

Planning Sub Committee

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference No: HGY/2019/2929 & 2930

Ward: Northumberland Park

Address: Nos. 867-879 High Road and land to the rear, N17 8EY.

Proposal - Planning Permission: Hybrid planning application (part Full/Part Outline) for the demolition of existing buildings & structures and redevelopment of the site for a residential led mixed-use scheme with up to 330 residential units (class C3), retail/café use (Use Class A1/A3), area of new public open space, landscaping and other associated works. Full details/permission is sought in respect of Block D, 867 and 869 High Road (Grade II listed) and proposed Block G to its rear. Outline permission is sought for the remainder of the site, with details of “scale”, “layout”, “appearance” and “landscaping” reserved in relation to proposed Blocks A, B and C and details of “appearance”, “landscaping” and “layout” only reserved in relation to Block E.

Proposal - Listed Building Consent: Listed Building Consent for Internal alterations and associated works to provide 6 x 2- bed flats at 867 and 869 High Road.

Applicant: Tottenham Hotspur Football Club (THFC).

Ownership: Private

Case Officer Contact: Graham Harrington

Site Visit Date: 21/11/2019.

Date received: 08/11/2019 **Last amended:** 28/02/2020.

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

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

SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposal is a well-designed, residential-led mixed-use scheme providing a range of residential accommodation and a small commercial unit.
- The proposed development is compatible with the approved Goods Yard scheme and allows for an incremental delivery of comprehensive proposals for site allocation NT5, in accordance with the adopted High Road West Masterplan Framework.
- The scheme would deliver family and smaller sized residential units including 40 Low Cost Rented homes (Social Rented and 20 London Affordable Rent) and 65 Shared Ownership homes, representing a 32% provision of affordable housing by unit number and 35% provision by habitable room.
- The layout and design of the development optimise the potential of the site, provides appropriate levels of publicly accessible open space and respects the scale and character of the surrounding area and the amenity of neighbours.

2 RECOMMENDATION

- 2.1 That the Committee resolve to GRANT planning permission and that the Head of Development Management or the Assistant Director Planning is authorised to issue the planning permission and impose conditions and informatives subject to referral to the Mayor of London for his consideration at Stage 2 and signing of a section 106 Legal Agreement providing for the obligations set out in the Heads of Terms below and a section 278 Legal Agreement providing for the obligations set out in the Heads of Terms below.
- 2.2 That the section 106 legal agreement referred to in resolution (2.1) above is to be completed no later than **1 May 2020** or within such extended time as the Head of Development Management or the Assistant Director Planning shall in her/his sole discretion allow.
- 2.3 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.3) above, planning permission is granted in accordance with the Planning Application subject to the attachment of the conditions.
- 2.4 That the Committee resolve to GRANT Listed Building Consent and that the Head of Development Management or the Assistant Director Planning is authorised to issue the Listed Building Consent and impose conditions and informatives.
- 2.5 That delegated authority be granted to the Head of Development Management or the Assistant Director of Planning to make any alterations, additions or deletions to the recommended heads of terms and/or recommended conditions (planning permission and/or Listed Building Consent) as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice Chair) of the Sub-Committee.

Conditions Summary – Planning Application HGY/2019/2929 (the full text of recommended conditions is contained in Appendix 11 of this report).

Detailed Element (Blocks D, F & G)

- 1) 5-year time limit
- 2) Development to be in accordance with approved plans.
- 3) Block G - Noise attenuation between A1/A3 unit and housing
- 4) Block G BREEAM accreditation ('Excellent') for A1/A3 unit.
- 5) Block G - Wind mitigation measures for outdoor seating area.
- 6) Block G - Ventilation/extraction details – A3 use
- 7) Block G - Hours of Use for any café/restaurant use (A3) - 07.00 to 23.00 (Monday to Saturday) and 08.00 to 23.00 (Sundays and Public Holidays).
- 8) Block F - Noise attenuation – details of glazing specification and mechanical ventilation.
- 9) Accessible housing - Identified dwellings (10%) to be built as wheelchair user dwellings, all other dwellings to be built as accessible and adaptable dwellings.
- 10) Detailed Fire Statement
- 11) Details of landscaping, public realm, play space, amenity space, biodiversity enhancement measures, boundary treatments & wind mitigation measures for Block G etc.
- 12) Details of external materials (Blocks D and G only)
- 13) Details of living roofs & PVs (Blocks D)
- 14) Details of ground floor rear boundary details (Block D)
- 15) Cycle parking provision.
- 16) Overheating

Outline Element (Blocks A, B, C & E & Open Space)

- 17) Reserved Matters to be submitted within 5 years, development must start within 3 years from date of permission or 2 years from approval of last Reserved Matter
- 18) Reserved Matters details
- 19) Reserved Matters details must accord with the approved Parameter Plans
- 20) Reserved Matters details must be in substantial accordance with the approved Revised Development Specification Framework and Revised Design Code.
- 21) Proposed detailed design to be subject to review by QRP before prior to submission of Reserved Matters applications
- 22) At least 10% of dwellings to be to be built to Building Regs Approved Document standard M4(3) (wheelchair user dwellings) standard.
- 23) All other dwellings to meet standard M4(2) (accessible and adaptable dwellings).

- 24) Blocks A & B - Reserved Matters application to be accompanied by a detailed Basement Impact Assessment
- 25) Blocks A, B and C – Reserved Matters application to be accompanied by a full Fire Statement
- 26) Block B - Reserved Matters application to be accompanied by a detailed Wind & Microclimate Assessment based on wind tunnel testing
- 27) Block B - Energy Centre - combustion & pipework
- 28) Block B – Reserved Matters application to be accompanied by fully rendered Accurate Visual Representations
- 29) Blocks B, C & E - Reserved Matters applications to be accompanied by details of glazing specification and mechanical ventilation.
- 30) Blocks B, C & E – Reserved Matters applications to include details of Living Roofs.
- 31) Brook House Yard Management & Maintenance Plan
- 32) All Blocks - Reserved Matters applications to be accompanied by detailed Operational Waste Management Plans.
- 33) All Blocks - Reserved Matters applications to be accompanied by detailed Overheating Assessments.
- 34) Open Space – Reserved Matters applications for Landscaping to include details of public realm, play space, amenity space, biodiversity enhancement measures, boundary treatments, wind mitigation measures and SuDs features etc.)
- 35) Temporary Landscaping Use
- 36) Protection measures for trees to be retained (Pre-commencement)

Both Detail and Outline Elements

- 37) Phases (Pre-commencement)
- 38) Archaeology – Stage 1 Written Scheme of Investigation (Pre-commencement)
- 39) Archaeology – Stage 2 Written Scheme of Investigation
- 40) Water supply Infrastructure Study (Pre-commencement)
- 41) Land contamination – Part 1 assessment & verification report (Pre-commencement)
- 42) Land contamination – Part 2
- 43) Unexpected contamination
- 44) Updated Energy Strategy
- 45) Railway Infrastructure Protection Plan
- 46) Secured by Design
- 47) Domestic boilers – Dry NOx emissions not exceeding 32 mg/kWh (0%)
- 48) Trees & Planting – 5-year replacement
- 49) Demolition/Construction Environmental Management Plans (Pre-commencement)
- 50) Construction Logistics Plan (Pre-commencement)
- 51) Management and Control of Dust (pre-commencement)
- 52) Non-Road Mobile Machinery (Pre-commencement)

- 53) Impact Piling Method Statement (pre-commencement)
- 54) Business and Community Liaison Construction Group (Pre-commencement)
- 55) Telecommunications
- 56) Energy monitoring

Informatives Summary – Planning Application HGY/2019/2929 (the full text of Informatives is contained in Appendix 11 to this report).

- 1) Working with the applicant
- 2) Community Infrastructure Levy
- 3) Hours of Construction Work
- 4) Party Wall Act
- 5) Numbering New Development
- 6) Asbestos Survey prior to demolition
- 7) Dust
- 8) Written Scheme of Investigation – Suitably Qualified Person
- 9) Deemed Discharge Precluded
- 10) Composition of Written Scheme of Investigation
- 11) Disposal of Commercial Waste
- 12) Piling Method Statement Contact Details
- 13) Minimum Water Pressure
- 14) Paid Garden Waste Collection Service
- 15) Sprinkler Installation
- 16) Designing out Crime Officer Services
- 17) Land Ownership
- 18) Network Rail Asset Protection
- 19) Site Preparation Works

Conditions Summary – Listed Building Consent Application HGY/2019/230 (the full text of recommended conditions is contained in Appendix 11 of this report).

- 1) 3-year time limit.
- 2) Development to be in accordance with approved plans and documents.
- 3) Contract to complete works to be in place prior to demolition.
- 4) Matching materials
- 5) Hidden historic features
- 6) Redundant plumbing, mechanical & electrical services
- 7) Making good redundant plumbing, mechanical & electrical services
- 8) Approval of details, including method statements (various)
- 9) Masonry cleaning
- 10) No new plumbing
- 11) No new grilles

Informatives Summary – Listed Building Consent HGT/2019/2930 (the full text of Informatives is contained in Appendix 11 to this report).

- 1) Working with the applicant
- 2) External materials to be approved pursuant to Planning Permission (HGY/2019/2929)

Section 106 Heads of Terms:

Dwelling mix

- 1) Minimum dwelling mix requirement of minimum 11% family-sized homes overall and at least 35% family-sized homes for Low Cost Rented Housing, with a mechanism for review

Affordable Housing

- 2) **Affordable Housing** – Affordable Housing Scheme to be submitted for approval prior to commencement of development or with first Reserved Matters application (whichever is the sooner):
 - a. Minimum of 35% by habitable room (798 habitable rooms)
 - b. Tenure mix – 60.5% Intermediate (Shared Ownership) Housing and 39.5% Low Cost Rented Housing (with this being split 50:50 Social Rent and London Affordable Rent)
 - c. London Affordable Rent levels and Shared Ownership income bands as set out in this report
 - d. LB Haringey to be offered first rights to purchase all of the Low Cost Rented homes
 - e. Quality standards and triggers for provision (no more than 25% of Market Units occupied until 50% of Affordable Units delivered, no more than 50% of Market until 100% of Affordable Units delivered).
 - f. Location of different tenures (by Block)

3) Viability Review Mechanism

- a. Early Stage Review if not implemented within 2 years.
- b. Break review – review if construction is suspended for 2 years or more

4) Infrastructure Provision – Financial contributions:

- a) Community Space - £443,190
- b) Library - £483,450
- c) The above being subject to review if an approved scheme is liable to pay an increased Borough CIL levy above £15 pre square metre, so that if CIL liability increases, the infrastructure contribution shall decrease by a corresponding amount.

Open Space Management

- 5) **Public Open Space Access and Management Plan** for the approved public realm and publicly accessible open spaces, ensuring public access and future management and maintenance.
- 6) **Future Use of Embankment Gardens and Pickford Yard Gardens** amenity space by residents of approved and proposed buildings immediately to the south in the wider masterplan area (subject to reasonable endeavours).
- 7) **SuDS Management Plan** to secure details of on-going management and maintenance of SuDS features.

Transportation

- 8) **Future Connectivity & Access Plan** – setting out how the development shall be constructed to allow for potential future pedestrian, cycling and vehicular access across the development to and from adjacent land.
- 9) **Car Capping** – No future occupiers will be entitled to apply for a residents or business parking permit under the terms of the relevant Traffic Management Order controlling on-street parking in the vicinity of the development.
- 10) **Enfield CPZ Contribution** - Baseline car parking survey, monitoring and if monitoring shows overspill car parking to be a significant problem, a financial contribution of up to £20,000 towards consultation/implementation of a CPZ.
- 11) **Residential Travel Plan & Car Club** comprising:
 - a) Appointment of a Travel Plan Coordinator
 - b) Provision of welcome induction packs containing public transport and cycling/walking information like available bus/rail/tube services, map and timetables, to every new resident.
 - c) Establishment or operation of a car club scheme, which includes the provision of 2 car club bays and two cars with, two years' free membership for all units and £50.00 per year credit for the first 2 years.
 - d) £3,000 for monitoring of the travel plan initiatives.
- 12) **Car Parking Design & Management Plan** for each Phase - To cover:
 - a) Location and design of any temporary car parking spaces
 - b) Location and design of car parking spaces
 - c) Provision of Electric Vehicle Charging Points (direct provision for 20% of spaces, with passive provision for a further 20%)
 - d) Allocation and management of car parking spaces (prioritising disabled people, then families with children then others)
 - e) Provision and management of disabled car parking spaces to allow for the required number of such spaces (up to 33 overall)

- f) All car parking spaces to be leased, not sold outright.
- 13) **Delivery Servicing Plan** - To be monitored by the Travel Plan Coordinator.
- 14) **Highways Agreement** – See Section 278 Agreement Heads of Terms.

Employment and Training

- 15) **Employment & Skills Plan** - Including Construction apprenticeships Support Contribution and Skills Contribution (to be calculated in accordance with Planning Obligations SPD).
- 16) Commitment to being part of the borough's **Construction Partnership**.

Carbon Management and Sustainability

- 17) **Temporary heating solutions** - Any temporary boilers installed in buildings before the site-wide energy centre in Block B is provided shall be high efficiency condensing gas boilers.

18) **Future connection to District Energy Network**

- Submission of Energy Plan
- Use all reasonable endeavours to connect Nos. 867-869 High Road (Block F) to a site-wide energy centre. If this does not prove feasible, these buildings to be served by high efficiency condensing gas boilers.
- Design of secondary and (on-site) primary DHN in accordance with LBH Generic Specification and approval of details at design, construction and commissioning stages.
- Use all reasonable endeavours to negotiate a supply and connection agreement with the DHN within a 10-year window.

19) **Carbon offsetting**

- Developer to pay an agreed initial carbon offset amount upon commencement;
- Developer to pay an agreed deferred carbon offset amount if no connection to a DEN is forthcoming after 10-years of completion.

Telecommunications

- 20) **Ultrafast broadband infrastructure** and connections to be provided.

Construction

- 21) Commitment to **Considerate Contractors Scheme**.

Monitoring

22) Borough monitoring costs in accordance with Paragraph 5.42 of the Planning Obligations SPD (approx. £26,000).

Section 278 Highways Legal Agreement Heads of Terms

23) Works to link in with High Road public highway

- 2.6 In the event that members choose to make a resolution contrary to officers' recommendation, members will need to state their reasons.
- 2.7 That, in the absence of the agreement referred to in resolution (2.1) above being completed within the time period provided for in resolution (2.2) above, the planning application and Listed Building Consent applications be refused for the following reasons:

Planning Application

- i. In the absence of a legal agreement securing 1) the provision of on-site affordable housing and 2) viability review mechanisms the proposals would fail to foster a mixed and balanced neighbourhood where people choose to live, and which meet the housing aspirations of Haringey's residents. As such, the proposals would be contrary to London Plan Policies 3.9, 3.11 and 3.12, Strategic Policy SP2, and DM DPD Policies DM 11 and DM 13, and Policy TH12.
- ii. In the absence of a legal agreement securing financial contributions towards infrastructure provision (community space, library and public realm), the scheme would fail to make a proportionate contribution towards the costs of providing the infrastructure needed to support the comprehensive development of Site Allocation NT5. As such, the proposals are contrary to London Plan Policy 3.16, Strategic Policies SP16 and SP17, Tottenham Area Action Plan Policies AAP1, AAP11 and NT5 and DM DPD Policy DM48.
- iii. In the absence of the legal agreement securing an Open Space Management and Access Plan and obligations relating to the future use of and access to Embankment Gardens and Pickford Yard Gardens, the proposal would fail to secure publicly accessible and well-maintained open space and fail to safeguard the comprehensive development of Site Allocation NT5. As such, the proposals would be contrary to London Plan Policies 7.5, 7.9, Policy SP12, Tottenham Area Action Plan Policies AAP1, AAP11 and NT5 and DM DPD Policy DM20.
- iii. In the absence of legal agreement securing 1) a residential Travel Plan and financial contributions toward travel plan monitoring, 2) Traffic

Management Order (TMO) amendments to change car parking control measures, 3), car club provision and 4) the implementation of a Delivery Servicing Plan the proposals would have an unacceptable impact on the safe operation of the highway network, and give rise to overspill parking impacts and unsustainable modes of travel. As such, the proposal would be contrary to London Plan Policies 6.9, 6.11 and 6.13. Spatial Policy SP7, Tottenham Area Action Plan Policy NT5 and DM DPD Policy DM31.

- iv. In the absence of an Employment and Skills Plan the proposals would fail to ensure that Haringey residents benefit from growth and regeneration. As such, the proposal would be contrary to London Plan Policy 4.12 and DM DPF Policy DM40.
- v. In the absence of a legal agreement securing the implementation of an energy strategy, including connection to a DEN, and carbon offset payments the proposals would fail to mitigate the impacts of climate change. As such, the proposal would be unsustainable and contrary to London Plan Policy 5.2 and Strategic Policy SP4, and DM DPD Policies DM 21, DM22 and SA48.
- vi. In the absence of a legal agreement securing the developer's participation in the Considerate Constructor Scheme and the borough's Construction Partnership, the proposals would fail to mitigate the impacts of demolition and construction and impinge the amenity of adjoining occupiers. As such the proposal would be contrary to London Plan Policies 5.3, 7.15, Policy SP11 and Policy DM1.

Listed Building Consent

- i. In the absence of a planning permission for the proposed conversion of the Listed Buildings to 6 apartments the proposed removal of historic fabric and internal and external alterations would be unnecessary and unacceptable. As such, the proposal is contrary to London Plan Policies 7.8 and 7.9, Strategic Policy SP12 and DM DPD Policy DM9.

2.8 In the event that the Planning Application and Listed Building Consent Applications are refused for the reasons set out above, the Head of Development Management or the Assistant Director Planning (in consultation with the Chair of Planning sub-committee) is hereby authorised to approve any further application for planning permission and associated Listed Building Consent which duplicates the Planning Application and Listed Building Consent provided that:

- i. There has not been any material change in circumstances in the relevant planning considerations, and

- ii. The further application for planning permission is submitted to and approved by the Assistant Director within a period of not more than 12 months from the date of the said refusal, and
- iii. The relevant parties shall have previously entered into the agreement contemplated in resolution (1) above to secure the obligations specified therein.

CONTENTS

- 3.0 PROPOSED DEVELOPMENT AND SITE LOCATION DETAILS
- 4.0 CONSULTATION RESPONSE
- 5.0 LOCAL REPRESENTATIONS
- 6.0 MATERIAL PLANNING CONSIDERATIONS
- 7.0 COMMUNITY INFRASTRUCTURE LEVY
- 8.0 RECOMMENDATIONS

APPENDICES:

- Appendix 1: Plans and Documents List
- Appendix 2: Quality Review Panel Report 13 March 2019
- Appendix 3: Quality Review Panel Report 19 June 2019
- Appendix 4: Quality Review Panel Chair's Briefing Report 11 December 2019
- Appendix 5: Development Management Forum Notes 14 March 2019
- Appendix 6: Planning Sub-Committee Minutes 8 July 2019
- Appendix 7: Internal and External Consultee representations
- Appendix 8: Mayor of London Stage 1 Report 27 January 2020
- Appendix 9: Neighbour representations
- Appendix 10: Images of the site and proposed scheme
- Appendix 11: Conditions

3. PROPOSED DEVELOPMENT AND LOCATION DETAILS

3.1. Proposed Development

3.2. This is a “hybrid” planning application (part full, part outline) for the retention and conversion of the two Listed Buildings on the High Road and the redevelopment of the rest of the site. A separate Listed Building Consent application seeks approval for internal and external works to Nos. 867 and 869 High Road. The elements where full and outline permission is sought is summarised in the table below.

Full planning permission	<ul style="list-style-type: none"> Nos. 867 and 869 High Road Blocks D, F and G 	
Outline planning permission	Demolition of all other existing buildings and structures on the site (including northern boundary wall).	
	Access (across the site) and Scale (Block E only) are for determination at this stage.	
	Matters to be reserved for subsequent determination are as follows:	
	<ul style="list-style-type: none"> Blocks A, B and C 	<ul style="list-style-type: none"> Scale Layout Appearance Landscaping
<ul style="list-style-type: none"> Block E 	<ul style="list-style-type: none"> Layout Appearance Landscaping 	

3.3. A Development Specification and Framework, Parameter Plans and a Design Code are submitted for approval in relation to the outline element of the application and the applicant has also submitted an Illustrative Scheme to show how outline proposals could be built out. The applicant has made a number of revisions to the application in response to discussions with officers. A full list of the up-to-date submitted plans and documents is set out in **Appendix 1**.

3.4. The overall proposals are summarised in the table below.

Use (Use Class)	Proposed Floorspace/site area
Residential (C3)	Up to 35,000 sqm GEA (330 units) (including

	conversion of Nos. 867 and 869 High Road)
Non-residential (A1/A3)	Up to 270 sqm GEA
Open Space	Minimum 6,380sqm, of which <ul style="list-style-type: none"> • Minimum 4,010 sqm will be provided as publicly accessible space (including at least 1,695sqm as a Public Square) • Up to 2,370 sqm will be provided as private communal gardens/roof terraces
Play space	Minimum of 1,250sqm
Car parking	Residential ratio of 0.16 spaces per unit, including 2,897 sqm covered parking floorspace (up to 52 spaces, 10 disabled persons spaces & 11 EVCPs)
Cycle parking	608 spaces
Back of house facilities	2,897 sqm GEA

3.5. Detailed elements

Block D

- 3.6. This building would be located on the northern edge of the site, fronting the proposed shared-surface road (Pickford Lane). It would comprise a part 5/part 6-storey building incorporating a podium car parking area and a communal roof garden on top. The building would accommodate 38 new homes, including 3-bed maisonettes fronting Pickford Lane and on two northern wings, with a mixture of 1, 3 and 3-bed flats, including 4 wheelchair accessible homes. A podium car parking area would include 21 spaces and the building would incorporate a new electricity sub-station.

Block F (Nos. 867-879 High Road)

- 3.7. These two Listed Buildings (Grade II) would be converted in to six x 2-bed flats, involving internal alterations and extensive external repairs.

Block G

- 3.8. This building is located directly to the west of Nos. 867-869 High Road. It is set around a proposed communal landscaped garden (Pickford Yard Gardens) which would be accessed from Pickford Lane and would be shared with Nos.

867-869. The building would step up from three, to four, to five and six-storeys fronting on to the proposed Peacock Park. The stepped building would incorporate a series of roof-level communal terraces. The building would accommodate 25 new homes, including 2-bed maisonettes fronting Pickford Lane and mainly 1 and 2-bed flats (with one 3-bed flat) above and two wheelchair accessible homes. A commercial unit for retail/café/restaurant uses (A1/A3) would be located on the ground floor, fronting on to Peacock Park.

3.9. **Outline elements**

Access, streets and footpaths

- 3.10. Means of access from a reconfigured signalised junction access point on the High Road, is in detail and for determination at this stage. The proposal is to 'tightened up' the junction, with narrower carriageway and wider footways and to retain one large London Plane tree on the eastern part of the site and two large London Plane trees in the High Road footway. In addition, there would also be a secondary vehicular access connecting the site with Cannon Road to the north.
- 3.11. On site access and circulation routes are in outline. The proposed two-way east to west access route (Pickford Lane) is proposed to be a residential street (with a carriageway of between 4.1 and 5.5m and footway space either side) which prioritises people over traffic, removes clutter from the pavement and encourages slower vehicle speeds through narrowing of vehicle areas. Two new routes would punch through from the two cul-de-sacs on the Cannon Road housing area to the north. The western one would be an extension of Pickford Lane and would be a vehicular route. The eastern one (Cannon Yard) would be pedestrian and cycle only. North-south emergency accesses/footpaths would run to the southern boundary, allowing for future connection to a further phase of the masterplan to the south. These include routes to the Rear of Blocks A and B (Goods Yard Walk) and either side of the proposed Peacock Park, between the park and Blocks A and G.

Public Realm and Open Spaces

- 3.12. The streets and footpaths referred to above (Pickford Lane, Cannon Yard and Goods Yard Walk) are all intended to be landscaped spaces that integrate generous soft landscaping and play opportunities. Peacock Park (at least 4,010sqm) would be a publicly accessible space for both the existing and new community located in the middle of the site. It is also proposed to provide three other spaces of varying character. Pickford Yard Gardens (760 sqm) would be a communal garden/growing space for residents of Blocks F and G only. Brook House Yard (350 sqm) would be a hard-surfaced play space, shared with Brook House Primary School. Embankment Gardens (580 sqm) would be a communal open space/paly space for residents of Blocks A and B only.

Blocks A and B

- 3.13. These two interlinked buildings would be at the western end of the site and provide an edge to the proposed Pickford Lane and Peacock Park and form the proposed Embankment Gardens. Block A along the edge of the Park would be between 3 and 9-storeys (+22m AOD to =43m AOD) and would include a range of 1-3-bed homes. Block B would be a residential tower and rise up to a maximum 29-storeys (+106m AOD). The illustrative scheme contains 200 mainly 1 and 2-bed homes in these buildings, but with some family-sized homes on the lower floors.

Block C

- 3.14. This building would be located at the western end of the site and front the north side of Pickford Lane. It would comprise a part 1/part 7/part 9-storey building (+19/37/43m AOD) and incorporate a podium car parking area and a communal roof garden on top (similar to that proposed for Block D. The illustrative scheme contains 39 homes in a range of 1 to 3-bed flats.

Block E

- 3.15. This building would be located at the eastern (High Road) end of the site next to Brook House School on the Cannon Road housing site to the north and front the north side of Pickford Lane. It would comprise a part 1/part 4/part 6-storey building (+19/28/34m AOD). The illustrative scheme contains 22 mainly 2-bed flats.
- 3.16. **Site and Surroundings**
- 3.17. The application site is rectangular in shape stretching between the High Road in the east and the Overground railway line embankment to the west. It measures 1.2 hectares, is about 153m wide and 69 to 75m deep and is relatively flat (although levels fall from west to east from approx.13.7m AOD to approx.12.6m AOD (1.1m).
- 3.18. The site accommodates Nos 867 and 869 High Road (Grade II Listed Buildings), a large retail store, currently occupied by B&M Home Store, five small retail units and a surface level car park. There are two large London Plane trees on the eastern part of the site, near the High Road (one on the northern boundary and one close to No. 869) and two other large London plane trees in the High Road footway. There are a number of other smaller less noteworthy trees on the site and immediately to the west in the railway embankment.
- 3.19. The site is fairly close to Cycle Superhighway 1, which runs from Old Street to the Stadium, well served by bus services (Routes 149, 259, 279, 349 and N279) on the High Road) and is about 300m away from White Hart Lane Overground

Station and the W3 bus route on White Hart Lane. It is within the Tottenham North Controlled Parking Zone (CPZ) and the Stadium Event Day CPZ. The eastern part of the site has a PTAL of 4 ('Good') and the western part has a PTAL of 3 ('Moderate'). The site's vehicular access forms one arm of a four-arm signal-controlled staggered junction with the High Road. Existing uses on the site are set out below.

Use (Use Class)	Existing Floorspace (GEA)
B&M Home Store (A1)	4,760 sqm
5 x small retail units (two vacant) (A1/A3/A5)	319 sqm
Nos. 867-879 High Road - adult education	806 sqm
Car parking	195 spaces
Cycle parking	0 spaces

- 3.20. The existing northern boundary comprises a brick wall of varying height from between approx. 21.m to 5.4m in height. Immediately to the north of the site is the Cannon Road housing scheme, which was built on the site of the former Cannon Rubber Factory in 2014/15. It comprises four residential buildings, which from west to east are: River Apartments (part 22/part 23-storeys – 86.2m AOD), Mallory Court (6-storeys) which backs on the application site, Ambrose Court (9-storeys) and Beachcroft Court (part 4/part 5-storeys), which includes the Brook House 2FE Primary School on the ground and first floors. Cannon Road itself splits in to two north-south cul-de-sacs that come up to the boundary and anticipate future connection on to the application site. The eastern arm of Cannon Road includes a games/outdoor learning space that is connected with the school. Further to the north, in the London Borough of Enfield, is the Langhedge Lane Industrial Estate and surrounding residential streets.
- 3.21. Immediately to the south east is No. 865 High Road, a poor-quality pastiche three-storey residential building, with residential rooms in its rear return looking north over the site. To the east is the High Road which comprises a range of three to four-storey mixed use buildings, including housing on some upper floors. Further to the east are the residential streets based around Bryantwood Road.
- 3.22. To the south are the Peacock Industrial Estate and the Goods Yard site. The Industrial Estate comprises part one/part 2-storey industrial, warehouse and office buildings which turn their back on the application site and are accessed from White Hart Lane and the High Road. The Goodsyard site comprises to the south west comprises a mainly cleared site that is owned by the Applicant and

for which planning permission was granted on appeal for a major residential-led development (see Planning and Enforcement History below). Further to the south (on the other side of White Hart Lane) is the Love Lane Estate.

3.23. To the west of the site (and the railway lines) is Pretoria Road, with mainly housing fronting the street and Durban Road which joins it from the west, and, in the London Borough of Enfield, the Commercial Road Industrial Estate.

3.24. **Relevant Planning and Enforcement History**

3.25. The existing retail warehouse, shop units and car parking were originally granted planning permission in 1982 (OLD/1982/0595). This also permitted the use of Nos. 867 and 869 High Road for office use. Since then, a number of permissions have been granted for minor changes to the store and units.

3.26. Planning permission was granted in 2011 (HGY/2010/2318) for the continued use of Nos. 867 and 869 High Road as a D1 (adult education centre).

3.27. In March 2019 (HGY/2019/0383), the Council has issued an Environmental Impact Assessment (EIA) Screening Opinion confirming that the emerging scheme did not comprise EIA Development.

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

3.29. Goods Yard (ref: HGY/2018/0187). Permission granted on appeal, against non-determination, in June 2019 for a residential-led mixed use redevelopment comprising up to 316 residential units, employment (B1 use), retail (A1 use), leisure (A3 and D2 uses) and community (D1 use) uses.

3.30. **Consultation and Community Involvement**

3.31. The applicant has submitted a Statement of Community Involvement (SCI) with the application. The SCI notes that the applicant undertook two days of public exhibitions and consulted with a range of stakeholders in March 2019.

3.32. Emerging proposals were considered by Haringey's Quality Review Panel (QRP) on 13 March and on 19 June 2019. The QRP Reports following these reviews are attached as **Appendices 2 and 3**. In response to a request by the QRP, the submitted detailed elevations for Blocks D and G were considered at a QRP Chair's Briefing on 11 December 2019 and comments made following this briefing are attached as **Appendix 4**.

- 3.33. Emerging proposals were presented at a Development Management (DM) Forum on 14 March 2019. A summary of responses from the Forum are attached as **Appendix 5**.
- 3.34. Emerging proposals were presented to the Planning Sub-Committee at pre-application stage on 8 July 2019. The minutes of this item are attached as **Appendix 6**.

4. **CONSULTATION RESPONSE**

4.1. The following were consulted regarding the applications:

Internal Consultees

- LBH Building Control
- LBH Carbon Management
- LBH Conservation Officer
- LBH Drainage
- LBH Economic Regeneration
- LBH Education (School Places Planning)
- LBH Emergency Planning and Business Continuity
- LBH Health in all Policies
- LBH Housing
- LBH NHS Haringey
- LBH Planning Policy
- LBH Pollution
- LBH Tottenham Regeneration
- LBH Transportation
- LBH Tree Officer
- LBH Waste Management

External Consultees

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

- Residents Associations (Cannon Road RA, Headcorn, Tenterden, Beaufoy & Gretton RA, Northumberland Park RA, Love Lane Residents Association, Love Lane RA (TAG))
- Thames Water
- Tottenham Civic Society
- Transport for London
- Tree Trust for Haringey
- UK Power Networks

4.2. An officer summary of the responses received is below. The full text of internal and external consultation responses is contained in **Appendix 7**.

Internal:

Building Control – The applicant has submitted a Fire Statement by a third party suitably qualified assessor (Buro Happold). The statement provides high level detail of how the proposal would function in terms of fire safety. However, the detail regarding the building's construction, the means of escape, access for fire service personnel and equipment and the ongoing maintenance and monitoring of these and how provision would be made within the site to enable fire appliances to gain access to the buildings should be submitted to and approved by the Council prior to commencement of works.

Carbon Management – Detailed queries over the submitted Energy Statement and Overheating Assessment and recommendations for using s106 planning obligations to secure connections to a District Energy Network and carbon offsetting financial contributions. The Revised Energy Statement and Overheating Design Note address some, but not all of these queries and it is recommended that conditions require an updated Energy Strategy to be submitted for approval and for carbon offsetting contributions to be calculated based on that.

Conservation Officer –. Planning application (HGY/2019/2929) – Comments can be summarised as follows:

- The proposed scale, height and bulk of the proposed taller Blocks A and B would be dominant in the townscape within and around the North Tottenham Conservation Area. This would adversely affect the character and appearance of the Conservation Area and its heritage assets and views of these.
- Whilst failing to preserve the settings of the Conservation Area and the setting of its heritage assets, the proposals would lead to less than substantial harm to their heritage significance.
- The adverse impacts of the taller blocks on the settings of the heritage assets would be considerably mitigated by the proposed enhancement of these settings through landscape design, laying out of public areas, sensitively

- designed buildings D, E and G and acceptably scaled block E and by the proposed repairs and enhancements of the listed block F.
- Testing of the visual impact of detailed design of blocks A and B by means of Accurate Visual Representations (AVR views) from key viewpoints within and surrounding the Conservation Area is recommended.

Listed Building Consent application (HGY/2019/2930) – No objections. The proposed conversion would bring the listed buildings back in to residential use and would be supported on conservation grounds, subject to the approval of surveys, details and method statements

Design Officer - These proposals are a well thought through and elegantly designed response to a significant site. The masterplan and layout represent an improvement on the existing adopted masterplan, with a clear, legible street network and an enlarged park. The propose mix of heights include a tall building at 29 storeys; this is successfully justified in accordance with Haringey policy. In particular, views of the development show it would generally not be any more detrimental than the existing and previously approved tall buildings, and by completing the intended row of tall buildings along the railway edge, be in accordance with the previously approved masterplan.

The detailed designs for the one existing renovated and two proposed blocks are elegantly composed and promise high quality residential living requirements. All the Quality Review Panel (QRP) concerns raised with the proposals have been successfully resolved, save one very minor one, that in Block G having to wheel the commercial waste in front of the residential entrance door. The illustrative scheme, parameter plans and particularly the design code for the outline parts of the proposals show they too could be of similarly high quality. In particular, communal entrance doors are all now designed to be clear, legible and inviting, all flats have good aspects, outlooks and private amenity spaces, with balconies or terraces always available off living rooms and designed to provide privacy and hide residents' clutter.

The proposals have also been successfully shown to not have any significant detrimental effect on existing neighbours, considering that this has long been planned for major change, with the high Road West Masterplan Framework developed in 2014. Daylight, sunlight and wind assessments show only minor effects compared to the expectation of development previously agreed.

Education (School Places Planning) – The site is within Planning Area 4. There is currently spare capacity across our primary schools in this planning area and it is not projected to see a deficit of places until 2024/25. No immediate comments.

Planning Policy – The site is the subject of a number of policy designations – including Tottenham Area Action Plan Site Allocation NT5, which is supported by the adopted High Road West Masterplan Framework. Observations on the

following issues: master planning, quantum of development, mix of housing, transport and access, the proposed tall building and heritage.

Pollution – No objections subject to securing the mitigation referred to in Section 8 of the applicant's Air Quality Assessment and specific conditions (land contamination, management and control of dust, combustion and energy plant, gas boilers, Non-Road Mobile Machinery, impact piling method statement, Demolition/ Construction Management Plans, Electric Vehicle Charging Points) and specific informatives (asbestos and dust).

Public Health – Raise a number of queries – most of which are addressed in the supporting documentation and/or this report (including the recommended conditions and s106 obligations).

Regeneration - In September 2017, the Council agreed the selection of Lendlease to enter into a development agreement to deliver the High Road West scheme. The successful bid progresses the proposals provided in the 2014 Arup masterplan, towards a site wide comprehensive scheme, which optimises the opportunities provided by the site so that it can deliver an extent of affordable homes, jobs, business opportunities and community spaces in a high-quality sustainable neighbourhood that responds to a recognised local need in the area. The Council are currently seeking ways to increase the number of Council-owned social rent homes as part of the scheme. A conclusion to this matter would permit the Council to undertake a ballot, currently scheduled for 2020, and progress towards a planning consent for the scheme.

The outcome of delivering High Road West will be a community neighbourhood including over 2,000 new homes, a new library and learning centre, a new square and park for markets and community events, a reinvigorated North Tottenham town centre, new space for existing and new businesses and more than £10million social and economic support for businesses and residents, including thousands of construction jobs and hundreds of new jobs following development.

Transportation – Queries raised in relation to the justification for the proposed level of car parking, swept path analysis for main access, provision for non-standard bicycles and distance between wheelchair accessible homes and parking spaces. No objections, subject to responses to these queries and conditions/obligations to secure s278 agreement for highway works, financial contributions towards public realm works, Car Club spaces and Club membership, electric vehicle charging points, Car Park Management Plan, restrictions on obtaining parking permits, Travel Plan and monitoring and Construction Management Plan.

Waste Management – (i) There has been no provision made for food waste storage within the residential proposal. (ii) The inclusion of a bulky waste storage

area is recommended and (iii) Any second collection of waste per week is subject to applicant paying a second collection charge.

External:

Cadet Gas – There is gas apparatus within the site and advice is given to the developer over the necessary liaison with and consents from the company.

Environment Agency - The EA has assessed the proposals as having a low environmental risk and have no comments to make.

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

Historic England – Archaeological Service (GLAAS) – Recommend that field evaluation is undertaken at this stage, to inform a decision.

London Borough Enfield – Whilst generally supporting the proposals, the council raises the following concerns:

- Social infrastructure – possible impact on social infrastructure in Enfield, particularly two nearby primary schools
- Parking – possible overspill parking in streets to north of site and the need for a financial contribution should be paid to help the Council establish a CPZ.
- Traffic and transport – the Transport Assessment does not assess impacts in Enfield or take account of committed developments in the borough.
- Conservation and design – views from Fore Street Conservation Area should be taken into account to establish harm to this designated heritage asset.

These concerns are addressed in the relevant sections of the report.

Metropolitan Police (Designing Out Crime Officer) – The DOCO has met with the applicant's architects and identified a number of site-specific issues that need to be addressed. No objections in principle, subject to the imposition of suitably worded condition and informative.

Mayor of London – The principle of a high-density residential-led development is supported. However, the proposals do not comply with the London Plan or the 'Intend to Publish', for the reasons set out below:

- Affordable housing: The proposed 25% affordable housing offer falls significantly short of the Fast Track threshold and is unacceptable.
- Urban design and historic environment: Concerns are raised over the omission of the tower from the detailed application given its prominence and the need to secure exemplary design quality. Less than substantial harm would be caused to heritage assets; further information is required to establish if the full potential of public benefits has been realised. The outline

- form of the tower element of the application raises concerns about the quality of the proposals Ground floor layout and indicative design for the top).
- Transport: Active Travel, disabled persons parking provision and parking management and cycle parking provision need to be addressed. Highway improvement works, a delivery and servicing plan and a construction logistics plan should be secured by condition or planning obligation.
 - Climate change: Further information needed on the heat network and configuration of the energy centre, carbon emission calculations; energy efficiency measures; overheating; district heating connection potential; renewable energy; heat pump specification; and carbon off-set contributions.

The Mayor's Stage 1 Report also raises the following issues:

- Calls for the applicant's full Financial Viability Appraisal to be made public
- Recommends securing a minimum amount of family-sized Social Rent homes
- Calls for the submission of a Fire Statement before determination
- Financial contribution towards bus services of £450,000 (£90,000 for five years).

The full Stage 1 Report is attached as **Appendix 8**. These issues are addressed in the relevant section of the report.

Natural England – No objections.

Network Rail – No objections.

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

LOCAL REPRESENTATIONS

5.1. On 22 November 2019, notification was sent to the following:

- 2,249 Letters to neighbouring properties
- 7 Letters to Residents' Associations (as noted above)
- 2 Letters to Haringey-based organisations (as noted above)
- 10 site notices erected in the vicinity of the site, publicising:
 - an application for Hybrid Planning Permission (Major Development) and a Listed Building Consent application for Nos. 867-869 High Road
 - development affecting the setting of the North Tottenham Conservation Area and Listed Buildings
- Press Advertisement (placed in Enfield Independent on 20 November 2019) advertising:
 - an application for Hybrid Planning Permission (Major Development) and a Listed Building Consent application for Nos. 867-869 High Road
 - development affecting the setting of the North Tottenham Conservation Area and Listed Buildings

5.2. Following the receipt of revisions, on the 11 February 2020, the occupiers of Mallory Court and the Cannon Road Residents' Group (CRRG) were re-consulted.

5.3. The number of representations received from neighbours, local groups etc in response to both rounds of consultation were as follows:

No of individual responses: 9

Objecting: 4 individuals

Supporting: Newlon Housing Trust, Brook House School and 2 individuals

Others: CRRG

5.4. The full text of neighbour representations and the officer response are set out in **Appendix 9**.

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

Objections:

- Loss of daylight/sunlight and consequential need to have lights on and use more energy.
- Block D would be uncomfortably close to Mallory Court – need to ensure that closest points would retain privacy (e.g. stairwells without windows).

- Proposed external materials for Blocks C and D should be lighter than proposed to help reflect light and aid natural brightness – especially for residents in Mallory Court and on lower floors of River Apartments.
- Proposed heights are significantly different from the tapering of height implied in the original masterplan.
- Proposed positioning of Block B feels ‘messy’ and is not fully aligned with other tall buildings in the area, as indicated in the masterplan. Bringing in an area of Network Rail-owned land to the west of Block B would allow for a better location of the tower and inclusion of additional facilities (e.g. cycle parking, outdoor café seating and car club parking).
- Electric Car Club parking spaces that were due to be provided on the Cannon Road site have not been provided – they must be provided here.
- Pre-school facilities should be included.
- Security concerns for proposed park and route through to White Hart Lane Station – lighting and would be CCTV essential.
- Existing boundary wall is important for security of Cannon Road car parking and gardens – the CRRA requests involvement in decisions over the future of this.
- Request collaboration with CRRA in order to share services/reduce service charges for both existing and proposed (e.g. concierge storage space to take in on-line delivery of parcels)
- Tenure segregation – tenure distribution in the indicative scheme is such that no Market and Social Rented homes would share access cores/internal circulation space. Concern that internal finishes in communal areas in Block E (social Rented homes) would be less.
- Addressing Local housing needs – Proposed amount is below policy requirement of 40%, the proposed tenure split (60:40 Intermediate: Social Rent does not meet local need/equalities issues. The GLA SHMA suggests a need for at least 65% affordable housing with a tenure split of 47:18 Social Rent: Intermediate. Social housing should be provided by the Council. The scheme should be paused to await results of a Full Scrutiny Review of the High Road West project.

Support:

- Much-needed facelift to a neglected area.
- Proposed homes, retail/café and new public open space would have far reaching benefits for existing and future residents.
- The Cannon Road Residents Association offers general support, despite detailed objections above.
- Brook House Primary School Head of School – proposed development would further THFC’s capacity to help regenerate the area and build community links. It would provide a new public square, new café, multi-use games area. It would also provide new employment opportunities, promote community aspirations, sense of pride, community spirit and community cohesion.

- Newlon Housing Trust (as neighbouring owner/housing provider – the scheme is well designed and would integrate the Cannon Road area in to a completely rejuvenated neighbourhood.

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

- Safety of construction works.
- Loss of views – including request for further information on distance between River Apartments and Block B to better understand loss.

6. MATERIAL PLANNING CONSIDERATIONS

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

1. Principle of the Development
2. Policy Assessment
3. Affordable Housing
4. Development Design
5. Residential Quality
6. Social and Community Infrastructure
7. Child Play Space
8. Heritage Conservation (including Listed Building Consent matters)
9. Impact on Amenity of Adjoining Occupiers
10. Transportation and Parking
11. Energy, Climate Change and Sustainability
12. Flood Risk, Drainage and Water Infrastructure
13. Air Quality
14. Wind and Microclimate
15. Trees
16. Ecology
17. Waste and Recycling
18. Land Contamination
19. Basement Development
20. Archaeology
21. Fire Safety and Security
22. Equalities
23. Conclusion

6.2 Principle of the development

6.2.1 *Policy Background*

6.2.2 The National Planning Policy Framework NPPF was updated in July 2018 and minor clarifications to the revised version were published in February 2019. The NPPF establishes the overarching principles of the planning system, including the requirement of the system to “drive and support development” through the local development plan process.

6.2.3 *The Development Plan*

6.2.4 For the purposes of S38(6) of the Planning and Compulsory Purchase Act 2004 the Local Plan comprises the Strategic Policies Development Plan Document (DPD), Development Management Policies DPD and Tottenham Area Action Plan (AAP) and the London Plan (2016).

6.2.5 A number of plans and strategies set the context for Tottenham's regeneration. These documents should be read in conjunction with the AAP. The application site is located within a strategically allocated site - NT5 (High Road West). A key policy requirement of the site allocation is that proposed development within NT5 should accord with the principles set out in the most up-to-date Council-approved masterplan. This is the High Road West Masterplan Framework (HRWMF), which is discussed in detail below.

The London Plan

6.2.6 The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. The consolidated London Plan (2016) sets a number of objectives for development through various policies. The policies in the London Plan are accompanied by a suite of Supplementary Planning Guidance (SPGs) that provide further guidance.

6.2.7 The current London Plan is the adopted Development Plan, but the Draft London Plan is a material consideration in planning decisions. The significance given to it is a matter for the decision maker, but the draft plan gains more weight as it moves through the process to adoption.

6.2.8 Public consultation on the Draft London Plan took place from 1st December 2017 to 2nd March 2018. On 13 August 2018, the Mayor published a version of the draft Plan that includes minor suggested changes. The plan was subject to an Examination in Public (EiP) between 15 January and 22 May 2019. On 9 December 2019, the Mayor published an 'Intend to Publish London Plan'. The Mayor hopes to publish a final version of the London Plan before May 2020.

Upper Lea Valley Opportunity Area Planning Framework

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

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

The Local Plan

6.2.11 The Strategic Policies DPD sets out the long-term vision of how Haringey, and the places within it, should develop by 2026 and sets out the Council's spatial

strategy for achieving that vision. The Site Allocations development plan document (DPD) and Tottenham Area Action Plan (AAP) give effect to the spatial strategy by allocating sufficient sites to accommodate development needs.

Strategic Policies

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

6.2.13 SP1 requires that development in Growth Areas maximises site opportunities, provides appropriate links to, and benefits for, surrounding areas and communities, and provides the necessary infrastructure and is in accordance with the full range of the Council's planning policies and objectives.

Tottenham Area Action Plan

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

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

NT5 Site: High Road West

6.2.16 The site allocation for the wider area (NT5 – High Road West) covers approx. 11.69ha and calls for a master planned, comprehensive development creating a new residential neighbourhood (with a net increase of 1,200 dwellings) and a new leisure destination for London. The residential-led mixed-use development is expected include a new high-quality public square and an expanded local shopping centre, as well as an uplift in the amount and quality of open space and improved community infrastructure.

6.2.17 The NT5 site allocation contains site requirements, development guidelines and sets out the steps for undertaking estate renewal. These are set out below. The application of relevant site requirements, development guidelines and estate renewal steps to the application site is set out in the sections following.

NT5 Site Requirements

- The site will be brought forward in a comprehensive manner to best optimise the regeneration opportunity.
- Development should accord with the principles set out in the most up-to-date Council-approved masterplan.
- Creation of a new residential neighbourhood through increased housing choice and supply, with a minimum 1,400 new homes of a mix of tenure, type and unit size (including the re-provision of existing social rented council homes, the offer of alternative accommodation for secure tenants, and assistance in remaining within the area for resident leaseholders from the Love Lane Estate).
- Creation of a new public square, connecting an enhanced White Hart Lane Station, and Tottenham High Road, to complement the redeveloped football stadium.
- New retail provision to enlarge the existing local centre, or create a new local centre, opposite to and incorporating appropriate town centre uses within the new stadium, including the new Moselle public square. This should complement not compete with Bruce Grove District Centre.
- Enhance the area as a destination through the creation of new leisure, sports and cultural uses that provide seven day a week activity.
- Improve east-west pedestrian and cycling connectivity with places such as the Northumberland Park Estate and Lee Valley Regional Park.
- The site lies within the North Tottenham Conservation Area and includes listed and locally listed buildings. Development should follow the principles under the 'Management of Heritage Assets' section of the APP.
- Where feasible, viable uses should be sought for existing heritage assets, which may require sensitive adaptations and sympathetic development to facilitate.
- Deliver new high-quality workspace.
- Increase and enhance the quality and quantity of community facilities and social infrastructure, proportionate to the population growth in the area, including:
 - A new Learning Centre including library and community centre;
 - Provision of a range of leisure uses that support 7 day a week activity and visitation; and
 - Provision of a new and enhanced public open space, including a large new community park and high-quality public square along with a defined hierarchy of interconnected pedestrian routes.

NT5 Development Guidelines

- Produce a net increase in the amount and the quality of both public open space and private amenity space within the area.
- To deliver transport improvements including a new, safe and attractive entrance to White Hart Lane Station and improved rail connectivity.

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

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

High Road West Master Plan Framework (HRWMF)

6.2.19 Policy AAP1 (Regeneration and Master Planning) indicates that the Council expects all development proposals in the AAP area to come forward comprehensively to meet the wider objectives of the AAP. To ensure comprehensive and coordinated development is achieved, masterplans will be required to accompany development proposals which form part of a Site Allocation included in the AAP.

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

6.2.21 The Council has entered into partnership with Lendlease who is preparing alternative proposals for a more intensive development in the same Site Allocation (including the application site). Nevertheless, little weight can be accorded to those draft proposals until there is a new Council-approved masterplan and/or a planning permission for a development different from that envisaged in Policy NT5 and the HRWMF.

6.3 Policy Assessment

Loss of Existing Retail and Education Uses and proposed flexible Retail/Restaurant/Café Use

6.3.1 Policy SP10 seeks to protect and enhance Haringey's town centres, according to the borough's town centre hierarchy and Policy DM41 promotes new retail spaces in town centres. AAP Site Allocation NT5 does not seek to retain large-format retail on the site, but rather seeks to either enlarge the existing North Tottenham Local Centre or create a new local centre. Draft London Plan Policy SD7 seeks to realise the full potential of existing out of centre low-density retail and leisure parks and commercial sites to deliver housing intensification.

6.3.2 The existing out-of-centre retail store (4,760sqm) and five small retail units (319sqm) date from the early 1980s and the main store was originally occupied by Sainsbury's. Following planning permission in March 2012 for a larger retail store (12,170sqm) on Northumberland Park on the edge of the Tottenham High Road North Local Centre as part of THFC's stadium project, Sainsbury's re-located to that new larger store. The existing store on the site is currently occupied by B&M, a grocery and general merchandise store. Three of the small units are occupied by a grocer, hair dressers and pharmacy and two are vacant.

- 6.3.3 The proposed loss of the existing out-of-centre large retail store and five small retail units is consistent with the development plan's 'town centres first' approach to retail provision and is acceptable in principle. The proposal to include a small (270sqm) flexible retail (A1) and café/restaurant (A3) unit on the ground floor of detailed Block G, fronting the proposed park, which would offset some of the loss of retail, would help enliven this space and is considered acceptable in principle.
- 6.3.4 The proposals would also result in the loss of the existing education (D1) use in Nos. 867-869 High Road (approx. 806sqm). The continued use of these properties for this purpose was permitted in 2011 and the buildings are currently partly used for adult education/office purposes. Whilst London Plan Policy 3.18 seeks to safeguard education uses, the proposals would facilitate the conversion of the Listed Buildings back to their original use (which is considered to be the best use of heritage assets) and officers consider that an exception to policy would be acceptable.

Principle of Provision of Housing

- 6.3.5 London Plan Policy 3.3 sets a target for the Council to deliver a minimum of 15,019 homes per year in the period 2015-2025. The Draft London Plan Policy H1 and Table 4.1 of the draft London Plan sets Haringey a 10-year housing target of 19,580 homes between 2019/20 and 2028/29. Policy SP2 states that the Council will maximise the supply of additional housing to meet and exceed its minimum strategic housing requirement.
- 6.3.6 The Tottenham AAP identifies and allocates development sites with the capacity to accommodate new homes. The wider High Road West area is allocated in the AAP (NT5) as an appropriate place for residential development alongside a mix of other uses and call for a minimum of 1,400 homes and a net increase of 1,200 homes). Of the 1,400 dwellings anticipated, 222 homes have already been developed in the form of the Cannon Road housing area (HGY/2012/2128) and planning permission has been granted on appeal for 316 homes on the Goods Yard site (HGY/2018/0187). This leaves 862 dwellings still to be provided and this application proposes up to 330 of this number.
- 6.3.7 Given the above, the principle of the provision of new homes on the site (alongside a mix of other uses) is acceptable. An assessment of the specific quantum of proposed housing and the indicative dwelling mix is set out in the sections below.

Principle of Comprehensive Development

- 6.3.8 Policy AAP1 (Regeneration and Master Planning) makes clear that the Council expects all development proposals in the AAP area to come forward comprehensively to meet the wider objectives of the AAP. It goes on to state that to ensure comprehensive and coordinated development is achieved, masterplans

will be required to accompany development proposals which form part of a Site Allocation included in the AAP and that applicants will be required to demonstrate how any proposal:

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

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

6.3.10 Policy NT5 makes clear that ‘development should accord with the principles set out in the most up-to-date Council approved masterplan’, which as discussed above, is the approved HRWMF prepared by Arup in September 2014. This is therefore an important material consideration when determining planning applications.

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

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

6.3.13 Although the HRMF seeks to ensure that the site is brought forward in a comprehensive manner, the phasing provisions of the HRWMF explicitly recognise existing land ownership. Indeed, Phase 1A (Cannon Road area) was delivered independently and the application site broadly corresponds with Phase 3. This acknowledgement that component parts of site allocations may be progressed separately (subject to them not prejudicing the delivery of the Site Allocation and HRWMF) was confirmed by the Goods Yard Appeal Decision in June 2019).

Length of planning permission/Listed Building Consent

6.3.14 The applicant has requested that the planning and Listed Building Consents be subject to a five-year deadline for implementation, rather than the standard 3, given that the current lease for B&M of the main retail store building means that they will not be vacating the site until the end of September 2023. Officers consider that the requested for longer than normal to implement a planning permission/Listed Building Consent is reasonable. However, some of the five small retail units are already vacant and could blight the site and the area during a five year period before implementation. The applicant is known to be considering demolishing these units to prevent anti-social behaviour and it is recommended that a planning condition ensure that if this is done, temporary landscaping/use of the resultant land is approved by the Council.

Principle of the Development – Summary

6.3.15 The provision of a mixed-use scheme comprising housing and commercial uses is acceptable in principle. The incremental development of Site Allocation NT5 is acceptable in principle, providing that the proposed development does not prejudice the future development of other parts of the Site, adjoining land, or frustrate the delivery of Site Allocation NT5 or wider area outcomes sought by the site allocation. Planning obligations around the future use of and access to Embankment Gardens and Pickford Yard Gardens are required to ensure that the proposals do not prejudice the comprehensive development of Site Allocation NT5. Standard planning conditions around outline permission implementation timelines and content of Reserved Matters are also required to make the scheme acceptable.

Development Density

6.3.16 London Plan Policy 3.4 indicates that a rigorous appreciation of housing density is crucial to realising the optimum potential of sites. This approach to density is reflected in the Tottenham AAP. While the draft London Plan proposes to remove the London Plan's density matrix, the current adopted London Plan retains the matrix. The local approach to density mirrors the adopted London Plan.

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

6.3.18 The applicant proposes up to 330 residential units in both detail and outline, the site is 1.2 hectares (Ha) in size and has a PTAL rating of 4/5. Based on detailed proposals for Blocks D, F and G and the applicants indicative dwelling mix for the outline element, the proposal would contain up to 958 habitable rooms. This would amount to a density of 275 units per hectare (u/ha) and 798 habitable room/hectare (hr/ha).

6.3.19 The adopted London Plan sets a target range of 70-260 u/ha and 200–700 hr/ha for schemes with an average hr/unit of 2.7-3.0, a PTAL of 4-6 and an ‘Urban’ character. The outline proposal therefore exceeds the density range in the adopted London Plan for both units and habitable rooms per hectare. However, Policy 3.4 makes clear that the matrix should not be applied mechanistically and that the indicative density ranges should be considered a starting point and not an absolute rule when determining the optimum housing potential. Schemes which exceed the ranges in the matrix must be of a high design quality and tested against a range of considerations (local context and character, public transport connectivity, design quality, contribution to place making, potential to define own setting, residential mix, design/management of facilities and location). Officers consider that the proposals would be acceptable when considered against these considerations, as demonstrated below, and that, subject to detailed assessment at reserved matters stage for the outline element, they would not represent an overdevelopment of the site. It should be noted that Intend to Publish London Plan Policy D3 omits the density matrix and promotes optimising site capacity through the design-led approach.

6.3.20 Given the site location within a growth area, and the AAP policy objectives to maximise development potential of land, the outline density is acceptable subject to a detailed assessment at reserved matters stage.

Dwelling Unit Mix

6.3.21 London Plan Policy 3.8 requires new residential developments to offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors. Strategic Policy SP2 and Policy DM11 of the Council’s Development Management DPD continue this approach.

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

6.3.23 The overall indicative dwelling mix for the illustrative scheme (detailed and outline elements) is set out below. The Revised Development Specification and Framework document states that family housing (3+bedroom units) will be provided at 14% (+/- 5%) of the number of units.

Bedroom Size	No. of Units	% by unit	Hab. rooms	% by Hab. rooms
1 bed 2 person	94	28%	188	19.5%

2 bed 4 person	200	61%	606	63%
3 bed 5 person	30	9%	134	14.5%
4 bed 6 person	6	2%	30	3%
Total	330	100%	958	100%

6.3.24 The proposed indicative dwelling mix is 89% 1 and 2 bed units and 11% family sized housing. However, the proposed indicative mix is not considered to represent an unacceptable over-concentration of 1- and 2-bedroom units given the site location and is generally consistent with the AAP approach to deliver smaller units in close proximity to public transportation. Subject to a detailed consideration at Reserved Matters stage, the indicative dwelling mix is acceptable and considered to meet with HRWMF principles. An assessment of the suitability of the dwelling mix as it relates to affordable housing is contained in the section below.

6.4 Affordable Housing

Policy Background

- 6.4.1 Paragraph 62 of the revised NPPF states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required. London Plan Policy 3.12 states that Boroughs should seek the maximum reasonable amount of affordable housing having regard to affordable housing targets, and the need to encourage rather than restrain residential development.
- 6.4.2 Intend to Publish London Plan Policy H5 and the Mayor's Affordable Housing and Viability SPG set a strategic target of 50% affordable housing. Policy H6 identifies a minimum threshold of 35% (by habitable room) affordable housing, whereby applications providing that level of affordable housing, with an appropriate tenure split, without public subsidy, and meeting other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor, can follow the 'fast track route' set out in the SPG; this means that they are not required to submit a viability assessment or be subject to a late stage viability review.
- 6.4.3 Policy H7 of the Intend to Publish 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 share ownership being the default tenures), and the remaining 40% to be determined in partnership with the Local Planning Authority and the GLA.
- 6.4.4 Policy SP2 of the Local Plan requires developments of more than 10 units to provide a proportion of affordable housing subject to viability to meet an overall borough target of 40%. Haringey's Planning Obligations SPD notes that if the

proposed development is achieving 35% affordable housing on the site without grant funding, then the Council will not require a full viability appraisal and independent review.

- 6.4.5 Policy AAP3 sets out the affordable tenure split (DM13 A[b]) in the Tottenham AAP area should be provided at 60% intermediate accommodation and 40% affordable rented accommodation.
- 6.4.6 Site Allocation NT5 includes the requirement to create a new residential neighbourhood through increased housing choice and supply, with a minimum 1,400 new homes of a mix of tenure, type and unit size (including the re-provision of existing social rented council homes, the offer of alternative accommodation for secure tenants, and assistance in remaining within the area for resident leaseholders from the Love Lane Estate).
- 6.4.7 Haringey's Housing Strategy 2017-22 (and Haringey's Intermediate Housing Policy statement 2018) provide guidance on the preferred tenure mix for affordable housing across the borough in order to deliver the overall aims of the Local Plan and meet housing need.
- 6.4.8 Revisions to the Housing Strategy agreed by Cabinet in February 2019 set out that the Council's preference for General Needs affordable housing is Social Rent or London Affordable Rent and the preference for intermediate rented housing is London Living Rent or Discount Market Rent, at rent levels equivalent to London Living Rent.

Amount, type, location and phasing of Affordable Housing

- 6.4.9 The applicant originally proposed 25% affordable housing by habitable room (23% by dwelling), with the tenure split as follows: 39% Social Rent by habitable room and 61% Shared Ownership by habitable room. This was based on no grant funding being available.
- 6.4.10 Since submission and based on up to 330 dwellings (798 habitable rooms), the applicant has revised its affordable housing offer. The revised offer is 35% affordable housing by habitable room (32% by dwelling) with the tenure split as follows: 39.5% Low Cost Rented (split 50:50, Social Rent and London Affordable Rent) (LAR) and 60.5% Shared Ownership by habitable room (again based on no grant funding).
- 6.4.11 Whilst it is not broken down in terms of number of homes, assuming that the proposed 50:50 split in terms of habitable rooms translates in to a 50:50 split in terms of the number of homes, the applicant's revised offer would comprise 20 Social Rent homes and 20 London Affordable Rent homes. This means that there would be nine fewer Social Rented homes than previously proposed (20 as opposed to 29), but 11 additional Low Cost Rented homes (40 as opposed to

29). This would still make a significant contribution to providing alternative accommodation for secure tenants from the Love Lane Estate as social rents, in accordance with the requirements of Site Allocation NT5.

6.4.12 A s106 planning obligation will ensure that the Council has the first right of refusal to purchase all of the Low Cost Rent housing (Social Rented and London Affordable Rent).

6.4.13 The applicant notes that the proposed design of buildings is ‘tenure blind’ and that the final dwelling mix and location of affordable housing within the scheme would be agreed following the grant of planning permission. Officers recommend that this is agreed before any development is commenced or as part of determining the first Reserved Matters application for an outline Block, whichever is the sooner. The illustrative scheme assumes the following distribution:

Block	Tenure	Units	Hab rooms	
A	Market	33	96	
B	Market	167	445	
C	Low-Cost Rent	39	128	
D	Market	16	49	
	Intermediate	22	75	
E	Market	3	9	
	Intermediate	18	53	
	Low-Cost Rent	1	4	
F	Market	6	22	
G	Intermediate	25	76	
Total		330	958	
Overall				
Overall	Market	225	623	
	Low-Cost Rent	40	132 (39.5%) (66 Social Rent & 66 LAR)	335 (35%)
	Intermediate	65	203 (60.5%)	
	Total	330	958	

6.4.14 . Registered Providers generally want Low Cost Rented housing to be served by separate lift and stair cores for management and maintenance reasons and the indicative distribution of Affordable housing around the proposed Blocks is considered reasonable.

6.4.15 It is recommended that s106 planning obligations ensure that the provision of Affordable housing keeps pace with the provision of Market housing, such that no more than 25% of approved Market homes can be occupied until 50% of

Affordable homes are delivered and that no more than 50% of Market homes can be provided until all the Affordable homes are provided.

Affordable Housing Dwelling Mix

6.4.16 Haringey's Housing Strategy 2017-2022 (updated February 2019) identifies a targeted housing mix for affordable housing. The table below sets out the proposed indicative dwelling mix by tenure and how this relates to the target mix for affordable housing.

	1-bed	2-bed	3-bed	4-bed	Total
Market	71 (31.5%)	146 (65%)	8 (3.5%)	0	225
Low-Cost Rent	8 (20%)	18 (45%)	8 (20%)	6 (15%)	40
	Target 11%	Target 45%	Target 35%	Target 10%	
Intermediate	15 (23%)	36 (55.5%)	14 (21.5%)	0 0	65
	Target 30%	Target 60%	Target 10%		

6.4.17 The proposed dwelling mix for Low Cost Rent is not in accordance with the Council's target, however, given the circumstances of the site and the fact that this is an increased percentage over the original submission, this is considered to be acceptable in this instance. It is recommended that a s106 planning obligation requires that at least 35% of the Low Cost Rented housing is 3-bed or more. Whilst there are more family-sized Intermediate homes than the Housing Strategy calls for, this is considered acceptable.

Affordability

6.4.18 50% of the proposed Low Cost Rented homes would be at social rent levels and 50% at London Affordable rent levels with the Council having the first right of refusal to these units.

6.4.19 London Affordable Rent is a form of Affordable Rent, for legal and regulatory purposes, but whereas nationally the cap on Affordable Rent is no more than 80% of market rent, the Mayor does not consider 80 per cent of market rent to be genuinely affordable in most parts of London.

6.4.20 The starting point for London Affordable Rent are benchmarks which reflect the national formula rent cap for social rents, updated by CPI for September 2016 plus one per cent. These benchmarks are updated each April by the increase in CPI (for the previous September) plus one per cent and updated benchmarks will be published by the GLA on an annual basis. Providers have the flexibility to

charge less than the benchmark. This means that London Affordable Rents tend to be slightly more expensive across London than Social Rents with the difference being smaller for larger bedroom units. In the case of Haringey our social rents tend to be lower than other boroughs and in this case the weekly rent for a London Affordable Rent 3 bed unit would be £167.67 compared to £112.75 at Social Rent, £324.57 LHA and £230.77 at Haringey affordable rent cap (50%) using 2019/20 benchmarks.

6.4.21 Once let, London Affordable Rent homes will be subject to rent-setting guidance issued by the Social Housing Regulator and will be subject to the annual one per cent rent reductions up to 2020. Providers will be able to re-let at up to the applicable benchmark level, uprated annually, or at an otherwise agreed level, as appropriate and in line with legislation and Regulator guidance. The benchmark rents do not include service charges, which may be charged in addition. Rents for London Affordable Rent homes have to be set in accordance with the Social Housing Regulator's Affordable Rent guidance. The landlord of these homes must be registered with the Social Housing Regulator.

6.4.22 The Intermediate Housing is proposed to be Shared Ownership with a minimum of 25% share on equity and rental on the unsold equity of up to 2.75% with the marketing for the units to be as follows: pre-completion and 3 months post completion to households living or working in Haringey with maximum annual incomes of £40,000 for 1 and 2 bed properties and £60,000 for 3 bed properties; 3-6 months post completion to households living or working in London with maximum annual incomes of £60,000; from 6 months post completion to households living or working in London with maximum annual incomes of £90,000. Whilst Shared Ownership isn't the Council's preferred intermediate tenure revised Appendix C of the Housing Strategy

6.4.23 The applicant's affordable housing offer is in line with the amended Housing Strategy and Intermediate Housing Policy (June 2018), which prioritises social, affordable and London Living Rents, and is in accordance with the Tottenham Hale Area Action Plan. However, while the proposed marketing of the London Living Rent units conforms to the Mayor of London's Plan and Housing Strategy, it is not strictly in accordance with the Haringey Intermediate Housing Policy marketing targets.

Viability Assessment

6.4.24 As originally submitted, the applicant's affordable housing offer fell short of the 35% (by habitable room) threshold to benefit from the 'Fast Track Route'. As such, it was supported by a Financial Viability Assessment (FVA). The Council instructed BNP Paribas to undertake a review of the applicant's FVA. BNPPs assessment of the applicant's FVA and the findings of this review helped secure the applicant's improved revised offer.

6.4.25 The applicant's revised offer of 35% affordable housing, alongside the necessary financial contributions for social infrastructure, means that the application now

benefits from adopted and emerging London Plan Policy for 'fast track' consideration and no longer needs to be justified by an FVA. Notwithstanding this BNPP has confirmed that the current affordable housing offer represents the maximum reasonable amount of affordable housing.

Viability Reviews

- 6.4.26 In order to ensure that the maximum reasonable amount of affordable housing is delivered, it is recommended that s106 planning obligations secure an Early Stage and Break Viability Review.. These obligations would re-consider viability in the event that any planning permission is not implemented within two years and if a planning permission is implemented, but then stopped.
- 6.4.27 As outlined in Section 7 below, the Council is proposing to increase the current Haringey CIL charge rate for the Eastern Zone of the borough from £15 to £50 per square metre and recently consulted on a Draft Charing Schedule. An approved development would be liable to pay the Haringey CIL rate that is in effect at the time that permission is granted in outline or when the first subsequent Reserved Matters application is approved. If a new higher CIL rate were to be introduced for the Eastern Zone before either of the above, this could have a significant effect on overall CIL liability for the scheme, increasing it from approximately £1.3m to £1.9m, which would affect viability and the ability of the scheme to deliver 35% affordable housing. Balancing the objectives of maximising affordable housing and securing financial contributions towards social infrastructure for the High Road West Masterplan area, it is proposed that the section 106 agreement includes a clause such that if the CIL increases the infrastructure contribution will decrease by a corresponding amount. This is likely to be a reduction from £927,000 to approx. £327,000 to absorb the additional CIL amount and maintain 35% affordable housing.

Contribution towards regeneration

- 6.4.28 London Plan Policy 3.4 resists the loss of affordable housing unless this is replaced at existing or higher densities with at least the equivalent amount of floorspace re-provided. London Plan paragraph 3.82 confirms that the redevelopment of affordable housing should not be permitted unless it is replaced by better quality accommodation and at least the equivalent amount of affordable housing floorspace. This approach is continued in the draft London Plan.
- 6.4.29 A key NT5 site requirement is the re-provision of existing Social Rented Council homes arising from the demolition of the Love Lane Estate. The Love Lane Estate contains 297 homes and lies to the south of White Hart Lane, within the NT5 site allocation. The Estate was built in the 1960's and includes three 10-storey 'Y' shaped blocks and several four storey slab blocks. The HRWMPF

calls for the demolition of the Love Lane Estate as part of the delivery of the wider NT5 site and the approved masterplan.

6.4.30 The requirements of NT5 in respect of the form of affordable housing are therefore different from those in other parts of the Borough. In order to facilitate the comprehensive redevelopment of the NT5 site and facilitate estate renewal, and taking account of the phasing proposed in the HRWMF which identifies the application site as forming the vast majority of Phase 3, the application site will need to provide a proportionate quantum of Social Rented housing to address the loss on the Love Lane Estate. Based on the indicative mix that informs the illustrative design for the scheme, the revised affordable housing offer would provide 20 new Social Rented homes (assuming 50% of Low Cost Rent habitable rooms equates to 50% Social Rented homes) as a contribution towards providing alternative appropriate housing for council tenants living on the Love Lane Estate.

Affordable Housing - Summary

6.4.31 The applicant's affordable housing offer has increased from 25% to 35% (by habitable room), which has been confirmed by the Council's advisors as the maximum reasonable amount. Officers consider that both the amount and type of proposed affordable accommodation is now acceptable, subject to approval of details and Early and Break viability review mechanisms.

6.5 Development Design

Policy Background

6.5.1 The revised NPPF should be considered alongside London Plan Policies 3.5, 7.4 and 7.6, Local Plan Policy SP11, and Policy DM1. Policy DM1 states that all development must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. Further, developments should respect their surroundings by being sympathetic to the prevailing form, scale, materials and architectural detailing. Local Plan Policy SP11 states that all new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use.

6.5.2 London Plan Policy 7.7 requires that tall buildings generally be limited to sites in opportunity areas, areas of intensification or town centres that have good access to public transport. Draft London Plan D8 continues this plan-led approach and states that the visual, functional and environmental elements of tall buildings should be considered in planning decisions.

6.5.3 The Upper Lee Valley Opportunity Area Framework proposes that future tall buildings will generally be in well-defined clusters in identified urban growth

centres. Strategic Policy SP11 requires all new development to ‘enhance and enrich Haringey’s built environment and create places and buildings of high quality’. Policy AAP6 states that, in line with DM6, Tottenham Hale and North Tottenham as growth areas have been identified as being potentially suitable for the delivery of tall buildings.

- 6.5.4 The HRWMF sets out the principle that tall buildings will only be considered in parts of the masterplan area where existing character would not be affected adversely by the scale, mass or bulk of a tall building. The HRWMF envisages a “legible tall building spine” that descends from Brook House to create an appropriate heritage setting for statutorily listed and locally listed assets.
- 6.5.5 The HRWMF also sets the principles that tall buildings should be located to minimise overshadowing of adjacent development and used as part of a way finding and movement strategy (for example located towards the end of east-west routes). Key views of the stadium should be considered and maintained in the profile of buildings.

Quality Review Panel Comments

- 6.5.6 Haringey’s Quality Review Panel (QRP) has assessed the scheme in full at pre-application stage twice (on 13 March 2019 and 19 June 2019). At the request of the Panel, a Chair’s Review of detailed new-build elements of the submitted application (Blocks D and G) took place on 11 December 2019.
- 6.5.7 The Panel is broadly supportive of the planning application, subject to a number of detailed amendments to Blocks D and G, set out below. It welcomes the amendments that have been made to the scheme following the review in June 2019 and feels that these have been successful in improving the relationship with the Listed Buildings on site (Block F) and improving the townscape qualities of the development. The Panel welcomes the reduction in height of parts of Blocks G and E.
- 6.5.8 While the scope of the Chair’s Review on 11 December 2019 was limited to the detailed elements of Blocks D and G, the Panel reiterated that the submitted parameter plans and design code will need to be very carefully considered to protect elements critical to the scheme’s quality. The Panel also highlighted that the design and detail of the tower (Blocks A / B), the other buildings in outline, and the landscape design across the whole site will require careful consideration at reserved matters application stage.

QRP Comment	Officer Response
Block D	
The Panel remains supportive of Block D and understands that it has remained largely unchanged since the previous review.	Noted.

<p>As at the previous review, the Panel supports the approach to the primary elevation, with deep reveals, inset balconies, chamfered brickwork and a dynamic composition that addresses the park to the south. However, it feels that some scope for refinement remains within the architectural expression of the building.</p>	<p>Noted.</p>
<p>The Panel considers that a greater visual 'solidity' to the main, central section of the elevation would improve the overall composition. In this regard, it would encourage the design team to explore increasing the dimension of the vertical framing elements, in addition to providing a more substantial parapet.</p>	<p>Parapet at roof level has been increased, the horizontal balcony depth has been increased and the windows to the living/dining areas have been increased to enhance the solidity of the building in line with QRP comments.</p>
<p>Increasing the visual 'solidity' of the upstands to the balconies could also give the building a greater visual weight, while also improving the sense of privacy and functionality for the balcony spaces.</p>	
<p>The Panel would encourage a further iteration of the design process to interrogate the plan of the accommodation in terms of how it relates to the design of the façade - to ensure that balconies are located off living spaces and that the size and location of window openings is appropriate for each room. It notes a conflict between some of the standard flat types and the composition of the exterior façade, which has resulted in reduced access to external balconies within some of the flats.</p>	<p>Plan First Floor: Living room windows to the south façade have been enlarged to improve the relationship between window and room, windows have been added to the stair core in line with QRP comments and obscure glazing have been added to some of the north façade windows to address the concerns of the residents of Mallory Court.</p> <p>Plan Second – Fourth Floor: There is now access to balconies from all living rooms and the applicant has increased the window size to living/dining areas to improve the relationship with the window and room in line with QRP comments. There is also</p>
<p>Maximising views from circulation areas of the block to the communal areas outside would be supported. Doors onto the podium should be wide, and fully glazed - and should include side lights where possible. In addition, windows that offer a view of the communal area from each floor of the stairwell would be welcomed.</p>	

	a window to the stair core and obscure glazing have been added to some of the north façade windows.
Block E	
The Panel welcomes the adjustment to the building height of Block E, that removes the additional storey and reduces the visual dominance of the block, improving its sensitivity to the setting of Block F, Grade II Listed Buildings.	Noted.
Block G	
The Panel welcomes the partial reduction in height of Block G to step down the storey heights.	Noted.
It also supports the inclusion of a more generous floor to ceiling height in the commercial elements at ground floor level and feels that this is now working well.	Noted.
There remains scope to improve the design of the main residential entrance, to give it greater presence on the street, while also reducing the visual prominence of the electrical cupboards. Further consideration of the materials proposed for the entrance could help to reinforce its 'special' nature, whether through the inclusion of bronze or timber for example.	The entrance area to the north façade has been amended to create a better quality shared entrance and the panels and doors to the bin store have been adjusted and we've added a planter to create continuity with the adjacent residential treatment in line with QRP comments.
The Panel would also encourage the design team to explore options to mitigate any potential nuisance from the commercial waste being wheeled in front of the entrance to the main residential core. Consideration of the detailed layout at ground floor level - and of the proposed management arrangements - could help with this.	
The articulation of the façade fronting onto the open space is working well, and the awnings provide a welcome level of detail and enclosure for the external space.	Noted.

<p>The play of the components within the elevations are successful; however, similarly to Block D, the panel would encourage further work to interrogate how the plan relates to the façades, to ensure that balconies are located off living spaces and that the size and location of window openings is appropriate for each room.</p>	<p>First to sixth floors: the location of proposed balconies on the west elevation of the building has been amended at all levels, to ensure access directly from living rooms and that balconies are more rationally located.</p>
<p>Aligning the window on each floor to sit centrally within the long corridor on the north façade of Block G would also be supported.</p>	
<p>The Panel welcomes the set-back upper level, faced with bronze cladding. It highlights that the quality of the cladding finish is critical and expresses concern that if a cheaper cladding material is used this could dilute the architectural quality of the block.</p>	<p>It is recommended that approval of external materials is secured by condition.</p>
<p>Blocks A/B (the tower)</p>	
<p>The Panel reiterates its previous view that it has serious concerns about the use of outline permissions for towers of this scale and sensitivity. However, if the authority is able to specify a detailed design code for Block B that guarantees a high standard of design, then this may be acceptable.</p>	<p>The applicant's Design Code is discussed below.</p>
<p>The proposed increase in height of 3 storeys on Block B from the initial review in March 2019 (at 26 storeys, max +97m AOD) to the current application (at 29 storeys max +103m AOD) could be acceptable if the design code establishes a very high quality of design. Achieving this will require careful definition of materiality, detail, three-dimensional form, roofline and interface of the tower both with Block A and with the public realm at ground level. The tower should have a special character, with high quality materials and details.</p>	<p>The applicant's Design Code is discussed below.</p>
<p>The Panel considers that the design code for Blocks A and B should enable both a certain level of flexibility, whilst at the same time establishing</p>	<p>The applicant's Design Code is discussed below.</p>

clear objectives and a clear quality standard consistent with Blocks D and G. It would encourage the design team to work closely with Haringey officers on the detailed technical aspects of the design code.	
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Site Layout

6.5.9 The HRWMF sets out the following layout principles:

- Create a legible network of east-west streets that connect into the surrounding area, existing lanes off the High Road, pocket parks and other open spaces;
- Create attractive north-south links behind the High Road which connect public parks and squares, key public buildings and the station;
- Incorporate a range of residential typologies including courtyard blocks of varying heights and terraced housing. Any tall buildings should be placed along the railway corridor to create a legible tall building spine. The buildings should use Brook House as a reference point and descend in height; and
- Demonstrate clear definition of fronts and back of buildings, public and private open spaces and active street frontages.
- Establish a simple palette of high-quality building materials for the Masterplan that includes significant use of brick.

6.5.10 In response, the proposed Illustrative Scheme and Parameter Plans generally comply with the HRWMF principles by:

- Providing an east-west route (Pickford Lane) across the site following the HRWMF alignment to connect into the wider masterplan phases;
- Including a commercial unit in the north west corner of the proposed square in a location consistent with the HRWMF.
- Providing a landmark tall building (Block A/B), and Block C to create a spine of tall buildings alongside the railway;
- Providing a new urban public space at the heart of the site, with provision for links through the site to access the station;
- Providing a range of housing typologies with a mix of courtyard and other blocks, with the tallest buildings located along the railway corridor;
- Buildings fronting onto public spaces and main roads, with the backs of the buildings and private spaces provided within courtyards;
- Providing defined public and private open spaces and active street frontages along the key routes; and
- Allowing for partial courtyard blocks created by Blocks A and B and F and G to be completed by Building A in the approved Good Yard scheme and further residential buildings on the Peacock Industrial Estate land to the south.

- 6.5.11 Whilst the proposed Illustrative Scheme and Parameter Plans generally comply with the HRWMF principles, the site does not include as much Network Rail land along its western edge as envisaged in the HRWMF. As pointed out by the Cannon Road Residents' Association, this has affected the location of the proposed tower (Blocks A/B) and of the proposed Goods Yard Walk through to White Hart Lane. However, whilst the proposed location of Block B would not result in such a clear 'spine of tall buildings' envisaged by the HRWMF; officers consider that the proposed location is acceptable. Furthermore, following pre-application discussions, the Illustrative Scheme and Design Code guidance for Goods Yard Walk has been revised and should ensure this is a safe and attractive pedestrian and cycle route through the Goods Yard and on to White Hart Lane.
- 6.5.12 Following pre-application discussions and comments, including those made by the Planning Committee at its meeting on 8 July 2019, the Illustrative Scheme shows a clear distinction between vehicular and pedestrian spaces for the proposed main east-west route (Pickford Lane) and clearer threshold spaces between this route and homes that would front it. Guidance on these issues is set out in the Revised Design Code, which would inform Reserved Matters applications. The proposals allow for an east-west pedestrian/cycle bridge to be provided in the future between Pickford Lane and Pretoria Road (on the western side of the railway), in accordance with an aspiration of the HRWMF.
- 6.5.13 The applicant's Design and Access Statement illustrates how the approved Goods Yard scheme and future development on the Peacock Industrial Estate could complete the courtyards proposed by Blocks A and B (Embankment Gardens) and by Blocks F and G (Pickford Yard Gardens). To ensure the application scheme does not prejudice subsequent phases of the HRMF, it is recommended that s106 planning obligations ensure that (a) residents of Building A on the Goods Yard and any future residential building on the Peacock Industrial Estate that adjoins it shall have access to Embankment Gardens amenity space and (b) residents of any future residential building on the Peacock Industrial Estate that adjoins Pickford Yard Gardens shall have access to this amenity space.
- 6.5.14 Subject to the recommended conditions and s106 planning obligations and detailed consideration at the Reserved Matters stage, officers consider that the proposed layout of the application scheme (as set out by the Parameter Plans) would be acceptable under the following three different development scenarios:
- As a stand-alone scheme, taking account of existing neighbouring uses and buildings and the need to connect with the Cannon Road housing area;
 - With the approved Goods Yard scheme to the south-west; and
 - With a potential development of the Peacock Industrial Estate that is built in accordance with principles of the HRWMF.

Amount, location and type of Open Space

- 6.5.15 A key principle of the HRWMF and a development guideline as per the AAP site allocation (NT5) is the production of a net increase in the amount and the quality of public open space. The HRWMF identifies broad building typologies to frame open space, and the site allocation calls for the creation of open space in addition to the creation of a legible network of east-west streets that connect into the surrounding area and the existing lanes off the High Road. The HRWMF proposes 39,400 sqm of open space in total, compared to 21,000 sqm of open space in the NT5 site area currently (an increase of 80%).
- 6.5.16 Policy DM20, seeks to ensure that sites over 1ha in size which are located in identified areas of open space deficiency (as this site is), should create new publicly accessible open space on the site, in accordance with the open space standards set out in the Haringey Open Space and Biodiversity Study (2013), subject to viability. The Study calls for 1.64 hectares per 1000 people.
- 6.5.17 There is currently no publicly accessible open space on the site. The proposals include provision of at least 4,010 sqm of open space. This comprises a new park and public realm areas. The proposed park (Peacock Park) would be at least 1,695 sqm and is located so that it is capable of being extended to the south, as and when other phases of the HRWMF are delivered. The public realm areas would be a minimum of 2,315sqm of new public realm and comprise the proposed main shared vehicular/pedestrian route (Pickford Lane), a landscaped route linking up to Cannon Road to the north (Cannon Yard) and a landscaped route behind Blocks A and B linking to the approved Goods Yard scheme (Goods Yard Walk). Children's play space of up to 1,250sqm would be located within the proposed park and public realm (this is addressed separately under Children's Play Space).
- 6.5.18 The site measures 1.2 ha, or 10.2% of the site allocation NT5/HRWMF area (11.69ha). The proposed provision of publicly accessible open space amounts to 10.2% of the overall area called for in the HRWMF and so is proportionate. Based on the indicative dwelling mix provided for in the Illustrative Scheme, there would be a requirement for approximately 0.92 hectares of open space. However, given that the overall site is 1.2 hectares, officers consider that this would not be achievable and would not optimise the density of development and that the amount of proposed publicly accessible open space is acceptable. The Council's CIL Regulation 123 List includes improvements to Lordship Lane Recreation Ground, Down Lane Park and Bruce Castle Park and CIL could be used to improve these spaces.
- 6.5.19 In addition to the above open space, the proposals include an open space immediately to the south of Brook House School, on the High Road frontage (Brook House Yard). This space (approx. 350sqm) is intended to serve as an extension of the existing school playground during school terms, but be a play space for residents of the scheme at other times. There are also proposed private communal residential amenity spaces. These are Embankment Gardens

for Blocks A and B (approx. 580sqm), Pickford Yard Gardens for Blocks F and G (approx. 760sqm) and Podium Gardens for Blocks C, D and E (various sizes). It should be noted that it is intended that Embankment Gardens and Pickford Yard Gardens would be accessible to residents of additional homes built to the south of them in subsequent phases of the HRWMF area – in the approved Goods Yard scheme and on the Peacock Industrial Estate.

Building Scale, Form and Massing

6.5.20 London Plan Policy 7.7 requires that tall buildings generally be limited to sites in opportunity areas, areas of intensification or town centres that have good access to public transport. Draft London Plan D8 continues this plan-led approach and states that the visual, functional and environmental elements of tall buildings should be considered in planning decisions.

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

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

Block	Proposed	HRWMF Indicative heights
Block A	3 to 9 storeys (22m AOD to +43m AOD).	5-8-storeys.
Block B	29 storeys (+106m AOD).	10-18 storeys.
Block C	Part 1, 7 and 9 storeys (+19/37/43m AOD).	5-8-storeys.
Block D (Detailed)	Part 5/part 6-storeys.	5-8 storeys.
Block E	Part 1, 4 and 6 storeys (+19/28/34m AOD)	5-8-storeys.

Block G (Detailed)	Part 3, 4, 5 and 6-storeys.	3-5 at rear of Nos. 867-868 High Road (Block F), rising to 5-8 storeys.
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6.5.23 As can be seen, the proposed building heights generally accord with the HRWMF principles of tall buildings being located next to the railway and reducing in height towards the High Road/White Hart Lane. Furthermore, most proposed building heights are similar to the HRWMF indicative heights, give or take a storey, and following comments by officers and the QRP, proposed Blocks E and G have been reduced in height so that they respond positively to the existing Listed Buildings that comprise Block F. The exception is proposed Block B.

6.5.24 At 29-storeys, Block B would be significantly taller than the maximum indicative 18-storeys envisaged by the HRWMF, although it should be noted that buildings taller than indicated have been approved as part of the Goods Yard scheme. However, the proposed tall building warrants further assessment.

6.5.25 There is clear and specific policy support for the principle of tall buildings in the Tottenham Growth Area and the proposed location of the tall building is considered to be broadly appropriate in the context of the HRWMF. The proposed tall building therefore needs to be assessed against relevant criteria in Policy DM6 (A to C and E), which include:

- Be in an area identified as being suitable for tall buildings, respond to the site's surroundings and represent a landmark building;
- Exhibit high level of architectural quality and design, including urban realm;
- Protect and preserve existing locally important and strategic views (having regard to the Council's Views SPG);
- Conserve and enhance the significance of heritage assets;
- Consider impact on ecology and microclimate; and
- Be accompanied by a digital 3D model.

6.5.26 Policy DM6 (D) also requires tall buildings within close proximity to each other should avoid a canyon effect, consider cumulative climatic impacts, avoid coalescence, demonstrate how they collectively contribute to the delivery of the vision and strategic objectives for an area.

6.5.27 These policy issues are addressed in turn as follows:

- Scale and surroundings - The site is within the North Tottenham Growth Area, which Policy DM6 identifies as a 'potential location appropriate for tall buildings'. The applicant's Townscape and Visual Impact Assessment (TVIA) assesses likely impacts on the surrounding area and this is discussed in detail below, under Wider Townscape Impacts.

- Architectural Quality and Design - Block B is in outline and the detailed architectural form and external materials are not for determination at this stage. The QRP has raised concerns about this and stresses the importance of having in place an effective Design Code that can help ensure high quality architecture and design. There are many examples in London of tall buildings being approved in principle at outline application stage, including the Goods Yard scheme (where approved Building B is up to 21-storeys and approved Building C is up to 18-storeys). Officers consider that, subject to the continued involvement of the QRP at Reserved Matters stage, the Revised Design Code (discussed in detail below) should ensure a suitably high-quality tower.
- Strategic and Local Views - the applicant's TVIA assesses likely impacts on relevant views and this is discussed in detail under Wider Townscape Impacts below.
- Heritage Assets - the applicant's Heritage Statement draws on the TVIA and assesses likely impacts of the proposed tall building on heritage assets – which is discussed in detail under Heritage below.
- Microclimate and Ecology issues. - the applicant's Daylight and Sunlight Assessment, Wind and Microclimate Assessment, and Preliminary Ecology Appraisal assess the likely impact of the proposed tall building. These are discussed in detail below, under the Residential Quality/Impact on Amenity of Adjoining Occupiers, Wind and Microclimate and Ecology headings.
- Cumulative issues - the various assessments referred to above address relevant cumulative environmental issues, taking account of the existing Riverside Apartments and approved towers on the Goods Yard site. Subject to discussion under Architectural Quality and Design above, the proposed tower should be sufficiently distinctive to ensure that it would not coalesce with existing and approved tall buildings.

6.5.28 Taking account of the above, officers consider that proposed Block B would accord with Policy DM6 and is acceptable in principle.

Wider Townscape Impacts

6.5.29 London Plan Policy 7.12 and Policy HC4 of the draft London Plan state that development should not harm strategic views, with further detail provided in the Mayor's London View Management Framework (LVMF) SPG. At the local level, Policy DM5 designates local views and the criteria for development impacting local view corridors.

6.5.30 The applicant's TVIA considers impacts across a study area (1 km radius of the site). It illustrates the maximum parameters for the proposed outline Blocks and

assesses their likely impact based on Accurate Visual Representations (AVRs) for 19 representative views, that were agreed with officers. The site does not fall within any designated strategic 'protected view', although it is visible from a location close Alexandra Palace.

6.5.31 The site does not fall directly within any Locally Significant Views as identified in Policy DM6, although it does fall in the background of Townscape View No. 28 (along Tottenham High Road from High Cross Monument to Bruce Grove Station) – which is tested by View 18. In addition, the applicant's assessment also considers the likely visibility from Linear and Townscape View No. 33b (To White Hart Lane Stadium), but concludes that the proposed development would not be visible due to the intervening built form.

6.5.32 . The HRWMF shows key views from the High Road looking westwards along new streets towards two landmark buildings on the western boundary (the now built Riverside Apartments at the end of Cannon Road and the proposed Block B). A number of images of the site and the proposed development are contained in **Appendix 10**. Officers consider that the proposed scheme is generally in accordance with the HRWMF and that it would have an acceptable impact on the wider townscape, including strategic and local views. Likely impacts on conservation areas, parks and gardens and listed and locally listed buildings are addressed in detail below under the Heritage Conservation heading.

Building Appearance and Materials

6.5.33 The detailed proposals for Block D are for a six-storey light-coloured brick clad building. The design of this building has been revised a number of times to take account of comments from officers and the QRP. Changes include the omission of balconies from the rear of the building, re-location of living rooms, omission of previously proposed window groupings for the front elevation and amendment of balcony groupings to create symmetry on the front elevation. A rendered image of the proposed building is contained within in **Appendix 10**. Officers now consider the proposals to be acceptable, subject to conditions reserving details of external materials and green/brown roofs.

6.5.34 The detailed proposals for Block F (Listed Buildings at Nos. 867-868 High Road) are discussed in detail below under the Heritage Conservation heading.

6.5.35 The detailed proposals for Block G are for a part three, four, five and six-storey varied brick-clad building. The design of this building has been revised a number of times to take account of comments from officers and the QRP. Changes include going from a two-storey to a single-storey plinth to enhance coherence of the divide between residential levels and the proposed commercial ground floor, increasing the height of the ground floor commercial unit, stepping back the top floor on eastern side to better respond to the Listed Buildings and proposed Pickford Yard Gardens and amending the northern elevation to reduce its scale and repetition and soften its appearance. A rendered image of the proposed

building is contained within in **Appendix 10**. Officers now consider the proposals to be acceptable, subject to conditions reserving details of external materials and other matters.

6.5.36 The appearance and materials of the outline elements of the application (Blocks A, B, C and E) would be governed by the Revised Design Code, which is discussed in detail below. Following comments by officers and QRP, the applicant has made a number of revisions to its Illustrative Scheme, including: (i) better articulation of a top/middle/base and a clearer entrance, together with a further lightening of proposed brickwork for proposed Block A, (ii) introducing a double-height entrance to Block B to enhance visibility and legibility of the entrance, together with the provision of a clearer base/middle and top and a reduction in horizontal divisions to improve proportions. These revisions are captured in the Revised Design Code and officers are satisfied that this, together with the review of Reserved Matters applications by the QRP, would ensure buildings of sufficiently high-quality to be acceptable.

6.5.37 The Mayor of London's Stage 1 Report raises some concerns about the quality of proposed Block B at ground floor level and considers that the design of top of the tower is poorly resolved and questions the inclusion of corner balconies at this level given the likely microclimatic conditions. It should be noted that the Illustrative Scheme for Block B is indicative only, and that details would be determined at Reserved Matters stage. Having said this, following comments by the QRP and Metropolitan Police's Designing out Crime Officer at the pre-application stage, the Illustrative Scheme includes a high degree of active frontage at the ground floor of Blocks A and B – with the exceptions being the inclusion of a vehicular access and electricity sub-station on the ground floor of Block B on Pickford Lane (although the street would be overlooked by homes in Block C, to the north). Officers accept that the Illustrative Scheme for Block B would benefit from design development and refinement. However, they are confident that the Revised Design Code and peer review by the Quality Review Panel would result in a sufficiently high-quality tower. To help ensure this, it is recommended that the following are secured by planning condition: (a) substantial compliance with the Revised Design Code, (b) use of the Quality Review Panel and (c) submission of fully rendered Accurate Visual Representations alongside Reserved Matters applications for Block B.

Public Realm, Landscaping and Boundary Treatments

6.5.38 London Plan Policy 7.5 indicates that landscape treatment, street furniture and infrastructure of public spaces should be of the highest quality, have a clear purpose, maintain uncluttered spaces and contribute to the easy movement of people. Policies DM2 and DM3 reflect this approach at the local level.

6.5.39 The proposed Peacock Park is in the centre of the site and would be shielded from road traffic and railway noise by proposed buildings. The applicant's Noise

Assessment concludes that this space should meet the upper end of noise levels recommended for open spaces in the relevant British Standard, which is good for an urban park. However, other open spaces near the railway and High Road would be noisier. The applicant's Daylight and Sunlight Assessment finds that the proposed park and other proposed publicly accessible open spaces would receive the recommended minimum levels of sunlight (2 hours over at least 50% of the area on March 21), including in the future cumulative scenario (approved Goods Yard scheme and future phase of the High Road West Masterplan).

- 6.5.40 The proposed publicly accessible open spaces are all in outline and detailed layout, design and landscaping would be determined at the Reserved Matters stage. The submitted Design Code includes appropriate 'Open Space Principles', 'Landscape and Public Realm', 'Street Design' and 'Park Design' guidance that should help ensure high-quality spaces. Peacock Park would be fronted by the proposed A1/A3 unit on the ground floor of Block G, which could provide an attractive amenity for park users.
- 6.5.41 The applicant proposes that the publicly accessible spaces (including the park) would be privately owned, managed and maintained. Officers recommend that s106 planning obligations secure the subsequent approval of an Open Space Management and Access Plan to secure public access and appropriate management and maintenance arrangements. Officers also recommend that there is a specific management plan agreed with Brook House Primary School to secure appropriate management and maintenance of this proposed dual-use space
- 6.5.42 The Illustrative Scheme shows all routes, public realm areas/park and private communal amenity spaces incorporating generous soft landscaping and high-quality materials. However, apart from the proposed communal garden/growing space for residents of Blocks F and G (Pickford Yard Gardens) and a narrow threshold strip around Block D, landscaping would be a Reserved Matter for subsequent approval.
- 6.5.43 The Revised Design Code includes relevant guidance on Open Space Principles, Landscape Character, Street Design, Threshold Design, Park Design, Hard Materials Palette, Soft Palette and Lighting – which should help ensure the provision of high-quality spaces that incorporate inclusive design principles. It also includes guidance on the permanent and interim boundary treatments. Following revision, officers consider that this guidance should ensure high-quality landscaping and boundary treatments that safeguard security and safety and do not prejudice the delivery of development on adjoining land. Secure by Design, Sustainable Urban Drainage and Biodiversity issues are addressed under separate headings below.

Secured by Design

- 6.5.44 The proposed illustrative scheme layout provides open and relatively wide spaces between Blocks, with building entrances and habitable rooms orientated as much as possible to overlook publicly accessible spaces, including the proposed park – which would also benefit from the proposed retail/café unit on the ground floor of Block G. Surface parking and children’s play spaces would be located close to buildings in well overlooked areas. Publicly accessible routes would be well lit, clearly defined and separated from private spaces through changes in level, material treatment, physical barriers or planting and screening. It should be noted that illustrative proposals for Embankment Gardens (at the rear of Block B that would connect with the approved Goods Yard scheme) have been revised following pre-application discussions.
- 6.5.45 The Revised Design Code’s open space principles and general guidance reflect and reinforce the above features of the illustrative scheme and there is relevant specific guidance for specific Blocks, landscape and public realm, access and movement, street design, threshold design, park design, lighting and boundary treatments.
- 6.5.46 The Cannon Road Residents’ Association (CRRA) has raised the particular importance of creating a safe park and route through to White Hart Lane Station, referring specifically to lighting and CCTV. The CRRA has also raised issues relating to the northern boundary and this is addressed under ‘Impact on the amenity of adjoining occupiers’ below. LBH Public Health has also raised issues relating to ‘contextual safeguarding’ of children and this is addressed under Children’s Play Space below. The Metropolitan Police’s Designing Out Crime Officer (DOCO) has met with the applicant’s architects and identified a number of site-specific issues that need to be addressed at the detailed stage. They have no objections in principle, subject to the imposition of suitably worded conditions/informatives.
- 6.5.47 Officers are satisfied that, subject to detailed scrutiny at the Reserved Matters stage, the proposed development would provide a safe and secure environment. In addition, as requested, it is recommended that conditions require Secured by Design accreditation, to ensure that the DOCO’s continued involvement in detailed design issues.

The Revised Design Code

- 6.5.48 The QRP has stressed the importance of ensuring that a detailed Design Code that enables provides a level of flexibility but establishes clear objectives for and a clear quality standard for the Blocks that are in outline (particularly Blocks A and B), consistent with that which has been demonstrated for the detailed new-build element of the scheme (Blocks D and G). The Revised Design Code would be one of three ‘control documents’ that it is recommended would be tied into any planning permission (the other two being Parameter Plans and the Development Specification & Framework). A condition would require that subsequent Reserved

Matters applications for the outline element are in substantial accordance with these 'control documents'

6.5.49 There is a balance to be struck between flexibility, to allow for innovative design development, and certainty, to provide sufficient confidence at this stage that the outline elements of the scheme, and Block B in particular, will be of a sufficiently high-quality to be acceptable. Officers carefully scrutinised the applicant's original Design Code and secured a number of changes by way of a Revised Design Code. Officers are satisfied that the Revised Design Code, together with the review of Reserved Matters applications by the QRP before they are submitted for approval, would ensure buildings of sufficiently high-quality to be acceptable. It is recommended that commitment to use the QRP review process is secured by planning condition.

Development Design – Summary

6.5.50 The proposals have benefited from a number of design reviews at both the pre-application and application stages which have resulted in revisions to proposed site layout, scale and massing, architectural treatment and landscaping and revisions to the Design Code that would manage detailed design for the outline elements. Officers now consider that the design of the proposed scheme is acceptable.

6.6 Residential Quality

6.6.1 London Plan Policy 3.5 sets out housing quality, space, and amenity standards, with further detail guidance and standards provided in the Mayor's Housing SPG. This approach is continued in the draft London Plan by Policy D4. Strategic Policy SP2 and Policy DM12 reinforce this approach at the local level.

6.6.2 Proposed homes in the detailed buildings (Blocks D F and G) meet the London Plan quality standards in terms of overall size, bedroom size, floor-to ceiling height, number of homes per core and private amenity space.

Indoor and Outdoor Space Standards

6.6.3 The majority of proposed homes are in the outline buildings (Blocks A, B, C and E). Flat layouts in the illustrative scheme for these Blocks meet the London Plan floorspace standards. Furthermore, the submitted Design Code (1.4.40, 1.4.41 and 1.4.47) includes commitments in relation to meeting the current version of the Technical Housing Standards, the layout of rooms and spaces and that floor-to-ceiling heights of at least 2.5m will be provided for over 75% of each flat. The Code (1.4.42 and 1.4.43) also states that, where possible, larger dwellings for 5 people or more should provide an additional habitable room and that dwellings at ground floor should be deigned over two floors and have direct access to communal amenity space.

Unit Aspect

- 6.6.4 A total of 14 homes (20%) in the proposed detailed buildings (Blocks D, F and G) would be single-aspect, although none would be single-aspect north facing. The prevalence of single-aspect homes increases in the proposed in the illustrative scheme for the proposed outline buildings (86 or 33%), but again, none would be single-aspect north facing. Furthermore, the submitted Design Code (1.4.44) states that, where possible, apartments should be dual or triple aspect and (1.4.45) that single aspect units should not be north facing. Officers accept that future detailed design can be expected to result in a reduced number of single aspect homes in the outline buildings and that, with the Revised Design Code commitments, the proposed illustrative scheme is acceptable.

Daylight/Sunlight/overshadowing – Future Occupiers

- 6.6.5 The Applicant's Daylight and Sunlight Assessment demonstrates that the proposed new homes would generally be well lit, with adequate sunlight. Officers agree. In addition, the Revised Design Code (1.4.46) states that detailed design should take measures to achieve recognised standard levels for sunlight and daylight.
- 6.6.6 The applicant's Assessment also shows that most of the proposed residential communal amenity spaces would receive the recommended minimum levels of sunlight (2 hours over at least 50% of the area on March 21). The exceptions are the proposed terrace on the north side of proposed Block D (which is overshadowed by the proposed building) and the proposed Embankment Gardens to the south of Blocks A and B, which is constrained by industrial buildings to the south – although sunlight conditions for this space improves significantly in June. Daylight and sunlight and overshadowing conditions would be worse in the future cumulative scenario (approved Goods Yard scheme and future phase of the High Road West Masterplan), particularly in relation to the proposed Pickford Yard Gardens for Blocks F and G, but overall officers consider the proposed conditions to be acceptable.

Wind and microclimate – Future Occupiers

- 6.6.7 This issue is addressed under the Wind and Microclimate heading below

Noise – Future Occupiers

- 6.6.8 The western part of the site (Blocks B and C) suffers from railway noise and the eastern part of the site (Blocks E and F) suffers from traffic noise from the High Road. The Applicant's Noise Assessment sets out sound insulation requirements to ensure that the internal noise environment of these Blocks meets the relevant standards and recommends that mechanical ventilation be installed for these

blocks, so that windows can be kept closed. It is recommended that details of the proposed glazing and mechanical ventilation be secured by condition.

- 6.6.9 It is also recommended that conditions be used to secure adequate mitigation to prevent undue noise transmission between the proposed A1/A3 unit in Block G and the proposed flats, to limit the hours of use of any café/restaurant (A3) to 07.00 to 23.00 (Monday to Saturday) and 08.00 to 23.00 (Sundays and Public Holidays) and to control noise from mechanical plant.

Accessible Housing

- 6.6.10 Local Plan Policy SP2 and Policy 3.8 of the London Plan require that all housing units are built with a minimum of 10% wheelchair accessible housing or be easily adaptable to be wheelchair accessible housing.
- 6.6.11 The applicant's Design and Access Statement includes a section on inclusive design which sets out an overall approach to designing to ensure that development is accessible to all (including disabled people, elderly people and parents/carers with children) and satisfactorily addresses the key considerations around movement and safety. It makes the case that creating a Document M4(2) (2015) compliant entrance, installing a lift to all floors or modifying the original staircases to the Grade II Listed buildings at Nos. 867- 869 High Road would result in significant loss of historic fabric and impact negatively on the character of the properties and officers accept this.
- 6.6.12 Both new buildings that are proposed in detail (Blocks D and G) have been designed to ensure that 90% of the proposed homes meet Building Regulations Part M4(2) standard ('wheelchair accessible) and that 10% meet Building Regulations Part M4(3) ('Wheelchair User Dwellings'). The Revised Design Code provides a commitment that homes in the proposed outline blocks will be designed to achieve the same standards. It is recommended that planning conditions secure the provision of accessible housing in both the detailed and outline elements of the proposals.
- 6.6.13 In line with draft London Plan Policy T6.1, disabled persons car parking is proposed to be provided at an initial level of 3% (10 spaces), with provision for this to be increased to 10% (33 spaces) should demand require this. It is recommended that this is secured by condition. The proposed location of disabled persons parking spaces for Blocks D and G are on street, in close proximity to the proposed Wheelchair Accessible homes, or in the proposed podium car park, closest to the lift cores – which is in line with good practice.

Residential Quality - Summary

- 6.6.14 Overall, officers consider that with the Revised Design Code and the recommended conditions in place and subject to detailed consideration at the

Reserved Matters stage, the proposed new homes would be of sufficiently high-quality.

6.7 **Social and Community Infrastructure**

Policy Background

- 6.7.1 London Plan 3.16 states adequate provision for social infrastructure is important in areas of major new development and regeneration. This policy is supported by a number of London Plan infrastructure related policies concerning health, education and open space.
- 6.7.2 The Council expects developers to contribute to the reasonable costs of new infrastructure made necessary by their development proposals through the Community Infrastructure Levy (CIL) and use of planning obligations addressing relevant adverse impacts.
- 6.7.3 The revised National Planning Policy Framework sets out that Planning obligations must only be sought where they meet the tests of necessity, direct relatability and are fairly and reasonably related in scale and kind to the development. This is reflected in CIL Regulation 122. London Plan Policy 8.2 states that development proposals should address strategic as well as local priorities in planning obligations, prioritising transport and affordable housing. Draft London Plan Policy DF1 continues this approach.
- 6.7.4 Strategic Policy SP16 sets out Haringey's approach to ensuring a wide range of services and facilities to meet community needs are provided in the borough. Strategic Policy SP17 is clear that the infrastructure needed to make development work and support local communities is vital, particularly in the parts of the borough that will experience the most growth. This approach is reflected in the Tottenham Area Action Plan in Policies AAP1 and AAP11. DPD Policy DM48 notes that planning obligations are subject to viability and sets a list of areas where the Council may seek contributions. The Planning Obligations SPD provides further detail on the local approach to obligations and their relationship to CIL.

NT5 Infrastructure Requirements and the HRWMF

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

requirements for the wider NT5 site are broadly identified in the NT5 site allocation, including:

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

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

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

Proposed site-specific infrastructure provision

6.7.8 The outline element of proposed development would make direct provision for a centrally located new publicly accessible open space (Peacock Park) and interconnecting pedestrian routes. The proposed park would amount to at least 1,695 sqm in size and would be capable of being enlarged as and when land to the south comes forward for development, in accordance with the HRWMPF. Subject to satisfactory detailed proposals and management and maintenance arrangements (discussed in more detail below), officers consider that this meets AAP site-specific requirement for open space.

6.7.9 An approach to additional s106 financial contributions to address the other AAP site-specific infrastructure requirements was considered as part of the Goods Yard appeal, where an overall package of £1m contributions was agreed for a proposed 316 dwellings and associated development. Based on the proposed maximum number of dwellings on the application site and an equivalent £per dwelling, the application scheme would be liable to pay the following site-specific infrastructure contributions: Community Space - £443,190, Library - £483,450 and Highway & Public Realm - £117,480. This amounts to a total £1,044,120. However, the application scheme includes significantly more publicly accessible

open space than the Goods Yard scheme, including a public square of at least 1,695sqm as opposed to a public square in the Goods Yard of at least 900sqm. The scheme would also knit in with existing streets in the Cannon Road area immediately to the north and include an open space next to Brook House School (Brook House Yard). This would measure approx. 350sqm and would serve as an extension to the school playground during school terms, but be a play space for residents of the scheme at other times. Given this greater proposed on-site provision of open space and connectivity with streets in the Cannon Road area, officers consider that it would be unreasonable to require financial contributions towards highways and public realm. This would reduce the total infrastructure financial contributions to £926,640.

6.7.10 The site is immediately next to the two-form entry Brook House Primary School and is proposing to make available a games area (Brook House Yard) to the school during term times. The site is within School Place Planning Area 4 and the Council's School Place Planning Lead notes that there is currently spare capacity within this Area and has no immediate concerns over school places in this part of the borough. In any event, CIL contributions could be used to fund additional school places in the future, should this prove necessary. However, the LB Enfield has raised concerns at the possible impact on school places at St John and St James Primary School and Raynham Primary School (approx. 800m to the north-east). The two schools are between about 400 and 800m from the site, one to the east of the High Road and, given sufficient capacity in schools in Haringey, officers do not consider that the proposed development would be likely to have a significant impact on Enfield schools, particularly as in 2019 the LB Enfield confirmed that its primary schools are currently in surplus.

6.7.11 The Cannon Road Residents' Association has asked that pre-school facilities should be included within the proposed development as the number of families in the area are growing and there is a lack of choice locally. The Childcare Act 2006 places a duty on local authorities to make sure that there are enough childcare places within its locality. The council is currently updating its Childcare Sufficiency Assessment (CSA). However, the 2015 Assessment and the sufficiency score cards (2016) do not identify a need to create more childcare places for the Northumberland Park Ward. In any event, subsequent phases of the HWMPF would provide opportunities to provide space for commercial nurseries should this situation change.

6.8 **Child Play Space**

6.8.1 Policy 3.6 of the London Plan seeks to ensure that development proposals include suitable provision for play and recreation. Policy S4 of the draft London Plan continues this approach. Local Plan Policy SP2 requires residential development proposals to adopt the GLA Child Play Space Standards and Policy SP13 underlines the need to make provision for children's informal or formal play space. The Mayor's SPG indicates at least 10 sqm per child should be provided.

6.8.2 Using the GLA's Population Yield Calculator (October 2019), the applicant's indicative dwelling mix and revised affordable housing offer estimates an on-site child population of 109 (51 x 0-04-year olds, 37 x 5-11-year-olds and 21 x 12+ year-olds). This generates an overall need for 1,090sqm of play space. The application proposes up to 1,250sqm of space, as follows:

- Doorstep Play (0-5-year olds) – 420sqm
- Neighbourhood Play (5-11-year olds) – 600sqm
- Youth space (12+year olds) – 230sqm

6.8.3 The detailed proposals for Block D include play space on a raised podium above the proposed car parking area and detailed proposals for Blocks F and G include play space within the proposed communal amenity space (Pickford Yard Gardens). For the outline element of the scheme, Parameter Plan 04 identifies children's play space as being located within communal residential amenity spaces in raised podium blocks (Blocks C and E), Embankment Gardens (Blocks A and B) and within the proposed park, Goods Yard Walk and Brook House Yard. The submitted Design Code includes appropriate 'Open Space Principles', 'General Guidelines', 'Landscape and Public Realm', 'Street Design' and 'Park Design' guidance that should help ensure high-quality spaces.

6.8.4 Public Health has raised concerns in relation to child safeguarding over the proximity of Block E to the existing school playground and the proposed Brook House Yard. Brook House School is on the ground and first floor of Beechcroft Court, which includes three floors of housing above (although it should be noted that these flats and their terraces are set back by approx.4 to 10m from the building edge). Brook House Yard would be immediately to the south of the existing school playground and would provide play space for the school when it is open and at other times for residents of the scheme. Block E (which is in outline) would be located immediately to the west of Brook House Yard and immediately to the south of Beechcroft Court. The proposed height of the Block has been reduced by one-storey following pre-application discussions and would comprise a part 1/part 4/part 6-storey building, with the illustrative scheme containing 22 flats. In recognition of the issue of potential overlooking and child safeguarding issues, the Revised Design Code includes the following guidance:

- Balconies should not be included on the eastern elevation of Block E, so as not to overlook the school playground.
- Block E windows facing east and north towards the school playground should be carefully considered for acoustics and overlooking.
- The western boundary of Brook House Yard should comprise a 1.5m high solid wall and a 1.5m high mesh fence (which could include plating to provide screening).

6.8.5 Subject to consideration of the detailed of Block E at a subsequent Reserved Matters stage, officers consider that the proposals should not cause undue overlooking of the existing school playground or the proposed extension to it.

6.9 Heritage Conservation

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

6.9.2 London Plan Policy 7.8 is clear that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. The draft London Plan Policy HC1 continues this approach and places an emphasis on integrating heritage considerations early on in the design process.

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

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

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

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

Legal Context

6.9.7 The Legal Position on the impact of heritage assets is as follows. Section 72(1) of the Listed Buildings and Conservation Areas Act 1990 provides: "In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing

the character or appearance of that area.” Among the provisions referred to in subsection (2) are “the planning Acts”.

- 6.9.8 Section 66 of the Act contains a general duty as respects listed buildings in exercise of planning functions. Section 66 (1) provides: “In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”
- 6.9.9 The Barnwell Manor Wind Farm Energy Limited v East Northamptonshire District Council case tells us that “Parliament in enacting section 66(1) intended that the desirability of preserving listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given “considerable importance and weight” when the decision-maker carries out the balancing exercise.”
- 6.9.10 The judgment in the case of the Queen (on the application of The Forge Field Society) v Sevenoaks District Council says that the duties in Sections 66 and 72 of the Listed Buildings Act do not allow a Local Planning Authority to treat the desirability of preserving listed buildings and the character and appearance of conservation areas as mere material considerations to which it can simply attach such weight as it sees fit. If there was any doubt about this before the decision in Barnwell, it has now been firmly dispelled. When an authority finds that a proposed development would harm the setting of a listed building or the character or appearance of a conservation area or a Historic Park, it must give that harm considerable importance and weight.
- 6.9.11 The authority’s assessment of likely harm to the setting of a listed building or to a conservation area remains a matter for its own planning judgment but subject to giving such harm the appropriate level of weight and consideration. As the Court of Appeal emphasized in Barnwell, a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted.
- 6.9.12 The presumption is a statutory one, but it is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. An authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the strong statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering.
- 6.9.13 In short, there is a requirement that the impact of the proposal on the heritage assets be very carefully considered, that is to say that any harm or benefit needs

to be assessed individually in order to assess and come to a conclusion on the overall heritage position. If the overall heritage assessment concludes that the proposal is harmful then that should be given "considerable importance and weight" in the final balancing exercise having regard to other material considerations which would need to carry greater weight in order to prevail.

Assessment of Significance

- 6.9.14 An identification of the significance of the North Tottenham Conservation Area and Nos. 867 and 869 (Grade II Listed Buildings) is set out below and forms the basis of considering the acceptability of the proposals from a heritage perspective.
- 6.9.15 The North Tottenham Conservation Area runs from the borough boundary, just to the north of the site, to Pembury Road/Scotland Green in the south. It is contiguous with the Bruce Grove Conservation Area to the south. The North Tottenham Conservation Area is included in Historic England's Heritage at Risk Register (2015), which records the Area's condition as 'very bad', but recognises that the overall trend is 'improving'. Significant development has taken place in and close to the Conservation Area in recent years (most notably THFC's stadium and improvements to Listed Buildings in the Club's ownership) and the Area is the subject of the Townscape Heritage Initiative, which is grant-funding façade improvement projects along the High Road.
- 6.9.16 Nos. 867 and 869 High Road comprise two Georgian townhouses (Grade II listed) in the northern edge of the Conservation Area (Sub Character Area A). The Area's boundary is tightly drawn around the buildings and excludes the rest of the application site. The Appraisal identifies these as Listed Buildings and notes that the recently built Georgian replica at No. 865 (to the south of No. 867) fails to match the proportions and detailing of the original, although it identifies it as a positive contributor and that this short sequence of buildings terminates with a gap site fronting the timber yard (Nos. 855-863), enclosed by unsightly hoardings.
- 6.9.17 Paragraph 1.2.3 of the North Tottenham – Conservation Area Appraisal and Management Plan states that "In spite of [these] changes the townscape retains a high degree of historical continuity, maintaining a contained linear street pattern forming a sequence of linked spaces and sub spaces, and with a notable variety and contrast in architectural styles and materials. The street width and alignment very much still follow the form established by the mid-19th century. There are good surviving examples of buildings dating from the 18th and 19th centuries including outstanding groups of Georgian houses and mid and late-Victorian shopping parades illustrating the changes to this building type in scale and style, together with examples of the inter-war style of the mid-20th century."

- 6.9.18 The pair of Georgian townhouses have survived significant industrial development of the area in the 19 and 20 centuries and have been the subject of significant change and extension since they were built. They were last refurbished in 1984, when the supermarket store and car parking was built at the rear. The buildings are generally in a good condition and currently accommodate a mixture of office space on lower floors with residential space above.
- 6.9.19 The immediate setting of the buildings comprises hard paved entrance to the north and west, providing access to the low-rise mundane supermarket building and car parking area, with three mature London Plane trees providing some interest, and unorganised car parking directly to the rear. To the north is recent Cannon Road development, to the east is Brantwood Road comprising 1970's residential tower and three-storey flats. On the whole, the immediate surrounding area to the north and west of the buildings is unattractive and detracts from the quality and character and appreciation of the Listed Buildings.
- 6.9.20 The applicant's Heritage Assessment assess the significance of the site and surrounding area in accordance with Historic England's 'Conservation Principles, Policies and Guidance'. The application is also supported by Significance Plans which identify the age and significance of internal and external features.

Evidential Value

- The Conservation Area provides evidence of a sequence of historic phases of development along Ermine Street;
- The groupings, position, design and details of the early C18 Georgian houses provide evidence of an important phase of expansion beyond the City of London;
- The late C19 houses and commercial buildings provide evidence of the development associated with the arrival of the railways and of White Hart Lane Station;
- The early and mid C20 industrial buildings provide evidence of substantial factory sites, associated with the thriving commercialisation of the area;
- The Listed buildings are good examples of early C18 Georgian houses in Tottenham.

Historical Value

- The Conservation Area provides evidence of phases of growth and evolution of the settlement, its centres, streets, buildings and community;
- The Site and its Listed buildings demonstrate the development of Tottenham, evolving from countryside to an urban environment, and then to an industrial environment;
- They show the evolution of Merchants' town houses, from the Georgian period onwards in Tottenham.

Aesthetic Value

- The Conservation Area and its context provides evidence of the architectural evolution of the area, incorporating landmark buildings from the eighteenth century to twenty-first centuries;
- The Listed buildings on the Site form a positive and prominent visual landmark group in the street scene and Conservation Area.
- The harmony, balance and consistency of the consciously Georgian design contribute positively to the buildings.
- The interior layout, architectural features, design and details complement the design of the Georgian exterior.

Communal Value

- The Conservation Area has a long history as a busy commercial hub, and the buildings reflect that continuity.
- The Georgian buildings of Tottenham provide an important and significant group at the core of the community.
- The position of the Listed buildings on the Site and their uses provide a reminder of the history of the local community, having evolved through uses as private houses, a dance hall, the polite frontage for industrial buildings and the transport depot, and more recently as offices.

The Proposals – Nos 867-869 (Listed Buildings) and High Road frontage

6.9.21 The two Georgian townhouses have been mainly in office/education use for since at least the mid 1980's. The proposal is to bring the two buildings back into wholly residential use by providing a two-bedroom flat on each floor of both buildings (six flats in total) by using minimal intervention. The proposed new Blocks (E and G) are set back from the High Road, behind a much-improved public realm for the entrance area to the site which includes three retained mature London Plane trees and the proposed Brook House Yard (to be shared with Brook House Primary School). The rear of the refurbished Listed Buildings would open out on to the proposed communal amenity space (Pickford Yard Gardens) shared with the occupiers of proposed Block G (and occupiers of potential future residential buildings to the south).

Impact on Heritage Assets – Nos. 867 to 869 High Road

6.9.22 The application is supported by Significance Plans which identify the age and significance of internal and external features. The applicant's Heritage Assessment draws on these sets out an assessment of the proposed works and their effect/impact of the significance of the Listed Buildings. Officers agree with the above assessment.

Exterior Works

Element	Heritage Value	Condition	Proposals
Roof	Low (1984)	Good	No alterations proposed

Element	Heritage Value	Condition	Proposals
Masonry	High (generally original with 1984 restoration to north elevation and patched of west elevation.	Good (most)	Enhance – tint in 1984 repairs to blend with surrounding original. Repair cracked brickwork. Remove modern render patches from south façade. Like-for-like repairs as required.
1 st & 2 nd Floor windows	Low (modern) in high (original) openings.	Good	Enhance – retain and redecorate.
Ground floor windows High Road elevation	Low (modern) in High (original) openings with Low (modern) window bars	Good	Enhance – remove unsympathetic window bars, retain and redecorate windows.
Ground floor windows west elevation	Low (modern) in Medium (modified) openings	Reasonable	Enhance – Replace unsympathetically proportioned French windows and replace with design to match original 6 over 6 proportions and consistent fenestration to both rear elevations.
Front door 867	Low (modern) in High (original) opening	Reasonable	Enhance – Remove modern door. Repair, reinstate and redecorate original door.
Front door 869	High (original)	Good	Enhance – retain and redecorate.
Front wall & railings	Low (modern) replicas from 1984	Reasonable	Enhance – Resolve drainage issue behind wall to prevent damp. Repair cracks to front wall. Redecorate railings.

Interior Works

Element	Heritage Value	Condition	Proposals
Staircases	High (original)	Good	No proposed works.

Element	Heritage Value	Condition	Proposals
Internal walls	High (Some original) and Low (modern stud partitions and modifications for 1984 structural steel installations).	Good	Enhance – reinstatement of the historic cellular layout where previously made open-plan. Neutral – majority of internal works affect modern partitions. Works to original walls have been carefully limited to meet use requirements with least possible impact.
Panelling	High (some original) with Medium (1984 ply repairs)	Good	Enhance – panelling will be retained, repaired and redecorated.
Fireplaces	High (some original) with Medium (1984 replicas).	Good	No alterations proposed.
Cornices & Skirtings	High (some original) with Low (1984 modern).	Good	Enhance – all original cornices and skirting will be retained and modern partitions will be removed where unsympathetically crossing cornices.
Kitchen & bathroom fittings	Low (modern)	Good	Enhance – all modern fittings will be removed. New fittings will be installed to suit residential use.

6.9.23 Having considered all of the proposed demolition and repair works, officers consider that the overall works relating to proposed conversion of these buildings are in keeping with their character and significance. Overall, the proposed conversion would deliver heritage benefits and, subject to the recommended conditions to control detailed aspects of the proposed works, are considered acceptable from a heritage perspective.

Immediate Setting

6.9.24 Proposed Block G (a part three/four/five/six storey building) would be set back approx. 9m from the two Listed Buildings (Block F) at its nearest point. Officers

consider that this proposed brick building would complement the listed buildings and sit at an appropriate scale, so that it would not appear dominating, and that Block G would make for a good transition to the new buildings proposed further west. This relationship with Block G and the proposed entrance area to the site means that the flank wall of No. 869 would still remain prominent when viewed from the High Road (looking south). Officers consider that this and the proposed Pickford Yard Gardens and associated landscaping to the rear of the buildings would improve the immediate setting of these Listed Buildings and represent a heritage benefit.

Wider Setting

- 6.9.25 The applicant's TVIA considers impacts across a study area (1 km radius of the site). This area includes three Conservation Areas in Haringey (North Tottenham, Tottenham Cemetery, Bruce Castle Park and Fore Street, within the London Borough of Enfield). It also includes 39 x Grade II listed buildings and structures and six Grade II* buildings along the High Road or to the southwest of the site. Also located on the western edge of the stud area is Bruce Castle, a Grade I Listed building. The TVIA illustrates the maximum parameters for the proposed outline Blocks and assesses their likely impact based on Accurate Visual Representations (AVRs) for 19 representative views. These views also show how the outline of the proposed scheme would appear alongside other consented developments that are due be constructed in the vicinity of the site.
- 6.9.26 The applicant's Heritage Statement draws on the submitted TVIA to consider impacts on Conservation Areas. However, consistent with discussion at the Local Public Inquiry in to the (approved) Goods Yard scheme, it screens out the need to provide an assessment for the Bruce Grove, Tottenham Cemetery and Fore Street South/Angel Conservation Areas. The LB Enfield has raised concerns about the likely impact on Fore Street Conservation Area and asks that views be taken into account in terms of the highest part of the proposed development to establish (the level of) harm to this designated heritage assets. The applicant's TVIA includes View 4 looking towards the site from Fore Street South Conservation Area and assesses the impact of the proposed tallest building (Block B). Taking account of the existing baseline (including Stellar House), the TVIA concludes that the scheme would result in a low to negligible magnitude of change – overall resulting in a minor and neutral effect. Officers disagree with this and consider that Blocks A and B would be dominant in the townscape within and around the North Tottenham Conservation Area and that they would adversely affect the character and appearance of the Conservation Area and its heritage assets and views of them.
- 6.9.27 The applicant's Heritage Statement also draws on the submitted TVIA to consider impacts on a representative number of Listed Buildings, Registered Parks and Gardens and locally listed buildings and undesignated heritage assets. It concludes that the proposed development would preserve and enhance

the character and setting of the heritage assets in the locality in the following ways:

- The proposed development would retain, preserve and enhance the heritage assets within the site;
- It would return the listed buildings on the site to residential use and reinstate gardens to the rear of the properties, enhancing the setting of the heritage assets;
- The scheme follows the key principles and parameters set out in the Local Plan led Masterplan Framework for the area;
- The proposed landmark tower would benefit the character of the area according to the criteria of the Historic England Tall Buildings Guide and the London Plan Strategic policy, and would be located in accordance with the High Road West Masterplan Framework, to enhance the vistas assessed as important within the Masterplan Framework process; and
- Improvement of public realm and the High Road frontage.

6.9.28 Having carefully considered the proposals, including the applicant's Heritage Statement, the Conservation Officer considers that the proposed tower would cause some harm to the North Tottenham Conservation Area, but that this would be 'less than substantial.' As such, taking full account of the Council's statutory duty under sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, paragraph 134 of the NPPF this harm has been given significant weights and requires a balancing exercise against public benefit is therefore required.

6.9.29 The overall proposals would provide a significant amount of housing, including 40 new much needed Low Cost Rented homes and 20 Social Rented homes as a contribution towards providing alternative appropriate housing for council tenants living on the Love Lane Estate. The proposals would also be designed to make a positive contribution to reducing carbon dioxide emissions and surface water run-off. In addition to this, the applicant's Regeneration Statement identifies the following other regenerative benefits:

- Help to deliver the HRWMP – including a positive contribution to place-making, provision of publicly accessible open space, new play space and public realm and the dual use of the proposed Brook House Yard amenity space with Brook House Primary School;
- Improvements to the High Road streetscape;
- 280 FTE jobs created in the construction phase;
- Up to 14 FTE jobs when the development is built (Net loss of approx. 146 FTE jobs);
- Annual household spending of £4.7m on goods and services in the area;
- Over £0.5m in council tax;
- £2.3m gained in New Homes Bonus; and
- Approx.£41,000 per year in business rates.

6.9.30 Officers consider that the public benefits of the proposals, as summarised above, outweigh the less than substantial harm that would be caused to the wider setting of the North Tottenham Conservation Area.

Heritage Conclusion

6.9.31 Historic England makes no comment on the proposals (as they are not Grade II* or Grade I Listed Buildings), but notes the application should be determined on the basis of Haringey's specialist conservation advice. Officers are bound to consider this strong presumption in line with the legal context set out above.

6.9.32 The proposed repair and conversion of the two Listed Georgian townhouses at Nos. 867-869 into solely residential use would enhance the character and significance of these buildings and the proposed creation of a communal garden area at the rear and the development of Block G would improve their immediate setting. The Conservation Officer has assessed that the proposed tower would be likely to cause less than substantial harm to the heritage significance of the North Tottenham Conservation Area and other heritage assets. A balancing exercise against public benefit is therefore required and the conclusion is that the public benefits would outweigh this less than substantial harm. Given this, officers conclude that, subject to the recommended planning and Listed Building Consent conditions to manage detailed works and setting, the proposals would preserve and enhance historic qualities of the heritage assets and comprise well managed change in accordance with Policies SP12, DM6, AAP5 and NT5 and guidance in the HRWMPF.

6.10 Impact on Amenity of Adjoining Occupiers

6.10.1 London Plan Policy 7.6 states that development must not cause unacceptable harm to the amenity of surrounding land and buildings. Policy DM1 states that development proposals must ensure a high standard of privacy and amenity for the development's users and neighbours.

Daylight/Sunlight Assessment - Methodology

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

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

- 6.10.4 The BRE Guide recommends that a room with 27% VSC will usually be adequately lit without any special measures, based on a low-density suburban model. This may not be appropriate for higher density, urban London locations. The NPPF 2019 advises that substantial weight should be given to the use of 'suitable brownfield land within settlements for homes...' and that LPAs should take 'a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site'. Paragraph 2.3.47 of the Mayor's Housing SPG supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city. Officers consider that VSC values in excess of 20% are reasonably good and that VSC values in the mid-teens are deemed acceptable.
- 6.10.5 The acceptable level of sunlight to adjoining properties is calculated using the Annual Probable Sunlight Hours (APSH) test. In terms of sunlight, the acceptability criteria are greater than 25% for the whole year or more than 5% between 21st September and 21st March.
- 6.10.6 A Sun Hours on Ground (SHOG) assessment considers if existing amenity spaces will receive the levels of sunlight as recommended within the BRE guidelines.
- 6.10.7 The Applicant's Daylight and Sunlight Assessment assesses the likely impact of the proposals on 27 neighbouring residential properties immediately to the north in the Cannon Road housing area, to the south (No. 865 High Road) and west (Lorenco House and various other properties on Pretoria Road). It also assessed the likely impacts on Brook House Primary School immediately to the north. This is based on the following three scenarios: Scenario 1 Existing v Proposed (maximum parameters and proposed detailed buildings), Scenario 2 Existing + Proposed + Consented Goods Yard Scheme and Scenario 3 "Mirror Massing" of the existing Cannon Road housing to the north v Proposed. The latter 'alternative baseline' assessment is permitted by the BRE Guidelines in circumstances where a site comprises vacant land or unusually low buildings, as here with existing car parking and the single-storey supermarket building. Officers consider the development scenarios and assessment methodologies to be appropriate.

Daylight/Sunlight Assessment Scenario 1 – Existing v Proposed

- 6.10.8 The results of scenario 1 (Existing v Proposed) show there is a good overall BRE compliance with the daylight and sunlight criteria. Specifically, 492 of 689 windows (71.4%) will meet the BRE Guidelines VSC target value of 27%, 387 of 431 rooms (89.8%) will meet the NSL target value, and 463 of 525 windows (88.2%) will meet the APSH target values.
- 6.10.9 The greatest impacts here relate to the loss of daylight and sunlight to existing homes in Mallory Court where only 21.8% of windows tested meet the VSC

target value, 54.5% meet the NSL target levels and 52.5% meet the APSH target values. The greatest concern is the impact on living rooms, where approx. 42 windows would be left with VSC levels at less than 20%, with reductions from existing light levels often around 50%. Some windows that light Brook House Primary School would also experience noticeable reductions in daylight and sunlight. However, a large reduction in daylight and sunlight to these homes and school is to be expected given the existing open nature of the site, which is directly to the south, and the unusually high daylight and sunlight levels they enjoy at present. This is considered further when considering the results of Scenario 3 below.

Daylight/Sunlight Assessment Scenario 2 – Existing + Proposed + Consented Goods Yard

- 6.10.10 In scenario 2 (Existing + Proposed + Consented Goods Yard) the rate of compliance for windows meeting the target values for VSC reduces as a result of the cumulative impact of the adjacent consented Goods Yard scheme. Specifically, 379 of 689 windows (55%) will meet the VSC target value. However, compliance with the NSL target values will remain the same as 387 of 431 rooms (89.8%) and 460 of 525 windows (87.6%) will meet the APSH target values. Many of the properties tested would be mainly affected by the Proposed Scheme rather than the Goods Yard scheme.

Daylight/Sunlight Assessment Scenario 3 – “Mirror Massing”

- 6.10.11 In Scenario 3 (“Mirror Massing”) the same scale buildings as in the Cannon Road housing area are assumed to be built on the site in a reflected plan form. With this assumed, 94.5% of windows tested meet the VSC target value, and 99% meet the APSH target values.
- 6.10.12 The transgressions caused by the Proposed Scheme are much reduced when compared to that of an empty existing site, with only 4 living room windows left with expected VSC levels of less than 20% (very low - in the order of 5-6%) and experiencing a reduction of 20% or more from the existing situation. It should be noted that the widespread presence of overhanging balconies at Mallory Court exacerbate the relative reductions in daylight/sunlight and can be considered to be contributing to many of the estimated transgressions. Impacts on Brook House Primary School would also be significantly less. It should be noted that the 4 living rooms on either end of Mallory Court that would be worse affected are served by two windows.
- 6.10.13 Officers consider that, overall, the levels of daylight and sunlight conditions would be acceptable. The fact that the vast majority of windows tested in this scenario meet daylight and sunlight standards with a mirror building assumed to currently exist suggests that the scale of proposed Block D is appropriate from a daylight and sunlight perspective. The Cannon Road

Residents Group suggest that external materials for Blocks C and D should be lighter than proposed to help reflect light and aid natural brightness – especially for residents in Mallory Court and on lower floors of River Apartments. The proposed soft buff brick for Block D (which is in Detail) is a relatively light brick and its use has been found to be acceptable in terms of daylight and sunlight. Block C is in Outline, although a light grey base and soft, light red/brown brick is identified at this stage. Again, this has been factored into the daylight and sunlight assessment and is considered acceptable.

Overshadowing Assessment

6.10.14 The Applicant's Daylight and Sunlight Assessment also assesses transient overshadowing of existing nearby gardens/amenity spaces for 21 March (Spring Equinox), 21 June (Summer Solstice) and 21 December (Winter Solstice) based on similar development scenarios used to assess daylight and sunlight. It assessed the following spaces: Rivers Towers Apartments, Mallory Court gardens, Mallory Court roof terrace, the open space between Mallory Court and Brook House Primary School, and Brook House Primary School (to the north), Bryantwood Road and Altair Close Estate (to the east) and College Road, Durban Street and Bradford Close - in Enfield (to the west).

6.10.15 The BRE Guidelines recommend that at least half of a space should receive at least two hours of sunlight on 21 March, or that the area that receives two hours of direct sunlight should not be reduced to less than 0.8 times its former value (i.e. there should be no more than a 20% reduction). This standard is met for most of the spaces assessed. The most affected spaces are private gardens for Mallory Court. These gardens are already partly overshadowed by an existing boundary wall and only two out of seven receive two hours of sunlight on half of their area. The proposed development would mean that none of these gardens receive any sunlight on 21 March. However, it should be noted that none of these gardens would receive any sunlight under the alternative "mirror massing" baseline, allowed for by BRE Guidelines. The proposed Block D is similar to a "mirror massing" baseline and is in line with the approved HRWMF.

Boundary treatment/security

6.10.16 The existing brick wall that runs along the northern boundary with the Cannon Road area would be demolished. The future boundary would be largely set by the building lines formed by Blocks C, D and E, which would extend up to the boundary. The detailed proposals for Block D would result in a building of 17.6m AOD (4.6m above ground) immediately to the south of gardens to Mallory Court. This is approx. 2.5m above the height of the existing wall at the western end of Mallory Court and 0.88m below the height of the existing wall at the eastern end of Mallory Court. The proposals also provide for the provision of a timber fence at the rear of the Mallory Court gardens, hard against proposed Block D.

- 6.10.17 The proposed parameters for outline Blocks C and E allow for a single storey building on the boundary line (up to 19m AOD, or approx. 6.1m and 6.2m above ground level respectively). Guidance in the Revised Design Code for other sections of the boundary allow for 3m high wall/fence lines for the existing Brook House School MUGA (Cannon Yard) and proposed Brook Yard Court.
- 6.10.18 The Cannon Road Residents' Association has stressed the importance of the existing wall for security of car parking and gardens and has asked to be involved in decisions over its replacement. Block D is for determination at this stage and officers consider that the proposed boundary treatment would safeguard security. However, it is recommended that a planning condition reserves details of the ground floor building elevation or boundary fence, to enable further consultation with residents at the condition stage over the boundary treatment they would find most acceptable. Detailed arrangements for Blocks C and E and other parts of the northern boundary would be reserved for subsequent approval. Officers consider that the proposed parameters and guidance would safeguard security and Reserved Matters would be subject to consultation, so the Residents' Association could comment at that stage.

Overlooking/privacy

- 6.10.19 Bedroom and living windows in Block D (in detail), would generally be 20m away from similar windows in Mallory Court, which is within the 18-21 metres yardstick separation distance referred to in the Mayor of London's Housing SPG, although the two wings to the building would be only 10m away. However, Block D has been designed such that north facing windows in the two wings of the proposed building that would be closer to Mallory Court would be high level and comprise secondary windows to kitchens and bedrooms, with living rooms and bedrooms deriving their outlook from east and west facing windows. In addition, the application has been revised to ensure that these secondary windows would be fitted with obscure glazing. Officers consider that this proposed detailed arrangement would safeguard privacy. It is also proposed to include planting for the proposed first floor level communal garden space to safeguard privacy and it is recommended that landscaping details are reserved by condition.
- 6.10.20 The proposed parameters for Block C mean that it would be within approx. 18 and 25m from the existing River Apartments building to the east. Officers consider that, subject to considering detailed proposals at the Reserved Matters stage, these separation distances are sufficient to safeguard privacy. Likewise, the proposed 12 to 15m distances between Block E and homes in the existing Beachcroft Court is considered satisfactory.
- 6.10.21 Elsewhere, proposed Block G (in detail) would be at 17/18m away from existing homes in the rear part of No. 865 High Road and the southernmost flank wall elevation (close to the boundary with the Peacock Industrial Estate) would

have no windows – safeguarding the development potential of this land. The proposed parameters for Block A would mean that Block A would be at least 7m from the Peacock Industrial Estate. The submitted Design Code also makes clear that to limit overlooking, windows to the southern boundary of Block A should be restricted to secondary windows to living spaces, kitchens or bathrooms. The proposed parameters for Block B would mean that the distance between this building and the approved Building A on the Goods Yard would be at least approx.18m. Subject to considering details at Reserved Matters stage, these arrangements should safeguard the privacy of people living in the approved scheme and any future phase of the HRWMP.

Wind and Microclimate

6.10.22 This is addressed below, under the Wind and Microclimate heading.

Noise

6.10.23 The mainly residential nature of the proposed development means that, subject to the recommended conditions to limit the hours of use of any café/restaurant (A3) in Block G and to control noise from mechanical plant, it should not cause undue disturbance to neighbouring residents.

Amenity Impacts – Summary

6.10.24 Amenity impacts must be considered in the overall planning balance, with any harm weighed against expected benefit. There would be some adverse impacts on amenity, as outlined above. However, officers consider that the level of amenity that would continue to be enjoyed by neighbouring residents is acceptable, given the benefits that the proposed scheme would deliver.

6.11 Transportation and Parking

6.11.1 The revised NPPF (July 2018) is clear at Paragraph 108 that in assessing development proposals, decision makers should ensure that appropriate opportunities to promote sustainable transport modes have been taken up.

6.11.2 London Plan Policy 6.1 seeks to support development that generates high levels of trips at locations with high levels of public transport accessibility. This policy also supports measures that encourage shifts to more sustainable modes and promotes walking by ensuring an improved urban realm. London Plan Policies 6.9 and 6.10 address cycling and walking, while Policy 6.13 sets parking standards.

6.11.3 Policy SP7 states that the Council aims to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by promoting public transport, walking and cycling and seeking to locate

major trip generating developments in locations with good access to public transport. This approach is continued in DM Policies DM31 and DM32.

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

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

Transport Assessment

6.11.6 The application is supported by a Transport Assessment (TA) and associated Residential Travel Plan and Delivery and Servicing Plan. The LB Enfield has raised concerns that the TA does not adequately address potential impacts in Enfield and does not take account of committed/possible development in the borough. Given that the proposed development is expected to result in a reduction of traffic (see Trip Generation below) and the distance and/or status of the committed/possible developments referred to by LB Enfield, officers consider that the TA's methodology and scope is acceptable.

Trip Generation

6.11.7 The applicant's TA estimates likely trip generation for various modes based on TRICS sites used for the Good Yard application, together with Census travel to work mode shares. This indicates that the proposals would result in approximately 40 (two-way) vehicular trips during the morning and evening peak periods. The assessment concludes that the development would result in a net reduction in the number of vehicular trips in the AM Peak (-3) and the PM Peak (-51) and that existing bus services and London Underground services would be able to cope with estimated increases in demand. Officers agree with this assessment.

Site Access

6.11.8 Site access is in detail and is for determination at this stage. Vehicular access to the site would be from the High Road, with the signalised junction being modified and 'tightened up' (narrower carriageway and wider footways). It is recommended that a s278 Agreement secure site details of how the proposed new street ties in with the existing highway and junction. There would also be a secondary vehicular access connecting with Cannon Road to the north.

6.11.9 The proposed two-way east to west access route (Pickford Lane) is proposed to be a residential street (5.5m carriageway and footway space either side) which prioritises people over traffic, removes clutter from the pavement and encourages slower vehicle speeds through narrowing of vehicle areas. Two new routes would punch through from the two cul-de-sacs on the Cannon Road housing area to the north. The western one would be an extension of Pickford Lane and would be a vehicular route. The eastern one (Cannon Yard) would be pedestrian and cycle only.

Future Access Points

6.11.10 Parameter Plan 05 (Site Access) identifies potential future access points along the southern boundary with the approved Goods Yard site and in Peacock Industrial Estate and north-south 'emergency and maintenance access routes' leading to these. The Illustrative Scheme shows north-south running from Pickford Lane to the southern boundary, allowing for future connection to a further phase of the masterplan to the south, in accordance with the HRWMF. These include a pedestrian/cycle route to the Rear of Blocks A and B (Goods Yard Walk) down to White Hart Lane and White Hart Lane Station and service routes either side of the proposed Peacock Park, with the intention that these are designed to prevent motor traffic from rat-running through the site. To ensure that detailed proposals enable satisfactory connections with land to the south, it is recommended that a s106 planning obligation requires a Future Connectivity and Access Plan to be approved by the Council. Connections via the approved Goods Yard scheme and subsequent phases of the High Road West Masterplan would open up new pedestrian and cycle links to White Hart Lane Station and improve the PTAL of the western part of the site.

Legal Highway Agreements

6.11.11 The proposed on-site routes are not designed to be adopted by the Council and would be managed and maintained by a private company. Works to the existing signalised junction on the High Road will need to be the subject of a legal agreement under Section 278 of the Highways Act 1980.

Pedestrian and cycle movement

6.11.12 The Mayor of London's Stage 1 Report raises the concern that the submitted Transport Assessment does not include a full Active Travel Zone (ATZ) assessment. Officers are satisfied that the scheme itself incorporates measures to encourage active travel, including a new park, pedestrian/cycle connections with the Cannon Road area and Brook House Primary School to the north and (via the approved Goods Yard scheme/future phases of the High Road West Masterplan) to White Hart Lane Station and the nearby Cycle Superhighway 1. Given these contributions towards active travel and healthy living, officers consider that the Pedestrian Environment Review System (PERS)

audit included as part of the Transport Assessment is sufficient and that there is no need for an ATZ assessment to identify mitigation elsewhere.

Car Parking

- 6.11.13 The proposal is to provide residential car parking at a ratio of 0.16 spaces per unit, which works out at up to 52 spaces. Two of the proposed residents parking spaces would be allocated for Car Club vehicles. Disability parking spaces would initially be provided at a level of 3% of homes (10 spaces), with a further 7% (23 spaces) able to be converted to disabled parking bay standard if required in the future. Electric Vehicle Charging Points (EVCPs) would be provided for 20% of the proposed spaces (12 spaces), with the remaining spaces enabled for passive provision. One disability parking space would be provided for the proposed A1/A3 unit in Block G and this would be fitted with an EVCP.
- 6.11.14 The Detailed element of the proposed development (Blocks D, F and G) includes 20 spaces in an under-croft parking area in Block D, which would include 2 disability parking spaces. The illustrative scheme shows another under-croft parking area in the Outline Block C and on-street parking along Pickford Lane. The Revised Design Code states that the proposed Peacock Park would be kept substantially free from cars and parking, that there would be parallel parking along Pickford Lane (apart from outside Blocks C and D, where there could be perpendicular parking) and that residential parking would be provided within 100m of residential front doors.
- 6.11.15 The LB Enfield has raised concerns about possible overspill car parking on streets to the north of the site, within Enfield, and has requested a financial contribution from the applicant to help fund the introduction of a Controlled Parking Zone (CPZ). The streets in Enfield are some distance from the majority of the proposed homes, with the Cannon Road housing area in between and the risk of overspill car parking is considered relatively low. Furthermore, it is understood that the LB Enfield has carried out preliminary consultation on a potential CPZ for highways to the north of the site, although it should be noted that these stress for part of the emerging Joyce and Snells Estate renewal scheme, which, when implemented would see comprehensive redevelopment, including new streets and highway re-design. Nevertheless, officers recognise that overspill car parking in Enfield could become a problem and recommend that s106 planning obligations secure a baseline car parking survey, monitoring and, if monitoring shows there to be a significant problem, a financial contribution of up to £20,000 towards consultation/implementation of a CPZ.
- 6.11.16 It is recommended that s106 planning obligations secure the approval of detailed car parking management plans ensure that spaces are provided before homes are occupied and manage the use and allocation of spaces. It is also recommended that planning obligations ensure that Car Club spaces are provided and that future occupiers are unable to obtain on-street parking permits within Haringey.

Cycle Parking

- 6.11.17 Following revisions, the Detailed proposals for Blocks D, F and G meet the draft London Plan cycle parking standards (providing space for 70, 12 and 50 long-stay covered spaces respectively, including 5% large/non-standard cycles. The Revised Design Code commits subsequent Reserved Matters applications for Blocks A, B, C and E to comply draft London Plan standards, stating that cycle parking should be provided at a minimum of 1.5 spaces per one-bedroom dwelling and 2 spaces for all other dwellings, and 1 visitors' space per 40 dwellings.

Travel Planning

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

Delivery and Servicing

- 6.11.19 The applicant's Delivery and Servicing Plan estimates that there would be around 33 delivery and servicing trips a day, the vast majority of them being by Light Goods Vehicles (LGVs). It is proposed to accommodate these trips on-street within the site, with vehicles using parking bays on the proposed access road. Officers agree that this is reasonable. It is recommended that implementation of the proposed Delivery and Servicing Plan is secured by s106 Agreement (with the proposed Travel Plan Co-Ordinator being responsible).

Public transport capacity

- 6.11.20 The Mayor of London's Stage 1 Report raises concerns that the Transport Assessment does not include an assessment of how the number of proposed rail trips (expected 57 AM Peak and 21 PM Peak) would be divided between lines and stations, or the impact of the extra trips on these stations. The applicant's transport consultants have estimated that around 80% of Over/Underground users would use White Hart Lane Station, with the remainder using Silver Street and Northumberland Park (estimated at 5% and 15% respectively).
- 6.11.21 The Mayor of London Stage 1 Report seeks a contribution of £450,000 (£90,000 per annum for 5 years) towards bus service enhancement. The applicant's Transport Assessment estimates that the development would result in up to 50 additional people getting on a bus and 10 extra people getting off a bus during the AM peak hour. The High Road is a busy bus route and the applicant notes that there are over 90 buses stopping within 400m of the site in the AM

peak, meaning that there are nearly two buses for every extra person that is expected to want to get on one, with observations suggesting that most of these had spare capacity. The NPPF makes clear that the requirement for mitigation arises when there is likely to be a severe impact on the transport network. Officers do not consider that the request meets the tests for planning obligations set out in the NPPF and legislation.

Construction Activities

6.11.22 The applicant's Transport Assessment does not assess likely traffic movements during demolition and construction. However, it does make clear that the principal contractor will submit for the Council's approval a Construction Logistics Plan (CLP) (to comply with relevant TfL guidance) to set out vehicle movements to and from the site with the aim of improving safety and reliability of deliveries, reducing congestion and minimising negative environmental impacts. In fact, a CLP will be required for each phase of development and it is recommended that these are secured by condition.

Transportation - Summary

6.11.23 Subject to the recommended planning conditions and s106 planning obligations referred to above, the proposals would result in a reduction of car-borne trips associated with the site, encourage walking, cycling and public transport use, safeguard the development potential of Site Allocation NT5 and mitigate traffic impacts during the construction phase. As such, it is acceptable from a transportation perspective.

6.12 Energy, Climate Change and Sustainability

6.12.1 The NPPF and London Plan Policies 5.1, 5.2, 5.3, 5.7, 5.8, 5.9, 5.10 and 5.11, and Policy SP4 sets out the approach to climate change and requires developments to meet the highest standards of sustainable design, including the conservation of energy and water; ensuring designs make the most of natural systems and the conserving and enhancing the natural environment. The London Plan requires all new homes to achieve a 35 per cent carbon reduction target beyond Part L 2013 of the Building Regulations (this is deemed to be broadly equivalent to the 40 per cent target beyond Part L 2010 of the Building Regulations, as specified in Policy 5.2 of the London Plan for 2015).

6.12.2 The London Plan sets a target of 25% of the heat and power used in London to be generated through the use of localised decentralised energy systems by 2025. Where an identified future decentralised energy network exists proximate to a site it will be expected that the site is designed so that it can easily be connected to the future network when it is delivered.

6.12.3 The Applicant's revised Energy Statement sets out how the three-step Energy Hierarchy has been implemented and estimates that site-wide regulated CO2 savings would be 60.1% for the Detailed new-build element, 76.2% for the refurbished Listed Buildings and 61.8% for the Outline element of the application, against a Part L 2013 compliant scheme.

Lean Carbon Savings

6.12.4 The proposed energy efficiency measures include levels of insulation beyond Building Regulation requirements, low air tightness levels, efficient lighting as well as energy saving controls for space conditioning and lighting. The scope of improvements of the existing building has been maximised but is limited due to its listed features. These measures achieve overall regulated CO2 emission reductions of 3.9% for the detailed new-build element, 38.5% for the refurbished Listed Buildings and 10.4% for the outline element. Overall, this meets the Intend to Publish London Plan target of 10% regulated CO2 emission reductions for the Outline element and exceeds the 15% reduction for non-residential uses.

Clean Carbon Savings

6.12.5 The Council has committed plans to deliver a North Tottenham District Energy Network (DEN). This facility has an anticipated development programme to be ready to deliver heat to developments in 2023 (subject to change).

6.12.6 A site-wide heat network served by a single energy centre in Block B is proposed for easy connection to the proposed DEN. This would connect all proposed new build development and potentially the two Listed Buildings. High efficiency gas boilers would be installed as the temporary heat source until the development connects to the plant. If it is not feasible to connect to the Listed Buildings, high efficiency condensing gas boilers would be provided for them. The on-site heat network is estimated to achieve overall regulated CO2 emission reductions of 48.9% for the detailed new-build element, 37.7% for the refurbished Listed Buildings and 46.7% for the outline element.

Green Carbon Savings

6.12.7 The applicant has identified photovoltaics as suitable technology for the development. The applicant is proposing that photovoltaics panels will be provided for the new build residential part of the development only, as installing them over the refurbished listed building could harm their appearance. The strategy assumes a 200sqm array on the roofs of Blocks B, D and E. The incorporation of PV panels would achieve overall regulated CO2 emission reductions of 7.3% for the detailed element and 4.6% for the outline element.

6.12.8 Officers are not wholly satisfied with the applicant's revised Energy Statement and it is recommended that a condition requires the submission of an updated

Energy Strategy before the commencement of Blocks D, F or G or when the first Reserved Matters application is submitted (whichever is the sooner).

Overall Carbon Savings

6.12.9 The proposed development delivers 67% improvement on site on the domestic detailed element of the scheme, 61.8% on the domestic outline element of the scheme and 35.7% on the detailed non-domestic scheme. To achieve 'zero carbon' for the new build residential portion of the scheme, the applicant's revised Energy Statement estimates that a total of 133.4 tonnes per annum of regulated CO₂, equivalent to 4,002 tonnes over 30 years needs to be offset by financial contributions. The proposed new build non-domestic portion of the scheme achieves 35% carbon reduction and no carbon offset is therefore required. The Revised Design Code includes a number of relevant guidelines for the Outline element of the scheme. However, it is recommended that s106 obligations are used to ensure the following:

- Communal gas boilers are installed in a site-wide energy centre (in Block B)
- Assume that this is connected to the proposed DEN with a low carbon factor
- Secure a carbon offset financial contribution based on the above assumption
- Secure an additional carbon offset financial contribution if system is not connected to the DEN within 10 (taking account of the additional carbon savings that would have been delivered by connecting to the DEN)

6.12.10 Based on the above approach, it is recommended that S016 planning obligations require the payment of an initial carbon offset amount upon commencement with a further deferred carbon offset payment made if no connection to a DEN is made within 10 years. It is also recommended a planning condition requires the submission and approval of an updated Energy Strategy to address officer concerns over some of the details in the revised Energy Statement.

Overheating

6.12.11 The applicant's Overheating Assessment and Overheating Design Note proposes to mitigate the risk of overheating by incorporating passive and active design measures, in line with London Plan Policy 5.9 and the Cooling Hierarchy, including:

- Minimising internal heat generation through energy efficiency design (e.g. reducing lateral pipework lengths within communal corridors)
- Reducing the amount of heat entering buildings in the summer (external shading elements, such as setback balconies and internal blinds)

- Natural ventilation for all buildings with maximised free openable area with mechanical ventilation the primary all-year round ventilation method for new build elements
- G-value of 0.4 for West facade of Block G and West and South facades of Block D; G-value of 0.63 to all others
- Night ventilation (10% of free openable area) for the top floor living spaces
- Internal blinds for the whole development (including Listed Buildings).

6.12.12 The applicant's Assessment/Note found that the detailed element (Blocks D, G and F) should meet the relevant CIBSE TM59 overheating risk criteria and that active cooling would only be required for the proposed retail unit on the ground floor of Block G. The submitted Design Code states that Reserved Matters applications should demonstrate how the design of dwellings will avoid overheating and it is recommended that conditions require that details of overheating mitigation measures for the Detailed Blocks are submitted to and approved by the Council and that Reserved Matters applications for the Outline Blocks are accompanied by an overheating assessment.

Sustainability

6.12.13 The applicant's Sustainability Statement sets out how the proposals address relevant policy objectives and the Revised Design Code includes a number of relevant commitments on SuDS, biodiversity and lighting for the outline element of the scheme and a number of specific conditions and s106 obligations are recommended under various report headings to secure these measures (Design Development, Flood Risk, Drainage and Water Infrastructure and Ecology). In addition, it is recommended that a condition is used to secure compliance with the BREEAM 'Excellent' standard for the proposed commercial space in Block G.

6.13 Flood Risk, Drainage and Water Infrastructure

6.13.1 Development proposals must comply with the NPPF and its associated technical guidance around flood risk management. London Plan Policy 5.12 continues this requirement. London Plan Policy 5.13 and Local Policy SP5 expects development to utilize Sustainable Urban Drainage Systems (SUDS). Policy 5.14 requires proposals to ensure adequate wastewater infrastructure capacity is available.

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

6.13.3 The site is in Flood Zone 1 and has a low probability of flooding from tidal and fluvial sources. It is within a Critical Drainage Area, but the submitted Flood Risk Assessment

(FRA) considers flooding from pluvial and groundwater sources and from sewers also to be low. The existing site is 100% impermeable and the FRA estimates that the existing discharge rate is approx. 157.7 litres per second (l/s) – discharging into a private sewer under the site and then in to a combined trunk sewer under the High Road.

6.13.4 A variety of Sustainable urban Drainage Systems (SuDS) features are proposed to be incorporated to provide a run off rate of 5 l/s, which the Applicant considers is the closest to the calculated greenfield runoff rate as is practicable whilst incorporating the proposed SuDS features and ensuring gravity discharge (i.e. no pumping). This amounts to a 97% betterment and is considered acceptable. The proposed SuDS features are as follows:

- Green/blue roofs to provide bio-diverse habitat in addition to capturing rainwater and naturally slowing the rate of runoff – on parts of Blocks B, C, D and E
- Permeable pavement and attenuation storage tank underneath the proposed Peacock Way, near to the High Road, to intercept and store water before it is discharged in to the public sewer.
- Rain gardens/swales in the proposed Peacock Park and Peacock Way; and
- Possible use of water butts to harvest water for irrigation of green spaces.

6.13.5 It is proposed that the SUDS features are privately managed and maintained and it is recommended that a s106 planning obligation ensures that they are managed in accordance with a SuDS Management Plan, as outlined in the applicant's submitted FRA.

6.13.6 Thames Water raises several water infrastructure issues concerning the proposal, including the ability of the water network infrastructure to accommodate the needs of the development proposal. It is recommended that planning conditions require water supply infrastructure and piling studies.

6.14 **Air Quality**

6.14.1 Policies DM4 and DM23 provide guidance on air quality in relation to development proposals. Policy indicates that development proposals should consider air quality and be designed to improve or mitigate the impact on air quality in the Borough and improve or mitigate the impact on air quality for the occupiers of the building or users of development. Air Quality Assessments will be required for all major developments where appropriate.

6.14.2 Where adequate mitigation is not provided planning permission will be refused. This approach is reflected in the London Plan Policy 7.14. Additional Air Quality issues are addressed by London Plan SPGs around dust control and sustainable design and construction. Haringey is an Air Quality Management Area (AQMA).

6.14.3 The application is supported by an Air Quality Assessment, which considers the potential impacts of both road traffic and the proposed boiler plant that would result from the proposed development. This concludes that the proposal would result in a net reduction of car parking spaces and an associated reduction in road traffic (with no significant effects on sensitive receptor) and that impacts of emissions from the proposed boiler plant would be negligible. The Assessment also concludes that future residents would experience acceptable air quality, with pollutant concentrations, taking account of emissions from both road traffic and the proposed boiler plant, below the air quality objectives for human health. The proposed development has been shown to meet the London Plan's requirement that new developments are at least "air quality neutral" and the following best-practice measures have been incorporated into the scheme (to be secured by planning conditions/obligations where necessary):

- Setting back of the new development buildings from roads by at least 20 m;
- Provision of two car club parking spaces;
- Provision of two short-stay car parking spaces to discourage the use of private vehicles (both with Electric Vehicle Charging Points);
- Provision of EVCPs for 20% of residential parking spaces, with passive provision for the remaining residential spaces;
- Provision of short- and long-stay cycle parking spaces for retail and visitor use;
- Provision of a minimum of 556 long-stay residential cycle parking spaces;
- Installation of ultra-low NO_x boiler plant, with emission rates below 32 mg/kWh; and
- Anticipated future connection to the district heating network, which would remove the need for boilers on site)
- The inclusion of broadleaf planting as part of the boundary treatment to the High Road frontage of Brook House Yard.

6.14.4 Mechanical ventilation details for the proposed A1/A3 unit on the ground floor of Block G up to roof level will need to be approved to make sure that they are sufficient to safeguard residential amenity. It is recommended that these are secured by condition.

6.14.5 The Assessment commits to the adoption of a Construction Environmental Management Plan (CEMP) (including Dust Management Plan) to minimise the environmental impacts of the construction works. The other conditions noted by the Council's Pollution Officer concerning combustion and energy plant, Combined Heat and Power details, Dust Management, and Non-Road Mobile Machinery registration are also required to make the scheme acceptable in air quality terms. Officers recommend all of these measures are secured by conditions.

6.15 **Wind and Microclimate**

6.15.1 London Plan Policy 7.6 and 7.7 state that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to wind and microclimate. This is particularly important for tall buildings. This approach is reflected in the draft London Plan. Policy DM6 states that proposals for tall buildings should consider the impact on microclimate. Policy AAP6 requires a high-quality public realm for developments in Tottenham.

6.15.2 The proposed scheme has been the subject of wind tunnel testing, which included taking account of the future surrounding scenario by assessing the proposed scheme with nearby consented schemes, including Nos. 810-812 High Road and the Goods Yard.

6.15.3 The illustrative scheme includes a number of specific soft landscaping, walls, screens and fences that have been identified as necessary mitigation measures. The relevant identified features are incorporated in to the detailed landscape scheme (curtilage space and private gardens associated with Blocks D, F and G) and it is recommended that these are secured by condition. Assuming these things are in place, the Assessment concludes the following:

- Safety - Pedestrian level wind conditions are expected to rate as safe for all intended users and no significant effect on pedestrian safety.
- Pedestrian comfort - expected to be windy but tolerable for pedestrians along the route between Blocks B and C. Otherwise, conditions on thoroughfares are expected to be suitable for pedestrian access to and passage through and past the site.
- Entrances - With appropriate entrance recesses, main entrances to the proposed development are expected to be suitable for pedestrian ingress/egress.
- Ground level open spaces - Public and communal amenity spaces are generally expected to enjoy suitable conditions for associated recreational activities, although any potential Block G cafe outdoor seating would need to be purposely located or locally sheltered.
- Roof-top terraces - Generally suitable for associated recreational activities, though Block C's Level 7 terrace may benefit from further development of the parapets or landscaping to maximise the potential for outdoor seating.
- Surrounding area - The Cannon Road development is susceptible to accelerated winds, particularly on the Brook House podium and this would not be significantly affected by the proposed development. There is the potential to very slightly exacerbate winds at the corner entrance to No. 840 High Road, where conditions are expected to remain at least tolerable for pedestrian ingress / egress. Otherwise, the effect of the proposed development is mainly to enhance the shelter to the area to northeast of the site. The proposed development is not expected to have a material effect on conditions within the neighbouring Cannons Road area.

6.15.4 With the introduction of the consented Goods Yard development, conditions within the proposed park would be enhanced and the potential limitations on a Block G cafe spill out area is alleviated. The slight effect at the corner of No. 840 High Road would also be alleviated. The application scheme does have potential to exacerbate the channelling of westerly winds between the Blocks A and B of the Goods Yard development, with resulting conditions rating (marginally) as unsuitable, in terms of pedestrian safety, for the general public in the centre of the road. In terms of pedestrian comfort, conditions at the centre of the road are suitable only for fast or business walking. However, the approved Goods Yard Development Specification and Design Code do consider the potential for accelerated winds in this area and it is expected that this effect can be adequately addressed during the detailed design stages for that approved scheme.

6.15.5 The proposed Blocks submitted in detail (Blocks D, F and G) are not significant structures with regards to wind effects. The only potentially adverse effect for these elements is on outdoor seating spaces associated with the proposed café in Block G. However, the applicant's assessment expects that suitable conditions could be achieved through either locating seating away from the building corner or by providing localised shelter for seating, by screening etc. It is recommended that such measures are secured by condition.

6.15.6 The submitted Design Code (4.12.13) requires landscape details for the Outline element of the proposed development to make direct references to the wind specialist recommendations and that the wind mitigation measures should be retained for the life of the development. The Assessment recommends that further wind tunnel testing be carried out at detailed design stage for Block B to confirm conditions and officers recommended that this is secured by a specific planning condition.

6.16 **Trees**

6.16.1 The Applicant's Tree Survey records 24 trees on and immediately adjacent to the site, the majority located around the western and eastern boundaries. Of these trees, none are Category A (the highest quality), 7 are Category B, 10 are Category C and 8 are Category U (unsuitable for retention). The Council's records do not indicate there are any trees on the site subject to a Tree Protection Order (TPO).

6.16.2 The Proposals proposal result in the loss of 12 trees. This includes 7 Category U trees and 5 Category C trees. Four mature prominent London Plane trees (Nos. 6001, 6002, 6003 and 6004) – two on the site near the High Road footway and two in the footway itself – would be retained. It is recommended that a condition requires the protection of trees to be retained during the demolition and construction phases in accordance with relevant British Standards. The detailed

scheme for Pickford Yard Gardens (Blocks F and G) and the illustrative scheme for the remainder of the site would see a significant net increase in trees on the site.

6.17 Ecology

6.17.1 London Plan Policy 7.19 indicates that whenever possible development should make a positive contribution to the protection enhancement creation and management of biodiversity. Priority is given to sites with ecological designations. Local Plan Policy SP13 states that all development must protect and improve sites of biodiversity and nature conservation. In addition, Policy DM19 makes clear that development on sites adjacent to internationally designated sites should protect and enhance their ecological value and AAP Policy AAP6 states that proposals for tall buildings that fall within 500m of a SPA/Ramsar area need to ensure no adverse effects.

The site

6.17.2 An extended Phase 1 habit survey was carried out in March 2019. This found that the majority of the habitats present on site (buildings, hardstanding and introduced shrub) are of negligible ecological importance and require no specific mitigation and there is no evidence of protected species, including bats, or significant opportunities for nesting birds. The Applicant's Preliminary Ecology Appraisal recommends the following potential opportunities to enhance the biodiversity of the site:

- Creation of green infrastructure, such as green roofs/walls or brown roofs within the development, which can be multi-functional, delivering biodiversity, amenity, aesthetic and drainage benefits;
- Planting of native flora species of known benefit to wildlife as part of newly created habitats. This includes shrubs, trees, grasses, forb species and nectar rich flowering plants;
- Additional planting along the west boundary, of native trees in order to enhancement the potential commuting corridor;
- Retention and buffering of existing mature London plane trees;
- The inclusion of bee bricks within brick walls and buildings to increase habitats for bee species; and
- Addition of bird and bat boxes across the site to improve nesting roosting opportunities, Swift boxes on high-rise buildings, bird boxes on lower buildings face north and east, and on newly planted or retained trees and bat boxes on west facing walls on any buildings adjacent to the west rail corridor.

6.17.3 The Design Code, as revised, includes a number of guidelines for subsequent Reserved Matters applications for the outline element of the scheme – including the use of native flora species of known benefits to wildlife to support the creation of new habitats and an attractive environment for pollinating insects and birds,

the inclusion of green roofs where possible, the inclusion of a series of bee bricks within the perimeter brick walls to Pickford Yard Gardens (actually submitted in detail), and bird and bat boxes across the site. Officers consider that the commitments given in the Design Code (which would be secured by condition) are sufficient for the outline element, but recommend the use of landscaping and biodiversity conditions to require appropriate provision for the detailed elements.

Habitats Regulation

- 6.17.4 Given the proximity of the application site to two designed European sites of nature conservation, it is necessary for Haringey as the competent authority to consider whether there are any likely significant effects on relevant sites pursuant to Section 63(1) of the Conservation of Habitats and Species Regulations 2017 (“the Habitats Regulations”).
- 6.17.5 The application site is approx. 1.7 km west of the Lea Valley SPA at its closest point. The Lea Valley area qualifies as a SPA under Article 4.1 of the Birds Directive on account of supporting nationally important numbers of species. This area is also a Ramsar site. The Lea Valley SPA/Ramsar comprises four underpinning Sites of Special Scientific Interest (SSSIs).
- 6.17.6 The application site lies approx. 4.9 km west of the Epping Forrest Special Area of Conservation (SAC) at its closest point. However, it is within the Zone of Influence (ZOI) of 6.2km as defined by Natural England in their Interim Guidance. The Epping Forest SAC is one of only a few remaining large-scale examples of ancient wood-pasture in lowland Britain and has retained habitats of high nature conservation value. Epping Forest SAC is also underpinned by a SSSI designation.
- 6.17.7 The applicant’s Preliminary Ecological Assessment notes that the Lea Valley SPA site is carefully managed to avoid impacts, with only limited access allowed to the wetland itself, with access closed seasonally to avoid impacts to wintering bird populations. As such, adverse effects as a result of increased recreational pressure are not considered likely. Likewise, the proposed development is not expected to result in an adverse air quality effects – indeed, road traffic, which is the major source of air quality pollution, is expected to decrease.
- 6.17.8 The applicant’s assessment also notes that the Habitat Regulations Assessments (HRA) for alterations to the Strategic Policies and The Tottenham Area Action Plan both conclude that there will be no likely significant effect on Epping Forest SAC through increased recreational pressure as nowhere within the Borough lies within the core recreational catchment for the site. In terms of air quality, the proposed car parking is limited (54 spaces at a ratio of 0.16 spaces per dwelling) and the assessment concludes that it is unlikely that links exist between the site and Epping Forest SAC via an air quality impact pathway. As such, no indirect effects on Epping Forest SAC are expected.

6.17.9 Natural England has reviewed the application and has raised no objections. Given the applicant's assessment and Natural England's response, officers consider the development would not give rise to likely significant effects on European designated sites (Lee Valley SPA and Epping Forest SAC) pursuant to Section 63(1) of the Conservation of Habitats and Species Regulations 2017 ("the Habitats Regulations"). An integrity test is therefore not required and the proposal is in accordance with Policies SP13 and DM19. The site is greater than 500m from the Lee Valley SPA, so Policy AAP6 does not apply.

6.18 Waste and Recycling

6.18.1 London Plan Policy 5.16 indicates the Mayor is committed to reducing waste and facilitating a step change in the way in which waste is managed. Local Plan Policy SP6 and Policy DM4 require development proposals make adequate provision for waste and recycling storage and collection.

6.18.2 The Applicant's Revised Occupational Waste Management Plan estimates the likely daily volume of residential and commercial waste and recyclables, which would require a total of 89 bins – 55 for general reuse and 34 for recycling. In addition, there would be the need for 15 external food waste boxes. The proposal is to integrate waste/recycling storage areas across the proposed development.

6.18.3 Proposals for the detailed elements of the proposed development (Blocks D, F and G) have been revised to incorporate larger bin store areas and space for bulky waste and are now acceptable. The submitted Design Code sets out a number of guidelines for the outline Blocks, including that residents would not have to walk more than 30m with their refuse/recycling. Officers consider that storage and collection of the estimated volume of generated waste for the Outline element of the proposed development is feasible, but that further details would be required at Reserved Matters stage, including details of commercial collection and pest management. It is recommended that detailed Waste Management Plans to accompany Reserved Matters applications are secured by condition.

6.19 Land Contamination

6.19.1 Policy DM32 require development proposals on potentially contaminated land to follow a risk management-based protocol to ensure contamination is properly addressed and carry out investigations to remove or mitigate any risks to local receptors.

6.19.2 The Applicant's Phase 1 Environmental Site Assessment concludes that the site is in an area of low to moderate environmental sensitivity and identifies a number of potential contamination sources given the sites historic and current use. It goes on to state that the potential risk of contaminated land liability is low to

moderate. The Assessment recommends that a Phase II intrusive ground investigation is carried out to appraise underlying soil and groundwater quality.

6.20 Basement Development

6.20.1 Policy DM18 relates to new Basement development and sets out criteria for where basements can be permitted. Basement development must be addressed through a Basement Impact Assessment (BIA).

6.20.2 The outline element of the proposed scheme includes non-residential basement space as part of Blocks A and B. The applicant's Basement Impact Assessment (BIA) Screening Report assesses site history and ground conditions and identifies no other proposed basements in the area. It goes on to consider impacts on underground structures and unexploded bombs, before discussing the proposed substructure and superstructure of Blocks A and B and design parameters for them. It is recommended that a planning condition requires a full BIA to accompany Reserved Matters applications for these Blocks, setting out a suitable basement design and construction methods.

6.21 Archaeology

6.21.1 The revised NPPF states that applicants should submit desk-based assessments, and where appropriate undertake field evaluation, to describe the significance of heritage assets and how they would be affected by the proposed development. London Policy 7.8 states that development should incorporate measures that identify record, interpret, protect and, where appropriate, preserve a site's archaeology. This approach is reflected at the local level.

6.21.2 The site lies in an area of archaeological interest. The Greater London Archaeological Advisory Service (GLAAS) has assessed the proposal and indicates the need for field evaluation to determine appropriate mitigation. GLASS note a two-stage process of archaeological investigation comprising evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

6.22 Fire Safety and Security

6.22.1 Policy D12 in the Intend to Publish London Plan (December 2019) makes clear that all development proposals must achieve the highest standards of fire safety and requires all major proposals to be supported by a Fire Statement. Following requests by officers and the Mayor (in his Stage 1 Report), the applicant has submitted a Fire Safety Statement.

6.22.2 The Statement consists of a high-level review of fire safety requirements for the proposed development based on relevant British Standards and addresses means of escape, fire safety systems, internal fire spread, external fire spread

and access and facilities for the fire service. The Statement covers both the Detailed and Outline elements of the proposals, with assessment of the Outline element based on the Illustrative Scheme. The Statement provides high-level detail of how the proposals would function in terms of fire safety. However, detailed proposals should be provided prior to works commencing.

Access for emergency vehicles

6.22.3 There would be two vehicular access points to the site – directly from the High Road and via Cannon Road to the north. Internal access matters would be reserved for subsequent approval. However, Parameter Plans 04 and 05 and the Revised Design Code provide for vehicular and emergency access to all proposed Blocks, in the event of a fire, in accordance with the existing Building Regulations. The proposed main east-west Pickford Lane would be between 4.1 and 5.5m wide and shared paths would be a minimum of 3.1m wide.

Full Fire Statement

6.22.4 The submitted Fire Safety Statement is considered sufficient for the determination of this application. However, it is recommended that planning conditions area attached to any permission to ensure that (a) each application for approval of Reserved Matters relating to the Layout of Blocks A, B and C is accompanied by a full Fire Statement and that (b) a full Fire Statement is submitted and approved for each of the detailed buildings (Blocks D, F and G) before work on them commences. In both cases, the full Statement should cover all the matters specified in London Plan Policy D12.

Building Regulations approval

6.22.5 The development would be required to meet the Building Regulations in force at the time of its construction – by way of approval from a relevant Building Control Body. As part of the plan checking process a consultation with the London Fire Brigade would be carried out. On completion of work, the relevant Building Control Body would issue a Completion Certificate to confirm that the works comply with the requirement of the Building Regulations.

6.23 **Equalities**

6.23.1 In determining this planning application, the Council is required to have regard to its obligations under equalities legislation including obligations under the Equality Act 2010. In carrying out the Council's functions due regard must be had, firstly to the need to eliminate unlawful discrimination, and secondly to the need to promote equality of opportunity and to foster good relations between persons

who share a protected characteristic and persons who do not share it. Members must have regard to these duties in taking a decision on this application.

6.23.2 As noted in the various sections in this report, the proposed development provides a range of socio-economic and regeneration outcomes for the Tottenham area including additional publicly accessible open space and the provision of new housing. A substantial amount of the proposed housing would be affordable housing, a proportion of which would be Council homes at social rents. This overall provision would add to Haringey's stock of market and affordable homes.

6.23.3 An employment skills and training plan, recommended to be secured by a S106 obligation, would ensure a target percentage of local labour is utilised during construction. This would benefit priority groups that experience difficulties in accessing employment. Assistance would also be provided for local tenders and employment skills and training. A financial contribution regarding apprenticeships is also recommended to be secured by a S106 obligation, as per the Heads of Terms above.

6.23.4 The proposed development would add to the stock of wheelchair accessible and adaptable dwellings in the locality and the Revised Design Code would help ensure that inclusive design principles are followed, in accordance with London Plan and local planning policy requirements.

7 COMMUNITY INFRASTRUCTURE LEVY (CIL)

7.1 Based on the information given on the plans, the Mayoral CIL (£60 per square metre, £59.64 with indexation) would be £1,813,056 (30,400 x £59.64) and (based on the current Haringey CIL charge rate for the Eastern Zone of £15 per square metre (£20.96 with indexation) the Haringey CIL charge would be £632,000 (20.96 x 30,161), giving a total of £2,445,056. Up to 10,588 sqm of floorspace could be eligible for Social Housing Relief.

7.2 The CIL will be collected by Haringey after/should the scheme is/be implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the construction costs index. An informative will be attached advising the applicant of this charge and advising the scheme is judged to be phased for CIL purposes.

7.3 The Council is proposing to increase the current Haringey CIL charge rate for the Eastern Zone of the borough from £15 to £50 per square metre and consulted on a Draft Charging Schedule between 18 December 2019 and 11 February 2020. The proposed development would be liable to pay the Haringey CIL rate that is in effect at the time that permission is granted.

8 RECOMMENDATIONS

- 8.1 GRANT PLANNING PERMISSION subject to conditions in **Appendix 11** and a Section 106 Legal Agreement and GRANT LISTED BUILDING CONSENT subject to conditions in **Appendix 11**.