

## Appendix 1 – Drawings and Documents

160623-GY-90-ST-101 P1; 160623-GY-90-ST-102 P1; 160623-GY-90-ST-103 P1;  
160623-GY-90-ST-104 P2; 160623-GY-90-ST-105 P2; 160623-GY-90-ST-106 P2;  
160623-GY-90-ST-107 P2; 160623-GY-90-ST-108 P2; 160623-GY-90-ST-004 P1;  
160623-GY-90-ST-007 P2; 160623-GY-20-GA-101 P1; 160623-GY-20-GA-102 P1;  
160623-GY-20-GA-103 P1; 160623-GY-25-EL-101 P1; 160623-GY-92-EL-101 P1;  
160623-GY-92-GA-101 P1; 160623-GY-92-GA-102 P1; 160623-GY-92-GA-103 P1;  
VN70817-105; VN70817-100D

Development Specification & Framework (March 2018 Update); Design and Access Statement (DAS); DAS Addendum (April 2018); Design Code (April 2018); Transport Assessment (with Travel Plan and Delivery and Servicing Plan); Transport Assessment Addendum (April 2018); Environmental Statement; Environmental Statement Addendum (April 2018); Planning Statement; Energy Statement; Sustainability Statement; Affordable Housing Statement; Affordable Housing Statement Addendum (April 2018); Statement of Community Involvement; Site Waste Management Plan; Occupational Waste Management Plan; Internal Sunlight and Daylight Assessment; Daylight, Sunlight and Overshadowing Addendum (April 2018); Flood Risk Assessment and Drainage Details; Water/Waste Water Utilities Assessment; Heritage Statement; Tree Survey and Arboricultural Impact Assessment and Method Statement; Employment and Regeneration Statement; Basement Impact Assessment.

Appendix 2 – Plans and Images



Image 1.1 – Historic Aerial Site Image (Source: Applicant)



Image 1.1A - Historic Aerial Site Image – looking southeast (Source: Applicant)



Image 1.2 – Existing Site access - looking north from White Hart Lane (Source Applicant)



Image 1.3 – Existing Site Image looking east (Source Applicant)



Image 1.4 – Existing Site Image looking northeast (Source Applicant)



Image 1.5 – Site Red Line Plan (Source: Applicant)



Image 1.6 – Parameter Plot Plan (Source: Applicant)

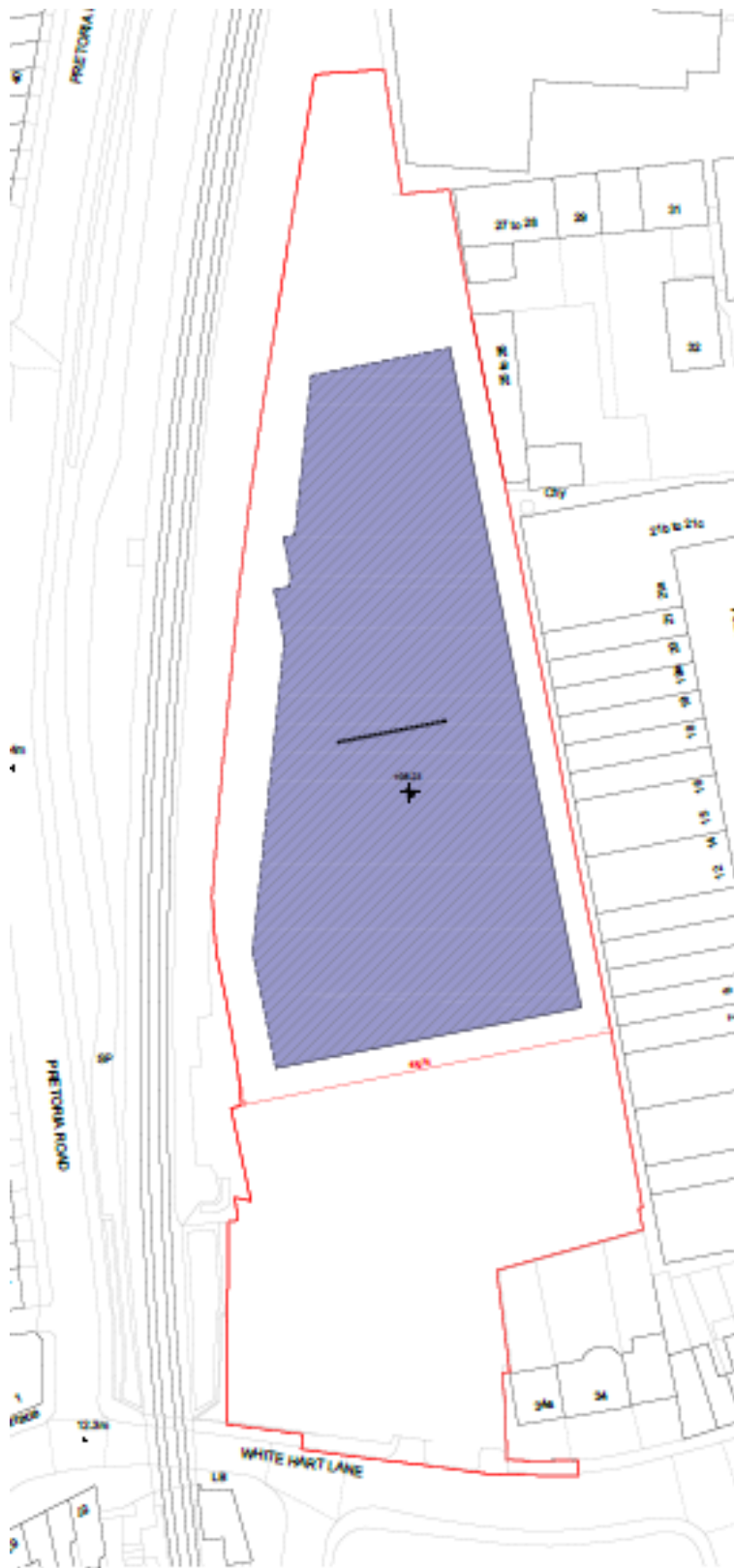


Image 1.7 – Parameter Plot Plan – Basement Extent (Source: Applicant)



Image 1.8 - Parameter Plot Plan - Public Realm (Source: Applicant)

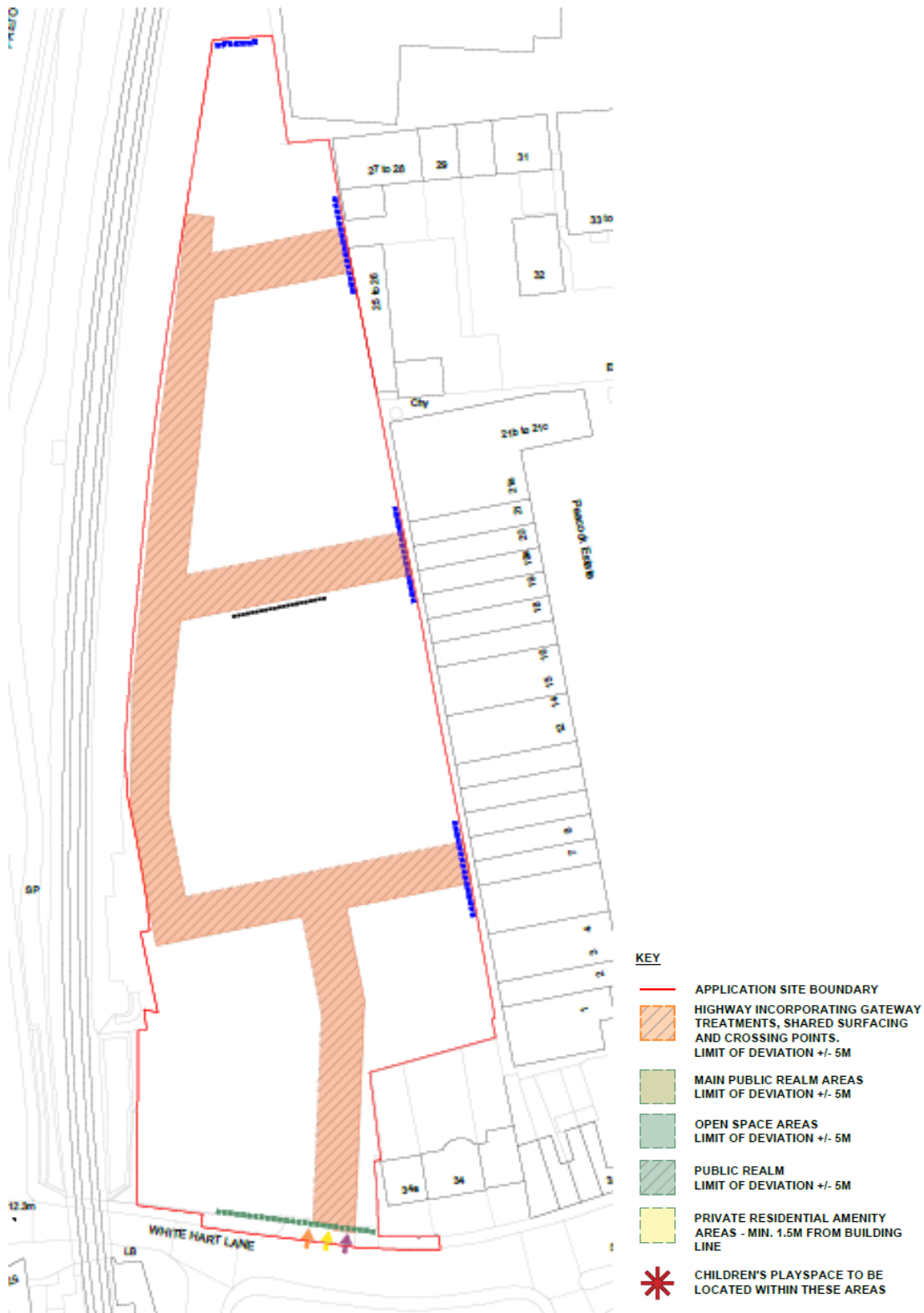


Image 1.9 - Parameter Plot Plan – Site Access (Source: Applicant)



Image 1.10 - Parameter Plot Plan – Ground Floor Uses (Source: Applicant)



Image 1.11 - Parameter Plot Plan – Upper Floor Uses (Source: Applicant)



Image 1.12 – Indicative massing (looking west) Source: Applicant

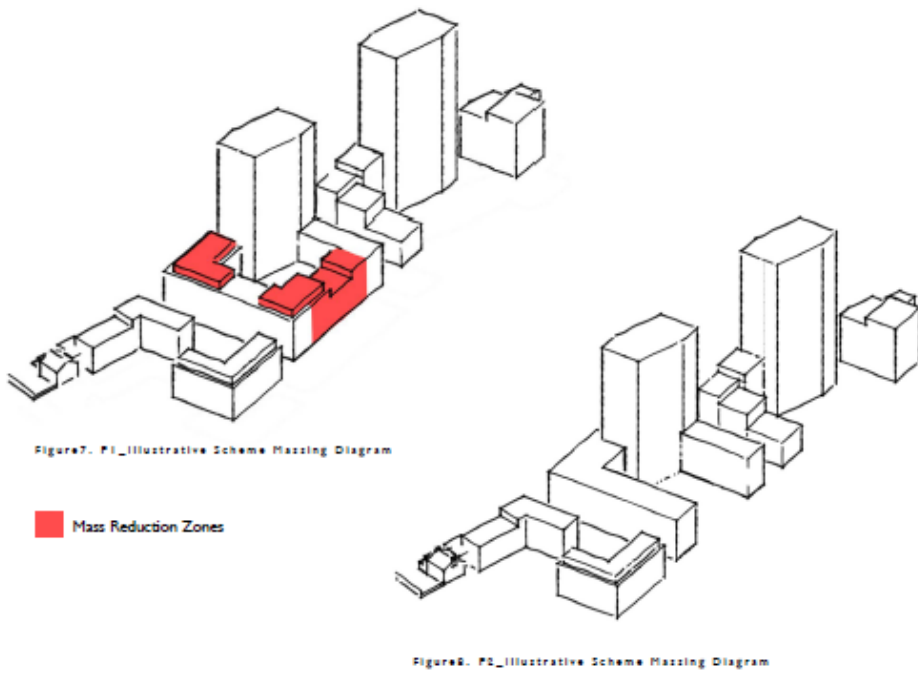


Image 1.13 – Scheme amendments (January 2018 LHS; April 2018 RHS). Red massing is indicative development removed from the proposal.



Image 1.14 – Indicative Massing - High Road near the White Hart Lane junction (looking northwest) Source: Applicant



Image 1.15 – Indicative Massing – William Street (looking north) Source: Applicant



Image 1.16 – Indicative Massing – Pretoria Road (looking southeast) Source: Applicant



Image 1.17 – Indicative Massing – Northumberland Park (looking west) Source: Applicant

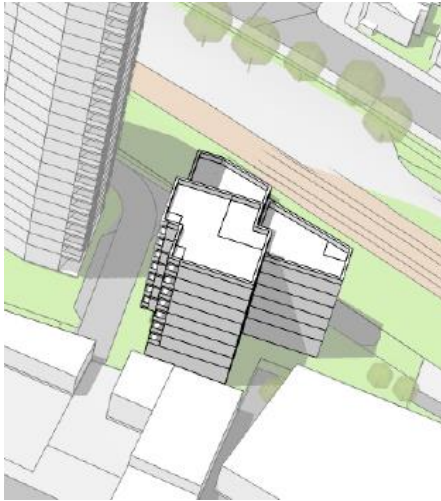


Image 1.18 – Indicative Image – Block A – Source: Applicant



Image 1.19 – Indicative Image – Blocks B (LHS) and C (RHS) – Source: Applicant



Image 1.20 – Indicative Image – Blocks D (RHS) and F (LHS) – Source: Applicant



Image 1.21 – Indicative Image – Blocks E – Source: Applicant



## **Haringey Quality Review Panel**

### **Report of Formal Review Meeting: Goods Yard**

Wednesday 28 February 2018

River Park House, 225 High Road, London, N22 8HQ

#### **Panel**

Peter Studdert (chair)

David Ubaka

Dieter Kleiner

Wen Quek

Craig Robertson

#### **Attendees**

Nairita Chakraborty	London Borough of Haringey
James Hughes	London Borough of Haringey
Robbie McNaugher	London Borough of Haringey
Richard Truscott	London Borough of Haringey
Deborah Denner	Frame Projects
Sarah Carmona	Frame Projects
Rebecca Ferguson	Frame Projects

#### **Apologies / report copied to**

Emma Williamson	London Borough of Haringey
Dean Hermitage	London Borough of Haringey
John McRory	London Borough of Haringey

#### **Confidentiality**

This is a pre-application review, and therefore confidential. As a public organisation Haringey Council is subject to the Freedom of Information Act (FOI), and in the case of an FOI request may be obliged to release project information submitted for review.

**1. Project name and site address**

The Goods Yard, 36 and 44-52 White Hart Lane, Tottenham, London N17 8DP

HGY/2018/0187 & HGY/2018/0188

**2. Presenting team**

Dan Bukin	F3 Architects LLP
Russ McGuinn	F3 Architects LLP
Katy Wright	F3 Architects LLP
Sean Bashforth	Quod

**3. Aims of the Quality Review Panel meeting**

The Quality Review Panel provides impartial and objective advice from a diverse range of highly experienced practitioners. This report draws together the panel's advice, and is not intended to be a minute of the proceedings. It is intended that the panel's advice may assist the development management team in negotiating design improvements where appropriate and in addition may support decision-making by the Planning Committee, in order to secure the highest possible quality of development.

**4. Planning authority's views**

The application site forms part of site allocation NT5 (High Road West) within the Tottenham Area Action Plan (AAP). The proposal has not previously been reviewed by the QRP but an application has been submitted. Only matters of site access and heritage matters pertaining to Station Master's House are set out full, with all other matters being reserved.

A masterplan is in place for the area ('the High Road West masterplan') prepared by Arup and adopted by Cabinet in 2014. As per Spatial Strategy Policy SP1, the site is located within the Northumberland Park Area of Change. In order to accommodate Haringey's growing population, 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. The NT5 site allocation for the wider area calls for a masterplanned, comprehensive development creating a new residential neighbourhood and a new leisure destination for London.

Site requirements indicate that the applicant's development should accord with the principles set out in the most up-to-date, council-approved masterplan. Officers seek the panel's view on the proposals, especially with regard as to whether the scheme is in accordance with the wider masterplan, in addition to the scale, massing and design of the development. Officers also note some concerns about the proposed access from White Hart Lane.



## 6. Quality Review Panel's views

### *Summary*

The development proposals for the Goods Yard site sit within the Council's High Road Masterplan, and the panel supports the aspirations set out by the planning authority in this document. The panel is concerned, however, that the current hybrid planning application would make it difficult for the wider masterplan vision to be successfully delivered.

The development of the Goods Yard site should facilitate the future delivery of the wider masterplan, and set a benchmark for high quality design in this part of Tottenham. The panel is unable to support the current planning application as it considers that the scheme exceeds the quantum of development proposed in the adopted masterplan, and will constrain development to the east of the site. The proposals also provide inadequate open space for the density of development proposed, and rely on neighbouring sites to make up this shortfall.

The panel would support further consideration of the distribution of massing and scheme layout, especially with regard to the eastern edge of the site at block C, to ensure that what is proposed in this location will facilitate high quality development on the master plan site as a whole, in addition to high quality open spaces and routes within this first phase of the development.

The panel supports the general approach to the southern section of the site, around the Station Master's House, although this will only be successful if vehicular access can be restricted at this entrance in a legally binding way, once the remaining phases are completed and the alternative vehicular access allowed for in the master plan is secured. Further details on the panel's views are provided below.

### *Massing and development density*

- The panel considers that the proposed density of development is exceeding that identified within the adopted wider masterplan for the area.
- This has compromised the amount and quality of open space within the site and within the wider area, and makes the unacceptable assumption that neighbouring developments will have to make up the shortfall.
- The panel feels that if this proposal is to come forward before the other phases, then the overall development density needs to reduce, to enable adequate levels of open space within the site.
- In comparison to the wider masterplan, the scale of the towers in the current proposals are wider and broader, which will have a negative impact on the



courtyards, open spaces and accommodation adjacent, in terms of place quality, overshadowing, and reduced access to daylight and sunlight.

- The panel would encourage the design team to re-think the distribution of the accommodation in order to ensure that the development works well in terms of the amount (and quality) of open space provided, the amenity of courtyards within blocks, the nature of the routes and the interface with future developments to the east within the master plan area.
- There may be some flexibility in adjusting the heights of the towers subject to a detailed assessment of their impact on long distance views.

#### *Scheme layout and architectural expression*

- The configuration of blocks C and B requires further consideration, as they currently create a very difficult junction at the boundary to the neighbouring areas of the masterplan to the east.
- In the adopted masterplan, block C represents half of a courtyard block, presenting a party wall at the interface of the neighbouring site for the equivalent half of the block.
- Block C in particular is unacceptable in its current form as it now presents a 'closed' section of building frontage very close to the boundary. This will significantly restrict the development that can be achieved on the neighbouring site immediately adjacent at the east, whilst also creating a very enclosed and deep street section at this interface.
- The internal courtyard of block C is now also much smaller, with a reduction in quality and amenity, and a greater degree of overshadowing due to the increase in width of the tower element in addition to the new wing of accommodation that closes the courtyard at the eastern end of the site.
- The panel considers that none of the potential wider scheme layout options presented at the review successfully address the problem with the interface at block C.
- The panel would support further consideration of this part of the scheme, to ensure that what is proposed in this location will facilitate high quality development adjacent, in addition to high quality open spaces and routes, both within and around the blocks themselves.
- The proposal for a mixed-use 'shared surface' space at the southern entrance to the site around the Station Master's House seems well-considered. However, this will only be successful if vehicle access at this point is seen as a short-term measure. Once the remaining parts of the master plan area are developed the main vehicle access to the site should be taken through the site



to the east as shown on the master plan, and this should be secured through a S106 Agreement.

- The architectural expression of the detailed (full) elements of the planning application was not discussed in detail at the review as the panel's comments were at a more strategic level.

#### *Inclusive and sustainable design*

- The panel would like to see more information on the technical aspects of the proposals, including results of studies undertaken, plus plans and sections marked up to illustrate the findings (in terms of daylight, sunlight, and wind).

#### *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.

### **Appendix: Haringey Quality Charter**

#### **Policy DM1: Delivering High Quality Design**

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

- Relate positively to neighbouring structures, new or old, to create a harmonious whole;
- Make a positive contribution to a place, improving the character and quality of an area;
- Confidently address feedback from local consultation;
- Demonstrate how the quality of the development will be secured when it is built; and
- Are inclusive and incorporate sustainable design and construction principles.

#### Design Standards

Character of development - development proposals should relate positively to their locality, having regard to:

- Building heights;
- Form, scale & massing prevailing around the site;
- Urban grain, and the framework of routes and spaces connecting locally and more widely;
- Maintaining a sense of enclosure and, where appropriate, following existing building lines;
- Rhythm of any neighbouring or local regular plot and building widths;
- Active, lively frontages to the public realm; and
- Distinctive local architectural styles, detailing and materials.

*Haringey Development Management DPD (2017)*



Development Management Forum – Meeting Summary

The Goods Yard

36 and 44-52 White Hart Lane, N17 8DP

HGY/2018/0187

A development Management Forum was held at Haringey Sixth Form College on 19<sup>th</sup> February 2018 at 19.00. The forum was attended by representatives of the applicant, including F3 architects, a representative of the Tottenham Conservation Area Advisory Committee (CAAC), Haringey Officers and several local residents.

The key issues discussed included a discussion of the principle of granting planning permission for land within an allocated site, the delivery of infrastructure, and several issues related to planning process.

Specific questions asked by attendees included:

Planning Process

- What is the application trajectory and has a committee date been set?
- What is the relationship of the scheme to the High Road West master plan proposal?
- Is the scheme piecemeal development in planning policy terms? Is the application a value “capture exercise”
- Will the wider area be subject to a Compulsory Purchase Order?

Infrastructure Delivery

- The culverts to the River Mossell require an infrastructure investment. Who will pay for this?
- How did the Good Yard work historically?
- Residents will not benefit from piecemeal development and the High Road West Master Plan calls for delivery of a library and other community facilities. Would these still be delivered with a piecemeal scheme?
- If planning permission is granted for this scheme, will Lendlease need to consider the planning decision?

The meeting closed 19:48.

J. Hughes – Principal Planning Officer  
19.02.2018

Appendix 5 – Internal and External Consultation Comments

COMMENTOR	COMMENT	OFFICER RESPONSE
<p>Historic England (GLAAS)</p>	<p><b>Recommend Archaeological Condition(s)</b>            Alongside prehistoric and Roman potential at the site suggested by its geography, hydrology and geology, the submitted desk-based archaeological assessment has also identified possible mediaeval and post-mediaeval remains connected with Tottenham vicarage. This is likely to have been a high status building that stood within the site boundaries and although possibly affected by later railway development, contemporary remains significant to the historic development of Tottenham can be expected.</p> <p>Thank you for your consultation received on 26 January 2018. The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter.</p> <p>The National Planning Policy Framework (Section 12) and the London Plan (2011 Policy 7.8) emphasise that the conservation of archaeological interest is a material consideration in the planning process. Paragraph 128 of the NPPF says 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. This information should be supplied to inform the planning decision. If planning consent is granted paragraph 141 of the NPPF says that applicants should be required to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) and to make this evidence publicly available.</p> <p>Appraisal of this application using the Greater London Historic Environment Record and information submitted with the application indicates the need for field evaluation to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a condition could provide an acceptable safeguard. A condition is therefore recommended to require a twostage process of archaeological investigation comprising: first, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full</p>	<p>Comments noted. Officers will seek conditions in the course of the appeal. Archaeological issues are considered in Section 6 of the main body of this report.</p>

## Appendix 5 – Internal and External Consultation Comments

	<p>investigation. The archaeological interest should therefore be conserved by attaching a condition as follows:</p> <p>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. The planning application lies in an area of archaeological interest.</p> <p>If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:</p> <p>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> <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>	
--	---	--

Appendix 5 – Internal and External Consultation Comments

	<p><b>Evaluation</b></p> <p>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.</p> <p>Further information on archaeology and planning in Greater London including Archaeological Priority Areas is available on the Historic England website.</p> <p>Please do not hesitate to contact me should you require further information or assistance. I would be grateful to be kept informed of the progress of this application.</p> <p>Please note that this response relates solely to archaeological considerations. If necessary, Historic England’s Development Management or Historic Places teams should be consulted separately regarding statutory matters.</p>	
<p>LBH Carbon Management</p>	<p>The submitted energy strategy is pre-design and shows that policy compliance can be achieved through lean, clean and green measures. With residual emissions being offset. Final details cannot be confirmed at this stage.</p> <p>As the scheme moves forward through the design process towards detailed design a detailed and updated Energy Strategy should be delivered for approval to the Council.</p> <p><u>Energy – Lean</u></p> <p>The applicant has proposed an improvement of beyond Building Regulations (2013) of 5.2% (23.1 tonnes per annum) across the whole site. This will be achieved through improved energy efficiency standards in key elements of the build. This is policy compliant and a positive.</p>	<p>Comments noted. Officers will seek obligations and conditions in the course of the appeal. Energy issues are addressed in Section 6 of the main body of this report.</p>

Appendix 5 – Internal and External Consultation Comments

	<p><u>Energy – Clean</u></p> <p>The Energy Strategy states that there are no plans for a Decentralised Energy Network (DEN) in the area. THIS IS NOT TRUE. And the Applicant (THFC) have been involved in the design of the North Tottenham DEN. The whole of this site will be required to connect to the North Tottenham DEN, via the North Tottenham Energy Centre in the High Road West Development less than 500m to the south.</p> <p>We will expect more details as to how all the space heating and hot water loads of this development will be provided via a connection to the North Tottenham DEN This detail can be conditioned for approval to ensure that the site will be able to connect to the North Tottenham DEN.</p> <p><u>Energy – Green</u></p> <p>The application has reviewed the installation of Solar Panels and Air Source Heat Pumps (ASHP) to achieve a carbon reduction of 13.8% (61.4 tonnes per annum) across the whole site.</p> <p>There is no commentary on the relationship between the ASHP and the North Tottenham DEN (both will provide the site with hot water). This potential excessive supply issue needs to be addressed. The installation of Solar PV is welcome and all opportunities to deliver this on site should be secured.</p> <p>The submitted energy strategy agrees that the remaining carbon emissions will be offset. At this stage the total emissions to be policy compliant are:</p> <p>To be Zero Carbon Housing 5,165 tonnes over 30 years, from the new-build domestic will have to be offset. And the shortfall to a 35% reduction from baseline for the non-domestic portion of the scheme would be 235 tonnes over 30 years, to be offset off-site. This principle should be carried forward to be conditioned at detailed design.</p> <p>Suggested condition:</p>	
--	---	--

Appendix 5 – Internal and External Consultation Comments

	<p>An Energy Strategy will be submitted a detailed design stage, for approval by the Local Planning. This strategy shall set out how the scheme will deliver zero carbon develop for the domestic elements of the development and no less than a 35% improvement over building regulations (2013) for the non-domestic elements. In line with Policy 5.2 of the London Plan. These targets will be met by:</p> <ul style="list-style-type: none"><li>- Energy Efficiency Improvements – achieving at least 5.2% through on-site measures (lean);</li><li>- Connection to the North Tottenham Decentralised Energy Network (clean);</li><li>- Inclusion of renewable energy – achieving at least 13% reduction through solar PV (green); and</li><li>- That the remaining carbon emissions are offset at the current (at the time of detailed design submission) price of carbon offsetting.</li></ul> <p>These targets were submitted and agreed as part of the outline application (HGY/2018/0187).</p> <p>The final agreed energy strategy shall be installed and operational prior to the first occupation of the development. And 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 comply with London Plan Policy 5.2. and local plan policy SP:04 Overheating Risk</p> <p>We will expect a dynamic thermal model be undertaken at detailed design stage. This will be modelled against London’s future weather patterns. We would advise that this risk is minimized at design stage, through designing in passive ventilation and appropriate mitigation strategies. Due to local noise sources (the stadium) and local poor air quality, openable windows should not be the only mitigation measures.</p> <p>We recommend that these are addressed through the following condition:</p> <p>Suggested Condition</p>	
--	--	--

## Appendix 5 – Internal and External Consultation Comments

	<p>To demonstrate that there is minimal risk of overheating, the results of dynamic thermal modelling (under London’s future temperature projections) for all internal spaces must be given to the Council for approval. This should be submitted to and approved in writing by the Local Planning Authority 6 months prior to any works commencing on site and shall be operational prior to the first occupation of the development hereby approved.</p> <p>This model and report should include details of the design measures incorporated within the scheme (including details of the feasibility of using external solar shading and of maximising passive ventilation) to ensure adaptation to higher temperatures are included. Air Conditioning will not be supported unless exceptional justification is given.</p> <p>Once approved the development shall be carried out strictly in accordance with the details so approved, shall be maintained as such thereafter and no change there from shall take place without the prior written consent of the Local Planning Authority.</p> <p>REASON: London Plan Policy 5.9 and local policy SP:04 and in the interest of adapting to climate change and to secure sustainable development.</p> <p><u>Sustainability Assessment</u></p> <p>The applicant has submitted a pre-assessment Sustainability Assessment for non-domestic development. Under BREEAM New Construction (2018) the scheme will achieve an “Excellent” standard.</p> <p>But there is no independently auditable assessment for the domestic units on this scheme. Suggested Condition:</p> <p>At detailed design you must submit for our written approval a design stage accreditation certificate confirming that the development (all domestic and non-domestic units) will achieve a BREEAM New Construction (2018 ed.) “Excellent” outcome (or equivalent).</p> <p>The development shall then be constructed in strict accordance of the details so approved, and shall achieve the agreed rating and shall be maintained as such thereafter. A post construction certificate shall then be issued by the Building Research</p>	
--	---	--

Appendix 5 – Internal and External Consultation Comments

	<p>Establishment or other independent certification body, confirming this standard has been achieved. This must be submitted to the local authority at least 6 months of completion on site.</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 works must be implemented on site within 3 months of the local authorities 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 to secure sustainable development in accordance with London Plan (2011) policies 5.1, 5.2, 5.3 and 5.9 and policy SP:04 of the Local Plan.</p> <p>Living Roof</p> <p>The development has stated that living roofs will be installed as part of the development offering biodiversity and water storage benefit. But there are no details on the design standard, the location, or the area covered by this living infrastructure.</p> <p>This should be conditioned to be delivered at detailed design.</p> <p>Suggested condition:</p> <p>That at detailed design stage the site details on the living roof shall be submitted to the local authority for approval. This will include the following:</p> <ul style="list-style-type: none"><li>• A roof(s) plan identifying where the living roofs will be located across the site;</li><li>• Confirmation that the substrate depth range of between 100mm and 150mm across all the roof(s);</li><li>• Details on the diversity of substrate depths across the roof to provide contours of substrate. This could include substrate mounds in areas with the greatest structural support to provide a variation in habitat;</li></ul>	
--	---	--

Appendix 5 – Internal and External Consultation Comments

	<ul style="list-style-type: none"> <li>• Details on the diversity of substrate types and sizes;</li> <li>• Details on bare areas of substrate to allow for self colonisation of local windblown seeds and invertebrates;</li> <li>• Details on the range of native species of wildflowers and herbs planted to benefit native wildlife;</li> <li>• The living roof will not rely on one species of plant life such as Sedum (which are not native);</li> <li>• Details of the location of log piles / flat stones for invertebrates; and</li> <li>• Management strategy of the living roof.</li> </ul> <p>The living roof will not be used for amenity or sitting out space of any kind. Access will only be permitted for maintenance, repair or escape in an emergency.</p> <p>The living roof (s) shall then be carried out strictly in accordance with the details approved by the Council. And shall be maintained as such thereafter.</p> <p>Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with regional policies 5.3, 5.9 and 5.11 of the London Plan (2011) and local policy SP:05 and SP:13.</p>	
<p>Historic England</p>	<p>Thank you for your letter of 26 January 2018 notifying Historic England of the application for planning permission relating to the above site. Our specialist staff have considered the information received and we do not wish to offer any comments on this occasion.</p> <p>Recommendation</p> <p>This application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice. It is not necessary for us to be consulted again on this application. However, if you would like further advice, please contact us to explain your request. We can then let you know if we are able to help further and agree a timetable with you.</p>	<p>Comment noted.</p>

Appendix 5 – Internal and External Consultation Comments

	<p>In returning the application to you without comment, Historic England stresses that it is not expressing any views on the merits of the proposals which are the subject of the application.</p> <p>Please note that this response relates to historic building and historic area matters only. If there are any archaeological implications to the proposals it is recommended that you contact the Greater London Archaeological Advisory Service for further advice (Tel: 020 7973 3712).</p>	
<p>Thames Water</p>	<p>16.02.2018</p> <p>Waste Comments</p> <p>Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.</p> <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. 'We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging 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</p>	<p>Comments Noted. Officers will seek obligations and conditions in the course of the appeal. Officers will seek to engage Thames Water in the SoCG process.</p>

## Appendix 5 – Internal and External Consultation Comments

	<p>should be directed to Thames Water’s Risk Management Team by telephoning 02035779483 or by emailing <a href="mailto:wwqriskmanagement@thameswater.co.uk">wwqriskmanagement@thameswater.co.uk</a>. Application forms should be completed on line via <a href="http://www.thameswater.co.uk/wastewaterquality">www.thameswater.co.uk/wastewaterquality</a>.”</p> <p>With the information provided Thames Water, has been unable to determine the waste water infrastructure needs of this application. Should the Local Planning Authority look to approve the application ahead of further information being provided, we request that the following 'Grampian Style' condition be applied - “Development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed”. Reason - The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community. Should the Local Planning Authority consider the above recommendation is inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Control Department (telephone 0203 577 9998) prior to the Planning Application approval.</p> <p>Water Comments</p> <p>The existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development. Thames Water therefore recommend the following condition be imposed: Development should not be commenced until: Impact studies of the existing water supply infrastructure have been submitted to, and approved in writing by, the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point. Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand.</p> <p>Supplementary Comments</p> <p>We have no concerns regarding foul water proposal, however we believe there is not enough information to agree on surface water proposal. Our records indicate small</p>	
--	---	--

## Appendix 5 – Internal and External Consultation Comments

	<p>diameter sewer (102mm) at point of proposed connection. On average this size sewer is able to cope with 8l/s only. Please provide details of existing connection point (sewer size and gradient -invert levels) confirming higher discharge rate. Connecting to not sufficient in capacity sewer may result site self-flooding.</p> <p>14.05.2018</p> <p>Waste Comments</p> <p>Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.</p> <p>‘We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission:“A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water’s Risk Management Team by telephoning 02035779483 or by emailing <a href="mailto:wwriskmanagement@thameswater.co.uk">wwriskmanagement@thameswater.co.uk</a>. Application forms should be completed on line via <a href="http://www.thameswater.co.uk/wastewaterquality">www.thameswater.co.uk/wastewaterquality</a>.” Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.</p> <p>Thames Water would advise that with regard to Foul Water sewage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided</p>	
--	--	--

Appendix 5 – Internal and External Consultation Comments

	<p>Following initial investigations, Thames Water has identified an inability of the existing surface water infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a infrastructure and phasing strategy for surface water 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 properties shall be occupied until confirmation has been provided that either:- all surfacewater network upgrades required to accommodate the additional flows from the development have been completed; or - a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan. Reason - The development may lead to flooding and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional flows anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid sewer flooding and/or potential pollution incidents.” The developer can request information to support the discharge of this condition by visiting the Thames Water website.</p> <p><a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a>. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.</p> <p>Water Comments</p> <p>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 water strategy 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 properties shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows from the development have been completed; or - a housing and infrastructure phasing plan has been agreed with Thames</p>	
--	---	--

Appendix 5 – Internal and External Consultation Comments

	<p>Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing 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” The developer can request information to support the discharge of this condition by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-largesite/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-largesite/Planning-your-development</a>. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.</p> <p>Supplementary Comments</p> <p>We have liaised with the developer and discussed the drainage requirements but until a detail surface water strategy (existing discharge flow confirmed) is provided and agreed, a condition should be in place.</p>	
Network Rail – Asset Protection Anglia	In regards to the application HGY/2018/0187 – Reconsultation, Asset Protection Anglia has no adverse comments on this proposal. However please ensure that the developer contacts the Asset Protection team once the application has been approved.	Comments noted. Officers will seek conditions in the course of the appeal.
Environment Agency	<p>16.02.2018</p> <p>Thank you for consulting us on the above application. We have reviewed the proposals and have no objections.</p> <p>A small strip to the South of the site is located in Flood Zone 2, however there is no development proposed in this area and we therefore have no comments. If you have any queries please feel free to contact me on the details below.</p> <p>16.04.2018</p>	Comment noted.

Appendix 5 – Internal and External Consultation Comments

	<p>Thank you for the reconsultation. We don't have any comments or objections to make on the amendments.</p>	
<p>LBH Environmental Health</p>	<p>Air Quality</p> <p>The London Plan, Policy 7.14 states that new development should:</p> <ul style="list-style-type: none"> <li>• minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans</li> <li>• promote sustainable design and construction to reduce emissions from the demolition and construction of buildings;</li> <li>• be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).</li> <li>• Ensure that where provision needs to be made to reduce emissions from a development, this is usually made onsite.</li> </ul> <p>As the application is for a major development an air quality assessment is required.</p> <p>The proposals for the development include High efficiency, low NOx gas fired boilers for space heating &amp; hot water.</p> <p>An Air Quality Assessment &amp; Air Quality Neutral Assessment (Environmental Statement, Volume 1, Chapter 9 –Air Quality (Quod, report ref. No Q080258, December 2017)) has been submitted along with the planning application to assess the air pollution impact of the proposed development.</p> <p>Based on the findings of the 2017 Air Quality Report submitted, I make the following comments: Air Quality Assessment</p>	<p>Objection noted. Officers will seek obligations and conditions in the course of the appeal. The issues of air quality and contaminated land are addressed in Section 6 of the main body of the report.</p>

## Appendix 5 – Internal and External Consultation Comments

	<p>The main air polluting operations associated with the entire site included up to 142 spaces for the residential, commercial / business uses with a Combined Heat and Power plant support by boilers to provide additional heat, as required;</p> <ul style="list-style-type: none"><li>• An Air Quality Neutral Assessment, taking into account emissions from boilers and combustion plant and road transport sources must be undertaken and submitted for approval.</li></ul> <p>Reason: To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction.</p> <p>The London Plan and the Mayor’s Air quality Strategy set out that developments are to be at least ‘air quality neutral’. To enable the implementation of this policy emission benchmarks have been produced for buildings’ operation and transport across London based on the latest technology (including its effectiveness and viability).</p> <p>Developments that do not exceed these benchmarks will be considered to avoid any increase in NOx and PM emissions across London as a whole and therefore be ‘air quality neutral’. These are to be considered minimum benchmarks and will be kept under review and will be updated in line with technological and commercial advances.</p> <p>The 2017 Air Quality assessment submitted as part of the application concluded that the development will be air quality neutral which means that the Development meets benchmark emission levels for NO2 and PM10 as set out by the Mayor of London. The assessment should be updated using site specific data where relevant.</p> <ul style="list-style-type: none"><li>• A detailed dispersion modelling study of the potential impact of the development was undertaken, focussing on the effects of increased traffic on the local road network during operation and construction, and emissions from the proposed Energy Centre. The assessment demonstrates that air quality will not present a significant constraint on the Development. No new exceedances of the UK’s air quality objectives are predicted during either construction or operation. As such, the Development is not anticipated to result in significant health effects from increased exposure to air pollution.</li></ul>	
--	---	--

## Appendix 5 – Internal and External Consultation Comments

	<p>The Air Quality Dispersal Modelling is considered unsatisfactory for the proposed application; particular concerns are as follows:</p> <p>a) The assessment is considered obsolete because the traffic data (provided to WSP by the Applicant's Transport Consultants (Vectos)) used in the modelling and appended the Air Quality report has not been approved (Appendix 9.5) by TfL. TfL's initial position and comments on the initial submission was made on 2nd February 2018 and the issues raised have not been resolved.</p> <p>The London Councils Air Quality and Planning Guidance 2007: Section 2.5.3 states - "Where a transport assessment (TA) has been prepared for a proposed development, modelled or predicted development traffic flows in the TA should generally be used as the basis for the calculation of 'with development' emissions and subsequent model runs. Before an air quality assessment based on a TA is undertaken, the TA should be approved by the local authority's traffic planners, in consultation with their air quality officers. If this does not happen, developers risk undertaking an air quality assessment on the basis of traffic proposals that may subsequently change, risking the assessment becoming obsolete".</p> <p>b) An update is required with respect to other model inputs.</p> <ul style="list-style-type: none"><li>• Section 9.3.7 of the report: "The assessment uses Calculator Using Realistic Emissions for Diesels (CURED, 2016). CURED takes account of the latest evidence on the future performance of diesel vehicles. This approach to modelling future vehicle emissions factors is robust in that it generates future concentrations that are not overly pessimistic". It is based on the latest available data relating to monitored emissions from Euro 6/VI vehicles and accords with best practice".</li></ul> <p>This guidance was set out by Air Quality Consultants, and Haringey Council will not accept this approach. The most conservative and authoritative approach should be adopted during the modelling.</p> <p>Defra's Emission Factor Toolkit (EFT) version 7.0 is a tool that allows users to calculate road vehicle pollutant emission rates for oxides of nitrogen (NOx) and Particulate Matter (PM - PM10 and PM2.5), for a specified year, road type, vehicle speed and vehicle fleet</p>	
--	---	--

## Appendix 5 – Internal and External Consultation Comments

	<p>composition. Carbon dioxide (CO<sub>2</sub>) emission rates can also be calculated for petrol, diesel and alternative fuelled vehicles</p> <p>The following 2016 published IAQM document presents the procedure to deal with uncertainty on vehicle emission data. “Dealing with Uncertainty in Vehicle NO<sub>x</sub> Emissions within Air Quality Assessments. <a href="http://www.iaqm.co.uk/text/position_statements/vehicle_NOx_emission_factors.pdf">http://www.iaqm.co.uk/text/position_statements/vehicle_NOx_emission_factors.pdf</a></p> <ul style="list-style-type: none"><li>• Consideration should still be given to the potential impacts of neighbouring sources on the site. The Air quality modelling does not include or consider the collective Air Quality impacts / emissions from adjacent developments (ES, Figure 3.1: Cumulative Schemes). The masterplan plan indicates possible Energy centres in Northumberland Park / White Hart Lane / High Road West area. The emissions from these sources should also be included or discussed in the modelling. The study should also take into account the proposed model output area, which may include other local hot spots of concern to the local authority.</li><li>• Air dispersal modelling should take into consideration all principal roads and junctions (e.g. Traffic lights, or roundabouts) in the vicinity of the Site, especially within AQMA.</li><li>• Background pollutant concentrations used in the assessment were taken from the national maps provided on the Defra website where background concentrations of those pollutants included within the UK's Air Quality Strategy have been modelled at a grid resolution of 1x1km for the whole of the UK. The resolution adopted is very high therefore, the data should be compared to monitoring data and modified where necessary.</li><li>• Validated and ratified monitoring data should be taken from an appropriate background site or from the National Air Quality Archive and background emissions data can also be gathered from the National Atmospheric Emissions Inventory database.</li><li>• Has time-varying emissions have not been discussed in the report.</li></ul> <p>c) Energy Centre Modelling</p> <ul style="list-style-type: none"><li>• Final details regarding the selection of CHP/boiler models, flue arrangements and operating pattern for the proposed CHP plant are not confirmed at this stage of assessment.</li></ul> <p>The assessment should be refined using site specific Energy Centre Parameters where available.</p>	
--	---	--

## Appendix 5 – Internal and External Consultation Comments

	<ul style="list-style-type: none"><li>• The remaining Blocks and surrounding buildings are too low or too distant to have a significant impact on the plume in relation to building downwash. The consultant should provide evidence showing the heights of the surrounding building in due course.</li><li>• The topography of the surrounding area is essentially flat and at the same elevation across the entire area considered in the modelling. The site ground level is taken to be an average of +14.5mAoD. Therefore, terrain data have not been included in the model. The topography of the LB of Haringey results in the land generally sloping down in an easterly direction down towards the River Lee. The consultant should provide a drawing showing the topography survey of the site in due course.</li><li>• The Air quality impacts of the entire development site, including nearby junctions, developments - including site wide gas boilers and CHP should ideally be re-modelled using ADMS- Urban providing source apportionment and indication of the re-circulating flow around the proposed buildings. Consideration should also be given to the emerging London Plan and specific Air quality policies.</li></ul> <p>With consideration of the above, I recommend refusal of the proposed application on air quality grounds.</p> <p>I also recommend the following conditions.</p> <p>Combustion and Energy Plant:</p> <ul style="list-style-type: none"><li>• Prior to installation, details of the Ultra-Low NOx boilers for space heating and domestic hot water should be forwarded to the Local Planning Authority. The boilers to be provided for space heating and domestic hot water shall have dry NOx emissions not exceeding 40 mg/kWh.</li></ul> <p>Reason: To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction CHP:</p> <ul style="list-style-type: none"><li>• Prior to commencement of the relevant part of the development, details of the CHP demonstrating that the unit to be installed complies with the emissions standards as set out in the GLA SPG Sustainable Design and Construction for Band B, shall be submitted to and approved in writing by the Local Planning Authority. This shall include detailed dispersion modelling, of all combustion plant, as recommended in Air Quality Assessment</li></ul>	
--	---	--

## Appendix 5 – Internal and External Consultation Comments

	<p>XCO2 energy dated September 2016. The scheme shall be carried out in accordance with the approved plans.</p> <p>Reason: To protect local air quality and ensure effective dispersal of emissions.</p> <p>Contaminated land: Volume 1, Chapter 13, of the Environmental Statement report (Quod, report ref. No Q080258, December 2017) submitted at the application stage presents the baseline ground condition and contamination at the proposed site, and previous report (e.g. URS (2015) and BuroHappold Engineering (2015) compiled for site. These reports present amongst other issues the preliminary conceptual site model of contamination and identified pollutant linkages. The conceptual model presented indicates potential pollutant linkages from previous and current site of the site (e.g. works, depot and builder's yard) and surrounding areas (e.g. Railway) and proposed preliminary remedial measures to mitigate risk to the receptors identified.</p> <p>The following statement is made in the 2017 Quod Environmental statement report; The baseline conditions at the Site have been determined using historical maps, published reports and data and the results of intrusive ground investigations in 2013 and 2015. Based on the historical use of the Site and ground investigation work to date, some heavy metals have been identified as present in the soils. Hydrocarbons are also present and are likely to be widespread across the Site due to its former use as a scrapyard. The potential sources of contamination are considered to currently pose a low to moderate risk. There is also a moderate risk from the presence of Japanese knotweed (an invasive weed) and Unexploded Ordnance from World War II.</p> <p>Site Remediation</p> <p>Mitigation measures have been considered to address the potential effects over the lifetime of the Development from demolition and construction works to operation. The Preliminary Remediation Strategy Report (see Appendix 13.1, Environmental statement) concludes that there is a potential risk to sensitive receptors from on-site contamination arising from previous and current site activities, and that an intrusive ground investigation should be carried out to characterise ground conditions and allow assessment in comparison with site specific assessment criteria. These criteria would then be used to develop a remediation strategy, if considered necessary, once the findings of the additional investigation and site specific risk assessment are available.</p>	
--	---	--

Appendix 5 – Internal and External Consultation Comments

	<p>Contaminated land: (CON1 &amp; CON2) CON1:</p> <ul style="list-style-type: none"><li>• Before development commences other than for investigative work:</li></ul> <p>a) Using information obtained from the Previous Assessment an additional site investigation, sampling and analysis shall be undertaken. The investigation must be comprehensive enough to enable:-</p> <ul style="list-style-type: none"><li>_ a risk assessment to be undertaken,</li><li>_ refinement of the Conceptual Model, and</li><li>_ the development of a Method Statement detailing the remediation requirements.</li></ul> <p>The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority.</p> <p>b) If the risk assessment and refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements, using the information obtained from the site investigation, and also detailing any post remedial monitoring shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.</p> <p>And CON2:</p> <ul style="list-style-type: none"><li>• Where remediation of contamination on the site is required completion of the remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied.</li></ul> <p>Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p>Management and Control of Dust:</p>	
--	---	--

Appendix 5 – Internal and External Consultation Comments

	<ul style="list-style-type: none"><li>• No works shall be carried out on the site until a detailed Air Quality and Dust Management Plan (AQDMP), detailing the management of demolition and construction dust, has been submitted and approved by the LPA. The plan shall be in accordance with the GLA SPG Dust and Emissions Control and shall also include a Dust Risk Assessment. Reason: To Comply with Policy 7.14 of the London Plan</li> <li>• Prior to the commencement of any works the site or Contractor Company is to register with the Considerate Constructors Scheme. Proof of registration must be sent to the LPA.  Reason: To Comply with Policy 7.14 of the London Plan NRMM</li> <li>• No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIA of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at <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.  Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA  NRMM LEZ</li> <li>• An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.  Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ</li></ul>	
--	--	--

Appendix 5 – Internal and External Consultation Comments

	<p>As an informative: Prior to demolition of existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.</p>	
<p>London Overground Infrastructure Management</p>	<p>Rail for London (RfL) is responsible for Infrastructure Protection matters relating to White Hart Lane station (just south of the site). Based on the nature of the scheme, we would seek the below planning condition on cranes/lifting equipment. Please also note that Network Rail deal with Infrastructure Protection matters relating to the adjacent permanent way/tracks. We have informed Network Rail of this application and expect that they will provide you with comments.</p> <p>1. Cranes and other lifting equipment may be required during the construction of this development and as such, RfL would request that LBH requires the applicant to submit a Crane / Lifting Management Plan for approval by LBH in conjunction with RfL.</p> <p>For cranes this would typically include crane base design (including certification), Risk Assessment and Method Statement for siting, erection, lifting arrangements, operational procedure (including any radio communications), jacking up, derigging in addition to plans for elevation, loads, radius, slew restrictions and collapse radius.</p> <p>No cranes should be erected or dismantled until RfL’s approval has been obtained in writing.</p> <p>Reason: To ensure that the lifting operations are carried out safely in compliance with BSI standards, and to prevent anything falling on to the adjacent railway, compromising the safety of the railway.</p> <p>29.04.2018</p> <p>Thank you for notifying us of the re-consultation of the above referenced planning application. From an IP perspective, RfL’s initial comments of 07/02/2018 still stand. I attach these to the bottom of this email for reference.</p>	<p>Comments noted. Officers will seek obligations and conditions in the course of the appeal. The issues of transportation are addressed in Section 6 of the main body of the report.</p>

Appendix 5 – Internal and External Consultation Comments

<p>Transport for London</p>	<p>02.02.2018</p> <p>I write following receipt of the Transport Assessment (TA) dated December 2017 submitted in support of the above planning application to the London Borough of Haringey.</p> <p>The new draft London Plan was published on the 29th November 2017 and sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. As such it is a material planning consideration and therefore, TfL comments below will be set in the context of those emerging policies. The following comments represent the views of Transport for London officers and are made on a “without prejudice” basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. These comments also do not necessarily represent the views of the Greater London Authority.</p> <p>Site description</p> <p>The site is bounded by White Hart Lane to the south; London Overground rail tracks to the west; retail units to the north; and an industrial estate to the east.</p> <p>The nearest section of the Transport for London Road Network (TLRN) is the A10 Great Cambridge Road, located approximately 1.1km to the west of the site. The nearest section of the Strategic Road Network (SRN) is the A1010 High Road, located approximately 160m to the east of the site.</p> <p>The nearest London Overground Station is White Hart Lane which is located approximately 40m from the site. This is served by London Overground services between Enfield Town and Liverpool Street. The nearest London Underground station is Tottenham Hale which is located approximately 2.6km south of the site. This is served by the Victoria Line. The nearest bus stops are located approximately 100m to the west of the site on White Hart Lane. These are both served by the W3 route. An additional 4 bus routes are accessible approximately 200m from the site on High Road.</p>	<p>Comments noted. Officers will seek obligations and conditions in the course of the appeal. The issues of transportation are addressed in Section 6 of the main body of the report.</p>
-----------------------------	---	---

## Appendix 5 – Internal and External Consultation Comments

	<p>Due to the aforementioned public transport connections, the Public Transport Accessibility Level (PTAL) of the site is 4 (on a scale of 1 to 6 where 6 is excellent and 1 is very poor).</p> <p>Cycle Superhighway 1 (CS1) is accessible on Church Road, which is located around 520m south of the site. This provides a cycle route to Liverpool Street station.</p> <p>Proposed development</p> <p>From the submitted material, TfL understands the proposal is for a residential-led mixed-use development, which will include:</p> <ul style="list-style-type: none"><li>• 330 residential units (C3 use); and</li><li>• 1,450sqm office / retail / leisure / community uses (B1, A1, A3, D2 and D3 use).</li></ul> <p>TfL understands that this is a hybrid application. Matters of layout, scale, appearance, landscaping and access within the site are reserved. Access to the site is sought for approval in this application.</p> <p>Trip generation and public transport impact</p> <p>The residential trip generation methodology is not in accordance with TfL guidance. This represents a shortcoming against draft New London Plan policy T4 “Assessing and mitigating transport impacts”. In line with TfL TA Best Practice Guidance, we request that the trip generation is revisited and the following points are addressed:</p> <ul style="list-style-type: none"><li>• Justification for the selection of sites from TRICS should be given, as they do not appear to provide a fair reflection of the proposed site.</li><li>• Local census data should be used to calculate mode shares, as this provides a more appropriate forecast for this site than the multi-modal data the applicant has used from TRICS.</li></ul> <p>Before TfL can be satisfied that the planning application is London Plan compliant we need to understand the impact on our buses. Pre-determination of this planning application the trip generation must be resubmitted to TfL for approval and the approved trip forecasts must be used to assess the impact of the development’s demand on</p>	
--	---	--

Appendix 5 – Internal and External Consultation Comments

	<p>London buses. Depending on the results of the bus assessment, mitigation may be required in the form of a S106 contribution for London bus capacity.</p> <p>Car Parking</p> <p>Residential uses</p> <p>A total of 113 parking spaces are proposed for the residential use; 99 for the use of residents and 14 ‘visitor spaces’. This equates to a ratio of 0.35 spaces per unit. The proposed quantity is acceptable as it is in line with the draft New London Plan maximum provision of 0.5 spaces per unit in Outer London PTAL 4 locations. However, we do not consider that visitor car parking is necessary at this location and we encourage its removal, thereby taking the overall car parking provision down to 99 spaces.</p> <p>It is proposed that 10% of resident parking spaces (10) will be accessible spaces. This accords with the draft New London Plan Policy T6.1 requirement of at least one disabled parking bay per dwelling for 3% of dwellings being provided from the outset. To fully accord with the draft New London Plan Policy T6.1, the applicant should also provide information in a Car Parking Design and Management</p> <p>Plan demonstrating how remaining bays up to a total of 10% of dwellings (in this instance a further 23 spaces) can be requested and provided as accessible parking in the future. In line with the current London Plan Policy 6.13, 20% of the spaces will be fitted with Electric Vehicle Charging Points (EVCPs) with a further 20% fitted with passive provision for future use. This is welcome; however, the applicant is strongly encouraged to fit all remaining spaces (80%) with passive provision, in line with draft New London Plan Policy T6.1.</p> <p>Non-residential uses</p> <p>A total of 27 parking spaces are proposed for the commercial / business uses; 22 for the occupants of the commercial / business units and 5 visitor spaces. TfL understands that the current commercial / business units on site are provided with 30 spaces. The proposed provision of 27 spaces is acceptable; however, as with the residential uses, the applicant is encouraged to lower their provision by removing the visitor parking spaces. No details have been provided on disabled parking bays for the non-residential land uses. The applicant is reminded that the draft New London Plan Policy T6.5 requires all non-</p>	
--	---	--

## Appendix 5 – Internal and External Consultation Comments

	<p>residential elements of a development to provide at least one disabled parking bay. The applicant must ensure that this is provided.</p> <p>The draft New London Plan Policy T6 states that a Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating car parking design and management. This should be secured by condition.</p> <p>Site access and layout</p> <p>TfL would like further information about the accesses to the site, in particular about the four potential future accesses on the eastern / northern boundaries of the site (Design and Access Statement page 75). The applicant should clarify what plans there are to open up these accesses and if they can be used by both pedestrians and cyclists. To improve permeability TfL would recommend that these accesses are available. The layout and design of the site should not prevent the opening of these accesses in the future. Furthermore, the routes through the site seem to be dominated by routes for vehicles with little thought for pedestrian / cyclist access. The applicant should provide TfL with information on how pedestrians and cyclists can move through the site and the measures that will be taken to prioritise pedestrians and cyclists over vehicles, in line with the draft Mayor's Transport Strategy and Healthy Streets approach. A reduction in car parking (through the removal of visitor parking spaces) would help to make the site less vehicle dominated and alleviate some of our concerns over the design of the site.</p> <p>Walking</p> <p>As the applicant is aware, improvements to the public realm and walking environment in vicinity of the site are planned as part of the Local Implementation Plan scheme for White Hart Lane. Whilst TfL accepts that a PERS audit of White Hart Lane is not required, TfL disagrees with the applicant's view that no further improvements to the walking environment are required. The planned improvements are fairly localised as they stretch from the junction of White Hart Lane / High Road to Creighton Road roundabout. The applicant should therefore provide an assessment of the walking environment of other areas in vicinity of the site. For example, TfL recommends an assessment of the streets on the eastern boundary of the site which link up with the potential future accesses to the site (mentioned above). Longer term necessary improvements to the walking environment in</p>	
--	--	--

## Appendix 5 – Internal and External Consultation Comments

	<p>vicinity of the site should also be identified. Following the assessment, gaps in provision and necessary improvements should be sent to TfL and Haringey Council to review.</p> <p>Cycling</p> <p>Analysis of local cycling conditions</p> <p>The applicant has not provided an analysis of local cycling conditions, which is a shortcoming against TfL guidance for planning applications, and the draft New London Plan Policy T5 which requires new developments to “remove barriers to cycling and create a healthy environment in which people choose to cycle”. The applicant should provide an assessment of the cycling environment, using tools set out in the London Cycle Design Standards (LCDS) Chapter 2. As part of this the applicant should assess the route to CS1. The assessment should identify improvements to the local cycling environment and should be sent to TfL and Haringey Council for review.</p> <p>Cycle parking quantity check</p> <p>It is unclear what quantity of cycle parking is proposed. There is a large discrepancy in the number of cycle parking spaces stated in the Transport Assessment (588 spaces) and the Planning Statement (782). For clarity, TfL has provided the cycle parking requirements of the current London Plan in Table 1, below. This is based on the current proposed number of units and make up of non-residential floorspace set out in the Transport Assessment.</p> <p>[Table]</p> <p>The above table shows a requirement of 618 cycle parking spaces across the site. As a minimum, cycle parking must be provided in line with the current London Plan standards, and the applicant is strongly encouraged to meet draft New London Plan standards. Details of cycle parking provision in line with London Plan standards can be provided in a Reserved Matters application or by condition.</p> <p>Cycle parking type, location and access</p>	
--	--	--

## Appendix 5 – Internal and External Consultation Comments

	<p>Limited detail is provided on the type, location, or access to the cycle parking. The applicant should ensure that all cycle parking is safe, secure and easily accessible, in line with guidance set out in the LCDS. TfL also recommend that at least 5% of the long-stay spaces are suitable for larger models of bikes. Details of cycle parking type, location and access in line with LCDS guidance and the draft New London Plan Policy T5 should be provided in a Reserved Matters application or by condition.</p> <p>London Overground Infrastructure Protection</p> <p>The site is located adjacent to London Overground tracks. TfL request that the following condition is imposed by the Council:</p> <p>Cranes and other lifting equipment may be required during the construction of this development and as such, Rail for London (RfL) would request that LBH requires the applicant to submit a Crane / Lifting Management Plan for approval by Haringey Council in conjunction with RfL.</p> <p>For cranes this would typically include crane base design (including certification), Risk Assessment and Method Statement for siting, erection, lifting arrangements, operational procedure (including any radio communications), jacking up, derigging in addition to plans for elevation, loads, radius, slew restrictions and collapse radius. No cranes should be erected or dismantled until RfL's approval has been obtained in writing.</p> <p>Reason: To ensure that the lifting operations are carried out safely in compliance with BSI standards, and to prevent anything falling on to the adjacent railway, compromising the safety of the railway.</p> <p>Please also note that Network Rail deal with Infrastructure Protection matters relating to the adjacent permanent way / tracks. RfL have informed Network Rail of this application and expect that they will provide Haringey Council with comments.</p> <p>Freight A Delivery and Servicing Plan (DSP) has been submitted in accordance with TfL guidance and draft New London Plan Policy T7. This provides a basic understanding of delivery and servicing arrangements, although in the final document TfL would welcome</p>	
--	---	--

## Appendix 5 – Internal and External Consultation Comments

	<p>plans demonstrating vehicle access to the site and servicing bays, as well as stronger measures to promote a safe and sustainable pattern of deliveries and servicing.</p> <p>The applicant has not submitted an Outline Construction Logistics Plan (CLP). This is a shortcoming against TfL guidance and draft New London Plan Policy T7. The applicant should provide this document for TfL to review.</p>	
<p>LBH Waste Management</p>	<p>Further to your request concerning the above planning application I have the following comments to make:</p> <ul style="list-style-type: none"> <li>• Wheelie bins or bulk waste containers must be provided for household collections.</li> <li>• Bulk waste containers must be located no further than 10 metres from the point of collection.</li> <li>• Route from waste storage points to collection point must be as straight as possible with no kerbs or steps. Gradients should be no greater than 1:20 and surfaces should be smooth and sound, concrete rather than flexible. Dropped kerbs should be installed as necessary.</li> <li>• If waste containers are housed, housings must be big enough to fit as many containers as are necessary to facilitate once per week collection and be high enough for lids to be open and closed where lidded containers are installed. Internal housing layouts must allow all containers to be accessed by users. Applicants can seek further advice about housings from Waste Management if required.</li> <li>• Waste container housings may need to be lit so as to be safe for residents and collectors to use and service during darkness hours.</li> <li>• All doors and pathways need to be 200mm wider than any bins that are required to pass through or over them.</li> </ul>	<p>Comments noted. Conditions concerning waste management will be sought by officers in the course of the appeal. The issue of waste is addressed in Section 6 of the main body of this report.</p>

## Appendix 5 – Internal and External Consultation Comments

	<ul style="list-style-type: none"><li>• If access through security gates/doors is required for household waste collection, codes, keys, transponders or any other type of access equipment must be provided to the council. No charges will be accepted by the council for equipment required to gain access.</li><li>• Waste collection vehicles require height clearance of at least 4.75 metres. Roads required for access by waste collection vehicles must be constructed to withstand load bearing of up to 26 tonnes.</li><li>• Adequate waste storage arrangements must be made so that waste does not need to</li><li>• be placed on the public highway other than immediately before it is due to be collected.</li></ul> <p>Further detailed advice can be given on this where required. There are no comments to provide on this application.</p> <p>Unable to provide comments as application form/plans were not enclosed with request for comments. Please provide further information so comments can be provided.</p> <p>Other comments as follows:</p> <p>The information provided below and above is to help with the outlined application submitted. (Haringey guidance is based on waste capacity rather than weight due to fact weight is based on compaction which is not always a practical solution)</p> <p>55 x 1100L Euro bins refuse 33 x 1100L Euro bins recycling 330 x food waste kitchen caddy 14 x 240L food waste exterior box</p> <p>The management plan would need to refer to pest control of waste storage areas. Commercial enterprise must make arrangements for a scheduled waste collection with a Commercial Waste Contractor.</p>	
--	---	--

## Appendix 5 – Internal and External Consultation Comments

	<p>The business owner will need to ensure that they have a cleansing schedule in place and that all waste is contained at all times.</p> <p>Commercial waste must be stored and disposed of separately and not mixed with residential waste.</p> <p>Commercial Business must ensure all waste produced on site are disposed of responsibly under their duty of care within Environmental Protection Act 1990. It is for the business to arrange a properly documented process for waste collection from a licensed contractor of their choice. Documentation must be kept by the business and be produced on request of an authorised Council Official under section 34 of the Act. Failure to do so may result in a fixed penalty fine or prosecution through the criminal Court system.</p> <p>23.04.2018</p> <p>The updates provided outlines that there are minimal changes in regards to refuse capacity requirements and the original application states that the Council guidelines are being followed in relation to capacity storage and presentation requirements. Therefore there is no change to original comments made.</p>	
Greater London Authority	(The full text of the GLA Stage 1 Report is Appendix 6 to this report)	Comments noted. The planning issues set out in the Stage 1 report are addressed in Section 6 of this report.
Natural England	(The full text of Natural England’s comments are Appendix 5A to this report)	Comments noted.
NHS Haringey Clinical Care Group	White Hart Lane Goods Yard (HGY/2018/0187) Thank you for the opportunity to comment on the above planning application. This response from NHS Haringey CCG addresses the healthcare impact of the development proposals.	Comment noted. Further discussions around S106 obligations will be addressed during the Statement of

Appendix 5 – Internal and External Consultation Comments

	<p>The planning application proposes 330 residential units, which could generate between 550 – 600 additional residents (HUDU Model and QUOD estimates). The socio-economic chapter of the submitted Environmental Statement (ES) notes that there are eight GP surgeries within approximately 1km of the site (paragraph 7.4.40 and Figure 7.5). In fact, there are four GP premises within Haringey within 1km of the site and two are branch sites. The remaining 4 GP premises are located within the London Borough of Enfield.</p> <p>Using NHS Choices paragraph 7.4.40 of the ES states that collectively these GP surgeries have an average of 2,192 registered patients per GP, which is higher than the Health Urban Development Unit (HUDU) Model suggested planning benchmark of 1,800 patients per GP. This indicates that the practices are operating at, or close to, capacity in workforce terms.</p> <p>Paragraph 7.4.41 notes that the closest GP surgery to the site is Tottenham Health Centre, located approximately 140m to the south-east. The ES incorrectly calculates a ratio of patients per GP which is lower than the 1:1800 benchmark using GP headcount rather than the full time equivalent (FTE). Using the number of FTE GPs the ratio is 1:2383, above the benchmark, which indicates that practice is operating at, or close to, capacity. The ES incorrectly assumes that as all practices are accepting new patients that there is spare capacity. Closing a practice list to new registrations is a decision taken by CCG in exceptional circumstances often because of contractual issues.</p> <p>The ES (paragraph 7.7.11) acknowledges that there is currently no surplus primary healthcare capacity and that, without mitigation, the development would have a minor adverse effect at the local level.</p> <p>Paragraph 7.7.30 states that some mitigation in the form of financial contributions towards the provision of additional capacity within local GP facilities could be secured through Section 106.</p> <p>Whilst health and wellbeing facilities is included on the Community Infrastructure Levy Regulation 123 List, the list is only indicative of potential CIL spending and there is no guarantee that CIL receipts will be allocated to local health facilities. It is noted that the Regulation 123 list explicitly excludes the provision of infrastructure that is required to make a development acceptable in planning terms and which meets the legal tests in Regulation 122.</p>	<p>Common Ground process in the appeal.</p>
--	---	---

Appendix 5 – Internal and External Consultation Comments

	<p>As such, the Council is able to negotiate necessary s106 planning obligations to secure infrastructure to mitigate a site-specific impact.</p> <p>Paragraph 7.4.42 acknowledges that a medical centre will also be brought forward as part of the Northumberland Development Project, which may include future GP provision alongside other community healthcare services. This facility is provided as shell and core premises at market rent and currently, there is no NHS funding to deliver the facility, for example to pay for fit-out costs. Therefore, is envisaged that a s106 contribution from the Goods Yard scheme would mitigate the primary healthcare impact of the development and would help deliver the new facility. This would meet the tests in Regulation 122.</p> <p>Using the illustrative housing mix included in the Planning Statement, the HUDU Planning Contributions Model calculates a primary healthcare capital requirement of £210,780. Therefore, the CCG seeks a s106 contribution of £210,780.</p>	
<p>LBH Conservation Officer</p>	<p>The site is part of the AAP allocation for High Road West. The Council adopted the Arup Master Plan for the High Road West a while ago. Whilst the proposal loosely refers to its envisaged layout, it creates much larger blocks within its own grounds, not taking into consideration the cumulative impact of the wider Master Plan. In doing so it results in incoherent circulation routes, poor relation with immediate context and overall a poorly conceived layout. The height and massing of the increased blocks would be considered to have an impact on the setting of various heritage assets which would need to be assessed along with the wider Master Plan. As such, there should be a reconsideration on the layout, scale and massing of the proposal.</p> <p>From a conservation point of view, whilst the retention of the listed and locally listed buildings are considered positive, the creation of a wide open ‘plaza’ is considered to be negative for the otherwise tight and fine grain frontage of the conservation area. Additionally, there is no clear indication of the use of this space as it appears to be a ‘shared access’ for the rest of the site. Given the scale of the proposal, it is likely that this ‘shared access’ would be heavily used by vehicles further detracting from the setting of heritage assets. As such the proposal for the wide opening would be considered to cause harm to the conservation area’s character and appearance.</p>	<p>Comments noted. The preliminary comments received were from the Council’s Conservation Officer who is no longer in post. Revised comments may be formulated following discussions with the applicant regarding planning obligations and other planning issues.</p> <p>The conservation and heritage issues are address in the main by of the report in Section 6.</p>

Appendix 5 – Internal and External Consultation Comments

	<p>At present, the proposal would be considered to cause less than substantial harm at the least. Further assessment and impact on setting of heritage assets would only be possible if the applicant considers a wider master plan for the site, with a coherent approach towards scale, massing and circulation prior to developing only part of the site. Consideration towards openings should keep in mind the urban morphology of the area.</p>	
<p>LBH Transport Officer</p>	<p>This development is known as Goods Yard, and is part of site allocation NT5- High Road West of the Tottenham Area Action Plan, adopted on July 2017.</p> <p>A temporary consent was granted in February 2016, (Ref. HGY/2015/3002), was permitting the use of this site as a construction compound for a period of three years.</p> <p>This is a hybrid application for a mixed use development with most matters reserved. When submitted, the scheme proposed a total of 330 residential apartment units; 1,450 sq.m GEA of non-residential development to comprise a mixture of B1 office, A1 retail, D1 community uses and A3 and D2 leisure floorspace. The residential part of this proposal was revised later.</p> <p>The programme of works is proposed in six phases, starting from north of the site to south. The duration of construction works is expected to last approximately 3 years, commencing in Q1 2019.</p> <p>1.1 Methodology/ study area</p> <p>The proposal was supported with the Environmental Statement (ES) and Transport Assessment (TA). Chapter 8 of the ES includes assessments of the transport matters. Assumptions made on trips generated during construction, as well as during the operational use, once the development is build.</p> <p>The study area and methodology that was used on the TA was not agreed with the local Highway Authority (HA) prior to submission of this proposal. Therefore, the impact this development is likely to have on the environment is based on assumptions from the transport consultant, at times, unsubstantiated. In addition, proposed mitigation measures were also drafted in a similar approach, that is without input from the local HA.</p>	<p>Objection noted. Officers note that several Transportation issues have been addressed following the Principal Transportation Officers initial comments, and Transport for London and the applicant have agreed a trip generation methodology. The issues of transportation are addressed in Section 6 of the main body of the report.</p>

## Appendix 5 – Internal and External Consultation Comments

	<p>1.2 Environmental Statement (ES)</p> <p>The correlation was made between existing use of the site, reported to have been generating Heavy Goods Vehicle (HGV) movements, and construction movements required to build this development. Although it is accepted that temporary permitted use has generated HGV trips, and captured in the 2017 survey data, factors such as: duration, timings, direction of travel, frequency of movements, are unlikely to be the same. It is unclear if the assessment included factoring of the permitted developments, since the surveys were conducted, nor the reasoning why HGV trips at the entry were not accurately measured and separated.</p> <p>Therefore, correlation approach as presented on the ES, and some other assumptions which will be explained later, that are used to derive to the conclusions are not considered accurate.</p> <p>1.3 Main access</p> <p>The main access is not a reserved matter therefore, is for consideration as part of this application. The proposed layout is shown on the submitted drawing, with ref: VN70817-100 rev:D</p> <p>Matters such as (current speeds; traffic/pedestrian flows along the public street; visibility splay(s); affect on mobility /visually impaired/ and other vulnerable road users; impact on existing street environment, layout, and nearby crossing;)have not been given due consideration when the main access was designed.</p> <p>The main access does not support the principles of inclusive design, thus provisions made do not support best pedestrian and other sustainable modes of transport. Therefore, the proposed design of the main access, which is off White Hart Lane, is not supported by the local Highway Authority and requires amendments.</p> <ul style="list-style-type: none"><li>• Proposed changes to the public highway, have not been discussed with the local HA, nor accompanied by a detailed technical audit, consequently presenting a shortcoming of this planning submission.</li></ul>	
--	--	--

## Appendix 5 – Internal and External Consultation Comments

	<p>A review of recorded personal injury accident data was undertaken for a select area, covering the five-year period. No specific problems were identified which demand improvements, according to the TA findings.</p> <p>However, accident analysis was undertaken to ascertain the current situation, with scenarios of 'during construction' and once the development is occupied left out. Both scenarios are required to ensure that safety risks are unlikely to be increased.</p> <p>Following the approval of the stadium nearby, road closures on White Hart Lane have been permitted on match days. The developer did not include an alternative vehicular access when the main and only vehicular access is closed. A solution should have been presented, mindful of the size of this development, and required provision for emergency vehicular access.</p> <ul style="list-style-type: none"><li>• Due to the size of proposed development, and proximity to the road closures at match days, allowing one access to connect to the wider highways network is not considered appropriate. Alternative link to the highway network is required, to support the emergency services.</li></ul> <p>1.4 Improving pedestrian/cycle and public realm environment If approved, modifications to the existing public highways are required in order to enable this proposal.</p> <p>D&amp;A statement includes an extract from the High Road West Masterplan framework, showing pedestrian linkages in the vicinity. It indicates that this area is not well connected.</p> <p>The proposed development will increase pedestrian and cycle trips to/from the site. In support of the current adopted policies, connectivity to the local area has to be improved.</p> <p>Due to its position, and in support of intensification of this area, certain improvements are required to enable the use of sustainable modes of transport. Cycle Superhighway route 1 (CS1) which starts from Liverpool Street to White Hart Lane is close to this development thus, making it easier for residents of this development to switch to sustainable transport modes and improving connections, is an important matter.</p>	
--	--	--

## Appendix 5 – Internal and External Consultation Comments

	<ul style="list-style-type: none"><li>• improve connections to and from this development by integrating and acquiring full benefits from the CS1. Explore possibilities of extending it through this development and improving crossing facilities.</li></ul> <p>If this proposal is approved, pedestrian and cycling connectivity improvements must be secured through S106 /S278, as listed:</p> <ol style="list-style-type: none"><li>1) public realm, pedestrian and cycle improvements, crossing facilities, on the public highway are required. (either, contributions towards known transport improvements, or other detailed proposals in support of sustainable modes of transport)</li><li>2) reinstatement of the two redundant accesses</li><li>3) footway improvements in the immediate vicinity</li></ol> <p>All works on a public highways must be implemented through S278 of the HA. The applicant is required to follow the S278 process and submit a safety audit report, including details and specifications of all areas, that are proposed to be modified.</p> <h3>1.5 Proposed internal layout/streets</h3> <p>The submitted proposal includes the internal street layout, with specifications left as reserved matters. Nevertheless, positioning of the buildings does limit future changes to street/footway dimensions and width allocations as such, therefore it can be argued that streets are somewhat defined in character at this stage.</p> <p>Design and Access statement, shows the proposed north-south which is the main route through this development, and runs parallel to the existing rail tracks. It was indicated this is going to be a shared surface, linking 3 of the east- west connections that are created to serve this development. Nevertheless, at this stage this is a reserved matter with possible changes to follow.</p> <p>Having cross referenced the High Road West Masterplan, the proposed design of north-south route falls short of achieving its purpose, which is, integration of this site with the area in the vicinity, and overall creating a better environment for pedestrians and cyclists. The proposed design is lacking to support sought improvements of the pedestrian/cycle linkages, and desire lines created by the nearby developments.</p>	
--	--	--

## Appendix 5 – Internal and External Consultation Comments

	<p>Reserved matters, covering all aspects of the internal streets, such as: (adoption (if proposed), allocation of street dimensions to pedestrians/ cyclists/vehicular movement, materials, parking spaces, loading bays, on-street parking controls, pedestrian crossing, street lighting and furniture, street markings crossing points), to follow.</p> <p>All areas proposed to be utilised for refuse/recycling collections, must be constructed to adoptable standards, regardless of adoption, and maintained by the developer thereafter.</p> <p>1.6 PTAL Public Transport Accessibility Level (PTAL) for this development was derived using the TfL's, WebCAT for base year 2011. Due to its size, there are three different PTAL scores. Most of the development site has a PTAL 4 but a section to the north has a PTAL 3, whereas a section nearest to White Hart Lane has a PTAL 5.</p> <p>For PTAL 3, the public transport provision is made of bus routes: 349; 259; 279; W3; 149; and White Hart Lane rail station.</p> <p>For PTAL 5, bus route 318 was shown, whereas for PTAL 3 bus routes 318 and 444 bus routes were included to make up the score. PTAL 4 is considered to be the best score to represent the actual connectivity to the public transport, because most of the site falls within this score.</p> <p>1.7 On-street parking controls The proposal is within the Tottenham North, Controlled Parking Zone (CPZ), with on-street parking controls Monday to Saturday, from 8am to 6.30pm.</p> <p>Tottenham North CPZ covers the White Hart Lane south of the site along with residential streets, such as Love Lane and William Street.</p> <p>The area was extended and timing changed to 8pm, in response to the approval of the proposal associated with the nearby stadium.</p>	
--	--	--

## Appendix 5 – Internal and External Consultation Comments

	<ul style="list-style-type: none"><li>• all residential units of this development will not have access to purchase on-street parking permits. Recommendations are for this to be secured through S106.</li></ul> <p>1.8 Parking restrictions on the public highways In order to monitor parking displacements on the public streets nearby following the occupation of this development, S106 contribution are sought. Contributions will be used to assess and analyse parking stress in the vicinity, and subject to consultations, a revised Controlled Parking Zone (CPZ) could be introduced.</p> <ul style="list-style-type: none"><li>• S106 contributions are required to review on-street parking, and costs associated with revision of the existing CPZ.</li></ul> <p>1.9 Trip Generation The multi-modal trip generation was derived using select sites from TRICS database. The sites used are not considered to be most comparative with that of the proposed development. Therefore, recommendations are to review trip rates and make necessary changes.</p> <p>Trip rates for different tenures were differentiated in the TA, (split is 40% affordable and 60% market price), but this approach is not justified and supported by appropriate findings.</p> <p>TfL also argued that, trip generation assessment is not correct because sites selected were not justified, and that local census data was not used to calculate transport mode-shares.</p> <p>2.0 Car Parking provision 2.1 Car parking for residential units Policy 6.13, of the London Plan sets out car parking standards and strategic direction to facilitate new developments with appropriate levels of parking. It indicates that, maximum car parking standards for residential developments in the outer London with a high PTAL, is up to 1 space per unit. LBH is identified on the map 2.2, as part of the outer London.</p> <p>Parking addendum to Chapter 6, has recommendations for blue badge holders indicating that: for residential developments, requirement is a provision for at least one accessible</p>	
--	---	--

## Appendix 5 – Internal and External Consultation Comments

	<p>on or off-street parking space. It is also stated that when off-street parking is provided then at least two parking spaces should be for blue badge holders.</p> <p>In addition, Policy 6A.1, of the addendum includes parking standards for blue badge holders for non- residential uses, indicating that, at least one on or off street car parking should be provided, and designated for blue badge holders, even if no other parking is provided.</p> <p>With regards to employment land uses the addendum necessitates parking provision for each disabled employee, and provision for disabled visitors.</p> <p>Policy 2.8 of the outer London Transport outlines strategic direction and recognises car parking requirements for outer London areas to be higher in comparison with central areas, although a flexible approach is encouraged in applying standards of the Policy 6.13 and Table 6.2.</p> <p>Policy 3.8 of the London Plan recommends are that 10% of new housing should be, either designed to be wheelchair accessible from the start, or easily adaptable for residents who are wheelchair users.</p> <p>Policy DM 32 on parking standards, part of the LBH Development Management DPD- January 2016, indicates that London Plan policies are valid when planning proposals are assessed.</p> <p>Policy T6 Car parking of the emerging draft London Plan, indicates that car-free is the starting point for all developments, which are (or planned to be) well connected. Table 10.3 has the maximum parking standards based on location and PTAL score. For Outer London (PTAL4) Opportunity Areas the maximum parking provision is 0.5 parking spaces per unit.</p> <p>The scheme initially proposed a total of 142 car parking spaces (for the 330 residential units), a ratio of 2.3 per unit, or 23% of units to have a car parking space. The parking spaces are proposed to be located mainly on the basement of residential blocks.</p>	
--	---	--

## Appendix 5 – Internal and External Consultation Comments

	<p>Following the comments made by TfL, number of residential units and parking spaces were revised to 108 (for the 316 residential units), a ratio of 2.9 per unit, or 29% of units to have a car parking space.</p> <p>On the TA it was indicated that the revised scheme makes changes by designating 121 residential units as affordable.</p> <p>In response, variation of the affordable units should make no difference to parking numbers because same ratio must be applied across different tenures.</p> <ul style="list-style-type: none"><li>• S106- apply same parking ratio for different residential tenures</li></ul> <p>When applying Policy 3.8, this development should include a total of 33 residential units which are Wheelchair User Dwellings (WUD) at the point of construction, or easily adaptable affers. Following the revision of the residential units this number can be reduced to 31 WUD.</p> <p>The Housing Supplementary Planning Guidance (March 2016)-London Plan 2016 Implementation Framework, set up standards indicating that each designated wheelchair accessible unit, should have a car parking space. If all of the assigned WUD are in use as wheelchair accessible units, and each have access to a car parking space at the same time, then parking provision for the revised proposal should be 31 parking spaces.</p> <p>The proposal includes 10 disabled parking spaces (for residential use), so 21 less parking spaces.</p> <p>2.2 Car parking for other land-uses A total of 27 parking spaces are proposed for other land uses included in this proposal, 22 for the occupants of commercial/business units and 5 visitor spaces.</p> <p>Disabled parking provision for non-residential use was omitted, and as such is non- policy compliant. Nevertheless, it is assumed that this is because split/allocations of the non – residential units are not known at this stage.</p>	
--	--	--

Appendix 5 – Internal and External Consultation Comments

	<ul style="list-style-type: none"><li>• Recommendations are to make revisions on the parking numbers and comply with policies and include at least minimum provisions, which are one disabled parking space per each different unit.</li></ul> <p>Details which were omitted at this stage, but to be submitted subsequently, are:</p> <ul style="list-style-type: none"><li>•Condition- Car Parking Management Strategy (CPMS) to cover matters such as:<ol style="list-style-type: none"><li>1• facilitating disabled users of the commercial (and any other land uses included in this development. Info on how this is going to be managed, enforcement measures.</li><li>2• residential parking spaces must be for use only by residents of this development, and made available before occupation, and retained thereafter.</li><li>3• include details on, which residential units are eligible for off-street parking (or developers permits), include details for reviewing the allocation of permits.</li><li>4• details about controlling the access to the parking areas, parking enforcement, swept paths, levels, show structural columns, vehicle circulatory movements, visibility splays</li></ol></li></ul> <p>All car parking spaces should be of the correct width and length, with in between allowance of 6m, as per Manual for Street (MfS) guidance.</p> <p>Please refer to ‘ IStructE Design recommendations for multi-storey and underground car parks’, when designing the basement car park. Supporting columns must not encroach on the parking spaces.</p> <p>A minimum provision of 20% active and 80% passive Electric Vehicle Charging Points (EVCP) is required to conform with the emerging draft London Plan policy. Due to the low number of parking provision and emerging new policies that require a higher percentage of this provision, recommendation are to increase the provision rather than include the minimum. Also consideration to be have in case of the spaces for commercial use, with all being active EVCP.</p>	
--	--	--

## Appendix 5 – Internal and External Consultation Comments

	<p>5•include locations of the EVCP; indicate the criteria a)for review the usage, b) converting passive points to active, if required.</p> <p>The proposed development is ‘car capped’, because only a limited number of residential units will have access to purchase the off-street parking spaces. To ensure that there is no overspill, all residential units are not entitled to purchase on-street parking permits. The constraints to be secured through s106 (reason: to safeguard for the scenario in case streets within this development get adopted and included in the CPZ, in the future).</p> <ul style="list-style-type: none"><li>• S106: ‘car- capped development’ with no permits issued for the CPZ parking, thereafter.</li></ul> <p>3.0 Cycling This matter merits proper analysis of the current environment to ascertain reasons for limited use of this mode of transport.</p> <p>This application was not supported with reviewing of the cycling conditions nearby, assessing the route to/from CS1 and proposing to improve connections. Therefore, the submission falls short of supporting Policy T5 of the draft New London Plan which sets the requirements for the new developments to “remove barriers to cycling and create a healthy environment in which people choose to cycle”.</p> <p>The proposal falls short of considering to identify improvements to the local cycling environment and creating connections with intent of improving permeability for this mode of transport.</p> <p>3.1 Cycle parking The current London plan includes cycle parking standards for residential developments, with the provision of: 1 cycle parking space for studios and 1 bed units; 2 cycle parking spaces for larger units, and set requirements for other land uses.</p> <p>It is not clear how many cycle parking spaces are proposed. Further details are required with subsequent applications. Please include a</p>	
--	---	--

Appendix 5 – Internal and External Consultation Comments

	<ul style="list-style-type: none"><li>• Condition: Provision for cycle parking (all land uses) must be in accordance with the latest standards. Cycle parking spaces must in place prior to occupation.</li></ul> <p>4.0 Delivery and Servicing Plan A Delivery and Servicing Plan (DSP) has been submitted to support this proposal. Although some details have been, further information are required. Details such as, how deliveries/servicing will be done and supported once the development is occupied.</p> <p>Matters such as: access to parts of the site to enable servicing, for deliveries- encourage better coordination with suppliers, which results in fewer trips, servicing bays, ongoing management and monitoring of deliveries (trips per day),</p> <ul style="list-style-type: none"><li>•Condition: further details to be submitted</li></ul> <p>5.0 Construction</p> <p>5.1 Construction trip generation During enabling and construction works, HGV's will access and egress the site via White Hart Lane, only.</p> <p>In terms of construction traffic the TA estimated, that the site will generate 20 two-way trips (per day), during most of the construction programme, equating to a maximum of 2 vehicles per hour. This statement in the TA is incorrect, because most construction traffic is generated at or near peak times. At other times, this number is predicted to be increased to 60 two-way trips (per day). This is a substantial increase form the first figure given, thus further information is required as to when is likely to happen, duration of the reported peak periods.</p> <ul style="list-style-type: none"><li>•Correction is required- this part of the submission is not satisfactory.</li></ul> <p>Although it is accepted that movements associated with the existing construction compound have been captured in the 2017 survey data, it is not clear how much HGV trips are generated.</p>	
--	---	--

## Appendix 5 – Internal and External Consultation Comments

	<p>In the TA the following statement is made that the local network is unlikely to see much change in the number of vehicles in the construction phase against existing levels.</p> <p>This statement cannot be accepted without any concrete evidence, such as, surveying the actual trips and presenting the results.</p> <p>5.2 Construction Logistic Plan (CLP) The submitted proposal was not supported with a Construction Logistic Plan (CLP). The statement in the TA was that the CLP will be submitted prior to the works on site.</p> <p>Although it is appropriate for the full detailed CLP to be submitted and agreed prior to start of works on site, it is common practice for large developments such as this, to submit some details at an early stage to indicate what the impact of construction is and present the mitigation measures.</p> <p>6.0 Travel Plans</p> <p>A Framework Travel Plan (TP) for residential part of this development was included. Although the document covers, some parts required of the standard travel plan, further details to be submitted, once the development is at the advanced design stage. Other land uses included in this proposal must have separate travel plans.</p> <p>The TPs must identify a range of measures which support sustainable modes of transport, each measure having a timescale for implementation.</p> <p>Upon getting base data following the occupation, aims for modal shifts to be agreed with the local planning Authority, prior to producing a TP. The agreement between parties to include measures that supposed to deliver the outcomes. The predicted trips/mode share as presented in the submitted TA to be matched or lower to ensure that no additional trips are slipped into the highway network. This is to ensure that this development is sustainable.</p> <p>A Travel Plan (TP) for residential and for commercial land reaching the thresholds are is required. The TPs must be drafted while considering the latest guidance.</p>	
--	---	--

Appendix 5 – Internal and External Consultation Comments

	<ul style="list-style-type: none"><li>•The travel plans to be secured through S106, with heads of terms containing actions to promote the use of sustainable modes of transport. For example: appointment of a travel plan coordinator, personalised travel plans for residents, initial contributions to residents to purchase bikes, provision of areas with equipment for cycle maintenance, contributions towards the first year membership of a car club or vouchers for residents to purchase bikes, etc. are some actions which could be included in the action plan.</li></ul> <p>Furthermore, in order to monitor the submitted TPs the developer must contribute towards the monitoring fee.</p> <ul style="list-style-type: none"><li>•S106 is sought to cover the local HA costs for reviewing the submitted TPs, annual amount of £1,000 (per travel plan submitted), for at least 5 years per development phase following the occupation, or until the agreed targets of the sustainable mode shares are met. Both of these conditions must be met before the developer is waived of its responsibility.</li></ul> <p>Conclusion: On behalf of the Highway Authority, I object to the proposal.</p>	
--	---	--

# GREATER LONDON AUTHORITY

## Development, Enterprise and Environment

Appendix 6 - GLA Stage 1 Report

**James Hughes**  
Development Management  
Haringey Council  
River Park House  
255 High Road  
Wood Green  
London N22 8HQ

**Our ref:** GLA/4567/01/MJ  
**Your ref:** HCY/2018/0187  
**Date:** 8 May 2018

Dear Mr Hughes

**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, 36 & 44-52 White Hart Lane**

I refer to the copy of the above planning application, which was received from you on 26 January 2018. On 8 May 2018, Jules Pipe, Deputy Mayor for Planning, Regeneration and Skills, acting under delegated authority, considered a report on this proposal, reference GLA/4567/01. 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 comply with the London Plan and the draft London Plan, for the reasons set out in paragraph 69 of the above-mentioned report; however, the possible remedies set out in that paragraph 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 me 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 Duncan Lawrence  
T: 020 3054 3649, E: [DuncanLawrence@tfl.gov.uk](mailto:DuncanLawrence@tfl.gov.uk).

Yours sincerely,



**P.P. Juliemma McLoughlin**  
Chief Planner

cc Joanne McCartney, London Assembly Constituency Member  
Nicky Gavron, Chair of London Assembly Planning Committee  
National Planning Casework Unit, DCLG  
Lucinda Turner, TfL  
Matt Eyre, Quod, Ingeni Building, 17 Broadwick Street, London W1F 0DE

8 May 2018

**The Goods Yard, 36 & 44-52 White Hart Lane**

in the London Borough of Haringey

planning application no. HGY/2018/0187

**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**

Hybrid planning application (part outline, part detailed) for the demolition of existing buildings, and construction of a residential-led mixed-use development in buildings of up to 21 storeys, comprising up to 31,000 sq.m. of residential space (up to 316 units), and up to 1,450 sq.m. of non-residential space. Change of use of 52 White Hart Lane from residential to restaurant/cafe.

**The applicant**

The applicant is **Tottenham Hotspur Football & Athletic Co. Ltd.**, and the architect is **F3**.

**Strategic issues**

**Principle of development:** Although the principle of a high-density residential-led development on this site is supported, the outline form of nearly all of the application site, together with the complete absence of pre-application discussions, raises concerns about the quality of the proposals, particularly in relation to the impact on heritage assets. The applicant is advised to submit a full application, or key elements in detail, to allow the proposals to be fully assessed.

**Affordable housing:** A minimum of 35% without public subsidy is proposed, and 40% with public subsidy, with the unit mix and affordable tenure to be detailed in reserved matters applications. As the site is a non-designated industrial site, a minimum threshold of 50% affordable housing is required in order to follow the fast track route and the applicant must therefore provide a viability assessment based on a policy compliant tenure mix. Early and late stage viability reviews are required, in accordance with Policy H6 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG.

**Urban design and historic environment:** The amendments to the application submitted post-submission are supported; however, concerns remain about the design and residential quality of the scheme, particularly the building heights, density, and the impact on heritage assets. GLA officers consider that harm will be caused to heritage assets; however, the outline nature of the proposals limit the ability to make a full assessment of the level of harm. The full public benefits of the site allocation cannot be assessed without a more comprehensive approach.

**Transport:** Further information is required, including site layout, walking/cycling environment, and cycle parking.

**Climate change:** Further information is required on worksheet calculations, the district energy network, the site heat network, and combined heat and power, which must be provided before the proposals can be considered acceptable.

**Recommendation**

That Haringey Council be advised that the application does not comply with the London Plan and the draft London Plan, for the reasons set out in paragraph 69 of this report.

## Context

1 On 26 January 2018, 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 has to provide the Council with a statement setting out whether he considers that the application complies with the London Plan and the draft 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 Categories 1A, 1B(c) and 1C(c) of the Schedule to the 2008 Order:

- 1A *"Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."*
- 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."*
- 1C(c) *"Development which comprises or includes the erection of a building of 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 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 website [www.london.gov.uk](http://www.london.gov.uk).

## Site description

6 The majority of the 1.27 hectare triangular-shaped site comprises land historically used as a railway goods yard; then a timber yard; a scrap breaker's (Sui Generis) since the early 1990s; and a construction compound associated with the redevelopment of Tottenham Hotspurs Stadium since 2016. The current use has a temporary permission expiring in February 2019, after which the use will revert to the previous lawful use as a scrap breaker's. The remaining part of the site contains the Carbery Enterprise Park, comprising 11 two storey industrial units in B1 and B2 uses (floorspace 1,125 sq.m.); and the Station Master's House (205 sq.m.) at 52 White Hart Lane, a detached two-storey locally listed brick building in the south-west corner of the site, which was previously in residential use but is currently vacant. The southern part of the site, including 52 White Hart Lane, lies within the North Tottenham Conservation Area.

7 The site is accessed directly off White Hart Lane and lies between the Peacock Industrial Estate to the east, the tree-lined embankment of the railway viaduct of the London Overground Line to the west, and the Grade II listed 32-34A White Hart Lane (known as the Grange Community Hub) to the south-east. White Hart Lane Station lies to the immediate south, adjacent to residential blocks of 4-10 storeys as part of the Love Lane Estate. The area to the west beyond the railway is predominantly made up of low-rise residential use. A 'big shed' retail park is directly to the north of the site, with a recent residential development further north, including a 23 storey block. Tottenham High Road is to the west of the site, containing a mix of

retail uses, as well as Tottenham Hotspurs Football Stadium to the south-west of the site, which is currently being redeveloped to provide a new Stadium, with residential, hotel, sports centre, community and health uses also permitted as part of the scheme (GLA Ref: D&P/2292g/02; LPA Ref: HGY/2015/3000).

8 The site is within the Upper Lee Valley Opportunity Area and the Tottenham Hale/North Tottenham Housing Zone.

9 The nearest section of the Transport for London Road Network (TLRN) is the A10 Great Cambridge Road, approximately 1 kilometre to the west. The nearest section of the Strategic Road Network (SRN) is the A1010 High Road, located 160 metres to the east of the site. The nearest London Overground Station is White Hart Lane, which is 40 metres from the site and is served by London Overground services between Enfield Town and Liverpool Street. The nearest London Underground station is Tottenham Hale, which is 2.6 kilometres south of the site and is served by the Victoria Line. The nearest bus stops are located 100 metres to the west, on White Hart Lane, served by route W3. An additional 4 bus routes are accessible 200 metres away on Tottenham High Road. The public transport accessibility level (PTAL) of the site is 4 (on a scale of 1 to 6, where 6 is excellent and 1 is very poor). Cycle Superhighway 1 is accessible on Church Road, which is 520 metres south of the site, linking to Central London.

## **Details of the proposal**

10 The proposal is in the form of a hybrid planning application, comprised of full and outline elements. In response to early concerns raised by GLA officers and the Council's Quality Review Panel, revisions were submitted on 4 April 2018. These revisions primarily relate to the removal of the eastern wing of Block C, and amendments to the design code and parameter plans.

11 Outline planning permission is sought for the demolition of existing buildings, and construction of a residential-led mixed-use development in buildings of up to 21 storeys, comprising up to 31,000 sq.m. of residential space (up to 316 units), and up to 1,450 sq.m. of non-residential space (Use Classes B1, A1, A3, D1 and D2). Details of layout, scale, appearance, landscaping and access within the site are reserved for later approval. The outline application is subject to parameter plans, design codes, and a development specification. An illustrative scheme is included in the design and access statement, which shows how the application could be delivered at reserved matters.

12 Detailed planning permission is sought for the change of use of 52 White Hart Lane from residential to restaurant/cafe use, and access to the site.

## **Case history**

13 The applicant has not engaged in formal GLA pre-application discussions. The applicant identifies one pre-application meeting with the Council shortly before the application was submitted, and the Council's Quality Review Panel (QRP) considered the application on 28 February 2018, after the application had been submitted.

## **Strategic planning issues and relevant policies and guidance**

14 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is made up of Haringey's Strategic Policies DPD (2017), Development Management DPD (2017), and Site Allocations DPD (2017); Tottenham Area Action Plan (2017); and the 2016 London Plan (Consolidated with Alterations since 2011).

- 15 The following are also relevant material considerations:
- The National Planning Policy Framework and National Planning Practice Guidance.
  - Draft London Plan 2017, which should be taken into account on the basis explained in the NPPF.
  - On 5 March 2018, the Government published the draft revised National Planning Policy Framework for consultation (until 10 May 2018). This should be taken into account appropriately in accordance with its early stage of preparation.
  - Upper Lee Valley Opportunity Area Planning Framework (OAPF, 2013)
  - The Tottenham High Road West Masterplan Framework (2014).
  - Opportunity Areas *London Plan; draft London Plan*
  - Employment *London Plan; draft London Plan*
  - Housing *London Plan; draft London Plan; Housing SPG; Housing Strategy; draft Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG*
  - Affordable housing *London Plan; draft London Plan; Housing SPG; Housing Strategy; draft Housing Strategy; Affordable Housing and Viability SPG*
  - Urban design *London Plan; draft London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
  - Historic environment *London Plan; draft London Plan*
  - Inclusive design *London Plan; draft London Plan; Accessible London: achieving an inclusive environment SPG*
  - Transport *London Plan; draft London Plan; Transport Strategy; draft Transport Strategy*
  - Climate change *London Plan; draft London Plan; Sustainable Design and Construction SPG; Climate Change Adaptation Strategy; Climate Change Mitigation and Energy Strategy; Water Strategy; draft Environment Strategy*

## Principle of development

16 The site falls within the Upper Lee Valley Opportunity Area, for which the London Plan and the Upper Lee Valley Opportunity Area Planning Framework (OAPF, 2013) identify an employment capacity of 15,000 and at least 20,100 new homes. The draft London Plan identifies the Opportunity Area for at least 21,000 new homes, with an employment capacity of 13,000.

17 The site is not identified as a Locally Significant Employment Area; however, after the current temporary use of the majority of the site as a construction compound expires in 2019, it will revert to its lawful use as a scrap breaker site. Approximately 10% of the site currently contains industrial units within Use Class B1 and B2. It is therefore considered to be a 'non-designated industrial site' in the context of draft London Plan Policy E7.

18 The Council's Tottenham Hale Area Action Plan (AAP, 2017) identifies the site as a relatively small part of Site Allocation NT5: High Road West, which envisages masterplanned, comprehensive development creating a new residential neighbourhood and a new leisure destination for London, including a new 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. The indicative capacity for the Site Allocation is 1,200 homes, 4,353 sq.m. of

commercial space, 11,740 sq.m. of town centre uses, and 1,200 sq.m. of other uses. The Tottenham High Road West Masterplan Framework (2014) shows the application site comprising mainly of residential use, with retail and employment along White Hart Lane.

### Residential

19 Policy H1 'Increasing Housing Supply' and Table 4.1 of the draft London Plan sets Haringey an annualised average housing completion target of 1,958 units (increased from 1,502 in the current London Plan) per year between 2019/20 and 2028/29. The site is allocated for residential-led development in the Tottenham AAP and the Masterplan Framework. The redevelopment of the site including up to 31,000 sq.m. of residential space (up to 316 units) is in accordance with local policy and would contribute to London Plan and draft London Plan housing targets and is supported.

### Non-residential uses

20 The Carberry Enterprise Park part of the site contains 1,125 sq.m. of Use Class B1 light industrial/office space, and Use Class B2 general industrial space, while the majority of the site is in temporary use as a construction compound until 2019, after which it will revert to its lawful use as a scrap breaker site. The application proposes up to 1,450 sq.m. of non-residential space (Use Classes B1, A1, A3, D1 and D2), including at least 400 sq.m. of Use Class B1 space and up to 400 sq.m. of retail space.

21 London Plan Policy 4.4 'Managing Industrial Land and Premises' provides a strategic aim for boroughs to adopt a rigorous approach to industrial land management, but recognises that managed release may be required to provide other uses in appropriate locations. Policy E4 'Land for industry, logistics and services to support London's economic function' of the draft London Plan identifies that sufficient land and premises need to be retained for industrial and related functions, and Table 6.2 identifies that Haringey needs to retain capacity. Policy E7 'Intensification, co-location, and substitution...' of the draft London Plan supports mixed use developments on non-designated industrial sites where there is no prospect of the site being used for industrial purposes; it has been allocated for mixed use in a development plan; industrial, storage or distribution space is re-provided; or where suitable alternative accommodation is available, and subject to relocation support.

22 The Tottenham AAP site allocation, within which the application site lies, identifies it for residential-led development, and while commercial and town centre uses are also required, the Masterplan Framework identifies the application site almost exclusively for residential uses, with a small element of retail and workspace fronting onto White Hart Lane. The Masterplan Framework identifies the main area of workspace to be provided outside of the application site to the east.

23 Noting the recently adopted AAP site allocation that covers this site, together with the uses identified for the application site in the Masterplan Framework, and the provision of a minimum of 400 sq.m. of Use Class B1 floorspace, the loss of existing 1,125 sq.m. of B1 and B2 floorspace, and the provision of up to 1,450 sq.m. of non-residential space (Use Classes B1, A1, A3, D1 and D2) floorspace is supported.

24 Policy E7 of the draft London Plan requires that the application demonstrates that the operations of industrial uses on the site and surrounding sites are not compromised by residential use, which applies to existing industrial uses on the eastern boundary of the site. In response to initial concerns raised by GLA officers and the Council's QRP, particularly in relation to the proposed Block C, the applicant has submitted revisions to remove the eastern wing,

which addresses these concerns as discussed under ‘urban design’ below, subject to suitable conditions.

25 The applicant states that its scheme at 500 White Hart Lane (LPA Ref: HGY/2016/0828, not referable), which secured planning permission in 2016, includes 550 sq.m. of employment space specifically intended to relocate businesses from the Carbery Estate. The applicant also states that some of these businesses would be able to relocate within the proposed business space on the application site; however, the proposed layout of the commercial uses proposed on the southern part of the site, and their relationship with residential uses and public spaces, is unlikely to support this. The applicant should provide details of the existing businesses and the relocation strategy, including timescales for demolition of the existing space and delivery of the new space, and details of what additional support will be provided for the existing tenants of the Carbery Estate.

### Outline form of application

26 The applicant justifies the outline form of application in order to provide flexibility to ensure that development fits in with future adjoining schemes and takes into account best practice, precedent and planning policy, identifying the residential component of the applicant’s nearby Stadium application as a similar approach. However, the neighbouring sites will be required to meet the requirements of the Masterplan Framework, in the same way as the current application. Furthermore, phasing of the proposals is highly unlikely due to the proposed shared basement, and the proposals are not comparable to the Stadium application, where the residential element would inevitably come forward as a later phase. As discussed below, notwithstanding the post-application improvements to the Design Code and Parameter Plans, the outline form of the application, together with the complete absence of pre-application discussions, raises concerns about the quality of the proposals, particularly in relation to the impact on heritage assets, and the applicant is advised to submit a full application in order to allow the proposals to be fully assessed.

## **Housing**

27 The outline application proposes up to 31,000 sq.m. of residential space (up to 316 units), with the mix to be defined at reserved matters stage, with the illustrative scheme as set out below:

	Market	Low cost rent	Intermediate	Total
One-bed	54	6	23	92 (20%)
Two-bed	122	18	51	182 (58%)
Three-bed	18	14	9	27 (12%)
Four-bed	7	8	0	15 (10%)
<b>Total</b>	<b>201</b>	<b>46</b>	<b>83</b>	<b>316</b>
		<b>35% (hab room)</b> <b>[40% with grant]</b>		

## Affordable housing

28 London Plan Policy 3.12 'Negotiating Affordable Housing' seeks to secure the maximum reasonable amount of affordable housing. Policy H5 'Delivering affordable housing' of the draft London Plan and the Mayor's Affordable Housing and Viability SPG set a strategic target of 50% affordable housing. Policy H6 'Threshold approach to applications' identifies a minimum threshold of 35% (by habitable room) (or 50% on former industrial sites) 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. Policy H7 of the draft London Plan 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 shared ownership being the default tenures), and the remaining 40% to be determined in partnership with the local planning authority and the GLA.

29 The application proposes 35% affordable housing without public subsidy, and 40% with public subsidy (subject to securing funding), with the unit mix and affordable tenure to be detailed in reserved matters applications. The illustrative scheme is set out above.

30 The affordability of the low cost rented units are proposed in accordance with the requirements of Policy H7 of the draft London Plan, the Mayor's Affordable Housing and Viability SPG, and the London Plan Annual Monitoring Report, whichever is lower of:

- up to 80% of the local market rent or local housing allowance levels, for one-beds;
- up to 65% of the local market rent or local housing allowance levels, for two-beds;
- up to 55% of the local market rent or local housing allowance levels, for three-beds;
- up to 45% of the local market rent or local housing allowance levels, for four-beds.

31 The affordability of the intermediate units are proposed in accordance with the Mayor's qualifying income levels, as set out in the Mayor's Affordable Housing and Viability SPG, and the London Plan Annual Monitoring Report. Affordability thresholds for all tenures must be secured in the section 106 agreement attached to any permission.

32 As the site is a non-designated industrial site, a minimum threshold of 50% affordable housing is required in order to follow the fast track route. While the offer of 35% is welcomed, the applicant must provide a viability assessment in accordance with London Plan Policy 3.12, draft London Plan Policies H5 and H6, and the Affordable Housing and Viability SPG. However, the applicant should first address the design and layout concerns discussed below, which may impact the quantum of residential space that could be provided on the site. In due course, the Council must publish the financial viability assessment in accordance with Policy H6 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG. GLA officers will ensure that the assessment is made available, to ensure transparency of information in accordance with the SPG.

33 The requirement for an early stage viability review will be triggered if an agreed level of progress on implementation is not made within two years of any permission being granted, in accordance with Policy H6 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG. Early stage viability reviews may also be required relating to the timing of the submission and implementation of reserved matters applications. A late stage review will be required when 75% of the units are sold or let.

### Housing choice

34 London Plan Policy 3.8 'Housing Choice' encourages a choice of housing based on local needs, while affordable family housing is stated as a strategic priority. Policy H12 'Housing size mix' of the draft London Plan states that boroughs should not set prescriptive dwelling size mix requirements for market and intermediate homes; and for low cost rent, boroughs should provide guidance on the size of units required to ensure housing meets identified needs.

35 The applicant states that 15-25% of the units would be family-sized, defined as three-bedrooms and above, with the mix to be determined at reserved matters stage. In accordance with the London Plan and the draft London Plan, it is recommended that the Council secures a minimum proportion of family-sized low cost rent units.

### Children's play space

36 London Plan Policy 3.6 and Policy S4 of the draft London Plan seek to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child, with further detail in the Mayor's Supplementary Planning Guidance 'Shaping Neighbourhoods: Play and Informal Recreation'.

37 The applicant's illustrative scheme identifies a requirement for 1,000 sq.m. of play space, with 420 sq.m. for under-fives. A minimum of 1,360 sq.m. of play space is proposed in residents' communal courtyards, public open spaces, and a dedicated play space at the north end of the site, and an indication of the design of play space has also been provided. Any reserved matters application would need to fully detail play space proposals taking account of existing and proposed off-site facilities, which should be appropriately secured.

## **Urban design**

38 As discussed below, notwithstanding the post-application improvements to the Design Code and Parameter Plans, the outline form of the application, together with the complete absence of pre-application discussions, raises concerns about the quality of the proposals, particularly in relation to the impact on heritage assets, and the applicant is advised to submit a full application in order to allow the proposals to be fully assessed.

### Density

39 London Plan Policy 3.4 and draft London Plan Policy D6 'Optimising housing density' seek to optimise the potential of sites, having regard to local context, design principles, public transport accessibility, and capacity of existing and future transport services. The higher the density of a development, the greater the level of design scrutiny that is required, particularly qualitative aspects of the development design, as described in draft London Plan Policies D4 'Housing quality and standards' and D2 'Delivering good design'.

40 The proposal would have a density of approximately 270 units per hectare if the maximum residential floorspace proposed was delivered, which accounts for the impact of non-residential uses. This exceeds the top of the guidance ranges in Table 3.2 of the London Plan (based on the site's PTAL of 4-5) and therefore requires a greater level of design scrutiny. Draft London Plan Policies D6 and D2 also emphasise the importance of design scrutiny for high density proposals. As discussed below, the outline form of the application, particularly in relation to the impact on heritage assets, does not allow a satisfactory assessment of the design

quality of the proposals, and the density proposed cannot currently be supported in line with London Plan Policy 3.4, and draft London Plan Policies D2, D4 and D6.

#### Site layout

41 The Council's approach to masterplanning the redevelopment of the area is fully supported in accordance with policies in Chapter 7 of the London Plan, and Policies D1 and D2 of the draft London Plan. The Masterplan Framework identifies the site as contributing the western sides of a series of new urban blocks and east-west routes, with the eastern sides intended to be delivered on the neighbouring site, currently occupied by the Peacock Industrial Estate.

42 As discussed above, in response to concerns raised about the original application materials, the applicant has revised the proposals to remove the eastern wing of Block C, which aligns with the Masterplan Framework layout, allows development to come forward to the east, and significantly reduces potential impacts on residential amenity from the existing industrial uses to the east. These amendments are supported; however, the applicant must demonstrate that engagement has taken place with the neighbouring landowners to the east and what possibilities exist for a more comprehensive approach. Furthermore, the resulting courtyard space of Block C should be limited to residents' communal amenity space in order to avoid potential conflict between users and residents, and in line with the Masterplan Framework.

43 The revised Parameter Plans identify minimum separation distances between the blocks of 12 metres, which is below the 18-21 metres usually identified as good practice, and should be increased.

44 Almost all of the application is in outline form, and given the tall buildings proposed and the sensitive relationship to a number of heritage assets as discussed below, the applicant is strongly advised to come forward with a detailed scheme in order to demonstrate that the highest design quality will be achieved.

#### Residential quality

45 London Plan Policy 3.5, and Policy D4 of the draft London Plan set out housing quality, space, and amenity standards, and as discussed above, residential quality is particularly important for high density proposals such as this.

46 The design codes and illustrative layouts generally conform to London Plan and draft London Plan residential standards, and the improvements made since submission are welcomed. However, there is limited assessment of the environmental impact of the railway and existing neighbouring industrial uses and design responses, for example the strategy for private amenity space/balconies. The design codes should secure duplex units at ground-first floor level or through units at ground floor level, to eliminate street facing bedrooms and ensure privacy. The design codes should also secure a tenure blind approach.

47 In accordance with Policy D11 'Fire safety' of the draft London Plan, the Council should secure an Informative prescribing the submission of a fire statement, produced by a third party suitably qualified assessor.

#### Height, massing and appearance

48 Whilst the potential for taller buildings is identified in the Masterplan Framework, and is not opposed in principle, the outline form of the application does not allow a full assessment of

the design quality of the tall buildings proposed, which are considerably above the heights identified in the Masterplan Framework. As discussed below, there are also concerns about the impact of the proposals on heritage assets arising from the height of the two tall buildings, and their potential coalescence in a number of views.

## **Historic environment**

49 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties 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*” and in relation to conservation areas, special attention must be paid to “*the desirability of preserving or enhancing the character or appearance of that area*”. Case law has established that there should be a strong presumption against granting permission that would harm a listed building or the character or appearance of a conservation area..

50 The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset’s conservation; significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset’s physical presence or 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. Policy HC1 ‘Heritage conservation and growth’ of the draft London Plan, like London Plan Policy 7.8, states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets

51 The locally listed Station Master’s House at the southern end of the site is a non-designated heritage asset, which will be retained and converted for retail use. This part of the site is also within the North Tottenham Conservation Area, which contains a number of listed buildings focused along Tottenham High Road. The Grade II listed ‘Grange’ adjacent to the site is also within the Conservation Area. Other Conservation Areas are more than 250 metres to the west, beyond the railway viaduct, and the proposals would not be visible from within them.

52 An assessment of the impact on heritage assets is contained within the applicant’s Heritage Statement, which includes an analysis of all heritage assets in the vicinity, and an analysis of the impact of the proposals. This takes account of the applicant’s Townscape and Visual Impact Assessment (TVIA), which includes a visual analysis of the impact of the maximum massing parameters on 21 views.

53 The proposals will provide some enhancements to the Conservation Area and its setting, the Station Master’s House and its setting, and the setting of the Grange, through the removal of walls and barriers, the delivery of new public space, and the closure of an unattractive gap to the White Hart Lane frontage and streetscape, which is supported. However, although the proposals locate the taller buildings in appropriate locations as identified in the Masterplan Framework, they are considerably taller than envisaged, with block B to the north rising to 21 storeys, compared to 14 storeys in the Masterplan Framework, and block C to the south rising up to 18 storeys, compared to 10 storeys. The Masterplan Framework identifies that buildings should step down according to these heights to have an acceptable impact on heritage assets.

As currently proposed, the height of the proposed 18 storey block, together with its proximity to White Hart Lane, will have a considerable impact on the setting of these heritage assets if developed to the maximum parameters, as demonstrated in Views 2 and 3 of the TVIA. These views also demonstrate the potential for the two tall buildings to coalesce, creating an overbearing mass. The heights proposed in the Masterplan Framework were also intended to limit impacts on the Conservation Area and listed buildings when viewed from Tottenham High Road, and Views 1 and 21 in the TVIA also raise concerns in this respect.

54 The Heritage Statement concludes that the impacts are beneficial to heritage assets. GLA officers consider that harm will be caused to heritage assets by the proposals; however, the outline nature of the proposals limit the ability to make a full assessment of the level of harm. The public benefits arising from the proposals include the delivery of new homes, including affordable homes; business space; the regeneration of a vacant site adjacent to a station; and new public space. However, as discussed under 'affordable housing' above, the application does not achieve the 50% affordable housing threshold on this formerly industrial site, which limits the full potential of public benefits. The full public benefits of the site allocation cannot be assessed without a more comprehensive approach. It should be noted that GLA officers must take account of the strong presumption against granting permission that would harm the character or appearance of the Conservation Area, and place considerable importance and weight to the harm caused to the setting of the listed buildings.

## **Inclusive design**

55 London Plan Policy 7.2 and Policy D3 of the draft London Plan seek to ensure that proposals achieve the highest standards of accessible and inclusive design (not just the minimum).

56 Policy 3.8 of the London Plan and Policy D5 require that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. The application materials state that the proposals will meet these requirements and include plans of wheelchair accessible units. The Council should secure M4(2) and M4(3) requirements by condition as part of any permission.

## **Transport**

57 Trip generation has been assessed in accordance with TfL guidance. This must be used to assess the impact of the development on the bus network and mitigation may be required in the form of a section 106 contribution for additional bus capacity.

58 A total of 79 parking spaces are proposed for residential use, equating to a ratio of 0.25 spaces per unit, while 27 parking spaces are proposed for the commercial/business uses, of which 22 are for employees and 5 are 'visitor' spaces. These provisions are acceptable in accordance with London Plan and the draft London Plan Policies. Of the residential parking spaces, 32 Blue Badge spaces are proposed in accordance with draft London Plan requirements. The draft London Plan requirement for at least one Blue Badge space for non-residential uses must also be met. It is proposed that current London Plan standards of 20% active and 20% passive Electric Vehicle Charging Points (EVCPs) will be provided. While this is welcome, the applicant is strongly encouraged to uplift the passive provision to 80% (all remaining) in accordance with the draft London Plan. A car parking design and management plan should be secured by condition, demonstrating the location of the Blue Badge spaces and EVCPs.

59 Further information should be provided to demonstrate that the proposal adopts the Healthy Streets approach, namely the potential for future access to the site from the wider area, how pedestrians and cyclists can move through the site, and measures that will be taken to prioritise pedestrians and cyclists over vehicles. The layout and design of the site should not prevent the future opening of the four potential access routes.

60 In line with TfL guidance and the draft London Plan, the applicant should provide assessments of the walking and cycling environment of areas in the vicinity of the site and identify any necessary improvements.

61 Limited detail is provided on cycle parking, which must be provided in line with London Plan standards, and the applicant is strongly encouraged to meet draft London Plan standards. At least 5% of long-stay spaces should be suitable for larger bikes. Cycle parking should be fit for purpose, secure and well located. Details of cycle parking quantity, type, location and access, with reference to London Cycling Design Standards, should be secured by condition.

62 Given the proximity of London Overground tracks, conditions relating to infrastructure protection are required.

63 A delivery and servicing plan (DSP) has been submitted in accordance with TfL guidance and London Plan and draft London Plan policy. A full DSP should be secured by condition, including plans demonstrating vehicle access to the site and servicing bays, and measures to promote safe and sustainable pattern of deliveries and servicing. In accordance with draft London Plan Policy T7, an outline construction logistics plan (CLP) should be provided for review, and a detailed CLP should be secured by pre-commencement condition. A framework travel plan has been provided and a full travel plan should be secured and monitored by section 106 agreement.

## **Climate change**

64 Based on the energy assessment submitted, compared to a 2013 Building Regulations compliant development, an on-site reduction equivalent to an overall saving of 50% of CO<sub>2</sub> per year in regulated emissions is expected for the domestic element; and 27% for the non-domestic element. Further information has been requested on worksheet calculations, the district energy network, the site heat network, and combined heat and power, which must be provided before the proposals can be considered acceptable in accordance with Policy 5.2 of the London Plan and Policy S12 of the draft London Plan, and the carbon dioxide savings verified. Full details have been provided to the applicant and the Council.

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

65 Council officers have had minimal pre-application discussions and it is understood that concerns remain. The application is expected to be considered at Committee in June 2018.

## **Legal considerations**

66 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.

67 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. There is no obligation at this present 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

68 There are no financial considerations at this stage.

## Conclusion

69 London Plan and draft London Plan policies on the principle of development; affordable housing; housing; urban design; historic environment; inclusive design; transport; and climate change are relevant to this application. The application does not comply with the London Plan and the draft London Plan, for the reasons set out below.

- **Principle of development:** Although the principle of a high-density residential-led development on this site is supported, the outline form of nearly all of the application site, together with the complete absence of pre-application discussions, raises concerns about the quality of the proposals, particularly in relation to the impact on heritage assets. The applicant is advised to submit a full application, or key elements in detail, to allow the proposals to be fully assessed.
- **Affordable housing:** A minimum of 35% without public subsidy, and 40% with public subsidy, with the unit mix and affordable tenure to be detailed in reserved matters applications. As the site is a non-designated industrial site, a minimum threshold of 50% affordable housing is required in order to follow the fast track route and the applicant must therefore provide a viability assessment based on a policy compliant tenure mix. Early and late stage viability reviews are required, in accordance with Policy H6 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG.
- **Urban design and historic environment:** The amendments to the application submitted post-submission are supported; however, concerns remain about the design and residential quality of the scheme, particularly the building heights, density, and the impact on heritage assets. GLA officers consider that harm will be caused to heritage assets; however, the outline nature of the proposals limit the ability to make a full assessment of the level of harm. The full public benefits of the site allocation cannot be assessed without a more comprehensive approach.
- **Transport:** Further information is required, including site layout, walking/cycling environment, and cycle parking.
- **Climate change:** Further information is required on worksheet calculations, the district energy network, the site heat network, and combined heat and power.

---

for further information, contact the GLA Planning Team:  
**Juliemma McLoughlin, Chief Planner**  
020 7983 4271 email juliemma.mcloughlin@london.gov.uk  
**Katherine Wood, Principal Planner**  
020 7983 5743 email Katherine.wood@london.gov.uk  
**Martin Jones, Senior Strategic Planner, Case Officer**  
020 7983 6567 email martin.jones@london.gov.uk

---

Appendix 7 – Councillor and Adjoining Occupier Responses

COUNCILLOR	COMMENT	OFFICER RESPONSE
<p>Cllr John Bevan Northumberland Park Ward</p>	<p>I am the Cllr responsible for responding to planning issues within this ward, I have visited the above address and my comments are below and are based on my observations and local knowledge during my 15 years as a Cllr for this ward.</p> <p>I am aware of the substantial public consultation that has taken place concerning The High Road West site and the subsequent master plan that has been prepared and is in the public domain. This plan addressing / incorporating the public concerns and ideas gathered as a result of the public consultation. The two sites mentioned in this application are part of this master planned site.</p> <p>I am concerned that this proposal would prevent the provision of the various elements of the High Road West scheme and would expect the planning service to ensure that this does not happen. I.E. That the agreed master plan be implemented thus providing the public benefits that have been promised following on from the wide spread public consultation.</p>	<p>Comments noted. Issues of comprehensive development are considered in Section 6 of the main body of this report.</p>
<p>ADJOINING OCCUPIER</p>	<p>COMMENT</p>	<p>OFFICER RESPONSE</p>

Appendix 7 – Councillor and Adjoining Occupier Responses

<p>Dwight Richards Managing Director Richwell Construction Ltd Unit 3 Carbery Enterprise Park 36 White Hart Lane N17 8DP</p> <p>Supports proposal</p>	<p>Richwell Construction are occupiers within the Cabery Enterprise Park, which is within the boundary of this planning application.</p> <p>We have reviewed the proposed scheme and have had productive discussions with the Club who have made clear their wish to retain our business within any new development. This will enable us to stay local and be a part of the regeneration process, rather than displaced by it.</p> <p>We therefore wish to support the application as we believe the application will bring forward the regeneration of our part of High Road West and enable us to make key business decisions with more certainty. We are also reassured by the quality of development that the Club has brought forward elsewhere in Tottenham, in addition to the stadium scheme.</p>	<p>Comment noted. A planning obligation around business relocation will be sought by officers in the course of the appeal.</p>
<p>Ted Hughes General Manager Orchard Medical Recruitment Unit 10 Carbery Enterprise Park 36 White Hart Lane N17 8DP</p> <p>Supports proposal</p>	<p>Orchard Medical Recruitment Ltd are occupiers within the Carbery Enterprise Park, which is within the boundary of this planning application.</p> <p>We have reviewed the proposed scheme and have had productive discussions with the club who have made clear their wish to retain our business within any new development. This will enable us to stay local and and be part of the regeneration process, rather than be displaced by it.</p> <p>We therefore wish to support the application as the believe the application will bring forward the regeneration of our part of High Road West and will enable us to make key business decisions with more certainty. We are also reassured by the quality of the development that the Club has brought forward elsewhere in Tottenham, in addition to the stadium scheme.</p>	<p>Comment noted. A planning obligation around business relocation will be sought by officers in the course of the appeal.</p>
<p>Ursula Riniker 6 Devonshire Court Devonshire Hill Lane London N17 7NJ</p>	<p>Here is my feedback on THFC's proposals for the Goods Yard site.</p> <ol style="list-style-type: none"> <li>1. I have looked at and read all the material online. I wish you stopped over-using "fantastic", since you seem to have little idea what it means, and if I</li> </ol>	<p>Objection noted. Issues of land ownership are not material to the planning decision.</p>

Appendix 7 – Councillor and Adjoining Occupier Responses

<p>Objects to proposal</p>	<p>have to read "much needed" so-and-so many more times, I shall lose the will to live.</p> <ol style="list-style-type: none"> <li>2. THFC, through its various companies, has bought lots of land in Tottenham with its wealth, but that does not give it the right to destroy Tottenham. Any development so close to the conservation area of Tottenham High Road should be sensitive to Tottenham's heritage, complement and sustain it, and not jar with it. The most attractive parts of the site are the Grange building and the Station Master's House.</li> <li>3. The proposed development does not fit into the area. The 2 - 5 storey buildings look reasonable but should still be improved and rendered more sustainable by using interesting, natural materials and covering the buildings with green roofs.</li> <li>4. The two proposed tower blocks of 18 and 21 storeys are horrendous and totally inappropriate for the area, as is the previously built tower of the "Rivers Apartments" which looms over an area of several miles and is an absolute eyesore which should never have been built. To add another two similarly ugly towers will irredeemably blight the whole area. Moreover, the white on these towers makes them stand out excessively and is offensive. Any tall buildings should be of a subdued colour that blends into the surroundings.</li> </ol>	<p>The appearance of the buildings will be determined at reserved matters stage in the event the appeal is allowed. There is policy support for tall buildings in a growth area. The visual appearance of the buildings will be determined at reserved matters stage in the event the appeal is allowed. The issues of design, building height and heritage are set out in section 6 of the main body of this report.</p>
<p>Serena McPherson 16 Pretoria Road N16 8DX</p> <p>Neither supports nor objects</p>	<p>My main concern is the working hours of the contractors - will there be set times the site will be open and closed. My bedroom is at the front of the house and can clearly hear the noise currently coming from that site already (associated with the football ground). Can I expect to see a cut-off time at night for the work?</p>	<p>Comments noted. The hours of construction are regulated pursuant to the Control of Pollution Act 1974. Officers will seek to secure a Considerate Constructor obligation</p>

Appendix 7 – Councillor and Adjoining Occupier Responses

		in the course of the appeal.
<p>Peacock Estate Management Limited (Company 02919379) Unit 10, Peacock Industrial Estate 20 White Hart Lane, London, N17 8DT</p> <p>Objects to the proposal</p>	<p>I'm writing on behalf Peacock Industrial Estate, the Peacock Estate Management Limited (Company 02919379) owns the communal land for the benefit of the individual unit owners.</p> <p>We understand that Tottenham Hotspurs Football Club has made a planning application for the old Goods Yard. The Peacock Industrial Estate is to the east the Goods Yard and the planning application has naturally an impact on us.</p> <p>We have three reservations:</p> <p>1- The area surrounding our site and also the Goods Yards is predominately industrial and commercial in character. In principle we do not object to more housing, however commercial spaces must also be protected and you need to ensure that there is sufficient space for small and micro businesses so there can be some new employment opportunities;</p> <p>2- Parking: due to the high volume of the vehicle traffic, the area in our opinion cannot cope with more vehicle traffic, therefore in your planning condition you should very clearly set limits on the car parking, not issue new resident permits to incoming/prospective tenants or buyers;</p> <p>3- a mesh metal fence is running along our boundary between the Goods Yard and Peacock Estate, which was adequate for the needs of the business community. When large block of apartments are build then this fence will not provide adequate protection for both sides. As part of the planning condition the developers should build a 240cm or 300cm high wall running along the border.</p> <p>We would be pleased if our reservations are noted in the planning permit application and await to hear from you.</p>	<p>Objection noted. The application site is not a designated industrial site. The issues of the loss and re-provision of employment floorspace are considered in the Section 6 in the main body of this report. Transport issues are also considered in Section 6. Officers will seek an obligation around on street parking permits in the course of the appeal. The issue of boundary treatments will be addressed at reserve matters stage if outline permission is granted.</p>

Appendix 7 – Councillor and Adjoining Occupier Responses

<p>Lendlease Development (Europe) Limited 20 Triton Street Regent's Place London NW1 3BF United Kingdom</p>	<p>(The full text of this objection is Appendix 7A to this report)</p>	<p>Objection noted. Issues of comprehensive development are considered in Section 6 of the main body of this report. Officers will discuss proportionate planning obligations concerning the NT5 site with the applicant as the appeal progresses.</p>
---	--	--



Appendix 7A

16 February 2018

Mr James Hughes  
London Borough of Haringey  
Level 6 River Park House Our ref: P00785570  
225 High Road  
Wood Green  
London  
N22 8HQ

Dear Mr Hughes

**THE GOODS YARD, 36 AND 44-52, WHITE HART LANE, LONDON, N17 8DP Application No HGY/2018/0187. (the "Application")**

Please find herein a consultation representation in relation to the above planning application (ref **HGY/2018/0187**) on behalf of Lendlease Europe Holdings Limited ("Lendlease").

**Regeneration of High Road West**

The Goods Yard site comprises an area of land within the wider High Road West Regeneration Area ("HRWRA").

The redevelopment of the HRWRA is a priority for the Council. The redevelopment proposals for the HRWRA are currently set out within the adopted 2014 Masterplan and no HRWRA has been identified as a key site (Site Allocation (SA) NT5) within the Council's Tottenham Area Action Plan (2017) ("AAP").

The HRWRA offers a once in a life time opportunity to bring forward a comprehensive Council and community led redevelopment which, when realised, will immeasurably improve the living conditions of residents in the Northumberland Park Ward and provide wider community benefits. It also offers the opportunity to deliver the local communities' priorities which have been identified and developed through community consultation and include:

- Better quality housing and more housing choice;
- A safer and more attractive place to live and work;
- More leisure facilities and activities for young people;
- New community facilities; and
- More job and training opportunities for local people.

With a view to delivering the above-mentioned benefits and the regeneration of the HRWRA as envisaged by the AAP, the Council undertook a 12-month procurement process to select a development partner.

Lendlease was officially appointed as the Council's development partner in December 2017. Following its appointment Lendlease is committed to engaging with the local community with the aim of bringing forward a proposal for the comprehensive regeneration of the HRWRA and will soon be embarking on detailed consultation with the community to develop proposals which can form part of a planning application for the whole of the HRWRA.



It is essential that the Council does not permit premature, piecemeal development which would serve to undermine this process and the wider objective of securing the comprehensive redevelopment of the HRWRA.

### **Policy Context**

The regeneration of Tottenham is a key priority for the Council; the AAP was prepared to ensure that the scale of development and long-term change proposed for Tottenham is positively managed and guided by a planning framework.

A key policy thread of the AAP is to ensure development proposals do not prejudice each other, or prejudice the wider development aspirations for the area covered by the AAP. The HRWRA is an allocated site within the AAP under Policy NT5. Policy NT5 seeks the delivery of 1,500 new homes and 12,590 sqm of commercial, town centre and community uses within the HRWRA.

The AAP makes it clear that the HRWRA is to be formed of 'Masterplanned, comprehensive development creating a new residential neighbourhood and a new leisure destination for London'. In doing so, the AAP stipulates that the Council wants to ensure development proposals 'do not prejudice each other, or the wider development aspirations for the Tottenham AAP area'.

Specifically, policy AAP1 'Regeneration & Masterplanning' expects all development proposals in the AAP area to 'come forward comprehensively to meet the wider objectives of the AAP.' Paragraph 4.6 of the AAP seeks to ensure that all development proposals are designed and submitted to the Council as part of a wider comprehensive development, as this will help to 'alleviate concerns associated with piecemeal development', and ensure that the proposed new development 'maximises benefits locally'.

This policy objective is repeated in Policy DM55 of the Council's Development Management DPD, which again seeks to ensure that development proposals are designed as part of a wider comprehensive development to help alleviate concerns associated with piecemeal development, ensuring the benefits to the local area are maximised.

### **The Application**

The Application proposes to deliver up to 330 new homes and up to 1,450 sqm of non-residential floorspace, equating to circa 22% of the residential and 11.5% of the non-residential floorspace expected to be provided within HRW under the AAP.

Lendlease is committed to bringing forward an application for the whole of the HRWRA. Granting consent for piecemeal development of the type envisaged by the Application would be premature in the context of the Council's vision for the wider regeneration of HRWRA and would undermine the wider policy objective of securing the co-ordinated and comprehensive regeneration of the area.

Notwithstanding our position as the Council's Development Partner, Lendlease has not yet formulated detailed development proposals for the HRWRA, it is clear that the piecemeal development of part of the HRWRA, such as the Goods Yard site, would have a significantly adverse impact on the viability of the wider regeneration of HRWRA because it would constrain options for the delivery of HRWRA and limit its ability to maximise the potential utilisation of the HRWRA and as a consequence reduce the ability to provide the full extent of infrastructure and community benefits envisaged by the AAP. Planning Policy SP1 of the Strategic Policies DPD makes it clear that the Council expects development in the Growth Areas (such as the HRWRA) to (inter alia), maximise site opportunities; provide the necessary infrastructure; and, be in accordance with the full range of the Council's planning policies and objectives. The social and



physical infrastructure required to support the development and growth planned through the Council's Local Plan is set out in the Council's Infrastructure Delivery Plan (IDP), particularly policy SP2.

It would be essential for the Council to allow Lendlease to consult and develop its proposals for the whole of the HRWRA so that a comprehensive understanding of the social and physical infrastructure required across the whole of the HRWRA is obtained. Only when such information is available will the Council be in a position to properly assess the precise infrastructure and community benefit costs required to deliver a scheme for the comprehensive redevelopment of the HRWRA and ascertain how such infrastructure and community benefits can be funded and delivered, alongside a viable development. Determining the Application in advance of having such information would clearly prejudice delivery of the wider regeneration of the HRWRA and the social and community benefits which policy demands.

### **Conclusion**

The regeneration of the HRWRA is a priority for the Council. The Council's commitment to securing the comprehensive regeneration which policy requires is illustrated by its appointment of Lendlease in December 2017 as its development partner.

Lendlease is fully committed to delivering that comprehensive redevelopment and will soon be embarking on detailed consultation with the community to develop proposals which can form part of a planning application for the whole of the HRWRA.

It is crucial the Council do not undermine the delivery of that comprehensive development and the local benefits it would bring by granting consent for premature piecemeal development of the sort contained within the Application.

There a number of other issues arising from the Application in terms of its failure to comply with relevant development plan policy, but our main objective at this stage is to draw to your attention to our in-principle objection to the Application within the context of it being fundamentally in conflict with the policy objectives of securing and delivering a comprehensive viable redevelopment of the HRWRA.

We request that this representation will be taken into consideration in the determination of this application. If you have any questions regarding the above, please do not hesitate to contact Jonathan Emery on [jonathan.emery@lendlease.com](mailto:jonathan.emery@lendlease.com).

Yours sincerely,

A handwritten signature in black ink, appearing to read "JE", is positioned below the text "Yours sincerely,".

Jonathan Emery  
Managing Director, Property – Europe, Lendlease

Appendix 7B – HRWMF and Applicant’s Red Line Plan



HRWMF - Applicant site superimposed for illustrative proposes over plan area in red.

Appendix 8 – Shared Surface Image – High Road West Master Plan Framework



Image 8.1 - Indicative Image – High Road West Master Plan Framework. White Hart Lane (looking east)