

**Graham Harrington
Haringey Council
6th Floor River Park House,
Wood Green, London
N22 8HQ**

**Our ref: GLA/4953/TO/01
Your ref: HGY/2019/2929
Date: 27 January 2020**

Dear Mr Harrington

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

**867-879 High Road, Tottenham , London , N17 8EY
Local Planning authority reference: HGY/2019/2929**

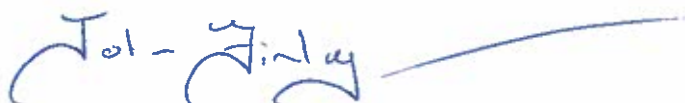
I refer to the copy of the above planning application, which was received from you on 13 November 2019. On 27 January 2020, Jules Pipe, the Deputy Mayor for Planning, Regeneration and Skills, acting under delegated authority, considered a report on this proposal, reference GLA/4953/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that the application does not yet comply with the London Plan and Intend to Publish London Plan, for the reasons set out in paragraph 74 of the above report; but that possible remedies set out in that paragraph could address these deficiencies.

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

Please note that the Transport for London case officer for this application is Conor Brady, e-mail conorbrady@tfl.gov.uk.

Yours sincerely,



John Finlayson

Head of Development Management

cc Joanne McCartney, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee

National Planning Casework Unit, DCLG
Lucinda Turner, TfL
Rebecca Burnhams, DP9

27 January 2020

**B&M Home Store, 867-879 High Road,
Tottenham****in the London Borough of Haringey
planning application no. HGY/2019/2929****Strategic planning application stage 1 referral**

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Hybrid planning application (part Full/part Outline) for the demolition of existing buildings and structures, and redevelopment of the site for a residential led mixed use scheme with up to 330 residential units (Class C3), retail/cafe use (Use Classes A1/A3), an area of new public open space, landscaping and other associated works.

The applicant

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

Strategic issues

Principle of development: The principle of a high-density residential-led development on this site is supported (Paragraphs 12-15).

Affordable housing: The proposed 25% affordable housing offer falls significantly short of the Fast Track threshold and is unacceptable. GLA officers will continue to robustly scrutinise the viability appraisal to ensure that the maximum amount of affordable housing is delivered (Paragraphs 16-26).

Urban design and historic environment: The general layout, massing and heights principles are supported. 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 (Paragraphs 31-48).

Transport: The applicant is required to address issues in respect of Active Travel, disabled persons parking provision and parking management and cycle parking provision. Highway improvement works, a delivery and servicing plan and a construction logistics plan should be secured by condition or planning obligation (Paragraphs 51-65).

Climate change: Further information 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 (Paragraphs 66-71).

Recommendation

That Haringey Council be advised that the application does not comply with the London Plan and the intend to publish London Plan, for the reasons set out in paragraph 74 of this report.

Context

1 On 20 November 2019, the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor has to provide the Council with a statement setting out whether he considers that the application complies with the London Plan and the intend to publish London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Categories 1A, 1B(c) and 1C(c) of the Schedule to the 2008 Order:

- *1A "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."*
- *1B(c) "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - outside Central London and with a total floorspace of more than 15,000 square metres."*
- *1C(c) "Development which comprises or includes the erection of a building of more than 30 metres high and is outside the City of London."*

3 Once Haringey Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The application site is a 1.2 hectare rectangular parcel of land located on the west side of Tottenham High Road. The site comprises primarily a large car park, a large two storey retail store (B&M Home Store), located at the western end of the site and 6 single storey retail units. The site contains two listed (Grade II) Georgian townhouses (867 & 869 Tottenham High Road) and is bound by Brook House school and residential blocks of 5-23 storeys as part of the mixed use Cannon Road development to the north, Tottenham High Road to the east, low rise commercial development and the site known as The Goods Yard to the south, and the tree-lined embankment of the railway viaduct of the London Overground Line to the west. The area to the west beyond the railway is predominantly in low-rise residential use. Tottenham High Road contains a mix of retail uses as well as Tottenham Hotspur's football stadium to the south-west of the site, which was completed to provide a new stadium, with residential, hotel, sports centre, community and health uses also permitted as part of the scheme (GLA Ref: D&P/2292g/02; LPA Ref: HGY/2015/3000). A small part of the east of the site containing the listed buildings is within the North Tottenham Conservation Area.

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

7 The site is located on Tottenham High Road, which forms part of the Strategic Road Network (SRN). The closest part of the Transport for London Road Network (TLRN) is the A406 Angel Road, 800 metres north. The nearest station is White Hart Lane, 300 metres south, served by the London Overground, providing connections north to Enfield and Cheshunt and south to central London via Hackney. TfL has recently made enhancements to White Hart Lane station, providing increased station capacity, step-free access and additional ticket vending machines. The closest London Underground station is Tottenham Hale on the Victoria line, 2.1 kilometres south. The nearest bus stop is on the A1010 High Road Tottenham at Brantwood Road served by routes 149, 259, 279, 349 and N279. These routes provide direct connections to destinations including Enfield, Edmonton, Dalston, Finsbury Park, and other parts of Tottenham. The site has a Public Transport Access Level (PTAL) of 4 on a scale of 0 to 6b, where 6b represents the highest level of connectivity. The closest part of the Strategic Cycle Network is 600 metres south of the site at Church Street.

Details of the proposal

8 The proposal is in the form of a hybrid planning application, comprised of full and outline elements. Outline planning permission is sought for the demolition of existing buildings and construction of a residential-led mixed-use development in buildings of up to 29 storeys, comprising up to 35,000 sq.m. of residential floorspace (up to 330 units), and up to 102.2 sq.m. of non-residential space (Use Classes A1 and A3). Details of layout, scale, appearance, and landscaping within Blocks A, B and C are reserved for later approval. Details of appearance and landscaping only are reserved in relation to proposed Block E, and detailed permission is sought for Blocks D and G, including the change of use of the listed buildings (Block F). Works to the listed buildings are also subject of a separate listed building application with the outline application subject to parameter plans, design codes, and a development specification. An illustrative scheme is included in the design and access statement, which shows how the application could be delivered at reserved matters.

Case history

9 A series of pre-planning application meetings have been held between the applicant, Haringey Council and the Greater London Authority with an in-principle meeting held with the GLA on 06 February 2019 and a further detailed meeting on 12 March 2019. GLA officers concluded that, noting the existing use and the site allocation, the principle of high quality high density residential-led mixed use redevelopment of this site would be strongly supported in strategic planning terms. Further information was suggested relating to housing, urban design, and transport prior to the submission of any application.

Strategic planning issues and relevant policies and guidance

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

11 The following are also relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance.
- The London Plan intend to publish version (December 2019). In line with paragraph 48 of the NPPF, the weight attached to the intend to publish London Plan should reflect the stage of its preparation; the extent to which there are unresolved objections to relevant policies; and the degree of consistency of the relevant policies in the emerging Plan to the NPPF.
- Upper Lee Valley Opportunity Area Planning Framework (OAPF, 2013)
- The Tottenham High Road West Masterplan Framework (2014).
- Opportunity Areas *London Plan; intend to publish London Plan*
- Housing *London Plan; intend to publish London Plan; Housing SPG; Housing Strategy; draft Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG*
- Affordable housing *London Plan; intend to publish London Plan; Housing SPG; Housing Strategy; draft Housing Strategy; Affordable Housing and Viability SPG*
- Urban design *London Plan; intend to publish London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Historic environment *London Plan; intend to publish London Plan*
- Inclusive design *London Plan; intend to publish London Plan; Accessible London: achieving an inclusive environment SPG*
- Transport *London Plan; intend to publish London Plan; Transport Strategy; draft Transport Strategy*
- Climate change *London Plan; intend to publish London Plan; Sustainable Design and Construction SPG; Climate Change Adaptation Strategy; Climate Change Mitigation and Energy Strategy; Water Strategy; draft Environment Strategy*

Principle of development

12 The site falls within the Upper Lee Valley Opportunity Area, for which the London Plan and the Upper Lee Valley Opportunity Area Planning Framework (OAPF, 2013) identify an employment capacity of 15,000 and at least 20,100 new homes. The Mayor's intend to publish London Plan identifies the Opportunity Area's capacity for at least 21,000 new homes and 13,000 new jobs.

13 The Council's Tottenham Hale Area Action Plan (AAP, 2017) identifies the site as a relatively small part of Site Allocation NT5: High Road West, which envisages masterplanned, comprehensive development to create a new residential neighbourhood and a new leisure destination for London including a new public square and an expanded local shopping centre, as well as an uplift in the amount and quality of open space and improved community infrastructure. The indicative capacity for the Site Allocation is 1,200 homes, 4,353 sq.m. of commercial space, 11,740 sq.m. of town centre uses, and 1,200 sq.m. of other uses. The Tottenham High Road West

Masterplan Framework (2014) shows the application site comprising of medium density residential use with a new community park.

Residential

14 Policy H1 'Increasing Housing Supply' and Table 4.1 of the Mayor's intend to publish London Plan sets Haringey a 10 year housing target of 15,920 (increased from 15,019 in the current London Plan) per year between 2019/20 and 2028/29. The site is allocated for residential-led development in the Tottenham AAP and the Masterplan Framework. The redevelopment of the site including up to 35,000 sq.m. of residential floorspace (up to 330 units) is in accordance with local Policy and would contribute to London Plan and the Mayor's intend to publish London Plan housing targets and is supported.

Loss of retail floorspace

15 Both London Plan Policy 2.15 and Policy SD6 of the Mayor's intend to publish London Plan adopt a town-centre first approach, which recognises that town centres should be the foci for commercial development beyond the CAZ. London Plan Policy 4.7 and Policy E9 of the Mayor's intend to publish London Plan support a successful and diverse retail sector and resist the loss of retail facilities that provide essential convenience or specialist shopping. The proposed development would result in the loss of approximately 4,800 sq.m of retail floorspace. However, the development is not within a town centre location and the High Road West Masterplan identifies the site for predominantly residential use, with a range of retail uses provided elsewhere within the masterplan area. Furthermore, the existing big box retail use within the site does not provide a specialist or essential retail requirement. Accordingly, having regard for the strategic objectives of the site, the loss of retail floorspace is acceptable.

Housing

Affordable housing

16 London Plan Policies 3.11 and 3.12 and Policy H5 of the Mayor's intend to publish London Plan seek to maximise the delivery of affordable housing, with the Mayor setting a strategic target of 50%. Policy H6 of the Mayor's intend to publish London Plan identifies a minimum threshold of 35% affordable housing (by habitable room), with an upper threshold of 50% for industrial sites and public land. Applications providing the relevant threshold level of affordable housing before public subsidy; with an appropriate tenure split; having explored potential additionality through grant funding; and, meeting all other relevant Policy requirements and obligations to the satisfaction of the Mayor and the Local Planning Authority can follow the 'Fast Track Route'. Such applications would not need to submit a viability assessment, and would not require a late stage viability review mechanism to be secured as part of any legal agreement attached to any permission.

17 The Mayor's preferred tenure mix is outlined in Policy H7 of the intend to publish London Plan provided as at least 30% low cost rent (social rent or London Affordable Rent), at least 30% intermediate (London Living Rent or shared ownership), and the remaining 40% as determined by the local planning authority. As set out in the

Tottenham Area Action Plan, within the Tottenham AAP area, Haringey requires a tenure split of 60% intermediate accommodation and 40% affordable rented accommodation.

Unit type	Market Housing		Social rent		Intermediate (shared ownership)		Total		unit mix
	Unit	Hab room	Unit	Hab room	Unit	Hab room	Unit	Hab room	
One bed	72	144	5	10	10	20	87	174	27%
Two bed	147	443	16	48	29	91	192	582	59%
Three bed	24	103	8	36	8	35	40	174	12%
Four bed	6	30	0	0	0	0	6	30	2%
Total	249	720	29	94	47	146	325	960	
			76 units (23% by unit) 240 hab rooms (25% by hab room)						

Table 1: Affordable Housing offer on illustrative 325 unit scheme

18 The application proposes 25% affordable housing by habitable room, without public subsidy. The affordable housing tenure mix comprises: 61% intermediate housing (composed of shared ownership) and 39% Low-cost Rent (composed of social rent), as set out in the table above showing a 325 unit illustrative scheme.

19 The proposed affordable housing offer falls significantly short of the 35% Fast Track threshold and is unacceptable as schemes are expected to deliver at least the threshold level of affordable housing without grant or public subsidy and to increase this proportion through the use of grant and other subsidy where this is available. Only where there are clear barriers to delivery and it is fully justified through detailed viability evidence in line with the methodology and assumptions set out in Policy H5 of the intend to publish London Plan and the Mayor’s Affordable Housing and Viability SPG, would a lower level of affordable housing be supported. Accordingly, the applicant must seek to increase the level of affordable housing provision.

20 As outlined in policies H5 and H6 of the Mayor’s intend to publish London Plan, given the level of affordable housing proposed, the application must follow a viability tested route. The applicant has submitted a financial viability appraisal (FVA) which is currently under review by GLA officers. GLA officers will continue to robustly scrutinise the viability appraisal to ensure that the maximum amount of affordable housing is delivered. Should the level of affordable housing remain below the threshold level, both early and late stage review mechanisms must also be secured in accordance with the Mayor’s intend to publish London Plan.

21 The Council must publish, in full, the FVA in accordance with Policy H5 of the Mayor’s intend to publish London Plan and the Mayor's Affordable Housing and Viability SPG. GLA officers will ensure that the assessment is made available, to ensure transparency of information in accordance with the SPG and it is noted that a redacted version of the FVA has been published by the Council. Officers accept that in very exceptional circumstances there may be legitimate reasons for keeping limited elements of viability information confidential. However, for this to be the case, the LPA should be convinced that the public interest in maintaining the exception outweighs

the public interest in disclosing the information. Boroughs should therefore consider this carefully with reference to the 'adverse effect' and overriding 'public interest' tests. At this stage, GLA officers are not aware of exceptional circumstances for this case and expect an unredacted FVA to be published.

22 The requirement for an early stage viability review will be triggered if an agreed level of progress on implementation is not made within two years of any permission being granted in accordance with Policy H5 of the Mayor's intend to publish London Plan and the Mayor's Affordable Housing and Viability SPG. Early stage viability reviews may also be required relating to the timing of the submission and implementation of reserved matters applications. A late stage review will be required when 75% of the units are sold or let.

Affordability

23 The low-cost rented units are proposed at social rent levels to enable the Council to utilise the units to decant tenants from the Love Lane Estate should it wish to do so. The provision of the social rent as the low-cost rent component is strongly supported and should be secured as such within any S106 agreement along with any decant agreement between the applicant and the Council.

24 The affordability of the intermediate units are proposed in accordance with the Mayor's qualifying income levels as set out in the Mayor's Affordable Housing and Viability SPG, and the London Plan Annual Monitoring Report. In addition to this, annual housing costs (including service charges, rent and any interest payment) should be no greater than 40% of net household income. Affordability thresholds for all tenures must be secured in the section 106 agreement attached to any permission.

Housing choice

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

26 The applicant states that 14% of the units would be family-sized, defined as three-bedrooms and above, with the mix to be determined at reserved matters stage. In accordance with the London Plan and the Mayor's intend to publish London Plan, it is recommended that the Council secures a minimum proportion of family-sized low cost rent units.

Children's play space

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

28 Based on the applicant's illustrative scheme, this equates to a requirement for 798 sq.m. of play space, with 379 sq.m. for under-fives. On site play space of up to 1,250 sq.m. is proposed in residents' communal courtyards, public open spaces (including the new park), and a dedicated play space, and an indication of the design of play space has also been provided. Any reserved matters application would need to fully detail play space proposals taking account of existing and proposed off-site facilities, which should be appropriately secured and all play areas should be equally accessible to all household tenures.

Fire Safety

29 In line with policy D12 of the Mayor's intend to publish London Plan, development proposals must achieve the highest standards of fire safety and ensure that they: are designed to incorporate appropriate features which reduce the risk to life in the event of a fire; are constructed in an appropriate way to minimise the risk of fire spread; provide suitable and convenient means of escape for all building users; adopt a robust strategy for evacuation which all building users can have confidence in and provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.

30 The applicant is as such required to submit a Fire Statement by a third party suitably qualified assessor. The statement should detail how the development proposal will function in terms of: the building's construction; the means of escape; access for fire service personnel and equipment, and the ongoing maintenance and monitoring of these how provision will be made within the site to enable fire appliances to gain access to the building. The Fire Statement should be submitted prior to determination.

Urban design

31 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within chapter seven, which address both general design principles and specific design issues. London Plan Policy 7.1 and intend to publish London Plan Policy D1 set out a series of overarching design principles for development in London. Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage, views, and the public realm. New development is also required to have regard to its context and make a positive contribution to local character within its neighbourhood as set out in London Plan Policy 7.4 and intend to Publish London Plan policies D2 and D3.

Density

32 The London Plan and the Mayor's intend to publish London Plan seek to optimise housing capacity, taking into account a range of factors including local context, character, public transport provision and good design. Policies D1 and D3 of the Mayor's intend to publish London Plan place a greater emphasis on a design-led approach being taken to optimising the development capacity of a particular site and to make the best use of land, whilst also considering the range of factors set out above. The residential density of the proposed development would equate to approximately 271 dwellings per hectare (800 hr/ha). The proposals have been subject to independent design review through Haringey's Quality Review Panel as well as pre-application meetings with GLA

and Haringey Council design officers. The pre-application process has positively informed the evolution of the proposals. The site is located within the Tottenham AAP area where the principle of high density development, including tall buildings, is supported. Accordingly, noting the positive evolution of the scheme in response to the above-mentioned pre-application and design review processes, and having regard to the urban design and residential quality considerations within this report more generally, the proposed density is supported.

Site layout

33 The Council's approach to masterplanning the redevelopment of the area is fully supported in accordance with policies in Chapter 7 of the London Plan and Policies D1 and D2 of the Mayor's intend to publish London Plan. The general layout, massing and heights principles are supported and successfully aligned with the emerging wider context of the Tottenham AAP. The block layouts are arranged around legible residential streets that connect with neighbouring sites as well as framing the northern end of the park, which is welcomed.

34 The ground floor of each block positions a mix of maisonette and 2-bed units with individual front door access to the street with car parking and ancillary servicing areas located away from the primary areas of public realm and within the podiums of blocks C and D. This will help to promote activity, passive surveillance and a sense of ownership for residents.

35 The northern frontage at the base of the tower is taken up by refuse frontage and basement access. There does not appear to be a designated pedestrian footway serving the units to the rear of the tower which consequently risk becoming isolated from the wider scheme. The design team should therefore explore ways to reduce the size of the refuse/ancillary space to allow sufficient space for a safe and accessible footway to wrap around the north and west edges of the tower.

Residential quality

36 London Plan Policy 3.5 and Policy D4 of the Mayor's intend to publish London Plan set out housing quality, space, and amenity standards, and as discussed above, residential quality is particularly important for high density proposals such as this.

37 At the upper levels, residential layouts are efficient with a good distribution of cores and proportion of dual aspect overall. Single aspect south facing units should be designed to avoid overheating through passive measures such as shading.

Height, massing and appearance

38 The submitted Design Code is fairly limited in detail but provides sufficient information to secure the key design principles including definition of the three character areas, architectural principles to each block and landscaping/access principles. The detailed application for blocks D, F and G should be used as a benchmark for securing high design quality for the future phases of the development. Given the limited detail provided in the Design Code, the outline form of the application in relation to Block B raises concerns about the quality of the tower.

Further detail of the appearance of the tower should be submitted to enable this element to be fully assessed.

39 The heights arrangement responds successfully to the pattern and heights of emerging development and sets up a simple increase in height from the east to the west of the site. The tower itself is positioned to appear distinct, with elegant proportions in local views and the design team have given due attention to all four facades. The principle of defining the top, middle and base of the tower is welcomed however, the top of the tower appears poorly resolved at present and the inclusion of corner balconies at this level is questioned given the microclimatic conditions at this height.

40 The architectural treatment to the remainder of blocks is well-considered and appropriate for the proposed typologies and heritage context at the eastern end of the site.

Historic environment

41 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should “*have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*” and in relation to conservation areas, special attention must be paid to “*the desirability of preserving or enhancing the character or appearance of that area*”. Case law has established that there should be a strong presumption against granting permission that would harm a listed building or the character or appearance of a conservation area. A finding of harm must be given considerable importance and weight.

42 The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset’s conservation; significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset’s physical presence or its setting. Where a proposed development will lead to ‘substantial harm’ to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to ‘less than substantial harm’, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Policy HC1 ‘Heritage conservation and growth’ of the Mayor’s intend to publish London Plan, like London Plan Policy 7.8, states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets.

43 The buildings 867 and 869 High Road, Tottenham on the eastern edge of the site are statutorily listed (Grade II) buildings which will be retained and refurbished for residential use. This part of the site is also within the North Tottenham Conservation Area which contains a number of listed buildings focused along Tottenham High Road. Other listed buildings affected by the development include: the Grade II listed ‘Grange’

250 metres to the south of the site, 797 and 799 High Road, and 819 and 812 High Road to the south east. These listed buildings are also located within the North Tottenham Conservation Area. Other Conservation Areas are more than 250 metres to the west, beyond the railway viaduct, and south.

44 An assessment of the impact on heritage assets is contained within the applicant's Heritage Statement which includes an analysis of all heritage assets in the vicinity, and an analysis of the impact of the proposals. This takes account of the applicant's Townscape and Visual Impact Assessment (TVIA), which includes a visual analysis of the impact of the massing parameters on 19 views.

45 The proposals will provide some enhancements to the Conservation Area and its setting, and the setting of the listed buildings at 867 and 869 High Road through the removal of the unattractive car park and fragmented townscape to the rear of the listed buildings, refurbishment works and bringing the listed buildings back into viable use, the creation of a new street immediately to the north of the conservation area lined with good quality buildings, using complementary materials at an appropriate scale and set at comfortable distance. Due to the scale, distance and topography, and having regard for the approved development at the adjacent Good Yards site where the development is visible from other nearby conservation areas, the proposals would not affect their significance.

46 However, although the proposals locate a landmark tall building in an appropriate location as identified in the Masterplan Framework, it is considerably taller than envisaged, rising to 29 storeys, compared to 18 storeys in the Masterplan Framework. As currently proposed, the height of the proposed 29 storey block, will have some impacts on the setting of identified heritage assets if developed to the maximum parameters. The heights proposed in the Masterplan Framework were intended to limit impacts on the Conservation Area and listed buildings when viewed from Tottenham High Road.

47 The Heritage Statement concludes that the impacts are beneficial to heritage assets when considering cumulative impacts with the recently approved development on the Goods Yard site and GLA officers consider that less than substantial harm would be caused to heritage assets by the proposals. The public benefits arising from the proposals include the delivery of new homes, including affordable homes; the regeneration of the site; and new public space. However, as discussed under 'affordable housing' above, the application does not achieve the 35% affordable housing threshold, nor has it been established if the maximum viable amount of affordable housing has been provided, which limits the ability to assess the potential of public benefits. It should be noted that GLA officers must take account of the strong presumption against granting permission that would harm the character or appearance of the Conservation Area, and place considerable importance and weight to the harm caused to the setting of the listed buildings. The public benefits of the proposal could outweigh the less than substantial harm to the HAs but further discussion/interrogation is required in relation to the AH offer and in relation to how the other benefits will be secured/delivered.

48 It is therefore suggested that the applicant should seek to increase the public benefits its proposals would lead to by significantly increasing the level of affordable housing.

Inclusive design

49 London Plan Policy 7.2 and Policy D3 of the Mayor's intend to publish London Plan seek to ensure that proposals achieve the highest standards of accessible and inclusive design (not just the minimum).

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

Transport

Healthy Streets

51 The Mayor's Healthy Streets Approach aims to reduce vehicle dominance, improve air quality, increase walking and cycling, and make attractive places to live, work and do business. All development should to deliver improvements that support the ten Healthy Streets Indicators in line with Policy T2 of the Mayor's intend to publish London Plan.

52 The development should also support the Mayor's aims for all Londoners to do 20 minutes of active travel each day and for at least 80 per cent of trips across London to be made by walking, cycling and public transport by 2041. It is expected that new development makes a greater contribution to achieving this aim, particularly in well-connected parts of London such as the application site.

53 The proposed development provides opportunities to improve connectivity to the north and south which is strongly welcomed. These connections should prioritise walking and cycling.

54 The Transport Assessment does not include a full Active Travel Zone (ATZ) assessment which should be amended to include an ATZ assessment which identifies measures that could support the expected high walking and cycling mode shares. This should also identify locally important walking and cycling routes within a 20 minute cycle radius.

55 Any necessary mitigation identified through this work should be secured in the S106 agreement, S278 agreement or by condition as appropriate.

Car parking

56 The applicant proposes providing 54 car parking spaces for the residential part of the development which the proposed 2 car club parking spaces and 10 disabled persons parking spaces would count towards. Based on development of up to 330 dwellings as set out in the Planning Statement, this yields a car parking ratio of 0.16

spaces per dwelling. Should a lower number of homes be consented, the maximum car parking ratio should be capped at 0.16 spaces per dwelling. Should a greater number of homes be consented, the car parking should be capped at 54 spaces (including disabled persons car parking and car club spaces). The applicant is also strongly encouraged to reduce this level of car parking in order to make better use of land which could provide additional public realm, soft landscaping or cycle parking.

57 Notwithstanding the above, the provision of 12 spaces for electric vehicle charging points (EVCP) and the remainder enabled for passive provision of EVCPs is welcomed.

58 The site sits in a Controlled Parking Zone. In order to protect the residential amenity of the existing community and to prevent overspill car parking, new residents and business should be restricted from applying for parking permits. As set out in the Mayor's intend to publish London Plan, no car parking spaces should be allocated to any particular home and should instead be leased. This also applies to disabled persons car parking.

59 The applicant should show how car parking could be converted to other uses in future, including conversion to additional disabled persons car parking, cycle parking, soft landscaping or public realm. This should be set out in a Parking Design and Management Plan, which should be secured by condition and discharged prior to occupation.

Cycle parking

60 Cycle parking will be provided to the minimum standards as set out in the draft London Plan which is supported. Given the density of the proposed development, the need to achieve a high level of active travel, and the proximity of the Strategic Cycle Network the applicant is strongly encouraged to provide cycle parking above these minimum standards, and that cycle parking spaces are provided for a variety of cycles. Short stay cycle parking for the residential part of the development should be provided at a rate of at least 1 space per 40 dwellings, in line with the standards set out in the Mayor's intend to publish London Plan.

61 A minimum of 5 per cent of spaces should be provided for larger cycles, adapted cycles and cargo cycles. The remaining spaces should be provided via a combination of Sheffield stands and two-tier stands, in line with the London Cycling Design Standards. Short stay cycle parking should be provided in the public realm as close to building entrances as possible.

Public transport

62 The site must be integrated into the local bus network to support the high proportion of trips expected to be made by sustainable modes. Given the proposed scale of development, in addition to cumulative development impacts, a contribution of £450,000 (£90,000 per annum for 5 years) towards bus service enhancement will be required. Further discussions on the content of any obligation including triggers should be undertaken with Transport for London. This should be secured through a section 106 agreement.

63 The Transport Assessment does not include an assessment of how the number of rail trips will be divided between lines and stations, or the impact of the extra trips on lines or stations. This should be addressed.

Managing travel demand

64 Construction works and delivery and servicing will need careful management to deliver Vision Zero objectives. A full Delivery and Servicing Plan (DSP) and Construction Logistics Plan (CLP), both in accordance with TfL guidance, should therefore be secured by condition. The CLP should be in place before construction commences and the DSP prior to occupation.

65 A full Travel Plan should also be secured by condition and discharged prior to occupation.

Climate change

66 In accordance with the principles of London Plan Policy 5.2 and Policy SI2 of the Mayor's intend to publish London Plan, the applicant has submitted an energy strategy, setting out how the development proposes to reduce carbon dioxide emissions. The strategy comprises a range of passive design features and demand reduction measures. Based on the information provided, the detailed domestic element of the proposed development is estimated to achieve a reduction of 19.5 tonnes per annum (16%).

67 The applicant is proposing a site-wide heat network supplied by a centralised energy centre. It has been confirmed that all apartments and non-domestic building uses will be connected to the heat network. Further information on the heat network and configuration of the energy centre are required in order to confirm conformity with London Plan Policy requirements. Further information is also required on carbon emission calculations; energy efficiency measures; overheating; district heating connection potential; renewable energy; heat pump specification; and carbon off-set contributions.

68 Based on the submitted energy assessment, the carbon dioxide savings exceed the on-site target set out in Policy 5.2 of the London Plan for domestic and non-domestic uses. Any remaining shortfall in CO₂ reductions should be met through a Section 106 contribution to the Council's offset fund in order to meet the zero-carbon target in place for the residential element, in accordance with London Plan Policy 5.2 and Policy SI2 of the Mayor's intend to publish London Plan.

69 The approach to flood risk management and the surface water drainage strategy for the proposed development complies with London Plan Policy 5.12 and 5.13 (and policies SI.12 & SI13 of the Mayor's intend to publish London Plan).

70 The proposed development generally meets the requirements of London Plan Policy 5.15 (and Policy SI.5 of the Mayor's intend to publish London Plan). The Applicant should also consider water harvesting and reuse to reduce consumption of wholesome water across the entire development site. This can be integrated with the surface water drainage system to provide a dual benefit.

71 The Applicant should calculate the proposed development's Urban Greening Factor, as set out in Policy G5 of the Mayor's intend to publish London Plan and aim to achieve the specified target.

Local planning authority's position

72 Haringey Council officers are currently considering the application.

Legal considerations

73 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008, the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view.

74 Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

75 There are no financial considerations at this stage.

Conclusion

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

- **Principle of development:** The principle of a high-density residential-led development on this site is supported. However, the outline form of the tower element of the application raises concerns about the quality of the proposals.
- **Affordable housing:** The proposed 25% affordable housing offer falls significantly short of the Fast Track threshold and is unacceptable. Accordingly, the applicant must seek to increase the level of affordable housing provision. GLA officers will continue to robustly scrutinise the viability appraisal to ensure that the maximum amount of affordable housing is delivered. Should the level of affordable housing remain below the threshold level, both early and late stage review mechanisms must also be secured in accordance with the Mayor's intend to publish London Plan and the Mayor's Affordable Housing and Viability SPG.

- **Urban design and historic environment:** The general layout, massing and heights principles are supported. However, there are concerns that the tower isn't included in the detailed application given its prominence and the need to secure exemplary design quality. GLA officers consider that less than substantial harm will be caused to heritage assets; further information is required to establish if the full potential of public benefits has been realised.
- **Transport:** The applicant is required to address issues in respect of; Active Travel, disabled persons parking provision and parking management and cycle parking provision, Highway improvement works, a delivery and servicing plan and a construction logistics plan should be secured by condition and obligation as appropriate.
- **Climate change:** Further information 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.

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