't need to be three different colours and then have that awful, 'semi-revealed sheath' expression which shows the grey tiles to the tops. There is little great precedent for that in architecture, so it draws huge attention to a purely graphic gesture which is therefore both metaphorically and physically shallow. The interesting tiling that's proposed to lower levels of these towers, with its texture and articulation in the facades is much more successful and probably enough (with some additional variation between ground and top) to carry the full facades of all three. In my view all should be in a single colour which relates back to the surroundings (i.e. like the redder, brick-like colour of the southernmost tower), or at least three subtly different tones of the same colour. Making each tower a contrasting colour seems again to be an exercise in drawing attention to each constituent part of a cluster which will already get plenty of notice because of its height. The cluster should be considered not as a feature in itself but as part of a whole. There are numerous other tall buildings on the skyline and they don't/shouldn't all compete for as much attention as possible. When they all shout loudly we end up with a chaotic zoo of iconic gesturing on what should be (for the most part) a background. So, I would very much prefer the simplification of the facade treatment of these towers.</p> <p>The landscaping seems decent although there's always a sense (like many similar schemes) that the dial on the amount of planting is always turned down slightly. In a climate emergency we should be dialling it up and making a virtue of it. Developers rarely commit to more than the minimum planting because they think of it only as a cost that they can't sell on, rather than as an asset that will raise the value of the parts that they can. I wonder if they're hitting their Urban Greening Factor target and if not, they should be required to.</p>	
Love Lane Residents' Association	In the Love Lane Residents' Charter (February 2014), we stated that the following design principles should apply to the High Road West Regeneration:	



Commentator	Comment	Response
	<ul style="list-style-type: none"> <li>• Our residents do not want to live in a high rise and high density ‘concrete jungle’ of poorly designed housing, with poor local facilities and badly maintained open spaces.</li> <li>• Return to a more traditional street layout, opening out on to the High Street.</li> <li>• Buildings of a traditional design.</li> <li>• Mix of different types and sizes of homes, including the provision of houses with gardens.</li> <li>• A mix of housing tenures owner-occupiers, private rented and social housing, the majority of which need to be affordable to local people in order to avoid social polarisation.</li> <li>• That it should not be possible to distinguish between the different tenures, which should be mixed within the buildings and floors. On the Love Lane Estate council tenants live side-by-side with temporary tenants, private tenants and owner-occupiers and that helps to foster a socially integrated community.</li> </ul> <p>We do not consider that the scheme(s) proposed fulfil those criteria.</p> <p>In particular, we are concerned about the following matters:</p> <p><u>Proposed building heights.</u> At least one high rise building of 32 storeys is proposed in the planning application and that is out of character with the area. If approved, it will lead to more high-rise buildings being built in the High Road West area. The maximum heights of housing should respect current heights and not be above ten stories.</p> <p><u>Density levels.</u> The current housing density on the Love Lane Estate is around 90 dwellings per hectare. This proposed development will be well in excess of that figure, setting a pattern of much higher housing densities in the area. It will create a densely packed neighbourhood in an area that is already cramped and crowded.</p> <p><u>Travel.</u> The increased capacity of the new Spurs Stadium and the increased number of events planned has had a dramatic impact on the everyday lives of our residents. Pre-covid, it is virtually impossible on match days for our residents to move around the area freely on foot, bicycle, car, and on public transport. Indeed, many of residents are unwilling to venture out at those times and they are effectively trapped within their homes. More residents will make an already bad situation much worse.</p> <p><u>Affordable housing.</u> The scheme does not provide sufficient housing – particularly of social rented housing – that the local community can afford to live in. On the Love Lane Estate, there are 80+ homeless households who have placed in homes that are below their assessed</p>	

Commentator	Comment	Response
	<p>housing need – in other words, living in overcrowded conditions. There are also many hidden households on Love Lane (adult children still living with their parents and unable to find a home of their own). Council housing across the neighbourhood is in very short supply.</p> <p><u>Lack of green space.</u> Green and open space is already at a premium in the area. Recent Research by Friends of the Earth (2020) has placed the Northumberland Park Ward amongst the worst “green-space deprived” wards in England. The green space proposed in the planning application does little to address the problem of the lack of public open space. Very few, if any, private gardens are provided by the proposed scheme. The Covid-19 pandemic has shown how important public and private green space is for people’s well-being.</p> <p><u>Pressure on local services.</u> The rise in the numbers of properties proposed on both sites will increase the population of the area, placing additional strain on already stretched local services – e.g., the transport infrastructure, health facilities, child-care provision and local schools.</p> <p><u>Overlooking and loss of daylight.</u> The height of the taller buildings will create overlooking and overshadowing problems for neighbouring properties.</p>	
9 River Apartments	<p>I live at flat number 9 RIVERS APARTMENTS and work from home, we need a further review of the building application not to mention the noise disruption that will come from a seven year building site, also the new tower will block most of the sun light ( BRE RECOMMENDED LEVELS)coming into my flat as well as the view.</p> <p>I feel this will affect my health both physically and mentally, in order for this application to be approved I feel the tower should be built further away from rivers apartments.</p>	
11 River Apartments	<p>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.</p>	
26 River Apartments	<p>I am broadly in support of development and regeneration within this area but would like to raise some points identified within this consultation for the proposed developments at The Goods Yard and The Depot.</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</p>	

Commentator	Comment	Response
	<p>the train line which has resulted in significantly greater noise and vibration levels when Overground trains pass through, felt and heard within our existing building, 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.</p> <p>The noise assessment did not factor in any noise from the light industrial units to the north of the Cannon Road development. There is a particular issue with one of the units (a CO2 gas supplier) who often starts working approximately 0600hrs. The noise emitted by the compressors is loud and piercing, enough to wake residents through closed windows. Due to the position of the new towers (particularly the one in The Depot) they may be affected due to noise travelling through the corridor formed by the proposed extension of Cannon Road into the new development. It is already disruptive to any resident with either north or east facing aspects in Rivers Apartments, and in upper floors of Ambrose Court on Cannon Road.</p> <p>The final issue I would like to raise is the amended position of the tower block for the Depot development. Under previously agreed plans, the tower was 50m from Rivers Apartments and not in a direct line. This allowed some distance and increased both privacy and light levels for residents of both blocks. The current plans have The Depot tower block only 30m away, and in a direct line. It also appears to be taller than the original plans, creating a greater shadow and visual footprint. The effect of these three changes will reduce privacy for those residents in south facing Rivers Apartments and north-facing Depot flats. I am also concerned that this will bring natural lighting levels below that recommended. It does not appear to have been considered as an impact on existing buildings, with current reports only identifying impacts for the new development.</p>	
35 River Apartments	<p>Our reasons for objecting to the planning application as it stands are listed below:</p> <ul style="list-style-type: none"> <li>• We are already severely impacted by the vibrations from the train line next to Rivers Apartments (RA). The vibration assessment that was submitted within the application is from 2017, before the train stock change that happened in 2020 which causes the vibrations to River Apartments and therefore other buildings along the line. The track defects should be fixed with immediate effect before a current analysis can be run again to ensure the new building does not shake.</li> <li>• The new proposed closer proximity is not acceptable as it will leave residents on the lower floors with light levels below the recommended BRE standards. It also means our communal garden will now be overlooked by a loom 29 storey tower offering us no privacy.</li> </ul>	

Commentator	Comment	Response
	<ul style="list-style-type: none"> <li>• South facing residents of Rivers Apartments will now have their view severely impacted by not one but two 29 storey buildings. We had always been told that RA would be the tallest building and that any further purpose-built flats in the surrounding areas (moving down towards the stadium) would not be as tall or impact so negatively on the RA views. This has been completely disregarded in the current proposal.</li> <li>• The coronavirus pandemic now means that many residents with RA will have some sort of flexible working policy and be able to work from home on a regular basis. We have recently been impacted for three years by our own remediation works and to put residents through this again for a further seven years is not acceptable. It will increase noise levels and affect our ability to work from home with ease and in turn potentially affect our mental health and work / life balance.</li> <li>• The previously agreed proposal was a lot more reasonable and considerate to local residents as opposed to the new proposed plans which directly contradict what was set out before with no consideration to how this will affect others. It's clearly now about making as much profit as possible by proposing huge towers which will seriously effect residents of RA way of life and will devalue the properties of those most affect by the new proposal.</li> </ul>	
<p>43 River Apartments</p> <p>(see also re-consultation on design revisions below)</p>	<p>When I bought my flat back in 2015 the plan was building 1 tower in the south yard as high as River Apartments.</p> <p>Now the plan changed for 2 huge towers (way higher then RA).</p> <p>I'm completely against it as will change my south views. Moreover, I'm against because if this was the initial plan I wouldn't have bought this flat.</p> <p>I wasn't consulted on the changes and I don't agree with them.</p>	
<p>44 River Apartments</p>	<p>When I moved to Rivers Apartments several years ago I was well aware of the planned building of new housing in The Goods Yard, however the original proposals have changed well beyond what they originally were and seem to show continued little consideration for existing residents. The proposed scheme will both block light from the Rivers Apartments building as well as provide reduced privacy both for those currently in the building as well as those in proposed new buildings. For those currently living on Cannon Road, we can no doubt expect that work times will bend to whatever whim is convenient for Tottenham Hotspur as well rather than the local residents given that the stadium building works appeared to consistently operate</p>	

Commentator	Comment	Response
	<p>outside reasonable and permitted times. I would appreciate if someone is able to explain why these plans have so consistently changed and why the current plans are deemed necessary?</p>	
<p>47 River Apartments</p>	<p>I am concerned that the building site is not fit for purpose due to the noise already in the area.</p> <p>The CO2 company in the Langhedge Lane Industrial Estate emits high pitch whistling noises when they are filling the tanks. This noise can begin before 6am, and is loud enough to be heard when the windows are closed. We have complained multiple times to the council which has not had any impact.</p>	
<p>48 River Apartments</p>	<p>While I completely support the redevelopment of the area, the welfare and rights of current residents are being overlooked. The towers being proposed will block light and infringe on the privacy of residents in Rivers Apartments. The position of the taller buildings is directly in front of Rivers. Surely there can be compromise and the taller buildings positioned in a staggered manner or closer to the high road? They should not all be clustered together when there is ample space. This will definitely impact on the wellbeing and mental health of residents who have shown commitment to the redevelopment of the area. We have endured stadium construction delays with additional noise and disruption. Cladding issues and noise pollution from the general area. What sort of equality impact assessment has been done to address the mental health impact on Rivers residents around light and privacy as well as the impact on property value as the views are now obstructed and just of another building. Additionally, the area infrastructure such as transport, safety and pollution cannot, I feel, support tripling of population without upgrades. Rivers currently shakes significantly with passing trains. The position of the towers nearer the rail line will bring similar issues and safety concerns there. Given tragic events such as Grenfeld and the Miami building collapse, there must be a conservative approach to building towers. I strongly urge all involved to compromise and position the taller buildings in a more reasonable space.</p>	
<p>69 River Apartments</p>	<p>The proposed plans have not considered the health and privacy for the future and existing residents of this development, I object to the new proposed plans for several reasons:</p> <p>1. 30m distance from facade to facade is too close for a directly adjacent high rise and will affect the light levels on the lower levels of Rivers Apartments to below the minimum BRE values. This will affect the health and well-being of these people.</p>	

Commentator	Comment	Response
	<p>2. I live on the south west corner and have not been provided with an image of the view from this side. I believe this has deliberately not been provided as from the plan view it seems I'll be in view on two individual high-rises along a train track. This layout is against Humans Right Watch guidelines for high rise positioning, where they should be placed in a direct line as shown on the previously approved scheme.</p> <p>3. Noise assessments have not considered key sources of noise in the area, most important being the Snell's park industrial estate (CO2 gas company) which are a nuisance at 5am for any north facing apartments. Assessment should be revised.</p> <p>4. Having a neighboring high-rise directly perpendicular and only 30m away will take away people's privacy and bring noise disturbance for both parties, again effecting their health and welfare.</p> <p>I object to the proposed plans and believe the existing proposal was borderline acceptable. It's seems we have given an inch and a mile has been taken, please reject this proposal for the well-being of new and existing residents.</p>	
78 River Apartments	<p>I'd to like firstly state that I strongly agree with all the comments that the Cannon Road Residents' Group has already provided on this planning application.</p> <p>I appreciate what the regeneration vision is trying to achieve, however, I object to these plans. These plans, and the recent changes to them, will 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 positioning The buildings were initially planned to be 50 metres away from Rivers Apartment and in these proposed plans, they are only 30 metres. This significant change will greatly impact the residents in this block.</p> <p>It's clear the buildings have been repositioned in order to have attractive views of the city, privacy and light to achieve the best possible price for Spurs and the developers. This repositioning however, will 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 hasn't been considered here. Consideration has been given to future residents to fund</p>	

Commentator	Comment	Response
	<p>Spurs developments at the expense of the Rivers leaseholders (and also others who hold investments in this building such as Newlon Housing Trust).</p> <p>For some flats this new positioning means that they will be left with light levels below BRE recommended levels. For some other flats, this means that views from their flats 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 now 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. Noise, vibrations &amp; disruption  2.1 . CO2 Gas Company noise  The CO2 Gas Company has been disturbing the sleep and general comfort levels of many residents for several years now. They operate six days a week often before 7am, have been known to operate on Sundays and also in the early hours of the morning (2am/3am).</p> <p>The noise can be heard even with the windows closed and attempting to sleep in an extremely well insulated (unfortunately not for noise) apartment means that it can get very hot, especially in the summer. It creates quite an unbearable environment. New buildings are not built for the heat and as we've seen this week, we are experiencing more and more high temperatures and hot weather and this will only continue. This will be an issue for all people living in new high rise blocks, including those in this is planning application. This noise will impact the east side of the Depot high rise and therefore those residents will have to experience the same challenges we do.</p> <p>A possible remedy to this situation would be for the CO2 Gas Company to be relocated from Langhedge Lane Industrial Estate. Until this happens Haringey council should not be permitting further residential units in its proximity. You can see from the planning application documents that have been uploaded that Jennifer Barrett from Haringey Council was contacted by the noise impact assessor about this proposal and didn't even reply. There's been a complete lack of regard to include this company in the assessment. Haringey Council know this is already impacting a large number of us in Rivers Apartments and Cannon Road properties so it seems incomprehensible to me that they haven't included them.</p>	

Commentator	Comment	Response
	<p>2.2 Trains The vibration and noise from the trains is an ongoing concern for Rivers Apartments. If it's affecting this block, it will most certainly affect these proposed new builds.</p> <p>The documents shared show that the vibration assessment that was undertaken was from 2017; that's four years ago. This was before the new rolling stock was introduced in 2020 which is much heavier and causes considerable vibrations to our building (the building shakes when the trains pass). The ongoing impact of these vibrations will likely cause damage to the building and will only do the same to any new structures.</p> <p>The track defect needs to be fixed and this should be completed before a new assessment is undertaken to ensure that there is no future impact to the new buildings.</p> <p>2.3 Building work impacting the ability to work from home Many of us are now working from home more than we are in the office and are therefore impacted more from the day to day noise in the area. Noise and disturbance from the area bounces off the local buildings (including from the CO2 Gas Company) and is incredibly disruptive.</p> <p>Even if the building works for these proposed plans are carried out during 'reasonable hours', many of the residents will be impacted by the ability to do their jobs due to this disruption and disturbance. This noise disturbance (and no doubt pollution from the works) is likely to go on for several years – approximately seven - which is an extremely long time to have to endure this.</p> <p>As such many residents would benefit from a secluded space to work from. A possible solution to this would be to use the empty units at the bottom of Rivers Apartments. This would require some investment and is something that no doubt Spurs could support given all the disruption that they'll be causing the local residents. This would also benefit the local community by providing space for families and other residents to use. We know Spurs are keen to support this kind of activity, given their commitment to their corporate social responsibility.</p> <p>In conclusion, I hope that these comments and others that are received on the planning application from local residents will be factored into the decision making to achieve a fair and equitable outcome that benefits all parties.</p>	



Commentator	Comment	Response
82 River Apartments	<p>I believe the change in the location of the building from 50 meters away to 30 meters away from Rivers Apartments was not communicated to the residents upon purchase. The closer 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>Noise pollution at Rivers Apartments has been an increasing issue. Vibrations and noises from the trainline add to this and are profoundly noticeable, a further assessment/analysis of this is required after fixing the track defect should a new development be considered.</p> <p>The CO2 Gas company located at 12-13, N18 2TQ, has been an incredibly problematic issue with regards to noise for the residents of Rivers Apartments, and it will no doubt cause issues for the new builds. Work is carried out from 5am in the morning, continuing late into the evening. Short, but astoundingly loud bursts of gas being expelled or topped up from cylinders can leave residents startled. It's an uninviting early morning alarm which is causing a lot of anxiety and sleep deprivation. Given the uncomfortable levels of heat in the building, windows are required to be left open, so avoiding the noise is impossible. The level of noise that is experienced from the building leads me to believe that a thorough analysis of environmental impacts to the building were overlooked when planning the building proposals of Rivers Apartments, would these have also been overlooked for the new builds? The purchasing of property with knowledge of these noise issues would not be favorable, and should be highlighted and made transparent to those thinking of investing. A level of regret in deciding to purchase in such as area is definitely present given the issues described.</p> <p>It should also be noted that the gates of the estate are left open at night, providing an optimal area for prostitution. I have personally seen prostitutes leading clients to the site, again providing a very undesirable residential area for high end builds.</p>	
88 River Apartments	I would like to begin by saying how supportive I am of the ORIGINAL plans that have already	

Commentator	Comment	Response
	<p>been approved. I believe that the area does need new homes, and redevelopment of unused land.</p> <p>However, the recently submitted updated plans we cannot support, and strongly object to.</p> <p>My main point of concern is reducing the distance between the existing Rivers Apartments building and The Depot tower by 40%, from 50m to 30m. The Depot tower north elevations not only moves that much closer, but also now runs completely parallel to, and in front of the Rivers Apartments building. This will have a HUGE impact on privacy for anybody living in a south facing apartment in Rivers Apartments, and anybody moving into a north facing apartment within The Depot tower.</p> <p>There is no good reason for moving the tower this close to Rivers Apartments, and directly in front of it, other than to ensure the south facing Depot Tower view is unobstructed by The Goods Yard towers, in the hope that the view will increase sale prices.</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>It is clear from the plans that NONE of the new towers will have sides of the buildings that directly face one another, providing an acceptable level of privacy and access to direct light. Why is it that existing residents should lose privacy and sunlight for the benefit of these new buildings?</p>	
96 River 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 2015-2016 that they are virtually unrecognisable.</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</p>	

Commentator	Comment	Response
	<p>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.</p> <p>Subsequent plans always allowed for a smaller building in between Rivers Apartments and the new taller building. 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 schoolchildren on the entire Cannon Road complex: Rivers Apartments, Mallory Court, Ambrose Court and Brook House. Note that for the following flats at Rivers Apartments the new building work will leave them with light levels below BRE recommend levels: flats # 3, 4, 8, 9, 13, 14.</p> <p>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 the newly planned buildings.</p> <p>Any building that you are planning should not be so significantly tall and should be 18 stories or lower as originally planned for.</p> <p>The revised plans that you are proposing are now changing the entire complex by making a tall building even taller (either 29 or 31 stories, it is unclear from THFC's communications) and placing it approximately 40% closer to Rivers Apartments, i.e. from 50m to 30m.</p> <p>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.</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-storey building a mere 10 metres away, rendering it useless as it will no longer be a peaceful &amp; private place to unwind.</p>	

Commentator	Comment	Response
	<p>In addition, views from at least 20 flats (all ending with 4 or 9) will now be of two 29 storey buildings. This goes against HRW planning guidelines which intended for all high rises to be in a line against the train track. If this were followed then the above flats should only be able to see one.</p> <p>The new positioning of the two buildings means that Rivers Apartments will have the entirety of the view of London obstructed, which was never in the plan. Once again this is an example of Spurs' greed, ignoring the promises they have made previously and having a significant impact on the wellbeing of residents who also live on the complex.</p> <p>In addition, 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>Note that the majority of residents at Rivers Apartments, including myself at #96, are impacted by the vibrations and noise coming from the train track. The vibration assessment presented by THFC Future Plans is from 2017, before the 2020 train stock change that causes the current vibration. It is imperative that they should fix the track defect and then run the analysis again to make sure the new building doesn't shake.</p> <p>Another factor that has not been taken into consideration is that - along with many other residents at Rivers Apartments - I am now working from home indefinitely. With the new buildings scheduled to take at least 7 years, the noise impact from prolonged living next to a building site will severely impact my ability to work, potentially my career progression, and certainly my mental health. Especially with buildings now so close to Rivers Apartments.</p> <p>Finally, the reports about sufficient public transport being provided for the area do not seem to match the reality of living here. The Overground is already full at peak travel times and it cannot accommodate many more commuters, let alone the hundreds of people that the new apartments are going to be housing. There doesn't seem to be sufficient consideration made for this.</p>	

Commentator	Comment	Response
20 Cannon Road	Finally. Excellent for the area! Well done!	
15 Cooperage Close	I wish to offer my full support for this planning application.	
38 The Lindales	There's no sufficient amount of affordable housing for those on low income or on UC.	
45 Pretoria Road	<p>I am providing some feedback on the planning application as an owner of property that will be potentially affected by the development and as a resident of the area for well over twenty years.</p> <p>My feelings towards the Goods Yard and Depot are generally positive, and I welcome any regeneration that provides good quality housing, jobs, business, entertainment and inspiration for the area. I do, however, have some concerns.</p> <p>In your Affordable Housing Statement you state that your scheme will provide 36% of affordable housing, which to me is already a rather small number, but from what I can tell only 40% of these will be 'low-cost'. This to me seems to be an overall rather minimal effort to tackle the issue of people who cannot afford homes that will likely be 80% of the market value, which I expect to be already way out of their reach.</p> <p>I also noticed a lack of any shared ownership options in your scheme that would aid those who would not have the income to rent or purchase property in the development as well, and find it rather odd given that this was offered before in the Cannon Rubber Factory development a few years back.</p> <p>I also feel that the 61 places offered to residents of the Love Lane estate (whose properties are currently under threat of demolition due to the ongoing HRW Masterplan that this development falls under) to be rather inadequate given the current circumstances, and there seems to be a lack of info as to who is eligible for those places.</p> <p>Another concern is a more personal one. The tower on the Depot development in the current plan will be situated directly opposite the front of my property in Pretoria Road, and I am concerned that it may negatively affect the view from there and also the resale value of my property and those of my neighbours along the same stretch of road.</p> <p>I understand that the placement and size of the towers have been designed to be as non-disruptive as possible, and I am happy and grateful for the effort, but looking through the maps,</p>	

Commentator	Comment	Response
	<p>visualisations and TVIA documents haven't really helped ease my concern. The existing New River apartment tower has in my eyes at least been really well designed to give some consideration to the light quality and field of view, and I hope that the final design of the 3 towers will attempt to do the same.</p> <p>I hope you will appreciate my concerns for the effect that this development will have for myself, my neighbours and the surrounding community, and I look forward to further news and info on the progress of the Goods Yard and Depot project.</p>	
61 Durban Road	<p>The parking situation in this road already suffers from commuters( using White Hart Lane Overground) taking up any available parking spaces when those in Pretoria Road are full.</p> <p>Now we are moving back to normal working patterns this is becoming increasingly noticeable during the week. I have already expressed a strong preference for a residents parking permit scheme for Durban Road in a survey of parking requirements undertaken by Haringey some time ago. The situation is bad.</p> <p>This is not about being able to park outside my house (which I know is not a right ) but being able to park somewhere on the street. I often par 100/200 meters away which is not ideal when something has to be loaded /unloaded.</p> <p>With this development I am assuming that there will be sufficient parking for the new residents/ business and business customers so that there is no overspill into this already crowded area. If this is not the case, then I would be interested to know</p> <p>However, looking back to the last major development in the area (the Stadium) the road was full of worker trucks and cars* to the extent that parking became impossible ( not just very difficult) (* or at least at the time judging by how many cars did not have a Tottenham Events day parking sticker which is a good indication whether the vehicle is resident)</p> <p>Therefore, my concern is that there is enough parking for workers on the development during its process.</p>	
Norfolk Avenue (Wood Green)	<p>No. This is getting ridiculous. Please, please please STOP BUILDING HIGH RISE PROPERTIES. Why do Councils believe that people will be happy in them, given that so many have been demolished? Why are you intent on building tomorrows slums today? This is</p>	

Commentator	Comment	Response
	<p>another example of Haringey thinking they can solve any housing crises by building horrible little places that one person can barely move in, let alone a potential family. What will happen is that people may buy pool together to buy, but not live in them - they rent them out at over the cost of the mortgage. When they are rented out, you will have over population of the properties, people moving in and out constantly. Then you will have the associated mess with those people moving in and out. Of course, there are never enough parking spaces, so all those extra people who move in will cause parking issues and the police will have even more disturbances to try and calm down.</p> <p>Will the water system be able to stand up to it? But Haringey don't care, they went ahead with 550 White Hart Lane in spite of the Water Board having fears. I await to see what issues will occur, the properties there will soon start to tilt and crack, as the properties at Thetford Close did 40 years ago. You just do not care. All you see is quotas. This used to be known as one of the greenest boroughs, you are turning into a concrete abyss. Pretty much like Tottenham Hale is. Dreadful place.</p> <p>Not to mention, where are the extra people going to send their children to schools? There are not enough spaces now, the bus route W3 is packed, even with the school service running, I don't even want to imagine the High Road at peak times. Will the existing GPs be able to cope with the extra influx?</p> <p>How many of Haringey's councillors are living near this site? Any? I'd be surprised if they were. Because I can't see that anyone with sense would be happy for this to go ahead. The site at the old Cannon Rubber Factory is bad enough, this is more of the same.</p> <p>No No NO NO NO !!! Stop it!</p>	
<b>Re-consultation on design revisions</b>		
Cannon Road Residents Association	<p>The way these changes have been communicated, it doesn't seem to be an active attempt at consultation with local residents, but perhaps you do other work here that I'm unaware of? From a quick poll of our residents, we're seeing 93% preferring the previous design of the scheme... That's not exactly a marginal result!</p> <p>From our perspective, the main part of the application where we had nothing negative to say was on the cladding design. It seemed modern, innovative in use of glazed ceramic and appropriate in the context of our building, Tottenham's heritage and the stadium design. For our</p>	

Commentator	Comment	Response
	<p>residents specifically, the blue and silver finish on the depot building would have made its position in the sky less intrusive when viewed from our windows against the sky. Glazed tiles were also chosen by the developer to reduce light impact from the very close positioning by reflecting sunlight back into our homes.</p> <p>So, replacing this design at the Depot building with the darkest matt terracotta shade possible is very concerning residents, some of whom will already be subjected to light levels lower than BRE guidelines with this new development. I didn't ever expect that the council would have less regard for these factors than the developer making the application, yet this is perhaps the case?</p> <p>And even on the broader street view - there are several updated rendered images that 'coincidentally' block the view of our building using kebab shops and trees, so you might be forgiven for thinking it looks fairly nice, which as a contained design without context of our building, it does. I have attached the one view provided that is best representative of what it will actually look like overall, before and after... The new version is so obviously jarring against our building I'm almost speechless than anyone with a design background would approve. Given our building is currently spaced with these buildings in a way that implies they are connected and we are often referred to by the developer as being part of this 'high rise family' I am struggling to see any awareness of this at all in the design change request. We have no doubt that this new design would have to be positioned further away from our building to seem even a vaguely sensible change.</p> <p>Given the sporadic (and many locals would even say bad) design cohesion at Tottenham Hale we want to understand the council rationale for wanting to make these changes before 8th November, when we will be objecting to the application and this amendment at the planning meeting.</p> <p>At what date and in what format was the design team able to raise concerns with the developer? What were those concerns? Were they raised in relation to comments made on the application and after the initial consultation deadline? Were concerns about other aspects of the application able to be raised at the same time, and were any raised, came what where they?</p>	
43 River Apartments	Initially only one building was planned to be built on this site. Now there's two, even higher buildings. I'm against it from the beginning.	



Commentator	Comment	Response
20 River Apartments	Thank you! Please start ASAP. Great for the area! Bought the flat because of the area regeneration but nothing yet. Please make this happen ASAP.	

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GREATER **LONDON** AUTHORITY

Good Growth

**Graham Harrington**  
Principal Planning Officer  
Haringey Council  
Development Management  
Civic Centre, 55 the High Road  
N22 8LE

**Our ref:** GLA/2021/0718/S1/01  
**Your ref:** HGY/2021/1771  
**Date:** 23 August 2021

Dear Graham

**Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008**  
**The Goods Yard and the Depot, High Road West, Tottenham**  
**Local Planning Authority reference: HYG/2021/1771**

I refer to the copy of the above planning application, which was received from you on 25 June 2021. On 23 August 2020 the Deputy Mayor for Planning Regeneration and Skills Jules Pipe MBE considered a report on this proposal, reference GLA/0718/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that the application does not fully comply with the London Plan for the reasons set out in paragraph 127 of the above-mentioned report. However, the possible remedies set out in that report could address these deficiencies.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the Council under Article 6 to refuse the application; or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Juan Sanclemente, e-mail: [juan.sanclemente@tfl.gov.uk](mailto:juan.sanclemente@tfl.gov.uk)

Yours sincerely

A handwritten signature in black ink that reads "John Finlayson" with a long horizontal flourish extending to the right.

**John Finlayson**  
Head of Development Management

cc Joanne McCartney, London Assembly Constituency Member  
Andrew Boff, Chair of London Assembly Planning Committee  
National Planning Casework Unit, MHCLG  
Danny Calver, TfL  
James Beynon, Quod

# The Goods Yard and The Depot, High Road West, Tottenham

Local Planning Authority: Haringey

local planning authority reference: HGY/2021/1771

## 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 867 homes (36% affordable housing by habitable room), 1,878 sq.m. of flexible commercial, business, community, retail and service use (in Class E use), together with public open space, landscaping, parking, with building heights ranging from 6 to 32-storeys.

## 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 (paragraphs 25 to 31).

**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. However, further discussion is required to verify the appropriate blended affordable housing threshold for the site, in accordance with the London Plan. Further details are required to confirm the affordability of intermediate housing (paragraph 33 to 57).

**Urban design:** The layout, landscaping, density and residential quality is supported. The legibility and quality of the southern entrance should be improved, with pedestrian access provided on both sides of the footway (paragraph 58 to 95).

**Tall buildings:** 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. However, the design and materiality of the tops of the towers should be reconsidered to ensure they have a positive townscape impact (85 to 91).

**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 (73 to 80).

**Transport:** Clarification is required on the trip generation assessment to enable officers to establish the impact (and cumulative impacts) on public transport (London Overground and bus services) in the context of the High Road West Masterplan site. 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 97 to 107)

**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 (paragraph 108 to 123).

### **Recommendation**

That Haringey Council be advised that the application does not fully comply with the London Plan for the reasons set out in paragraph 127. However, the possible remedies set out in this report could address these deficiencies.

## Context

1. On 25 June 2021 the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following categories of the Schedule to the Order 2008:
  - Category 1A: "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."
  - Category 1B(c): "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - outside Central London and with a total floorspace of more than 15,000 square metres."
  - Category 1C(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/>

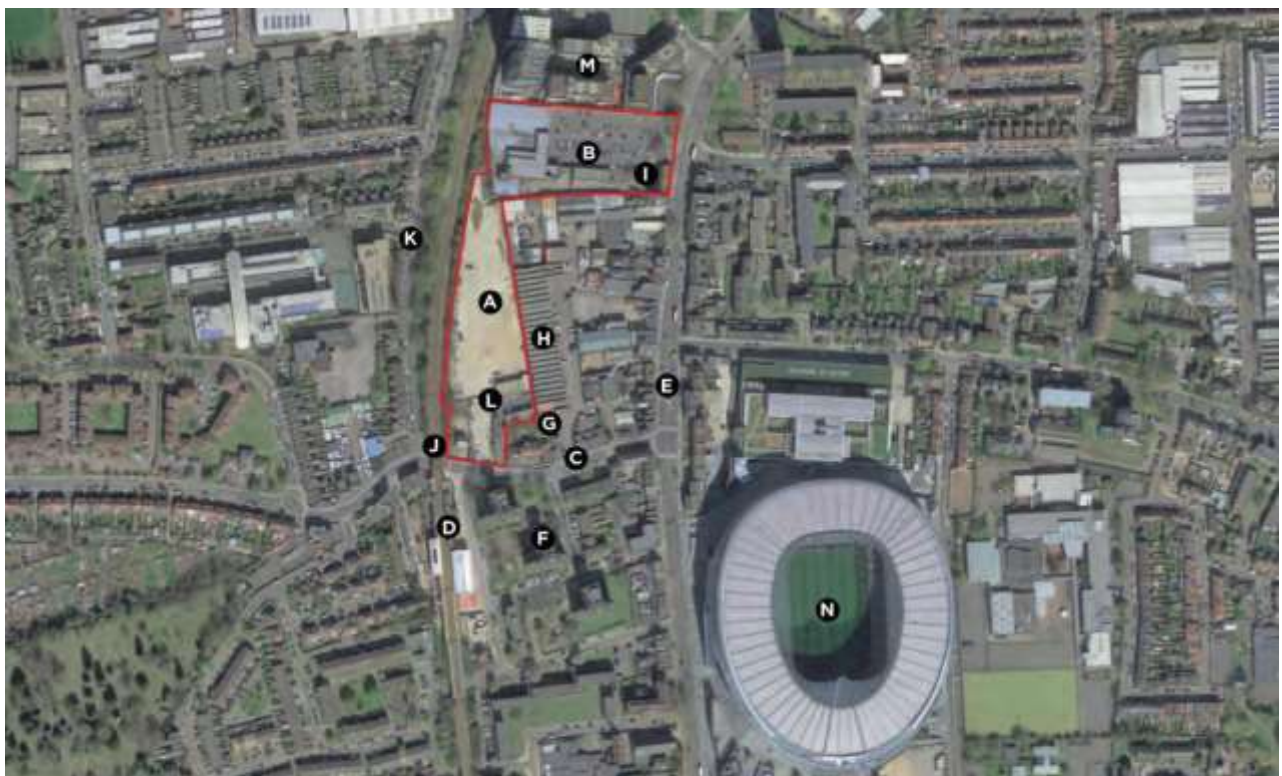
## Site description

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 (as set out in more detail below) 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



**KEY**

- |  |                             |                                 |                                    |
|--|-----------------------------|---------------------------------|------------------------------------|
| <span style="color: red;">■</span> Site Boundary | <b>D</b> Overground Station | <b>H</b> Peacock Ind. Estate    | <b>L</b> Carbery Enterprise Park   |
| <b>A</b> Goods Yard Site                         | <b>E</b> High Road          | <b>I</b> 867-869 High Road      | <b>M</b> Cannon Road Development   |
| <b>B</b> The Depot Site                          | <b>F</b> Love Lane Estate   | <b>J</b> Station Master's House | <b>N</b> Tottenham Hotspur Stadium |

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.

### **The 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). The Cannon Road development to the north of the Depot site comprises residential blocks ranging in height from 6 to 10, together with a 22-storey tower (Brook House) and a primary school.
15. 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. The Council has recently commenced a ballot consultation with residents on the emerging estate regeneration proposals. 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.

## Details of this proposal

16. Full planning permission is sought for the residential-led mixed use redevelopment of the site comprising:
- 867 homes (36% affordable housing by habitable room);
  - 1,878 sq.m. of flexible commercial, business, community, retail and service use (in Class E use);
  - 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 32-storeys.

17. The layout, height and massing of the scheme is shown below in Figure 2.

Figure 2 – layout, height and massing



18. A total of 14 blocks are proposed, together with the change of use of Station Masters House and 867-869 High Road. Three towers are proposed ranging in height from 27, 32 and 29-storeys, from south to north. The Goods Yard scheme proposes 8 blocks ranging in height from 3, 5, 6, 7, 7 and 32-storeys. The Depot scheme proposed 6 blocks ranging in height from 5, 6, 9 and 29-storeys. The northern section of a proposed public park (Peacock Park) is also proposed which would be fronted by Blocks B, D and G within the Depot site. The remainder of this public open space is anticipated to be provided on land to the east, as envisaged in the High Road West Masterplan (2014). This would necessitate the adjacent sites coming forwards which are in separate ownership.
19. This application proposes an uplift of 221 homes and 330 sq.m. of non-residential floorspace above the extant planning permissions. Within the Depot site Blocks D, E, F and G are identical to the extant planning permission in terms of scale, layout and use. An extant Listed Building Consent (LBC) exists for the

conversion of 867-869 High Road to residential use and the proposals for this element of the scheme remains unchanged (LPA ref: HGY/2019/2930).

## Case history

20. 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.
  - 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.
  - 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). In addition, the applicant stated that it would be willing to deliver 40% affordable housing (by habitable room) if housing grant is available, which was secured via S106 agreement. 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.
21. In relation to the current proposals, a GLA pre-application in principle meeting was held with the applicant and Council on 5 May 2021 in relation to which an advice note was issued on 14 May 2021. This supported the land use, housing provision, layout and design. Further discussion and a more detailed assessment was required to determine the affordable housing threshold for the site and in relation to tall buildings, heritage, townscape and environmental impact.

## Strategic planning issues and relevant policies and guidance

22. 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.
23. The following are also relevant material considerations:
  - The National Planning Policy Framework and National Planning Practice Guidance;
  - The Mayor's Affordable Housing and Viability SPG;

- 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)

24. 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 &amp; Viability SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; the London Housing Strategy; Good Quality Homes for All Londoners draft LPG;</i>      |
| • Urban design and heritage                  | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Good Quality Homes for All Londoners draft LPG;</i>  |
| • Inclusive access                           | <i>London Plan; Accessible London: Achieving an Inclusive Environment SPG;</i>   |
| • Climate change and sustainable development | <i>London Plan; Sustainable Design and Construction SPG; the London Environment Strategy; Circular Economy Statements draft LPG; Whole-life Carbon Assessments draft LPG; ‘Be Seen’ Energy Monitoring draft LPG;</i> |
| • Transport                                  | <i>London Plan; the Mayor’s Transport Strategy</i>   |

## Land use principles

25. 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.

26. 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.
27. 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.
28. 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.
29. The application proposes to increase the permitted number of homes from 646 to 867 (+221 homes). 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.
30. The revised application has been progressed through a design-led approach, in accordance with the London Plan, as set out in more detail below. The scheme broadly maintains the layout and public open space framework established by the High Road West Masterplan and existing planning permissions, whilst also ensuring an increase in open space compared to the existing planning permissions (+4,470 sq.m.). The provision of affordable housing would be increased by 70 additional affordable homes compared to the extant planning permission. Similarly, the quantum of family sized housing is increased (+69 homes) and the quantum of play space provision has also been increased (+290 sq.m.). This is supported. The quantum of additional flexible commercial floorspace in Class E use (+330 sq.m.) is acceptable.
31. GLA officers note that ongoing discussions are being undertaken with the local planning authority to establish the social infrastructure requirements for the site, which should be agreed and secured by planning obligation, in accordance with London Plan Policy D2 and Policies S1-3.
32. To conclude, 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 of the London Plan.

## 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. Applicants should seek to maximise affordable housing provision by seeking grant funding. Where additional affordable housing is provided above the relevant affordable housing threshold, the tenure mix requirements are flexible, as set out in Policy H6 of the London Plan.
35. 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

36. 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). There is a presumption that the 40% to be decided by the borough will focus on low cost rent; however, in some cases a more flexible tenure may be appropriate, for example due to viability constraints or to achieve mixed and inclusive communities. Appropriate tenure splits should be determined through the Development Plan process or by supplementary planning guidance.
37. 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

38. 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 Goods Yard site and comprises non-designated industrial land, providing 1,125 sq.m. (GEA) of light industrial floorspace. This part of the site is in industrial use and therefore subject to the 50% affordable housing threshold, which has been agreed by the applicant. The affordable housing threshold for the remainder of the Goods Yard site was subject to discussion at pre-application stage and during the course of the original application which was determined at appeal.

39. The applicant has stated that, in its view, the only part of the site which should be considered industrial and subject to the 50% affordable housing requirement is the Carberry Enterprise Park. It does not consider that the remainder of the Goods Yard should be considered as industrial land for the reasons set out below. The applicant has sought a Counsel opinion dated 17 May 2021 which supports their view in this respect and is included as an appendix to its planning statement (Christopher Katowski QC).
40. The remainder of the Goods Yard site currently comprises vacant cleared former industrial land which has been used for a number of years as a construction compound associated with the Tottenham Hotspur Stadium development, as part of a temporary planning permission. A further temporary planning permission has been recently issued to enable the site to be used as a car park to enable the safe return of fans to the Tottenham Hotspur Stadium, as a result of the Covid-19 pandemic.
41. Historically, this part of the site was previously used as a scrap yard / car breaker's yard (Sui Generis use), which is the last permanent use of the site. GLA officers understand that, once the temporary planning permissions have expired, the lawful use of the site would, as a matter of planning law, revert back to the original scrap yard / car breaker's yard (Sui Generis use). However, the site was last used as a scrap yard in 2015 and the site has been cleared of all buildings and infrastructure associated with this former use. In addition, the applicant secured the removal of the Environmental Permit associated with the scrap yard use.
42. The applicant has stated that it would not be possible to reinstate the former scrap yard use for two reasons: (i) firstly, there is no environmental permit granted for this use; and (ii) secondly, planning permission would be required for the operational development necessary to reinstate the scrap yard use. This planning application would be contrary to the Development Plan which allocates the site for comprehensive, residential-led redevelopment through the Tottenham Area Action Plan (site allocation Ref. NT5). Any planning application within Allocation NT5 would also need to demonstrate that it would not prejudice the future developments of other parts of the site, adjoining land, or frustrate the delivery of the site allocation, as required by Policy DM55 of the Haringey Development Management DPD.
43. The applicant has stated that it considers the site should be subject to a blended affordable housing threshold, with the Carberry Enterprise Park subject to a 50% threshold and the Depot and remaining Goods Yard subject to the 35% threshold. Taking into account the respective site areas (in sq.m.) the applicant has stated that the site should have a blended affordable housing threshold of 36%. The site areas are shown below.

Table 1 – applicant's assessment of the affordable housing threshold for the site

Site component	Site area (sq.m.)	Proportion of site	Threshold
Carberry Industrial Estate	1,546	6%	50%

Other land	23,479	94%	35%
<b>Total</b>	<b>25,025</b>	<b>100%</b>	<b>36%</b>

Figure 3 – site components



44. Having reviewed the specific circumstances of this case, GLA officers recognise that it is a matter of planning judgement as to whether the Goods Yard should be considered industrial land for the purposes of London Plan Policy H5. The practical difficulties and planning challenges associated with the prospect of re-activating the previous industrial scrap yard use on the site is noted. However, this is often the case where former industrial land is allocated for comprehensive residential-led mixed use redevelopment. Furthermore, there is concern that temporary planning permissions should not be used as a justification for a site no longer being considered industrial land for the purpose of the London Plan threshold approach to affordable housing, as this would circumvent and undermine the purpose and application of the policy. The rationale for the threshold approach is based on the differences in values between industrial and residential development, as set out in paragraph 4.5.7 of the London Plan. Further discussion and re-assurance on this matter is therefore required prior to Stage 2.

#### The applicant's affordable housing proposal

45. 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 66:34 tenure split by unit.
46. The applicant has also stated that its baseline affordable housing offer would not be contingent on grant / public subsidy. If grant becomes available, the applicant has stated that it would increase the overall affordable housing to up to 40%, with the exact amount, location, tenure and unit mix of the additional affordable housing to be provided to be agreed with the Council, with a mechanism for securing this proposed within the S106 agreement. This would mirror the approach secured on the previous extant planning permission.



47. Compared to the extant planning permissions, the application proposes an additional 221 homes overall, and a net increase of 70 affordable homes (296 compared to 226 affordable homes). In terms of affordable housing, the additionality would comprise an additional 20 low cost rent units and an additional 50 intermediate units. The overall affordable housing percentage and tenure mix by habitable room would remain the same as in the extant planning permission, with a 40:60 split proposed weighted towards intermediate housing.
48. In addition, as with the previous planning permission, the Council would be able to elect up to 61 of the 101 new 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

49. The applicant has not submitted a Financial Viability Appraisal (FVA) as it considers that the application is eligible for the Fast Track Route. GLA officers are of the view that, whilst the tenure split and 'with grant' scenario proposed complies with the criteria for the Fast Track Route, further discussion is required between the Council, applicant and GLA officers to confirm whether or not the Goods Yard should be considered industrial land for the purposes of Policy H5 of the London Plan, noting the concerns set out above (paragraph 44).

#### Housing affordability

50. 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.
51. 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. Any intermediate rent products, such as Discount Market Rent (DMR) or London Living Rent (LLR) should be subject to a maximum income cap of £60,000. 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

52. Policy H10 of the London Plan states that new development should generally consist of a range of unit sizes and sets out a range of factors which should be considered when determining the appropriate housing mix on a particular scheme. This includes housing need; the requirement to deliver mixed and inclusive neighbourhoods; the nature and location of a site in relation to town centres and public transport access; the aim to optimise housing potential; and the mix of land uses on a scheme.

53. The proposed housing mix includes a range of unit sizes, including 136 three-bedroom units and 11 four-bedroom units. Of the affordable 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 10% of this tenure proposed as 3-bedroom units. This is strongly supported and accords with London Plan Policy H10.

#### Play space provision

54. Policy S4 of the London Plan states residential developments should incorporate high quality, accessible play provision for all ages, of at least 10 sq.m per child. Play space provision should normally be provided on-site; however, off-site provision may be acceptable where it can be demonstrated that this addresses the needs of the development and can be provided nearby within an accessible and safe walking distances, and in these circumstances contributions to off-site provision should be secured by Section 106 agreement. Play space provision should be available to all housing tenures within the immediately adjacent blocks and courtyards to promote social inclusion.
55. Based on the updated GLA play space calculator, the scheme would generate an overall requirement for 3,090 sq.m. of play space provision. This assumes a child yield of approximately 309, with provision based on the standard set out above.
56. 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.
57. The moderate shortfall in play space should be met on site, for example, potential opportunities along the landscaping within Goods Yard Walk adjacent to the railway embankment. Alternatively, a financial contribution towards further play provision should be secured, which could be accommodated on the remaining sites within the High Road West Masterplan area.

#### **Urban design**

58. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, residential quality, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.

#### Design changes from the extant planning permissions

59. Compared to the extant planning permissions, the key design changes proposed in this application are summarised as follows:
- Further optimisation of the site's development potential to increase the number of residential homes from 646 to 867;
  - Increase in the height of the consented towers (from 18, 22 and 29-storeys) to 27, 32, 29-storeys (north to south);
  - Changes to the relationship of the proposed heights to create a rise and fall in the heights of the proposed towers, whereas the previous permitted schemes proposed a gradual / incremental increase in the height of the towers from south to north;
  - Relocation of the main north-south vehicular, pedestrian and cycle route from the western boundary of the Goods Yard to the eastern boundary, so that it sits more centrally within the masterplan area;
  - Creation of the 'Goods Yard Walk' - a communal landscaped space along the western boundary of the site.
60. As noted above, Blocks D, E, F and G within the Depot site are identical to the extant planning permission in terms of scale, layout and use. Only Blocks A, B and C are revised.

#### Design, layout, landscaping and public realm

61. 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.
62. The main design and layout changes proposed are supported and 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. 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.
63. 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 is therefore strongly supported.

64. 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.
65. 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.
66. 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). 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.
67. 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.
68. Overall, the design and layout accords with the master planning principles set out in the High Road West Masterplan Framework and is supported. However, further details and CGIs should be provided to more clearly show the quality and legibility of the main entrance routes to the site from White Hart Lane and the High Road. A pedestrian footway should be provided on both sides of the street at the southern entrance adjacent to Grade II listed the Grange to ensure this key approach route for pedestrians is as generous and welcoming as possible.

#### Residential quality

69. Minimum quantitative standards for private internal space, private outdoor space and floor to ceiling heights apply to all tenures and types of self-contained housing, as set out in Policy D6 of the London Plan. Single aspect units should normally be avoided and only provided where these units would constitute a more appropriate design solution in terms of optimising the capacity of a particular site whilst ensuring good design. Potential issues associated with single aspect units in terms of passive ventilation, privacy, daylight, overheating

and noise should also be adequately addressed and single aspect units that are north facing, contain three or more bedrooms, or are exposed to significant adverse noise impacts should normally be avoided.

70. The Housing SPG (2016) also sets out benchmark unit per communal core per floor ratio (8 units). Private amenity space should normally be provided to serve upper floor flats in the form of balconies, unless there are exceptional circumstances which demonstrate that site constraints mean that balconies cannot be provided. Where this is the case, the required quantum of space should be provided within the dwelling as mitigation / compensation.
71. Overall, the scheme proposes 54% dual aspect units. No north facing single aspect units are proposed, or south facing single aspect units, with all of the non-dual aspect units either east or 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. 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 would be addressed and mitigated. Further conditions should be secured to ensure the proposed mitigation measures are incorporated in the completed scheme.
72. 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.

#### Heritage impact

73. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should “*have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*”. In line with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, planning decisions must also give special attention to the desirability of preserving or enhancing the character or appearance of the conservation areas which may be affected by a proposed development. If it is judged that harm to the heritage asset/s would arise from the proposed development, considerable importance and weight must be attributed to that harm, in order to comply with the statutory duties.
74. NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset’s conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Where a proposed development will lead to ‘substantial harm’ to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a

development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. . In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset

75. NPPF paragraph 203 states that in relation to non-designated heritage assets that "a balanced judgement will be required having regard to the scale of harm or loss and the significance of the asset". Locally listed buildings are defined as non-designated heritage assets for the purposes of the NPPF.
76. 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.
77. 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.
78. 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.
79. 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. GLA officers note that this was broadly the conclusion of decision makers on the two extant planning permissions, albeit the exact impacts and proposed public benefits package will need to be re-examined, given the increased density and height of the proposals and the revised design and massing.
80. However, the proposed public benefits would need to be further clarified at Stage 2 and appropriately secured. Matters relating to affordability; the scheme's overall compliance with the London Plan affordable housing policies; and the social infrastructure requirements and provision/ mitigation measures will require further discussion and agreement and will need to be robustly secured for these to be given full weight in the balancing exercise.

81. 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	Medium	View 10, 11, 12
Grade II listed the Grange, 34 White Hart Lane	Less than substantial harm	Medium	View 25
Grade II listed 797 & 799 High Road	Less than substantial harm	Medium	View 5
Grade II listed 819-821 High Road	Less than substantial harm	Medium	View 6
Grade II* Dial House	Less than substantial harm	Low	View 4
Conservation areas			
North Tottenham Conservation Area	Less than substantial harm	Medium	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
Fore Street Angel (Enfield)	Less than substantial harm	Low	View 8
Fore Street South (Enfield)	Less than substantial harm	Low	View 9

82. 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.

#### Architectural and materials quality

83. London Plan Policy D3 requires new development to be of a high quality of architectural design which responds to local character and ensures appropriate detailing and the use of attractive, robust and durable materials.

84. The majority of 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.

85. The towers would be clad in three shades of glazed brick (green, orange and blue) as shown below. This would contrast with a cooler grey-tone glazed brick

used on the recessed elements and tops of the buildings. The coloured bay elevations would be angled and projected slightly to create a faceted appearance which is considered successful. However, the tops and inner skin of the buildings appears as a separate feature (see TVIA views 4, 5, 6)

Figure 3 – TVIA view 6 showing the proposed towers behind the High Road (from Northumberland Park)



86. The overall architectural quality of the scheme as a whole and the majority of blocks is supported and would ensure the provision of a visually interesting, cohesive scheme. However, in relation to the three towers, further architectural and tonal refinement is required to ensure the grey clad ‘top hats’ and recessed inner skin of these buildings responds appropriately to the surrounding townscape and heritage context. This should ensure the buildings have a positive impact on the surrounding townscape views and skyline, given these buildings will be highly visible in the immediate and wider surrounding area, in accordance with London Plan Policy D9.

#### Height, massing and tall buildings

87. London Plan Policy D9 seeks to ensure that there is a plan-led and design-led approach to the development of tall buildings across London and that the visual, functional, environmental and cumulative impacts of tall buildings are addressed to avoid adverse or detrimental impacts.
88. Part B of Policy D9 states that boroughs should determine which locations are appropriate for tall buildings (subject to meeting the other requirements of the Plan) and states that tall buildings should only be developed in these suitable locations.
89. Part C of Policy D9 sets out the qualitative criteria for assessing the impact of tall buildings where tall building developments are proposed. A variety of long-range, mid-range and immediate views should be assessed to ensure tall buildings contribute positively to the character of the area and avoid harm to heritage



assets. The architectural and materials quality of tall buildings should be of an exemplary standard. Tall buildings should aid legibility and wayfinding and have a positive impact on the public realm. The environmental impacts including wind, microclimate, daylight/sunlight, glare impacts should be assessed. Cumulative visual, function and environmental impacts should also be assessed, taking into account other permitted developments.

90. 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. 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.
91. The extant planning permissions already exceeded this indicative height at 18, 22 and 29-storeys. As set out above, 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, 32, 29-storeys.
92. 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.
93. To conclude, the application complies with the locational requirements set out in Part B of Policy D9. GLA officers have assessed the visual, heritage, environmental, functional and cumulative impacts of the proposal, noting the permitted and Local Plan context as set out above. Overall, GLA officers consider that the height and massing of the scheme could comply with the qualitative assessment criteria set out in Policy D9. However, further architectural refinement is required to ensure the towers achieve an exemplary quality of architecture and respond positively to the surrounding townscape and skyline, as detailed above (paragraph 85).

#### Density and design review

94. London Plan Policies D1 to D4 seek to optimise the development potential of a site through a design-led process to ensure development makes the best use of land, with consideration given to a range of factors including site context, public transport, walking and cycling accessibility and the capacity of surrounding infrastructure. Development proposals which are referable to the Mayor should have undergone a design review or local borough process of design scrutiny where the proposed development comprises a tall building, or where the density exceed 350 dwellings per hectare.

95. This 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.

#### Fire safety

96. 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.

#### Inclusive design

97. Policy D5 of the London Plan require that all new development achieves the highest standards of accessibility and inclusive design. All new self-contained homes should meet the Building Regulations M4(2) standard for 'accessible and adaptable dwellings', with at least 10% of homes designed to meet the M4(3) standard for 'wheelchair user dwellings', as set out in London Plan Policy D7. The application complies with these requirements, which should be secured by condition.

### **Transport**

#### Site access arrangements

98. 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. The applicant is recommended to review the southern access route traffic arrangement, including the walking and cycling infrastructure in order to integrate the southern section of masterplan area and provide for safe and secure movement across White Hart Lane. As set out above, the southern access route should provide footways on both sides. A Stage 1 Road Safety Audit (RSA) should be completed prior to determination.
99. The proposal seeks to accommodate basement parking facilities through ramp arrangements access via signal control system/give way arrangements to manage movements. Entrance points should not impact safety or impede vehicle or pedestrian flow. This should be subject to further detailed assessment with further details provided for assessment prior to commencement as part of conditions.

#### Healthy Streets and Vision Zero

100. The Transport Assessment (TA) includes an Active Travel Zone (ATZ) assessment and a Healthy Streets Check for Designers (HSCD) for highway works. The optimised development will see an increase in pedestrian and cycle trips to/from the site and the local area. Whilst the TA focuses on the integration of the Peacock Industrial Estate and the future Peacock Park to the east and the High Road, as well as some recommendations from the ATZ, the TA should consider how the on-site route will connect to the wider cycle network in the area, including CS1 and the southern section of masterplan area.

#### Cycle parking

101. A total of 1,708 cycle parking spaces are proposed, including long and short stay spaces for residential units, as well as non-residential parking spaces. This complies with the minimum quantitative standards in the London Plan. The applicant should address issues regarding the quality of the cycle parking, specifically the layout and aisle width and suitability for large bicycles. Further detail on the cycle parking provision is therefore required, which could be secured by condition. All cycle parking must be in accordance with the London Cycling Design Standards (LCDS), including at least 20% Sheffield stands and further 5% wider spaces for non-standard bicycles. Lockers and changing facilities for cyclists should be provided for the non-residential uses.

#### Car parking

102. In total, 145 residential car parking spaces are proposed. This includes 87 disabled persons' parking bays, 52 standard spaces, 4 car club spaces and 2 visitor car parking spaces. This equates to a car parking ratio of 0.17 spaces per residential unit. This is in line with extant permissions and complies with London Plan Policy T6.1. The majority of car parking would be off-street either at basement or podium, with a limited number of on-street car parking proposed, which would be interspersed with landscaping, which is supported. Given the proposed uplift above the extant planning permissions, consideration should be given to allocate five of the spaces to car clubs.
103. The London Plan requires 20% of parking to be fitted with active electric vehicle charging infrastructure, with passive provision for all remaining spaces. This must be applied and secured by condition. A Car Parking Management Plan (CPMP) has been provided which is strongly supported. This should be secured by condition. A Controlled Parking Zone (CPZ) permit free agreement should also be secured as part of the S106 agreement.

#### Trip generation and highway and public transport impact

104. The methodology applied in the TA is generally acceptable. However, clarification is required in respect of residential person trip rates for the AM peak and the low modal share assumed for rail. The applicant is required to provide a further assessment of the cumulative impact of the application on the public transport network, taking into account other permitted developments and other emerging developments in the wider masterplan area. In particular, this additional work should clarify the impact on White Hart Lane station in terms of passenger flows to and from each platform and should identify any places where the existing capacity is exceeded during peak periods. This review should be

focused on the heaviest loaded link on the route to estimate the impact on London Overground line loadings in both directions during peak periods. Where mitigation is required, this should be secured via financial contribution.

105. Sensitivity analysis should also provide accumulative trip generation figures so that the impact on the bus network capacity can be determined. Subject to the outcome of any additional assessment, TfL may seek mitigation towards enhancing bus priority measures and/or fund infrastructure upgrades.

#### London Overground Infrastructure Protection

106. 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

107. The applicant has submitted a framework Travel Plan, which sets out specific objectives in support of London policy. The focus on encouraging active modes (walking and cycling) and facilitating opportunities to achieve a healthy lifestyle for all users are 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

108. 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 relationship to the rest of the masterplan site. The CLP should also be aligned with major stadium events. A 3.7 metre kerb to kerb alternate way working refuse collection loading/unloading emergency access is proposed at the northern end of The Goods Yard. A Stage 1 Road Safety Audit should be completed prior to determination due to potential for conflict between vehicles and vulnerable road users.

### **Sustainable development**

#### Energy strategy

109. 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.
110. 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.

111. 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.
112. 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.
113. 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.
114. London Plan Policy SI2 requires the energy performance of completed developments to be monitored, verified and reported following construction ('Be Seen').
115. 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

116. 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.

## Circular Economy

117. A Circular Economy Statement has been submitted which takes into account the GLA's draft guidance (2020) and outlines how circular economy principles will be incorporated in the design, construction and management of the proposed development, including through minimising materials use and the sourcing and specification of materials; minimising and designing out waste at various stages; and by promoting reusability, adaptability, flexibility and longevity. This is supported and complies with London Plan Policy SI7. A post-completion report is proposed by the applicant which would provide further details which should be secured via planning condition.

## **Environmental issues**

### Urban greening, trees and biodiversity

118. 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.
119. 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 and green walls 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.
120. 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.
121. All of the mature London Plane trees would be retained, which is strongly supported. This complies with the requirements of London Plan Policy G7.
122. 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.

123. 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. 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

124. 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.

#### **Local planning authority's position**

125. Haringey Council planning officers are currently assessing the application and are targeting a Planning Committee in the Autumn.

#### **Legal considerations**

126. 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**

127. There are no financial considerations at this stage.

#### **Conclusion**

128. 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, 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. However, further discussion is required to verify the appropriate blended affordable housing threshold for the site, in accordance with the London Plan. Further details are required to confirm the affordability of intermediate housing.
- **Urban design:** The layout, landscaping, density and residential quality is supported. The legibility and quality of the southern entrance should be improved, with pedestrian access provided on both sides of the footway.
- **Tall buildings:** 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. However, the design and materiality of the tops of the towers should be reconsidered to ensure they have a positive townscape impact.
- **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:** Clarification is required on the trip generation assessment to enable officers to establish the impact (and cumulative impacts) on public transport (London Overground and bus services) in the context of the High Road West Masterplan site. 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.
- **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.



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For further information, contact GLA Planning Unit (Development Management Team):

**Andrew Russell, Principal Strategic Planner (case officer)**

email: [andrew.russell@london.gov.uk](mailto:andrew.russell@london.gov.uk)

**Reece Harris, Team Leader – Development Management**

email: [reece.harris@london.gov.uk](mailto:reece.harris@london.gov.uk)

**Allison Flight, Deputy Head of Development Management**

email: [alison.flight@london.gov.uk](mailto:alison.flight@london.gov.uk)

**John Finlayson, Head of Development Management**

email: [john.finlayson@london.gov.uk](mailto:john.finlayson@london.gov.uk)

**Lucinda Turner, Assistant Director of Planning**

email: [lucinda.turner@london.gov.uk](mailto:lucinda.turner@london.gov.uk)

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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 1<sup>st</sup> floor, a large lounge with kitchen, study and seating areas on the 7<sup>th</sup> 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 25<sup>th</sup> 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 Pubic 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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**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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FRAME PROJECTS

**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;
  - 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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**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.



**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:
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  - c Confidently address feedback from local consultation;
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**Design Standards**

## Character of development

- B Development proposals should relate positively to their locality, having regard to:
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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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## Appendix 10: Plans and Documents List

### Documents

- Cover Letters dated 31 May 2021 & 20 October 2021
- Environmental Statement (June 2021) - including ES Volume II Townscape & Visual Impact Assessment & Townscape & Visual Impact Assessment Addendum (October 2021)
- Design & Access Statement (May 2021) and Design & Access Statement Addendum (October 2021)
- Planning Statement (May 2021)
- Affordable Housing Statement (May 2021)
- Arboricultural Assessment (May 2021)
- Basement Impact Assessment (27 May 2021)
- Circular Economy Statement (27 May 2021)
- Construction Management Plan (May 2021)
- Drainage Strategy (27 May 2021)
- Ecological Appraisal Report (27 May 2021)
- Fire Statement (10 September 2021)
- Flood Risk Assessment (27 May 2021)
- Heritage Statement (May 2021)
- Land Contamination Assessment (Phase 1) (27 May 2021)
- Noise Impact Assessment (27 May 2021)
- Regeneration Statement (May 2021)
- Statement of Community Involvement (May 2021)
- Utilities Statement (27 May 2021)
- Waste Management Plan (20 October 2021)
- Sustainability & Energy Statement (May 2021) and Sustainability & Energy Statement Addendum (Revision 07, 28 October 2021)
- Transport Assessment (28 May 2021)
- Air Quality Assessment (16 June 2021)
- Air Quality Positive Statement (16 June 2021)
- Daylight & Sunlight Report (Internal) (17 June 2021) & Daylight & Sunlight Report (Internal) Addendum (19 October 2021)

SITE WIDE & THE GOODS YARD		
Drawing Number	Drawing Title	Revision
GYARD F3 ZZ EX ST A2052	EXISTING BLOCK PLAN	A2. P1
GYARD F3 ZZ B1 GA A 82100	PROPOSED GA BASEMENT FLOOR PLAN	A2. P1
GYARD F3 Z2 00 GA A 82101	PROPOSED GA GROUND FLOOR PLAN ZONE 2	A2. P2
GYARD F3 Z1 00 GA A 82102	PROPOSED GA GROUND FLOOR PLAN ZONE 1	A2. P2
GYARD F3 ZA 00+ GA A 82103	BLOCK A PROPOSED GA L00-L06 FLOOR PLANS	A2. P2
GYARD F3 ZA 07+ GA A 82104	BLOCK A PROPOSED GA L07-L26 FLOOR PLANS	A2. P2
GYARD F3 ZB 00+ GA A 82105	BLOCK B PROPOSED GA L00-L27 FLOOR PLANS	A2. P2
GYARD F3 ZC 00+ GA A 82106	BLOCK C PROPOSED GA L00-ROOF PLAN	A2. P2
GYARD F3 ZD 00+ GA A 82107	BLOCK D PROPOSED GA L00-ROOF PLAN	A2. P2
GYARD F3 ZE 00+ GA A 82108	BLOCK E PROPOSED GA L00-ROOF PLAN	A2. P2
GYARD F3 ZF 00+ GA A 82109	BLOCK F PROPOSED GA L00-L02 FLOOR PLANS	A2. P2
GYARD F3 ZF 03+ GA A 82110	BLOCK F PROPOSED GA L03-ROOF PLAN	A2. P2
GYARD F3 ZG 00+ GA A 82111	BLOCK G PROPOSED GA L00-ROOF PLAN	A2. P2
GYARD F3 ZH 00+ GA A 82112	BLOCK H PROPOSED GA L00-ROOF PLAN	A2. P1
GYARD F3 ZA ZZ EL A 82500	BLOCK A PROPOSED GA NORTH & WEST ELEVATIONS	A2. P2
GYARD F3 ZA ZZ EL A 82501	BLOCK A PROPOSED GA SOUTH & EAST ELEVATIONS	A2. P2
GYARD F3 ZB ZZ EL A 82502	BLOCK B PROPOSED GA NORTH & EAST ELEVATIONS	A2. P2
GYARD F3 ZB ZZ EL A 82503	BLOCK B PROPOSED GA SOUTH & WEST ELEVATIONS	A2. P2
GYARD F3 ZC ZZ EL A 82504	BLOCK C PROPOSED GA ELEVATIONS & SECTIONS	A2. P2
GYARD F3 ZD ZZ EL A 82505	BLOCK D PROPOSED GA ELEVATIONS & SECTIONS	A2. P2
GYARD F3 ZE ZZ EL A 82506	BLOCK E PROPOSED GA ELEVATIONS & SECTIONS	A2. P2
GYARD F3 ZF ZZ EL A 82507	BLOCK F PROPOSED GA ELEVATIONS & SECTIONS	A2. P2
GYARD F3 ZG ZZ EL A 82508	BLOCK G PROPOSED GA ELEVATIONS & SECTIONS	A2. P2
GYARD F3 ZH ZZ EL A 82509	BLOCK H PROPOSED GA ELEVATIONS & SECTIONS	A2. P1
GYARD F3 ZA ZZ EL A 82510	BLOCK A PROPOSED GA MATERIALS ELEVATION STUDY	A2. P3

SITE WIDE & THE GOODS YARD		
GYARD F3 ZB ZZ EL A 82511	BLOCK B PROPOSED GA MATERIALS ELEVATION STUDY	A2. P3
GYARD F3 ZC ZZ EL A 82512	BLOCK C PROPOSED GA MATERIALS ELEVATION STUDY	A2. P3
GYARD F3 ZD ZZ EL A 82513	BLOCK D PROPOSED GA MATERIALS ELEVATION STUDY	A2. P3
GYARD F3 ZE ZZ EL A 82514	BLOCK E PROPOSED GA MATERIALS ELEVATION STUDY	A2. P3
GYARD F3 ZF ZZ EL A 82515	BLOCK F PROPOSED GA MATERIALS ELEVATION STUDY	A2. P3
GYARD F3 ZG ZZ EL A 82516	BLOCK G PROPOSED GA MATERIALS ELEVATION STUDY	A2. P3
GYARD F3 ZH ZZ EL A 82517	BLOCK H PROPOSED GA MATERIALS ELEVATION STUDY	A2. P2
GYARD F3 ZC ZZ EL A 82518	BLOCK C PROPOSED GA MATERIALS ELEVATION STUDY 2	A2. P2
GYARD F3 ZD ZZ EL A 82519	BLOCK D PROPOSED GA MATERIALS ELEVATION STUDY 2	A2. P2
GYARD F3 ZE ZZ EL A 82520	BLOCK E PROPOSED GA MATERIALS ELEVATION STUDY 2	A2. P2
GYARD F3 ZF ZZ EL A 82521	BLOCK F PROPOSED GA MATERIALS ELEVATION STUDY 2	A2. P2
GYARD F3 ZG ZZ EL A 82522	BLOCK G PROPOSED GA MATERIALS ELEVATION STUDY 2	A2. P2
GYARD F3 ZH ZZ EL A 82523	BLOCK H PROPOSED GA MATERIALS ELEVATION STUDY 2	A2. P1
GYARD F3 ZSMH ZZ EL A 82524	SMH PROPOSED GA MATERIALS ELEVATIONSTUDY	A2. P2
GYARD F3 ZA ZZ DR A 82550	BLOCK A PROPOSED GA ELEVATION DETAIL – EAST ENTRANCE	A2. P2
GYARD F3 ZA ZZ DR A 82551	BLOCK A PROPOSED GA ELEVATION DETAIL – NORTH SHOULDER	A2. P2
GYARD F3 ZA ZZ DR A 82552	BLOCK A PROPOSED GA ELEVATION DETAIL – SOUTH SHOULDER	A2. P2
GYARD F3 ZA ZZ DR A 82553	BLOCK A PROPOSED GA ELEVATION DETAIL – WEST ARTICULATION	A2. P2
GYARD F3 ZA ZZ DR A 82554	BLOCK A PROPOSED GA ELEVATION DETAIL – EAST ARTICULATION	A2. P2
GYARD F3 ZA ZZ DR A 82555	BLOCK A PROPOSED GA ELEVATION DETAIL – SOUTH FAÇADE TOP	A2. P2
GYARD F3 ZB ZZ DR A 82556	BLOCK B PROPOSED GA ELEVATION DETAIL – EAST ELEVATION	A2. P2
GYARD F3 ZB ZZ DR A 82557	BLOCK B PROPOSED GA ELEVATION DETAIL – NORTH SHOULDER	A2. P2
GYARD F3 ZB ZZ DR A 82558	BLOCK B PROPOSED GA ELEVATION DETAIL – SOUTH FAÇADE TOP	A2. P2
GYARD F3 ZB ZZ DR A 82559	BLOCK B PROPOSED GA ELEVATION DETAIL – WEST ARTICULATION	A2. P2
GYARD F3 ZB ZZ DR A 82560	BLOCK B PROPOSED GA ELEVATION DETAIL – WEST ARTICULATION STEP	A2. P2
GYARD F3 ZAB ZZ SE A 82600	BLOCK A&B GA PROPOSED SECTIONS	A2. P2
GYARD F3 ZZ EX ST A 89000	SITE LOCATION PLAN	A2. P1
GYARD F3 ZZ EX EL A 89001	EXISTING SITE ELEVATIONS	A2. P1
GYARD F3 ZZ EX EL A 89002	EXISTING SITE ELEVATIONS	A2. P1
GYARD F3 Z1 00 GA A 89003	PROPOSED GA USE PLAN ZONE 1	A2. P2
GYARD F3 Z2 00 GA A 89004	PROPOSED GA USE PLAN ZONE 2	A2. P2
GYARD F3 ZZ EX ST A 89005	DEMOLITION PLANS	A2. P1
GYARD F3 ZZ EX EL A 89006	DEMOLITION ELEVATIONS	A2. P1
GYARD F3 ZZ ZZ SE A 89007	SITE WIDE PROPOSED GA SECTION HH	A2. P2
GYARD F3 ZZ ZZ SE A 89008	SITE WIDE PROPOSED GA SECTIONS AA & BB	A2. P2
GYARD F3 ZZ ZZ SE A 89009	SITE WIDE PROPOSED GA SECTIONS CC & DD	A2. P2
GYARD F3 ZZ ZZ SE A 89010	SITE WIDE PROPOSED GA SECTIONS EE & FF	A2. P2
GYARD F3 ZZ ZZ SE A 89011	SITE WIDE PROPOSED GA ILLUSTRATIVE MATERIALS STUDY - SOUTH & WEST SECTIONS	A2. P2
GYARD F3 ZZ EX ST A 89012	PROPOSED SITE BLOCK PLAN	A2. P2
GYARD F3 ZZ RF EL A 89013	PROPOSED SITE ROOF PLAN	A2. P2
GYARD F3 ZZ ZZ SE A 89014	SITE WIDE PROPOSED GA ILLUSTRATIVE MATERIALS STUDY - EAST SECTION	A2. P2
GYARD F3 ZSMH 00 GA A 82113	PROPOSED GA GROUND FLOOR PLAN	A2. P2
GYARD F3 ZSMH 01 GA A 82114	PROPOSED GA FIRST FLOOR PLAN	A2. P2
GYARD F3 ZSMH 02 GA A 82115	PROPOSED GA ROOF PLAN	A2. P2
GYARD F3 ZSMH 00 GA A 82116	EXISTING & DEMOLITION GA GROUND FLOOR PLAN	A2. P2
GYARD F3 ZSMH 01 GA A 82117	EXISTING & DEMOLITION GA FIRST FLOOR PLAN	A2. P2
GYARD F3 ZSMH ZZ EL A 82118	PROPOSED GA ELEVATIONS	A2. P2
GYARD F3 ZSMH ZZ SE A 82119	PROPOSED GA SECTIONS	A2. P2
GYARDF3 ZZ ZZ SH A 0103-S2	GY AREA SCHEDULE	P6
GYARD F3 ZZ ZZ SH A-0107	GY ACCOMMODATION SCHEDULE	P5

THE DEPOT		
Drawing Number	Drawing Title	Revision



THE DEPOT		
DEPOT F3 ZABC B1+ GA A 82101	BLOCK ABC PROPOSED GA B1-L00 FLOOR PLANS	A2. P2
DEPOT F3 ZABC 01+ GA A 82102	BLOCK ABC PROPOSED GA L01-L05 FLOOR PLANS	A2. P2
DEPOT F3 ZABC 06+ GA A 82103	BLOCK ABC PROPOSED GA L06-L07 FLOOR PLANS	A2. P2
DEPOT F3 ZABC 08+ GA A 82104	BLOCK ABC PROPOSED GA L08-L09, L11+ FLOOR PLANS	A2. P2
DEPOT F3 ZABC 14+ GA A 82105	BLOCK ABC PROPOSED GA L14+,L17, L20 FLOOR PLANS	A2. P2
DEPOT F3 ZABC 23+ GA A 82106	BLOCK ABC PROPOSED GA L23-ROOF PLAN	A2. P2
DEPOT F3 ZABC ZZ EL A 82500	BLOCK ABC PROPOSED GA SOUTH & EAST ELEVATIONS	A2. P2
DEPOT F3 ZABC ZZ EL A 82501	BLOCK ABC PROPOSED GA NORTH & WEST ELEVATIONS	A2. P2
DEPOT F3 ZD ZZ EL A 82502	BLOCK D PROPOSED GA ELEVATIONS-SECTIONS	A2. P3
DEPOT F3 ZE ZZ EL A 82503	BLOCK E PROPOSED GA ELEVATIONS-SECTIONS	A2. P2
DEPOT F3 ZG ZZ EL A 82507	BLOCK G PROPOSED GA ELEVATIONS-SECTIONS	A2. P2
DEPOT F3 ZABC ZZ EL A 82508	BLOCK ABC PROPOSED GA MATERIALS ELEVATION STUDY	A2. P3
DEPOT F3 ZABC ZZ SE A 82600	BLOCK ABC PROPOSED GA SECTIONS	A2. P2
DEPOT F3 ZZ ZZ SE A 89000	SITE WIDE PROPOSED GA SECTIONS GG	A2. P2
DEPOT F3 ZABC ZZ SE A 860001	BLOCK ABC – NORTHERN BOUNDARY DETAIL SECTION	A2. P2
DEPOT F3 Z3 00 GA A 89005	SITE WIDE PROPOSED GA GROUND FLOOR PLAN ZONE 3	A2. P2
DEPOT F3 Z4 00 GA A 89006	SITE WIDE PROPOSED GA GROUND FLOOR PLAN ZONE 4	A2. P2
DEPOT F3 Z3 00 GA A 89007	SITE WIDE PROPOSED GA USE PLAN ZONE 3	A2. P2
DEPOT F3 Z4 00 GA A 89008	SITE WIDE PROPOSED GA USE PLAN ZONE 4	A2. P2
DEPOT F3 ZD 00+ GA A 82107	BLOCK D PROPOSED GA L00-L03 FLOOR PLANS	A2. P3
DEPOT F3 ZD 04+ GA A 82108	BLOCK D PROPOSED GA L04-ROOF PLAN	A2. P3
DEPOT F3 ZE 00+ GA A 82109	BLOCK E PROPOSED GA L00-ROOF PLAN	A2. P2
DEPOT F3 ZG 00+ GA A 82110	BLOCK G PROPOSED GA L00-L03 FLOOR PLANS	A2. P2
DEPOT F3 ZG 04+ GA A 82111	BLOCK G PROPOSED GA L04-ROOF FLOOR PLAN	A2. P2
DEPOT F3 ZF B1+ GA A 82112	BLOCK F PROPOSED GA B1-L00 FLOOR PLANS	A2. P1
DEPOT F3 ZF 01+ GA A 82113	BLOCK F PROPOSED GA L01-L02 FLOOR PLANS	A2. P1
DEPOT F3 ZF RF GA A 82114	BLOCK F PROPOSED GA ROOF PLAN	A2. P1
DEPOT F3 ZF ZZ EL A 82504	BLOCK F PROPOSED GA EAST ELEVATIONS	A2. P1
DEPOT F3 ZF ZZ EL A 82505	BLOCK F PROPOSED GA NORTH SOUTH ELEVATIONS	A2. P1
DEPOT F3 ZF ZZ EL A 82506	BLOCK F PROPOSED GA WEST ELEVATIONS	A2. P1
DEPOT F3 ZD ZZ EL A 82509	BLOCK D PROPOSED GA MATERIALS ELEVATION STUDY	A2. P3
DEPOT F3 ZE ZZ EL A 82510	BLOCK E PROPOSED GA MATERIALS ELEVATION STUDY	A2. P3
DEPOT F3 ZD ZZ EL A 82511	BLOCK D PROPOSED GA MATERIALS ELEVATION STUDY	A2. P3
DEPOT F3 ZE ZZ EL A 82512	BLOCK E PROPOSED GA MATERIALS ELEVATION STUDY 2	A2. P3
DEPOT F3 ZG ZZ EL A 82513	BLOCK G PROPOSED GA MATERIALS ELEVATION STUDY 2	A2. P2
DEPOT F3 ZG ZZ EL A 82514	BLOCK G PROPOSED GA MATERIALS ELEVATION STUDY 2	A2. P2
DEPOT F3 ZABC ZZ DR A 82515	BLOCK ABC PROPOSED GA ELEVATION DETAIL – EAST ENTRANCE	A2. P2
DEPOT F3 ZABC ZZ DR A 82516	BLOCK ABC PROPOSED GA ELEVATION DETAIL – EAST ARTICULATION	A2. P2
DEPOT F3 ZABC ZZ DR A 82517	BLOCK ABC PROPOSED GA ELEVATION DETAIL – EAST SHOULDER	A2. P2
DEPOT F3 ZABC ZZ DR A 82518	BLOCK ABC PROPOSED GA ELEVATION DETAIL – SOUTH ENTRANCE	A2. P2
DEPOT F3 ZABC ZZ DR A 82519	BLOCK ABC PROPOSED GA ELEVATION DETAIL – NORTH SHOULDER	A2. P2
DEPOT F3 ZABC ZZ DR A 82520	BLOCK ABC PROPOSED GA ELEVATION DETAIL – WEST SHOULDER	A2. P2
DEPOT F3 ZABC ZZ DR A 82521	BLOCK ABC PROPOSED GA ELEVATION DETAIL – NORTH TOP DETAIL	A2. P2
DEPOT F3 ZZ EX ST A 89003	SITE DEMOLITION PLAN	A2. P1
DEPOT F3 ZZ ZZ SH A 0101	TD AREA SCHEDULE	P6
DEPOT F3 ZZ ZZ SH A 0108	TD ACCOMMODATION SCHEDULE	P5

Landscape		Drawing Title	Revision
DR	0862-RFM-HRW-XX-DR-L-0001	Illustrative Masterplan - Interim Phase	P04
DR	0862-RFM-HRW-XX-DR-L-0002	Illustrative Masterplan - Complete Phase	P04
DR	0862-RFM-GY-00-DR-L-0101	Level 00 Illustrative GA - Goods Yard	P04
DR	0862-RFM-GY-XX-DR-L-0102	Roof level Illustrative GA - Goods yard	P02
DR	0862-RFM-GY-00-DR-L-0103	Level 00 Planting Strategy - Goods Yard	P04

Landscape		Drawing Title	Revision
DR	0862-RFM-GY-XX-DR-L-0104	Roof level Planting Strategy - Goods Yard	P03
DR	0862-RFM-GY-XX-DR-L-0105	Illustrative Sections - Goods Yard	P01
DR	0862-RFM-GY-XX-DR-L-0106	Illustrative Swatches - Goods Yard	P01
DR	0862-RFM-TD-00-DR-L-0201	Level 00 Illustrative GA - The Depot	P02
DR	0862-RFM-TD-XX-DR-L-0202	Roof level Illustrative GA - The Depot	P02
DR	0862-RFM-TD-00-DR-L-0203	Level 00 Planting Strategy - The Depot	P02
DR	0862-RFM-TD-XX-DR-L-0204	Roof level Planting Strategy - The Depot	P03
DR	0862-RFM-TD-XX-DR-L-0205	Illustrative Sections - The Depot	P01
DR	0862-RFM-TD-XX-DR-L-0206	Illustrative Swatches -The Depot	P01

## Appendix 11 – Conditions

### 1. Time Limit

(a) The development shall be begun within five years of the date of the permission.

REASON: This condition is imposed by virtue of Section 91 of the Town & Country Planning Act 1990 and to prevent the accumulation of unimplemented planning permissions.

### 2. Approved Plans and Documents

(a) The Development hereby approved shall be carried out in accordance with the following approved plans and documents:

- SEE APPENDIX 10.

REASON: In order to ensure that the development is carried out in accordance with the approved details and to protect the historic environment.

### 3. Phases (PRE-COMMENCEMENT)

(a) No Development excluding site preparation works shall commence in any Phase until a Phasing Plan has been submitted to and approved in writing by the Local Planning Authority, which may only be varied with the prior written approval of 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 an approved Phasing Plan, which may be varied from time to time, subject to the prior written approval of the Local Planning Authority 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 X.

REASON: To assist with the identification of each chargeable development (being each Phase) and the calculation of the amount of CIL payable in accordance with the Community Infrastructure Levy Regulations 2010 (as amended) and to ensure that housing and other uses are delivered in a co-ordinated way.

### 4. Minimum amount of Business Floorspace

(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, unless otherwise agreed in writing by the local planning authority.

REASON: In order to ensure a mixed-use scheme that mitigates the loss of existing industrial premises in accordance with London Plan Policy E4, Local Plan Policies SP8 and SP9, AAP Policy NT5 and Local Plan Policies DM38 and DM40.

## 5. Accessible Housing

(a) 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) as follows unless otherwise agreed in writing with the Local Planning Authority.

i. 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-046-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-027-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.

ii. All other dwellings shall meet Approved Document M M4(2) ('Accessible and adaptable dwellings').

REASON: In order to ensure an adequate supply of accessible housing in the Borough and to ensure an inclusive development.

## 6. Commercial Units - Ventilation/Extraction

(a) No ground floor commercial unit shall not 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)) and shall be permanently maintained thereafter.

REASON: In order to prevent adverse impact on air quality.

### **7. Commercial Units - Café/restaurant Opening Hours**

(a) 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).

REASON: To safeguard residential amenity.

### **8. Commercial Units – BREEAM (PRE-COMMENCEMENT)**

(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 details so approved, 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 the local authority for approval, confirming this standard has been achieved.

(d) In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority’s approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.

REASON: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan Policy SP4 and DM21.

### **9. Commercial Units – Noise Attenuation**

(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 prior to the occupation of any of the first-floor dwellings directly above the commercial unit are first occupied and shall be maintained thereafter.

REASON: In order to ensure a satisfactory internal noise environment for occupiers of these dwellings.

**10. Noise Attenuation - Dwellings**

(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 mechanical 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 – 11pm	<b>Living rooms &amp; Bedrooms</b>	<b>35dB(A)</b> (L <sub>Aeq,16hour</sub> )
	<b>Dining Room Area</b>	<b>40dB(A)</b> (L <sub>Aeq,16hour</sub> )
Night Time Noise 11pm -7am	<b>Bedrooms</b>	<b>30dB(A)</b> (L <sub>Aeq,8hour</sub> )

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 mechanical 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.

REASON: In order to ensure a satisfactory internal noise environment for occupiers of these dwellings.

**11. Depot Block G – Wind Mitigation**

(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.

REASON: In order to prevent adverse impact on wind microclimate, in accordance with Policy D9 of the London Plan (2021) and Local Plan Policy DM6.

### **12. Detailed Fire Statement**

(a) 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 unless otherwise approved in writing by the Local Planning Authority.

REASON: To ensure that the development incorporates the necessary fire safety measures in accordance with the Mayor's London Plan Policy D12.

### **13. Landscape Details**

(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 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, signs etc.);
- viii) Proposed and existing functional services above and below ground (e.g. drainage power, communications cables, pipelines etc. indicating lines, manholes, supports etc.);
- 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 unless otherwise agreed in writing by the Local Planning Authority.

(c) Any trees or shrubs which die, are removed or become seriously damaged or diseased within five years from the completion of the landscaping works shall be replaced in the next planting season with the same species or an approved alternative as agreed in writing by the Local Planning Authority.

REASON: To ensure a satisfactory level of residential amenity, children's play opportunities, food growing opportunities, biodiversity enhancement and boundary treatments.

#### **14. Trees & Planting – 5-year Replacement**

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 other similar size and species.

REASON: To ensure that the approved soft landscaping thrives and makes a positive contribution to residential amenity, publicly accessible open space and (in the case of Block F) the setting of Listed Buildings.

#### **15. Temporary Landscaping/Use**

(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 the Local Planning Authority for its approval.

(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, unless agreed in writing by the Local Planning Authority, shall be maintained thereafter until work commences on any of the Outline works development hereby approved.

REASON: To safeguard the amenity and community safety of the Outline site pending its redevelopment.

#### **16. Tree Protection Measures (PRE-COMMENCEMENT)**

(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).



(d) Any of the retained trees which die, are removed or become seriously damaged or diseased within five years of the completion of the last Landscaping Matters approved under Condition X shall be replaced in the next planting season with the same species or an approved alternative as agreed in writing by the Local Planning Authority.

REASON: To safeguard the health of trees that are to be retained in accordance with Policy G7 of the London Plan 2016.

### **17. Biodiversity**

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 Council. This shall 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 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.

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 Policies G1, G5, G6, SI1 and SI2 of the London Plan (2021) and Policies SP4, SP5, SP11 and SP13 of the Haringey Local Plan (2017).

### **18. External Materials and Details**

(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 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) Thereafter the development shall be carried out in accordance with the approved details and materials.

REASON: To ensure that the development hereby approved is satisfactory.

### **19. Living roofs**

(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 10m<sup>2</sup> 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 1m<sup>2</sup> and at least one feature per 10m<sup>2</sup> 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.

REASON: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity, reduces the impact on climate change and supports the water retention on site during rainfall. In accordance with Policies G1, G5, G6, SI1 and SI2 of the London Plan (2021) and Policies SP4, SP5, SP11 and SP13 of the Haringey Local Plan (2017).

## **20. Ground Floor Rear Boundary Details – Depot Block D**

(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 before any dwelling in Depot Block D is first occupied and shall be maintained thereafter.

REASON: To ensure a satisfactory boundary treatment between Block D and Mallory Court to the north.

## **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 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 a 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.
- 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 details so approved and shall be operated and maintained as such thereafter.

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, SI3, and Local Plan Policy SP4 and DM22.

## **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 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.

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 Policy SI4 of the London Plan (2021), and Policies SP4 and DM21 of the Local Plan.

## **23. Future overheating (Dwellings)**

(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
- vii. No active cooling (unless otherwise agreed in writing with the Local Planning Authority)

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 Policy SI4 of the London Plan (2021), and Policies SP4 and DM21 of the Local Plan.

#### **24. Circular Economy**

(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](mailto: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.

REASON: In the interests of sustainable waste management and in order to maximise the re-use of materials.

#### **25. Whole Life Carbon**

(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](mailto: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.

REASON: In the interests of sustainable development and to maximise on-site carbon dioxide savings.

#### **26. Energy Monitoring**

(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 Local Planning Authority's approved specifications as published on its website.

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.

### **27. PV Arrays**

(a) Installed PV Arrays shall be maintained in good working order and cleaned at least annually.

REASON: To ensure that the installed PV arrays generate renewable energy at their full potential.

### **28. Brook House Yard Management Plan**

(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 an approved Management & Maintenance Plan.

REASON: To ensure that the Space is satisfactorily managed and maintained and in the interest of community safety.

### **29. Secured by Design**

(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 guide lines at the time of above grade works of each Phase of the development.

REASON: To ensure safe and secure development and reduce crime.

**30. Stage I Written Scheme of Investigation of Archaeology (PRE-COMMENCEMENT)**

(a) 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.

REASON: to protect the historic environment

**31. Stage II Written Scheme of Investigation of Archaeology**

(a) 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.

REASON: to protect the historic environment

**32. Foundation Design – Archaeology (PRE-COMMENCEMENT)**

(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 and approved in writing by the Local Planning Authority.

(b) The development shall be carried out in accordance with the approved details.

REASON: The planning authority wishes to secure physical preservation of the site's archaeological interest in accordance with the NPPF.

**33. Water Supply Infrastructure (PRE-COMMENCEMENT)**

(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 X above, shall then be implemented in accordance with the recommendations of the approved impact study and retained in perpetuity thereafter.

REASON: To ensure that the water supply infrastructure has sufficient capacity to supply the development hereby approved.

### **34. Land Contamination – Part 1 (PRE-COMMENCEMENT)**

(a) No development shall commence in each relevant phase other than investigative work until:

- i) Taking account of information in the 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 shall be 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.

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

### **35. Land Contamination – Part 2**

(a) 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.

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

### **36. Unexpected Contamination**

(a) 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.



(b) The remediation strategy shall be implemented as approved.

REASON: 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 183 of the National Planning Policy Framework.

### **37. Basement Vehicular Access Control Arrangements**

(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.

The CPMP shall set out 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.

REASON: To ensure the safe movement of vehicles in to and out of parking areas.

### **38. Road Safety Audit – White Hart Lane (PRE-COMMENCEMENT)**

(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

REASON: To ensure the safe movement of vehicles and pedestrians.

### **39. Road Safety Audit – Embankment Lane (PRE-COMMENCEMENT)**

(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

REASON: To ensure the safe movement of vehicles and pedestrians.

#### **40. Car Parking Design & Management Plan**

(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).

(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.

REASON: To manage the on-site car parking provision of the proposed development so that it is used efficiently and only by authorised occupiers. To protect the amenity of the site users. To promote sustainable travel.

#### **41. Cycle Parking Details (PRE-COMMENCEMENT)**

(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 and retained thereafter for this use only.

REASON: To promote travel by sustainable modes of transport and to comply with Policy T5 of the London Plan (2021) minimum cycle parking standards and the London Cycling Design Standards.

#### **42. Delivery and Servicing Plan**

(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 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 approved in writing by the Local Planning Authority.

REASON: To set out the proposed delivery and servicing strategy for the development, including the predicted impact of the development upon the local highway network and both physical infrastructure and day-to-day policy and management mitigation measures. To ensure that delivery and servicing activities are adequately managed such that the local community, the pedestrian, cycle and highway networks and other highway users experience minimal disruption and disturbance. To enable safe, clean and efficient deliveries and servicing.

#### **43. Detailed Construction Logistics Plan (PRE-COMMENCEMENT)**

(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)
- vii) Crane Erection and Dismantling

REASON: To provide the framework for understanding and managing construction vehicle activity into and out of the proposed development, encouraging modal shift and reducing overall vehicle numbers. To give the Local Planning Authority an

overview of the expected logistics activity during the construction programme. To protect of the amenity of neighbour properties and to maintain traffic safety.

**44. Public Highway Condition (PRE-COMMENCEMENT)**

(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) been undertaken in collaboration with the Council's Highways Maintenance team and submitted in writing 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 in writing 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.

REASON: To ensure the construction works do not result in the deterioration of the condition of the public highway along the site.

**45. Railway Infrastructure Protection Plan (PRE-COMMENCEMENT)**

(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 a an IPP shall be implemented in accordance with approved details.

REASON: to protect infrastructure in close proximity to London Overground track.

**46. Demolition/Construction Environmental Management Plans (PRE-COMMENCEMENT)**

(a) No development 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 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;
- x. Details of any other standard environmental management and control measures to be implemented.

(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) Demolition and construction works shall only be carried out in a particular Phase in accordance with an approved DEMP and CEMP for that Phase.

REASON: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality.

#### **47. Management and Control of Dust (PRE-COMMENCEMENT)**

(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
- i) Mitigation measures to manage and minimise demolition/construction dust emissions during works;
- ii) 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.

REASON: To safeguard residential amenity, protect air quality and the amenity of the locality.

#### **48. Non-Road Mobile Machinery 1 (PRE-COMMENCEMENT)**

(a) Prior to the commencement of the development in a Phase (as identified in an approved Phasing Plan), 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 560 kW to be uploaded during that Phase of the development shall be submitted to and approved by the Local Planning Authority in writing.

Reason: To protect local air quality and comply with Policy SI1 of the London Plan and the GLA NRMM LEZ

**49. Non-Road Mobile Machinery 2 (PRE-COMMENCEMENT)**

(a) All plant and machinery to be used during the demolition and construction phases of the development shall meet Stage IIIA of EU Directive 97/68/ EC for both NOx and PM emissions.

REASON: To protect local air quality and comply with Policy SI 1 of the London Plan and the GLA NRMM LEZ

**50. Impact Piling Method Statement (PRE-COMMENCEMENT)**

(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.

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

**51. Business and Community Liaison Construction Group (PRE-COMMENCEMENT)**

(a) 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.

REASON: In order to ensure satisfactory communication with residents, businesses and local stakeholders throughout the construction of the development.

## **52. Telecommunications**

(a) 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.

Reason: To protect the visual amenity of the locality in accordance with Policy DM1 of the Development Management Development Plan Document 2017.

## **INFORMATIVES**

1. Working with the applicant. In dealing with this application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our development plan comprising the London Plan 2021, the Haringey Local Plan 2017 along with relevant SPD/SPG documents, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably. In addition, where appropriate, further guidance was offered to the applicant during the consideration of the application.

2. Community Infrastructure Levy. The applicant is advised that the proposed development will be liable for the Mayor of London and Haringey CIL. Based on the information given on the plans, the Mayor's CIL would be £3,408,103 (56,286 x £60.55) and (based on the current Haringey CIL charge rate for the Eastern Zone of £15 per square metre (£20.90 with indexation) the Haringey CIL charge would be £1,140,300 (54,560 x £20.90), giving a total of £3,408,103. This will be collected by Haringey after the scheme is 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.

Note: The CIL rates published by the Mayor and Haringey in their respective Charging Schedules have been inflated in accordance with the CIL regulations by the inflation factor within the table below

3. Hours of Construction Work. The applicant is advised that under the Control of Pollution Act 1974, construction work which will be audible at the site boundary will be restricted to the following hours: -

8.00am - 6.00pm Monday to Friday

8.00am - 1.00pm Saturday  
and not at all on Sundays and Bank Holidays.

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

5. Numbering New Development. The new development will require numbering. The applicant should contact the Local Land Charges at least six weeks before the development is occupied (tel. 020 8489 3472) to arrange for the allocation of a suitable address.

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

7. Dust. The applicant must ensure that any issue with dust where applicable is adequately addressed so as to ensure that; the effects of the construction work upon air quality is minimised.

8. Written Scheme of Investigation – Suitably Qualified Person. 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.

9. Deemed Discharge Precluded. The Condition addressing a Written Scheme of Investigation (WSI) is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

10. Composition of Written Scheme of Investigation. Historic England GLAAS envisages that archaeological fieldwork would comprise the following:

#### Geoarchaeological Assessment and Coring

Geoarchaeology is the application of earth science principles and techniques to the understanding of the archaeological record. Coring involves boreholes drilled into the buried deposits to record (and sample) their characteristics, extent and depth. It can assist in identifying buried landforms and deposits of archaeological interest, usually by using the results in deposit models. Coring is often undertaken when the deposits of interest are too deep for conventional digging, or when large areas need to be mapped. It is only rarely used in isolation usually forming part of either an archaeological evaluation to inform a planning decision or the excavation of a threatened heritage asset.

#### Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent,



quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

The scope of the archaeological mitigation will depend on the results of the above phases of work. You can find more information on archaeology and planning in Greater London on our website This response only relates to archaeology. You should also consult Historic England's Development Management on statutory matters.

11. Disposal of Commercial Waste. 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.

12. Piling Method Statement Contact Details. Contact Thames Water  
<https://developers.thameswater.co.uk/Developing-a-largesite/>  
Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk)

13. Minimum Water Pressure. 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.

14. Paid Garden Waste Collection Services. Haringey operate a paid garden waste collection service; the applicant is advised that any waste storage area should include space for a garden waste receptacle. For further information on the collection service please visit our website: [www.haringey.gov.uk/environment-and-waste/refuse-and-recycling/recycling/garden-waste-collection](http://www.haringey.gov.uk/environment-and-waste/refuse-and-recycling/recycling/garden-waste-collection)

15. Sprinkler Installation. The London Fire and Emergency Authority recommends that sprinklers are considered for new development and major alterations to existing premises. Sprinkler systems installed in building can significantly reduce the damage caused by fire and the consequential cost to businesses and housing providers, and can reduce the risk to life.

16. Designing out Crime Officer Services. The applicant must seek the continual 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](mailto:docomailbox.ne@met.police.uk) or 0208 217 3813.

17. Land Ownership. The applicant is advised that this planning permission does not convey the right to enter onto or build on land not within his ownership.

18. Network Rail Asset Protection. Network Rail strongly recommends the developer contacts Network Rail Asset Protection London South East Asset Protection [anglia@networkrail.co.uk](mailto:anglia@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 at [www.networkrail.co.uk/aspx/1538.aspx](http://www.networkrail.co.uk/aspx/1538.aspx).

19. Site Preparation Works. These comprise site preparation and temporary works including but not limited to the demolition of existing buildings and structures; surveys; site clearance; archaeological works; ground investigation; remediation; the erection of fencing or hoardings; the provision of security measures and lighting; the erection of temporary buildings or structures associated with the development; the laying, removal or diversion of services; construction of temporary access; temporary highway works; and temporary internal site roads.

20. Listed Building Consent. This planning permission must be read in conjunction with the Listed Building Consent (HGT/2019/2930) dated 25 September 2020.

21. s106 Agreement and s278 Agreement. This planning permission must be read in conjunction with the s106 Agreement dated XX and any associated s278 Highway Act Agreement(s).

22. Site Boundaries. This planning permission relates to the 'Goods Yard' and 'The Depot', the extent of which is shown on approved drawing reference 'GYARD-F3-ZZ-EX-ST-A-89012, Rev P2'.

## **Pre-Application Briefing to Committee**

### **1. DETAILS OF THE DEVELOPMENT**

**Reference No:** PPA/2021/0026

**Ward:** Seven Sisters

**Address:** Florentia Clothing Village Storage Park, Vale Road, N4 1TD

**Proposal:** Provision for five new blocks of light industrial floor space (GEA equates to circa 9,880sqm)

**Applicant:** Florentia Property Unit Trust/General Projects RE Limited

**Agent:** Victoria Orbart, DP9

**Ownership:** Private

**Case Officer Contact:** Tobias Finlayson

### **2. BACKGROUND**

- 2.1. The proposed development is being reported to Planning Sub-Committee to enable members to view it ahead of a full planning application submission. Any comments made are of a provisional nature only and will not prejudice the outcome of any formally submitted planning application.
- 2.2. It is anticipated that the planning application, once received, will be presented to the Planning Sub-Committee in the first quarter of 2022. The applicant has engaged in pre-application discussions with Council Planning Officers as well as presenting the scheme to the Quality Review Panel (QRP).

### **3. SITE AND SURROUNDINGS**

- 3.1. The existing Florentia Clothing Village campus sits to the south of Vale Road and comprises a mix of low-rise industrial buildings currently used for a variety of creative and start-up businesses comprising light industrial, studio workspace and residential uses. The application site sits to the west of the existing village and is occupied by 'Storage for London' consisting of 130 self-storage units.
- 3.2. The site is within a Locally Significant Industrial Site (LSIS), the Harringay Warehouse District, a Creative Enterprise Zone (CEZ), and an Area of Change (Seven Sisters Corridor).

#### **4. PROPOSED DEVELOPMENT**

- 4.1. The proposal is for provision for four new blocks of light industrial floor space (GEA equates to circa 9,880sqm).

#### **5. PLANNING HISTORY**

- 5.1. The adjacent Florentia Clothing Village itself has been subject to a number of different applications. However, the storage pre-application site itself has no relevant planning history.

#### **6. CONSULTATIONS**

##### **Public Consultation**

- 6.1. This scheme is currently at pre-application stage and therefore, the Local Planning Authority has undertaken no formal consultation at this stage.

##### **Applicant's Consultation**

- 6.2. Officers have advised the applicant of the requirements of the National Planning Policy Framework (NPPF) and the Council's Statement of Community Involvement (SCI), which set out that a developer should engage with and consult the local community in planning and development issues on major developments prior to submitting an application.
- 6.3. The applicant has engaged with local groups and councillors and will be holding public consultation events. Feedback/comments resulting from the applicant's own consultation will be included within its SCI submitted with any forthcoming planning application.

##### **Development Management Forum**

- 6.4. The proposed development is not of such size as to necessitate a Development Forum (DMF). Furthermore, the applicant's own engagement is considered to be sufficient to allow local people to understand and provide feedback on this proposal.

##### **Quality Review Panel**

- 6.5. The Quality Review Panel (QRP) reviewed the proposal on 29 September 2021 with the report attached at **Appendix 2**. The summary of the QRP views is:

*The panel feels that this has the potential to be an exciting scheme, within a distinctive and characterful area. It appreciates the Council's ambition for high quality, sustainable and biodiverse warehouse-style development within this unique part of London, and it welcomes the principles outlined by the design*

*team in their presentation. However, it feels that further work, at both a strategic and detailed level, is required if its potential is to be realised.*

*While the panel supports the general typology, scale and height of the proposals, it feels that there is more work to do to integrate the scheme into the wider context (including Florentia Clothing Village), in terms of how it functions as a piece of urbanism and as part of a larger masterplan for the local area. This should include further analysis of views, legibility, townscape, connections, routes, and links to wider networks. This analysis should feed into the next iteration of design, including the configuration, distribution, layout and three-dimensional design of the new buildings, routes and spaces within the site.*

*Sustainable design principles should be embedded at the heart of the proposals and should inform early strategic decision-making, as well as the detailed design. This should include decisions about orientation and form, retention / re-use of materials and elements, and the adoption of a fabric-first approach to the design of the building envelope. The panel would encourage the appointment of a landscape architect to the project team at an early stage, to contribute to the strategic and detailed work on the scheme's landscape design and approach to biodiversity.*

## **7. MATERIAL PLANNING CONSIDERATIONS**

7.1. Officers' initial views on the development proposals are outlined below:

### **Principle of Development**

- 7.2. Within Locally Significant Industrial Sites proposals for the intensification, renewal and modernisation of employment land and floorspace are supported subject to certain criteria being met (see London Plan Policy E7, Development Management DPD Policy DM37 and Local Plan Strategic Policy SP8).
- 7.3. The proposal is likely to result in a significant increase in employment through an increase in potential jobs (circa 455) and floorspace; (circa 9,880 sqm).
- 7.4. The whole Warehouse District is currently included within the Tottenham Creative Enterprise Zone, 1 of 6 CEZs across London designated by the Mayor to support and enhance affordable creative workspace in the capital alongside the role and presence of artists, makers and creators.
- 7.5. The proposal has been designed to meet the specific need for SME and creative space within the CEZ and is therefore strongly supported in principle. Where viable affordable workspace at rents maintained below the market rate will be secured in accordance with the requirements of Policy E3 of the London Plan.

### **Design and Appearance**

- 7.6. The proposal has been presented to the Quality Review Panel (Appendix 2), which was broadly supportive, as summarised at section 6.5 above. Officers are confident that the design approach presented, with further refinement, will result in an overall design that is acceptable and can be supported, particularly when considered in the context of the surrounding environment, which is comprised of mostly utilitarian buildings and the type of use proposed (light industrial). Officers acknowledge that the applicant has designed a scheme that recognises the need for buildings that provide visual interest whilst meeting the wide range of occupiers' needs.

### **Impacts on Amenity of Surrounding Residents**

- 7.7. The design and scale is unlikely to result in a significant impact on residential uses within the Florentia Clothing Village adjoining the site and the separation distance to the residential terraces to the north along Hermitage Road, are substantial.
- 7.8. The applicant has been advised to consider the impact of any likely night-time weekend activities or events and prepare a management plan for consideration, to ensure these can be accommodated without affecting neighbouring properties. This can then form part of the proposal to provide confidence such activities can be managed appropriately.

### **Transportation and Highways**

- 7.9. As this is a major redevelopment proposal, any forthcoming planning application will require a Transportation Assessment. The key transportation issues are sustainable travel, access, improvements to connectivity, and parking and servicing demands from within the site, and minimising the impacts of the construction process.
- 7.10. The applicant is currently working with officers on ensuring these and other transport and highways matters are appropriately addressed within a Transport Assessment.

### **Landscaping**

- 7.11. The site currently comprises hardstanding and no soft landscaping. Although the proposal is for continuation and intensification of light industrial uses, officers agree with the QRP that the proposal presents an opportunity to 'green' the site. This is particularly important given the London Plan requirements relating to Urban Greening Factor and securing net biodiversity gain (policies G5 and G6). The site lies within a Critical Drainage Area and therefore needs to reduce the overall level of flood risk (see Policy DM26 of the Development Management DPD) through Sustainable Urban Drainage Systems such as soft landscaping and permeable surfaces. To this end, officers expect the applicant to discuss

these matters in further detail and for these matters to be appropriately addressed in a landscaping plan.

### **Sustainability**

- 7.12. The applicant is currently working with officers on ensuring carbon reduction and overheating targets are met. These matters will be detailed further within the detailed Energy and Sustainability statements required to be submitted with any forthcoming planning application.

### **Conclusion**

- 7.13. Officers consider that the principle of the proposed development is acceptable and that it will unlikely result in undue harm to neighbouring residential amenities. In addition, subject to further detailed design and assessment in conjunction with ongoing discussions with officers, matters such as design, transport, sustainability and landscaping will likely be satisfactorily addressed should a planning application be forthcoming.

### Appendix 1: Plans and Images

#### Location plan



#### 'Bird's eye' view of existing site looking south







Massing to Vale Road



Vehicular entrance to Vale Road



Pedestrian entrance to Vale Road



Typical inner courtyard view with external walkways



View from upper walkway



## Appendix 2: Quality Review Panel Report

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### **Haringey Quality Review Panel**

#### **Report of Formal Review Meeting: Vale Road Creative Workspace**

Wednesday 29 September 2021  
Zoom video conference

#### **Panel**

Hari Phillips (chair)  
Phil Armitage  
Irène Djao-Rakiline  
Louise Goodison  
Dieter Kleiner

#### **Attendees**

Robbie McNaugher	London Borough of Haringey
John McRory	London Borough of Haringey
Richard Truscott	London Borough of Haringey
Tobias Finlayson	London Borough of Haringey
Sarah Carmona	Frame Projects
Reema Kaur	Frame Projects

#### **Apologies / report copied to**

Rob Krzyszowski	London Borough of Haringey
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#### **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.

#### **Declarations of interest**

Dieter Kleiner is a Director at RCKA and panel member of the Haringey Quality Review Panel. RCKA and Turner Works, who are part of the design team on the Vale Road Creative Workspace project, are both independently appointed by Ebbsfleet Development Corporation to collaborate on their cultural co-location plans in the region.

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**1. Project name and site address**

Vale Road Creative Workspace, Storage Park, Vale Road, N4 1TD

**2. Presenting team**

Jacob Loftus	General Projects
Jacob Sandelson	General Projects
Samantha Whellams	General Projects
Carl Turner	Turner Works
Raphael Arthur	Turner Works
Simon Cadle	Turner Works
Abdul Thahid	Quartz
Tom Horne	DP9
Victoria Orbart	DP9

**3. Aims of the Quality Review Panel meeting**

The Quality Review Panel provides impartial and objective advice from a diverse range of experienced practitioners. This report draws together the panel's advice, and is not intended to be a minute of the proceedings. It is intended that the panel's advice may assist the development management team in negotiating design improvements where appropriate and in addition may support decision-making by the Planning Committee, in order to secure the highest possible quality of development.

**4. Planning authority briefing**

The proposal is for an extension to the existing Florentia Village, comprising five new light industrial blocks (Use Class E). The site is located to the south-eastern side of Vale Road, within the Haringay Warehouse District, adjacent to the Florentia Clothing Village site. It has a public transport accessibility level value of 2, which is considered 'poor'. The existing Florentia Clothing Village campus sits to the south of Vale Road and comprises a mix of low-rise industrial buildings currently used for a variety of creative and start-up businesses, including light industrial, studio workspace and residential uses. The application site sits to the west of the existing village and is currently occupied by Storage for London, which consists of 130 self-storage units. The site is neither listed nor within a conservation area. However, it is within an Area of Change (Seven Sisters Corridor) as well as within a Creative Enterprise Zone (CEZ). These designations acknowledge that the area is suitable for growth and intensification in order to facilitate renewal and regeneration, but seek to protect and nurture existing industries, particularly the creative industries such as those based around fashion that have blossomed in this area.

The site is also designated as a Locally Significant Industrial Area within which proposals for the intensification, renewal and modernisation of employment land and floorspace are supported. The use proposed (light industrial) is appropriate within this location and, given the existing use is storage, would make a demonstrable improvement in the use of the site for employment purposes through an increase in



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jobs and floorspace. The proposal also meets a need for small and medium-sized enterprises and creative space. Officers seek the panel's views on the design quality of the proposals, the approach to sustainability and landscaping, and how well the development will integrate with neighbouring buildings and routes.

**5. Quality Review Panel's views***Summary*

The panel feels that this has the potential to be an exciting scheme, within a distinctive and characterful area. It appreciates the Council's ambition for high quality, sustainable and biodiverse warehouse-style development within this unique part of London, and it welcomes the principles outlined by the design team in their presentation. However, it feels that further work, at both a strategic and detailed level, is required if its potential is to be realised.

While the panel supports the general typology, scale and height of the proposals, it feels that there is more work to do to integrate the scheme into the wider context (including Florentia Clothing Village), in terms of how it functions as a piece of urbanism and as part of a larger masterplan for the local area. This should include further analysis of views, legibility, townscape, connections, routes, and links to wider networks. This analysis should feed into the next iteration of design, including the configuration, distribution, layout and three-dimensional design of the new buildings, routes and spaces within the site.

Sustainable design principles should be embedded at the heart of the proposals and should inform early strategic decision-making, as well as the detailed design. This should include decisions about orientation and form, retention / re-use of materials and elements, and the adoption of a fabric-first approach to the design of the building envelope. The panel would encourage the appointment of a landscape architect to the project team at an early stage, to contribute to the strategic and detailed work on the scheme's landscape design and approach to biodiversity. Further information on the panel's views is provided below.

*Massing, height and building uses*

- In general terms, the panel broadly supports the scale and height of the development, in addition to the building use proposed.

*Place-making, public realm and landscape design*

- The panel would encourage the project team to appoint a landscape architect at the earliest opportunity.
- The development site represents an incredible opportunity to reinforce and develop connections across the area. A wider urban and landscape strategy is needed; the panel would like to see a masterplan that includes the urban and



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landscape approach, alongside pedestrian and cycle links into, through and beyond the site. The site should be considered as a part of a district rather than a campus, as it will have a significant impact on the surrounding area.

- Further analysis is needed of the site's relationship to the wider environment in terms of open and green space networks, and the drainage network. It would like to see a diagram showing the diversity of open space typologies across the site and beyond, including streets, squares, plazas walkways and parks.
- The panel notes that an 'industrial' design approach can also be very green and landscaped, so it would encourage the project team to evaluate the proposal's urban greening factor.
- Green / living walls should be avoided as they require intensive irrigation if plants are to thrive. The panel feels that creating porosity through planting within the ground and roof planes would be a better approach to 'greening' the site.
- As there is no basement, an opportunity exists to incorporate areas of soft landscaping and sustainable drainage systems (SuDs). Avoiding large areas of concrete slab would be welcomed.
- The proposed roofscape will cover a significant proportion of the site area and the inclusion of green roofs (up to a 30% slope) should be considered.

*Scheme layout and access*

- The panel welcomes the principles of achieving greater permeability and openness for the development and it would like to see more detail on how routes and views through the new development from the existing Florentia Clothing Village will be integrated into the scheme. This should include analysis of how the existing workshop area functions.
- The panel notes that there are long warehouses with alleyways running alongside, and it questions whether these routes will be perceived as safe. Locating building entrances at the ends of alleyways could help with natural surveillance and activity.
- The panel would like to see further consideration given to the nature of all the pedestrian routes through the site, along with greater clarity on how smaller routes meet the larger courtyard spaces. The panel notes that revisiting how the routes and spaces will integrate within and beyond the site may result in adjustments to the footprint and configuration of the proposed buildings.
- The panel feels that there is an opportunity to 'celebrate' the courtyards more, rather than just utilise them for servicing access, and it would like to see



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further work undertaken to enhance their nature and role.

- The panel would encourage further analysis of the unit typologies and configurations. It is not convinced that there is demand for large warehouse space and it has concerns that the smaller workshops (located in the upper storeys of the development) will become divorced from the activity at ground level. Bringing some smaller units down to ground level and encouraging footfall to upper levels, for example through programming events and the design of stairs / lifts, would help to create a more vibrant sense of place. This will be especially important if the business model for the workshops includes 'opening up' to the public for sales.
- The panel questions the level of provision of cycle storage, and feels that 64 spaces, and 10 short stay spaces, will be inadequate to serve the 354 people working within the site.

*Inclusive and sustainable design*

- The panel would like to know more about the strategic and detailed approach to low 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; proposals should demonstrate how they comply with these targets.
- A low / zero carbon approach to design should inform the earliest strategic design decisions and should be part of the ongoing narrative as the scheme continues to evolve. The proposals presented do not reflect this approach to development; the panel would like to see sustainable design principles embedded within the design process.
- BREEAM targets were mentioned within the presentation; the panel considers that these standards are not challenging enough in terms of current aspirations towards low / zero carbon in light of the climate emergency. Further strategic and detailed work in collaboration with the sustainability consultants would be supported.
- Consideration of the embodied energy within the existing buildings is an important starting point; embodied carbon represents a significant proportion of the lifetime carbon measure – equivalent to 15-25 years of operational carbon. The panel would like to see detailed analysis of a development approach that seeks to retain or reuse building elements or materials, to identify opportunities and inform the choice of materials. The existing concrete slab across the entirety of the site presents a significant challenge in this regard.





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- Consideration of the operational energy requirements should start with a 'fabric first' approach – optimising the orientation, form, 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 will also form part of this work.
- The site is very quiet, with high levels of solar access. Careful consideration of the detailed design of the north and south-facing facades will be necessary. These should respond to their specific microclimatic conditions to minimise overheating, while achieving good daylight levels.
- The orientation and design of the roof should be optimised, to allow for the installation of PV panels, either immediately or in the future.
- The panel highlights that the floor plans are very deep and will have limited daylight penetration, due to the configuration and stacking of units. It would encourage the project team to revisit the configuration of the buildings, to optimise daylight levels and achieve quality working environments, perhaps through offsetting or pulling out parts of the plan.
- The thermal performance of the external fabric should strike a good balance between the level of daylighting and heat loss. The panel thinks that polycarbonate panels as proposed will not offer adequate thermal properties.
- The inclusion of air source heat pumps will have specific space and design requirements, which need to be accommodated within the plans at the earliest opportunity.

*Next steps*

- The panel would welcome a further opportunity to review the proposals. They highlight a number of action points for consideration by the design team, in consultation with Haringey officers.
- It also offers a focused chair's review specifically on the approach to low carbon design and environmental sustainability, if required.



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**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.

