

Planning Sub Committee

## REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

### 1. APPLICATION DETAILS

**Reference No:** HGY/2020/1584 & 1586

**Ward:** Northumberland Park

**Address:** Nos. 798-808 High Road, N17 0DH

**Proposal – Planning Permission:** Full planning application for the erection of a four storey building with flexible A1/A2/A3/B1/D1/D2 uses; external alterations to 798-808 High Road; change of use of 798-808 High Road to a flexible A1/A2/A3/B1/D1/D2 uses; demolition of rear extensions to Nos. 798, 800-802, 804-806, 808 and 814 High Road; erection of new rear extensions to Nos. 798, 800-802, 804-806 and 808 High Road; hard and soft landscaping works; and associated works.

**Proposal – Listed Building Consent:** Listed building consent for internal and external alterations to 798-808 High Road, including the demolition of rear extensions Nos. 798, 800-802, 804-806 and 808 High Road; erection of new rear extensions to Nos. 798, 800-802, 804-806 and 808 High Road; and associated works.

**Applicant:** Tottenham Hotspur Football Club (THFC).

**Ownership:** Private

**Case Officer Contact:** Graham Harrington

**Site Visit Date:** 30 August 2020.

**Date received:** 11 June 2020. **Last amended:** 18 September 2020.

**Plans and Documents:** 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.

### SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposed development with its proposed mixture of high-quality refurbished and new floorspace and flexible range of uses would establish a 'cultural quarter' (with a new live performance space and music recording studio at its heart), accords with Site Allocation NT7 in the Tottenham Area

- Action Plan and would help make the site vibrant and active at times when the THFC stadium is not in use;
- The 'cultural quarter' would provide between 30 and 285 net Full Time Equivalent (FTE) long-term jobs based on the possible range of proposed uses, as well as 174 FTE construction jobs, and is estimated would provide between £70,000 and £660,000 net additional local spending per year;
  - The resultant minor loss of residential accommodation is acceptable given the substantial increase in expected housing within the Site Allocation and from the applicant's separate proposals for No.807 High Road and the significant benefits that would come from the proposed uses;
  - The proposed loss of retail space from the North Tottenham Local Centre accords with Local Plan Policy DM43 and the proposed uses within and adjacent to the Local Centre should improve its vitality and viability;
  - The proposed new Linear Building and landscaped space would be high-quality additions to the townscape, creating a more accessible and inclusive environment and providing a new positive frontage to Northumberland Park and publicly accessible space (during the day), which would improve community safety (with the site currently experiencing high levels of anti-social behaviour);
  - The proposed refurbishment, alteration and extension of Nos. 798 to 808 High Road would facilitate the long-term use of these heritage assets, without harming their special architectural or historic interest or the character and appearance of the North Tottenham Conservation Area;
  - The proposed demolition of the building at the rear of No.814 and the proposed Linear Building and landscaped courtyard would enhance the setting of Nos. 798 to 808 High Road and preserve and enhance the character and appearance of the North Tottenham Conservation Area;
  - Subject to detailed noise mitigation and management measures, the proposed cultural uses should not cause unacceptable harm to residential amenity; and
  - The development would be 'car free', provide good cycle parking and facilities to encourage cycling, incorporate on-site renewable energy technologies and be designed to link with the proposed North Tottenham District Energy Network too help reduce carbon emissions.

## 2 **RECOMMENDATION**

HGY/2020/1584

- 2.1 That the Committee resolve to GRANT planning permission and that the Head of Development Management or the Assistant Director Planning, Building Standards and Sustainability is authorised to issue the planning permission and impose conditions and informative 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 **31 January 2021** or within such extended time as the Head of Development Management or the Assistant Director Planning, Building Standards and Sustainability 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.
- HGY/2020/1586
- 2.4 That the Committee resolve to GRANT Listed Building Consent and that the Head of Development Management or the Assistant Director Planning Building Standards and Sustainability 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 Building Standards and Sustainability 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/2020/1584** (the full text of recommended conditions is contained in Appendix 8 of this report).

- 1) 4-year time limit
- 2) Development to be in accordance with approved plans.
- 3) Contract for Linear Building before demolition of building r/o No. 814 High Road
- 4) Café/restaurant opening hours
- 5) Courtyard Opening Hours
- 6) BREEAM Accreditation Very Good' (Linear Building & Nos. 804-806 High Road)
- 7) Performance Space Noise 1
- 8) Performance Space Noise 2
- 9) Performance Space Noise 3
- 10) Performance Space Terrace – Use
- 11) Music Recording Studio Noise
- 12) Mechanical Plant Noise
- 13) Ventilation/Extraction Details
- 14) Landscape Details
- 15) External Materials and Details – Linear Building

- 16) External Materials and Details – Nos. 804-806 High Road
- 17) No new plumbing on outside of buildings
- 18) No new grills on outside of buildings
- 19) Secured by Design
- 20) Fire Statement
- 21) Updated Energy Strategy
- 22) Overheating
- 23) Mechanical Ventilation and Heat Recovery
- 24) Domestic boilers
- 25) PV array details
- 26) Land Contamination – Part 1
- 27) Land Contamination – Part 2
- 28) Unexpected Contamination
- 29) Stage I Written Scheme of Investigation of Archaeology
- 30) Stage II Written Scheme of Investigation of Archaeology
- 31) Cycle Parking Provision
- 32) Car Parking Provision
- 33) Car Parking Management Plan
- 34) Delivery and Service Plan
- 35) Construction Logistics Plan
- 36) Demolition/Construction Environmental Management Plans
- 37) Impact Piling Method Statement
- 38) Business and Community Liaison
- 39) Telecommunications

**Informatives Summary – Planning Application HGY/2020/1584** (the full text of Informatives is contained in Appendix 8 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) Sprinkler Installation
- 15) Designing out Crime Officer Services
- 16) Land Ownership
- 17) Site Preparation Works

**Conditions Summary – Listed Building Consent Application HGY/2020/1586**  
(the full text of recommended conditions is contained in Appendix 9 of this report).

- 1) 4-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 external materials & method statements (various)
- 9) Masonry cleaning
- 10) No additional plumbing on outside of buildings
- 11) No additional grilles on outside of buildings

**Informatives Summary – Listed Building Consent HGT/2019/1586** (the full text of Informatives is contained in Appendix 9 to this report).

- 1) Working with the applicant
- 2) External materials to be approved pursuant to Planning Permission (HGY/2020/1584)
- 3) Air Quality Monitoring Station Removal

**Section 106 Heads of Terms:**

- 1) **Energy:** (a) Submit a further revised Energy Strategy for LPA approval; (b) design scheme in accordance with generic specification to allow connection to North Tottenham DEN, (c) Pay Initial Carbon Offset Contribution based on connection to DEN, (d) Use all reasonable endeavours to connect to DEN and (e) if not connected within 10 years, pay an additional Deferred Carbon Offset Contribution.
- 2) **Initial Carbon Offset Contribution:** Amount to be determined in further revised Energy Strategy (payable upon commencement);
- 3) **Deferred Carbon Offset Contribution:** Amount to be determined in further revised Energy Strategy (payable after 10 years, if no connection to DEN);
- 4) **Be Seen:** Commitment to uploading data to the GLA's Energy Monitoring platform.
- 5) **Employment & Skills Plan:** (a) Local Labour during construction, (b) Construction Apprenticeships, (c) Apprenticeship Support Contribution and (d) End User training/skills financial contribution (£126,912) and possible partnership with the anchor tenant of a music recording studio;

- 6) **Car Free Scheme:** Changes to Traffic Management Order to prevent occupiers from obtaining Business permits in the North Tottenham CPZ (and £4,000 fee);
- 7) **Travel Plan:** (a) Detailed Travel Plan, (b) appointment of Travel Plan Coordinator and (c) financial contribution of £4,000 for monitoring of travel plan initiatives;
- 8) **Construction:** (a) Commitment to Considerate Contractors Scheme and (b) signing up to Construction Partnership and (c) £4,000 Construction Management Plan/Construction Logistics Plan monitoring fee; and
- 9) **Monitoring:** Borough monitoring costs in accordance with para. 5.42 of the Planning Obligations SPD (approx. £11,946).

### **Section 278 Highways Legal Agreement Heads of Terms**

- 1) Removal of redundant crossovers on High Road and Northumberland Park, link in with Northumberland Park highway works and re-planting of street tree in Northumberland Park footway.

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 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 DPD Policy DM40.
- ii. In the absence of a legal agreement securing the implementation of a further revised 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.
- iii. In the absence of legal agreement securing a Travel Plan, financial contributions toward travel plan monitoring and Traffic Management Order (TMO) amendments to prevent future occupiers from obtaining Business permits the proposals would rely disproportionately on 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 a legal agreement securing the developer's participation in the Considerate Constructor Scheme and the borough's Construction Partnership and monitoring of a Construction Management Plan and Construction Logistics Plan, 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 change of use and extension of the Listed Buildings, 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/or Listed Building Consent Application are refused for the reasons set out above, the Head of Development Management or the Assistant Director Planning, Building Standards and Sustainability (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.

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### **APPENDICES:**

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- Appendix 3: Quality Review Panel Chair's Briefing Report 8 September 2020
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### 3. PROPOSED DEVELOPMENT AND LOCATION DETAILS

#### 3.1. Proposed Development

3.2. The proposal follows repairs to the fabric of Northumberland Terrace, secured through the planning obligations attached to the Northumberland Park Stadium planning permission (HGY/2015/3000). This application proposes a more comprehensive approach to the Terrace and land to the rear to secure the long-term future of these buildings and further regenerate this part of Tottenham. The application proposals represent the third of four completed and proposed phases, as follows:

- Phase 1 – Paxton House, a new multi-functional building providing ticket office, club retail and administrative offices, was completed in 2019 and provides the immediate interface between the Stadium and southern end of the Northumberland Terrace;
- Phase 2 – Restoration of the external envelope of Nos. 790-794 High Road, including the removal of more recent rear extensions (N.B. Nos 796, Percy House, has also been fully restored and is now occupied by the Tottenham Hotspur Foundation);
- **Phase 3 – These application proposals;** and
- Phase 4 - Renovation of Nos. 790 (Grade II\*), 792 (Grade II) and 794 (Grade II) High Road. These proposals are still being developed and will be subject to further pre-application discussions with officers and Historic England.

3.3. The applicant's overarching vision for the Northumberland Terrace is to create an attractive and useable development that interlinks with the new Stadium and enhances, and better reveals, the heritage significance of the area. This would be achieved through the creation of new buildings, elevational improvements to existing historic buildings and significant public realm enhancements to create an attractive thoroughfare and public space between the new Stadium and Northumberland Park.

3.4. The proposed scheme comprises three elements, as follows:

- Erection of a new part-three and part-four storey multi-use 'Linear Building' along the eastern edge of the site, backing on to Lillywhite House, and fronting a proposed new courtyard space and Northumberland Park;
- Heritage-led restoration, internal alterations and extension to Nos. 798-808 High Road, to facilitate their reuse for a range of uses, the demolition of several modern rear extensions and a separate building at the rear of No. 814 and their replacement with new extensions and the 'Linear Building;' and
- Creation of a new high-quality semi-public courtyard between the 'Linear Building' and the High Road buildings.

#### Linear Building

- 3.5. The proposed mainly four-storey 'Linear Building' picks up the building line of the Paxton Building to the south and would extend this as a new eastern edge to the site, running north towards Northumberland Park. This elevation would run parallel to the existing blank Sainsburys elevation and face the backs of the High Road properties, forming a new terrace set back approx. 18m from the existing buildings and providing a frontage to the proposed courtyard. The proposed building turns through ninety degrees as it meets Northumberland Park to the north and reduces in scale to four-storeys with the top storey setback thus appearing as 3 storeys from street level.
- 3.6. The building would incorporate a new 3.7m tall undercroft on to Northumberland Park, to facilitate a proposed one-way vehicle servicing route from the High Road out on to Northumberland Park. The proposed design would embed the existing electricity sub-station in the building and include a defined pedestrian entrance and exit route to the east of the vehicular route. Gates would allow the courtyard to be closed at night.

#### Alterations and enhancements to Nos. 798-808

- 3.7. The proposed works to these mainly listed buildings are discussed in detail in the Heritage section. In summary, the proposals comprise the conservation and renovation of the buildings and, generally, replacement single-storey extensions that would be subservient additions. The exception being the proposed large two-storey extension to Nos. 804-806. These works would provide new "front doors" to the proposed courtyard space, in some cases allowing for uses to spill out in to it. The works would also improve the accessibility of the building, as discussed in detail in the Development Design section below.

#### Courtyard

- 3.8. The proposed landscaped courtyard (approx. 1,445sqm) would provide a new publicly accessible space, with a decorative screen and gate along the southern boundary and gate on the Northumberland Park frontage to allow for the space to be locked at night. The space would comprise a mixture of hard and green spaces, including a north-south linear rain garden, with steps and ramps to create variety in level and is designed to accommodate 'spill out' uses from the surrounding buildings – including cafes/restaurants, shops/outdoor market and live performances. It is designed to tie together the new and the old building and provide connections to and through the site.

#### Proposed Uses

- 3.9. Changes to the Use Classes Order 1987 came in to force on 1 September 2020. The Regulations that introduced the changes require Local Planning Authorities to determine applications that were submitted prior to this date in accordance with the previous use classes. This report therefore refers to the previous use

classes throughout. The proposed scheme is for a flexible range of uses for the refurbished and new buildings, as set out in Table 1 below.

**Table 1: Proposed Land Uses**

Property	Use (Use Class) and indicative uses	Proposed floorspace (sqm GIA)
No. 798	B1/D1 Gallery, creative workspace/ offices	235
No. 800	B1/D1 Gallery, creative workspace/ offices	606
No. 802	B1/D1 Offices, recording studio	262.5
Nos. 804-806	A3, B1, D1, D2 Café/bar, offices, performance space	920
No. 808	B1/D1 Gallery, creative workspace/offices	311.5
Linear Building	A1/A2/A3/B1/D1 Retail, café, gallery, creative workspace/ offices	2,953
All buildings	All proposed uses	5,288

3.10. The proposals allow for various future land use scenarios and these are discussed in Section 6.2 below.

### 3.11. **Site and Surroundings**

3.12. The site is largely rectangular in shape and located to the east of the High Road (A1010). It incorporates Nos. 798 to 808 High Road and land to their rear (east) and the rear part of No. 814 High Road, extending to 0.376 ha in area. The High Road runs in a north-south direction along the site's western boundary. The properties themselves form the western site frontage, being a continuous terrace of three and four storey Georgian and Victorian buildings that are irregular in size.

3.13. The High Road buildings are either statutorily listed or identified as making a positive contribution to the North Tottenham Conservation Area as follows:

- No. 798 – Listed Grade II;
- Nos. 800-802 – Listed Grade II;
- Nos. 804-806 – Conservation Area Contributor; and
- No. 808 – Listed Grade II\*.

3.14. The land to their rear is made up of tarmac and concrete hardstanding, providing a mix of informal car parking (approx. 23 spaces) and 158 cycle

parking spaces serving the adjoining Lilywhite House and the wider Stadium/Northumberland Development Project. This area has problems of antisocial behaviour and crime, with low levels of active surveillance and a perception of inadequate safety.

3.15. The existing uses on site are set out in Table 2 below.

**Table 2: Existing Land Uses within the site**

Property	Use (Use Class)	Existing floorspace (sqm GIA)
No. 798	Vacant	232
No. 800	B1, D1 Vacant	582
No. 802		261
Nos. 804-806	A1, A3, Residential (2 flats)	748
No. 808	Residential (4 flats)	324
No. 814 (rear)	B8/Residential (1 flat)	133
Total		2,280

3.16. The site is subject to the following planning designations:

- Within Site Allocation 'NT7' (Tottenham Hotspur Stadium), proposed for major mixed-use development alongside the redeveloped Stadium;
- Within the North Tottenham Growth Area;
- All but the eastern edge is within the North Tottenham Conservation Area;
- Nos. 804-808 are within the Tottenham High Road Local Shopping Centre;
- Within an Archaeological Priority Area and Critical Drainage Area; and
- Indicative Decentralised Energy "Connection Zone."

3.17. The Site is also within Flood Zone 1, being an area at the lowest risk of flooding. There are no further statutory or environmental designations applicable. The High Road properties have a Public Transport Accessibility Level (PTAL) rating of 5, with the eastern part of the Site having a PTAL of 4. The PTAL for the whole site is expected to rise to 5 in 2021 (with increases in frequency of train services from White Hart Lane Station).

3.18. The site and adjoining streets are within the Tottenham North Controlled Parking Zone (CPZ), which applies Monday to Saturday and restricts parking for the period 08.00 – 18.30 (Monday to Saturday). The site is also within the Tottenham Event Day CPZ.

3.19. Immediately adjoining the site to the south there are a number of further buildings of historic merit. No. 796 High Road (Percy House – Grade II\*) has been refurbished and provides offices for the Tottenham Hotspur Foundation. Beyond this is No. 794 High Road (Grade II); No. 792 High Road (Grade II); and

No. 790 High Road (Dial House – Grade II\*). Nos. 790 to 794 are currently vacant, previously being used for offices / residential. Immediately to the north of the site is Nos. 810/812 High Road (Grade II\*) (vacant, but with permission for community/business/café use); and No. 814 High Road (locally listed) which is a bookmakers on the ground floor and residential above., which has a separate 2-storey building to the rear that fronts Northumberland Park.

### 3.20. **Relevant Planning and Enforcement History**

- 3.21. Planning and Listed building consents for various properties in Northumberland Terrace, including planning permission and Listed Building Consent for a single-storey extension and the change of use of Nos. 810 and 812 to flexible D1, A3 and B1 use (HGY/2017/1181).

Planning Applications adjacent to the site of note include:

- 3.22. THFC Northumberland Park project including comprehensive phased redevelopment for a stadium, Tottenham Experience, sports centre, community, offices, housing and health centre, involving the demolition of three locally listed buildings and works to a Grade II Listed building (HGY/2015/3000 and 3001).
- 3.23. Lilywhite House, supermarket and Tottenham University College. Full planning permission for the retail supermarket and Lilywhite House (THFC's administrative offices) was granted in March 2012 (HGY/2011/2350). This permission was subsequently varied in March 2014 to allow for the introduction of the Tottenham University Technical College (UTC) within Lilywhite House (HGY/2013/1976). Permission was granted in March 2018 for the change of use of 1,810sqm of retail at first floor level to a 24-hour gym (HGY/2018/0149).
- 3.24. Paxton Building Ticket Office (Land to the rear of Nos. 790-796 High Road). HGY/2016/3310 (December 2016) - Erection of a four-storey building (Sui Generis Use) to comprise new ticket sales offices, retail, administrative offices and other ancillary uses; demolition of rear extensions of the listed buildings Nos. 792 and 794 High Road; demolition of boundary wall to the rear of 792-796 High Road; associated hard and soft landscaping; and other ancillary works. There are a number of approval of details consents.
- ### 3.25. **Consultation and Community Involvement**
- 3.26. 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.

- 3.27. Emerging proposals were considered by Haringey's Quality Review Panel (QRP) on 6 November 2019 and at a QRP Chair's Briefing on 8 September 2020. The QRP Report and Chair's Briefing Report following these reviews are attached as **Appendices 2 and 3**.
- 3.28. Emerging proposals were presented to the Planning Sub-Committee at pre-application stage on 10 February 2020. The minutes of this item are attached as **Appendix 4**.

## 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 Development
- LBH Pollution
- LBH Tottenham Regeneration
- LBH Transportation
- LBH Waste Management

### External Consultees

- Georgian Group
- Greater London Archaeology Advisory Service (GLAAS)
- Historic England
- London Fire Brigade
- London and Middlesex Archaeological Society
- Metropolitan Police Designing Out Crime Officer
- Music Venue Trust
- Thames Water
- Tottenham CAAC
- Tottenham Civic Society
- Transport for London

4.2. An officer summary of the responses received is below. The full text of internal and external consultation responses is contained in **Appendix 5**.

Internal:

**Carbon Management** – Officers are not wholly satisfied with the applicant's revised Energy Strategy and it is recommended that a condition requires the submission and approval of an updated Strategy before the commencement of development. However, subject to this and S016 planning obligations to facilitate connection to the proposed DEN and initial and deferred carbon offset contributions and conditions on other matters, there are no objections.

**Conservation Officer** – The proposal has been positively informed by a good level of research into the history and significance of the site and by a thorough design exploration. The proposed light touch restorative approach to the front elevations would raise the quality and legibility of the High Road frontage of the

terrace and is very welcome. The interiors of the listed buildings would benefit from careful repair works and a sensitive reconfiguration driven by detailed, bespoke design solutions. The demolition of poor-quality rear extensions and visual clutter is supported, being an opportunity to unveil the architectural quality of the listed buildings and to inform the spatial qualities of the new yard at their back. The proposed elegant and unobtrusive extensions appear to successfully complement, and, at the same time unveil, the architecture of the rear elevations of the listed buildings. The proposed Linear Building is an imaginative and bespoke design response to both the key features and domestic character of the historic terrace and the contemporary, dynamic geometries of the Paxton building. The yard and its new buildings and extensions to the historic and listed buildings reads as a well-designed, coherent and convincing solution to bring together the historic town and the new quarter and is fully supported from conservation grounds. Detailed design, material specification and methodologies for both demolitions, external, internal works and new extensions to the listed buildings should be approved by the Council to ensure preservation of the special character of the listed buildings.

**Design Officer** – Support for the proposed masterplan approach to the area between the High Road/Northumberland Park and Lillywhite House. The height, massing and density of the Proposed Linear Building and various extensions is modest and appropriate to its context. The proposed architectural detailing for these buildings is supported and the proposed landscaping treatment and use of the courtyard is welcomed.

**Drainage** – No objection, subject to a condition securing a SuDS management and maintenance plan.

**Pollution** – No objection, subject to conditions relating to unexpected Contamination, Non-Road Mobile Machinery, Demolition/Construction Environmental Management Plan. Also, an informative on the need for an Asbestos Survey.

**Regeneration** – Support in principle, although requests further information on viability of the proposed performance venue given COVID-19 pandemic, that it would complement and not compete with future proposals for High Road West and that proposed leisure uses are supported by a leisure demand study. Need to understand what public transport enhancements would be put in place and how operation would work alongside the stadium. Support community access (free/preferential access) to proposed uses for local people. Further information needed on how local employment and business opportunities could be secured.

**Transportation** –the application is considered acceptable to transportation subject to condition and S106 obligations, and a S278 agreement for Highway Changes.



**Waste Management** – Businesses must arrange waste collection with a commercial waste contractor.

External:

**Cadent Gas** – No comments received.

**Environment Agency** – No comments received.

**Historic England** – No comments – application should be determined in accordance with national and local policy guidance and the views of the Council's specialist conservation advisor

**Historic England – Archaeological Service (GLAAS)** – Site is within an area of archaeological interest. A planning condition should secure a Written Scheme of Investigation.

**Metropolitan Police (Designing Out Crime Officer)** – The DOCO has met with the design team. No objection in principle, subject to suitably worded planning conditions.

**Thames Water** – Water - no network infrastructure capacity objections, but request for conditions to safeguard water mains and other underground water assets and informative on water pressure. Surface Water and Foul Water drainage – no objections.

**Transport for London** – An Active Travel Zone assessment should be undertaken. Amount of proposed cycle parking acceptable, but detailed comments on proposed stacking details. Delivery and servicing and car parking arrangements acceptable. A Construction Logistics Plan should be secured by condition.

## LOCAL REPRESENTATIONS

5.1. On 9 July 2020, notification was sent to the following:

- 444 Letters to neighbouring properties
- 2 Letters to Haringey-based organisations (as noted above)
- 1 site notices erected in the vicinity of the site, publicising:
  - Planning application
  - Listed Building Consent application
  - development affecting the setting of the North Tottenham Conservation Area and Listed Buildings
- Press Advertisement (placed in Enfield Independent on 15 July 2020) advertising:
  - Major application affecting a conservation area and Listed Buildings

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

No of individual responses: 2  
Objecting: 1 individual  
Supporting: None  
Other: 1 individual

5.3. The full text of neighbour representations and the officer response are set out in **Appendix 6**.

5.4. The main issues raised in representations are summarised below.

Objections:

- Air quality monitoring equipment in the front of No. 808 High Road (Listed Building) is unacceptable and its removal should be a condition of any planning permission.

Other:

- Councillor Bevan – No objection, subject to uptake of advice from Historic England and the Council's Conservation Officer.

## 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. Development Design
4. Heritage Conservation (including Listed Building Consent matters)
5. Impact on Amenity of Adjoining Occupiers
6. Transportation and Parking
7. Energy, Climate Change and Sustainability
8. Flood Risk, Drainage and Water Infrastructure
9. Air Quality
10. Waste and Recycling
11. Land Contamination
12. Archaeology
13. Fire Safety and Security
14. Equalities
15. 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).

#### *The London Plan*

6.2.5 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.

6.2.6 In December 2019, the Mayor published an ‘Intend to Publish London Plan’. On 13 March 2020, the Secretary of State issued Directions to change a number of proposed policies. In line with paragraph 48 of the NPPF, the weight attached to this 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. Whilst the published London

Plan (2016) remains part of Haringey's Development Plan, given the advanced stage that the Intend to Publish version of the London Plan has reached, significant weight can be attached to it in the determination of planning applications (although there is greater uncertainty about those draft policies that are subject to the Secretary of State's Direction).

#### *Upper Lea Valley Opportunity Area Planning Framework*

- 6.2.7 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.

#### *The Local Plan*

- 6.2.8 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*

- 6.2.9 The site is located within the 'Northumberland Park Area of Change' as per Haringey's Spatial Strategy Policy SP1. This policy 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*

- 6.2.10 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.
- 6.2.11 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.
- 6.2.12 The site forms part of the Tottenham Area Action Plan (AAP) North Tottenham 7 (NT7) Site Allocation. This calls for (amongst other things):

- A. Redevelopment of the existing football stadium to increase match day capacity, with the introduction of residential, commercial, retail, education, community, leisure and hotel uses, and improved public realm across the site.
- B A mix of leisure uses around Tottenham Stadium to ensure it is a destination on match and non-match days;
- C Development which contributes to creating a wider commercial and visitor destination for the area.

6.2.13 Site Allocation NT7 sets out a number of requirements, including:

- The retail/commercial uses should be complementary and not compete with the uses proposed on the expanded Local Centre on the western side of the High Road within the High Road West area.
- 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 this document.
- To address the statutory presumption in favour of retaining heritage assets unless justifiable.
- An increase in residential on the site.
- Comprehensive approach to delivering physical improvements to the Northern/Northumberland Terrace, including the identification of viable, long term uses for vacant buildings.

6.2.14 Policy AAP1 (Regeneration and Master Planning) indicates that the Council expects all development proposals in the Tottenham AAP area to come forward comprehensively to meet the wider objectives of the AAP. The application scheme effectively comprises a mini masterplan for this part of the site, in line with overarching aspirations for the Site Allocation as a whole.

### 6.3 Policy Assessment

#### *Loss of Housing*

6.3.1 There is a pressing need for more housing in Haringey and London as a whole. Adopted London Plan Policy 3.14, Intend to Publish London Plan Policy H8 Local Plan Policy DM10 seeks to resist the loss of all existing housing, unless the housing is replaced with at least equivalent new residential floorspace.

6.3.2 The Site includes 7 private rented homes (4 in No. 808, 1 in No. 806a, 1 in No. 804 and 1 in the rear extension to No. 814), with an estimated floorspace of approx. 566sqm GIA. All of these homes would be displaced by the proposed non-residential uses. However, this needs to be considered within the context of Site Allocation NT7, which the site forms a part of. The Site Allocation calls for at least 285 additional homes within the wider Site Allocation. To date, planning permission has been granted for up to an additional 585 homes in the Allocation (approx. 49,000sqm GIA), meaning that it would deliver up to 300 more homes than the minimum requirement. When considered across the Site Allocation, the

proposed loss of housing would be outweighed by the substantial increase in expected housing, which can be considered to comply with relevant planning policies, and the significant benefits that would come from the proposed replacement uses. In addition, the applicant's separate proposals for No.807 High Road include 9 proposed homes, which would provide a net increase of a further 7 homes.

#### *Loss of Retail*

- 6.3.3 Part of the site (Nos. 804 to 812 High Road) is within the designated Tottenham High Road North Local Shopping Centre. Local Plan Policy DM43 allows for a range of appropriate town centre uses in Local Centres, providing that: (a) The overall number of units in non-retail use (including extant planning permissions) will not exceed 50% across the entire frontage, unless it can be demonstrated the proposal will significantly enhance the vitality and viability of the centre; and (b) an active frontage is provided, or if this is not possible, a window display or other appropriate town centre frontage.
- 6.3.4 The ground floor properties in the site that are within the Local Centre are currently in the following uses: No. 804 is a café (A3), No. 806 is a funeral directors (A1) and No. 808 is residential. The proposal would result in the loss of retail space from No. 806 (approx. 125sqm). However, a review of the Local Centre (06/11/19) reveals that, taking account of the approved A3/B1 and D1 use of Nos. 810/812, of 33 ground floor properties, 18 (55%) are currently in A1 use – making the loss of retail from the Local Centre acceptable in principle. In any event, this loss would be mitigated by the proposed retail use on the ground floor of No. 807 High Road, which is also within the Tottenham High Road North Local Shopping Centre (Planning application HGY/2020/1361, considered separately on this committee meeting agenda). The ground floor of this proposed building has been designed so that it could potentially accommodate a re-located Co-Op Funeral Care business, although this is by no means certain and the two schemes are not dependent on each other or technically linked.

#### *Principle of proposed flexible retail/business/community/leisure uses*

- 6.3.5 Site Allocation NT7 supports the provision of, retail, business, education, community and leisure use (amongst other uses) around the Tottenham Stadium to ensure it is a destination on match and non-match days.
- 6.3.6 Local Plan Policy DM41 supports proposals for new retail, leisure and cultural uses in Local Centres where they are consistent with the size, role and function of the centre, sustain and enhance vitality and viability and contribute to Haringey's spatial strategy and (subject to a sequential test) uses on the edge of such centres.

6.3.7 Intend to Publish London Plan Policy E3 also supports the use of planning obligations to secure affordable workspace for specific social, cultural or economic development for specific sectors – including creative and artists’ workspace rehearsal and performance space and makerspace, but only in specific circumstances.

*Future use scenarios*

6.3.8 The application seeks permission for a range of flexible alternative uses for parts of the site, as set out in Table 3 below. This table also sets out the current Use Classes that the proposed uses now fall within.

**Table 3: Propose Uses**

Property	Indicative uses	Proposed floorspace (sqm GIA)	Use Class when application submitted	Current Use Class
No. 798	Gallery, creative workspace/ offices	234	B1/D1	E & F1
No. 800	Gallery, creative workspace/ offices	606	B1/D1	E & F1
No. 802	Offices, recording studio	262	B1/D1	E
Nos. 804-806	Café, offices, community, performance space	960	A3/B1/D1 /D2	E & sui generis
No. 808	Gallery, creative workspace/offices	311	B1/D1	E & F1
Linear Building	Retail, café, gallery, creative workspace/ offices	2,953	A1/A2/A3/B1 /D1	E & F1

6.3.9 Given that the site allocation promotes retail, business, community and leisure uses throughout the NT7 allocation site, officers do not consider that there is a need to consider the sequential acceptability of these uses on the site. The proposed uses are welcome in principle.

6.3.10 Most of the proposed uses are flexible and could be located in any of the existing/proposed buildings. However, the proposed performance space (Nos. 804-806) and music recording studio (No. 802) are in proposed bespoke spaces suitable for these uses and are discussed in more detail below. The applicant is not proposing a minimum amount of any of the proposed uses. The Council therefore needs to consider whether it would be acceptable for no particular use

to be provided as well as whether the proposed maximum amount of a particular use would be acceptable.

- 6.3.11 The proposed uses are discussed in turn below. It should be noted that, given the proposed flexible use of space, the figures proposed for various uses add up to more than the total amount of proposed space.
- 6.3.12 Business space (B1). The proposal allows for 100% of the proposed floorspace (5,288sqm) to be used for B1 use. This is considered acceptable. The range of refurbished and new floorspace is likely to appeal to a range of different businesses – including administrative, research, design and makers, with floor-to-ceiling heights being appropriate for this range and the cellular nature of the existing buildings (in particular) would suit SMEs. Adopted and emerging planning policy does not require the provision of ‘affordable workspace’ on this site.
- 6.3.13 The proposed music recording studio at No. 800 falls within this use. The building as a whole has been designed to provide a home for a major recording label, and has benefited from discussions with a prospective occupier. The applicant has also had discussions with the Music Venue Trust. Recording spaces would be within a basement/ground floor extension and meeting rooms, break out spaces and video recording/editing rooms would be located on the upper floors.
- 6.3.14 Retail and Financial and Professional Services (A2). The proposal allows about 70% of the total proposed floorspace (2,953sqm) to be used for A1/A2 use, with this being allocated to the proposed new linear building. This building is partly within the Local Centre, as it fronts Northumberland Park, but would mainly front the proposed courtyard space. The proposed maximum amount and location of these uses is considered acceptable.
- 6.3.15 Café/restaurant (A3). The proposal allows about 73% of the total proposed floorspace (3,873sqm) to be used for A3 use, with this being allocated to the proposed new linear building and Nos. 804-806. This would allow for this use to be in outward facing locations of the site within the Local Centre and in the proposed new building fronting the proposed courtyard. The proposed maximum amount and location of these uses is considered acceptable.
- 6.3.16 Non-residential Institution (D1). This use includes art galleries, but also health centres, children day nurseries etc. The proposal allows for all of the proposed floorspace (5,288sqm) to be used for B1 use. This is considered extremely unlikely in practice, but acceptable in principle.
- 6.3.17 Assembly and Leisure (D2). This is the proposed performance and ancillary spaces proposed for Nos. 804-806 and its two-storey extension, which would be partly in the Local Centre. The proposal allows for the whole building as extended to be in D2 use (approx. 960sqm). The location, with access from the



High Street and the courtyard, and maximum amount of proposed floorspace is considered acceptable.

- 6.3.18 The extension would provide a double-height performance space with capacity for approx. 120 seated/300 standing at ground floor, and approx. 60 seated at first floor. There would also be an accessible terrace on the roof of the extension. The original building would form an integral part of this use, providing the supporting functions such as circulation, food/beverage, offices, 'green rooms' and additional back of house elements. The proposed performance space is a key aspect of achieving a 'Cultural Quarter' and destination at the site and has been designed to facilitate a range of "performance" related uses such as live music, comedy, dance/theatre and gallery/exhibition space. The connection to the proposed square allows the venue to work with potential 'pop-up' street food and retail markets in the courtyard to further their food and beverage offer.
- 6.3.19 The application is supported by a 'Performance Space Feasibility Study' which sets out how the proposed size, design, access and servicing arrangements have been informed by detailed discussion with The Music Venue Trust and prospective occupiers and that business planning and financial viability have been key considerations. The current COVID 19 pandemic presents particularly significant challenges to the viability of the proposal. However, it is recommended that any permission would have a standard three-year life and this would enable implementation of an approved scheme once the pandemic is over.
- 6.3.20 Overall. The permissive nature of the application, allowing for a range of uses and amount of uses, is considered necessary to provide the required flexibility to bring forward a vibrant and successful 'cultural quarter'. This and the potential maximum number of various components is considered acceptable and no harm to land use policy objectives is identified. Residential amenity and other issues are discussed below.
- 6.3.21 Community access/engagement. The Regeneration Team has raised the prospect of free access to the proposed performance space for schools and local groups and preferential hire rates for local organisations and musicians is explored and this has been discussed with the applicant. However, in response, the applicant has stressed the importance of securing the right tenants to ensure that the scheme is successful and provides a long-term beneficial future for the on-site heritage assets and that providing subsidised access would compromise the delivery of a scheme that is already marginal in viability terms. The applicant has also stated that it does intend to undertake a range of community-based events at the site where possible, including within the proposed new publicly accessible courtyard, but that it would not be practical, realistic or justified by planning policy to have these aspects controlled under this application.
- 6.3.22 The Regeneration Team notes that the proposed scheme could provide opportunities for the Borough's food and beverage entrepreneurs and provide

creative pathways for young people, particularly by way of partnership working with an anchor institute for the recording studio. The applicant has responded by stating that it is in advanced discussions with a major potential anchor tenant (Universal Music Group) and that part of UMG's focus would be to provide a platform for new talent within the music/recording industry, including marketing and management, but that it would not be possible to accommodate wider community uses alongside their operation, which must be prioritised.

6.3.23 In the absence of any specific planning policy requiring community access to proposed new leisure/cultural facilities or preferential commercial terms for Borough residents/businesses, officers do not consider it is possible to insist on this. However, the inherent nature of the proposals would deliver a number of economic and regeneration benefits, as outlined below, and it is possible that wider community access to facilities could be negotiated with occupiers once they are established.

#### *Employment and regeneration benefits*

6.3.24 The applicant's Regeneration and Economic Statement applies industry-standard job/floorspace ratios to a best-case employment scenario (all B1) and a worse case employment scenario (all D1 art gallery) and identifies the likely range to be 30 to 285 net Full Time Equivalent (FTE) jobs based on the possible range of proposed uses. This compares with an estimated 60 jobs on the site at present, so there could be a net loss of employment. The Statement goes on to set out other regenerative benefits of the proposals, which can be summarised as follows:

- Construction jobs - an average of 174 FTE jobs over the 18-month construction period;
- A new "Cultural Quarter" for North Tottenham creating a destination in its own right, and supporting existing uses and communities to thrive;
- Creation of a recording studio, and a performance venue forming the heart of the new "Cultural Quarter";
- Regeneration effects and enhancement of heritage buildings along High Road - transformation of the existing site to a high-quality new development;
- High quality new workspace - 5,288 sqm gross (3,470 sqm net) GIA new and refurbished high-quality flexible workspace;
- Skills and training opportunities - In work employment and training opportunities accessible to local people;
- Wider local economic benefits - between £70,000 and £660,000 net additional local spending per year, supporting local businesses; and
- Gross Value Added uplift - between £2.6 million and £24.4 million.

6.3.25 In line with the Council's Planning Obligations SPD, it is recommended that s106 planning obligations secure the following: (a) Local Labour during construction, (b) Construction Apprenticeships, (c) Apprenticeship Support Contribution and (d) End User training/skills contribution (£126,912). It is also recommended that

obligations also require exploration of the possibility of securing a partnership with the anchor tenant of a music recording studio.

## 6.4 Development Design

### *Policy Background*

- 6.4.1 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.

### *Quality Review Panel Comments*

- 6.4.2 Haringey’s Quality Review Panel (QRP) has assessed the scheme in full at pre-application stage (on 6 November 2019). The Panel’s comments are summarised in Table 4, with an officer response. At the request of the Panel, a Chair’s Review of the submitted application took place on 8 September 2020. The Chair’s comments are summarised in Table 5, with an officer response.

**Table 4: QRP comments & response**

<b>QRP Comment</b>	<b>Officer Response</b>
There remains scope to refine the architecture of the proposals, in particular the elevations of the studio building, and the performance and gallery spaces. It would also encourage the design team to explore options to replace the rear façade of 790 High Road, to better accommodate the uses proposed, showcase the cultural uses within the rear courtyard, and define a stronger gateway into Paxton Place.	The linear building and performance space designs have been significantly altered to respond to these comments. No. 790 High Road will be addressed in Phase 4.
Further refinement of the soft and hard landscape within the courtyard would also be supported, to ensure that the space will support a variety of different uses. In addition, The Panel would like to know more about the detailed design of some of the key ‘thresholds’ and gateways within the site.	The landscaping design has been revised in light of these comments to support different uses. The thresholds to the proposed scheme are discussed under Public Realm, Landscape and Boundary

QRP Comment	Officer Response
	Treatments and Secured by Design below.
The courtyard space needs to function well across a variety of usage levels, for example in an everyday setting, or on a market day, or during a festival. It would encourage further thought about how the landscape design could support these different activities.	The layout of the proposed scheme has been amended in response to these comments
Clarity around the level changes across the site would be welcomed. Drawing cross-sections through the courtyard space could help to inform the 3D design of the different spaces and routes within the central area of the site.	Cross section drawings have been submitted as part of the application.
The Panel would like to know more about the detailed design of some of the key 'thresholds' within the site; for example, the gated entrances to the courtyard, and the eastern edge of the site adjacent to Lilywhite House.	As above, the thresholds to the proposed scheme are discussed under Public Realm, Landscape and Boundary Treatments and Secured by Design below.
Consideration of 'secured by design' principles should help to inform the design of these gateways, to avoid the creation of places lacking in surveillance. Bringing the location of gates adjacent to the High Road forward to remove potential hiding places might be an option to explore.	The design has been informed by discussions with the Metropolitan Police Designing Out Crime Officer and the issue is discussed under Secured by Design below.
The Panel would also like more information about the proposed lighting throughout the scheme. The design of lighting within the courtyard will be very important and help to define whether the space will be perceived as public or as private, while also evoking a sense of 'theatre'.	Proposed lighting is discussed under Realm, Landscape and Boundary Treatments below.
Consideration of exactly what uses are proposed within the existing buildings of Northumberland Terrace will help to inform the nature and detail of the refurbishment. This will be essential to resolve the technical issues of inserting new uses into heritage buildings.	Proposed uses of the High Road properties are discussed in detail under Heritage below.

<b>QRP Comment</b>	<b>Officer Response</b>
This block reflects some of the rhythms of the Northumberland Terrace within its façade, but the panel questions whether this is successful and would encourage further thought about how the architecture of the studio block responds to the existing terrace and expresses its use. A less domestic appearance could be appropriate.	The linear building design has been significantly revised to respond to these comments and is discussed under Linear Building - Scale, Form and Massing below.
Issues of safety and perception of safety should also inform the detailed design of the entrances to the residential accommodation.	Residential is not one of the proposed uses.
Further engagement with local businesses and community groups could also help to inform the detailed design of the studio block, ensuring that it responds well to local economic need.	Proposed uses of the Linear Building are discussed under Policy Assessment above.
Cycle storage areas providing ventilation to the under-croft car park of Lilywhite House leave little space for active frontage. Options that could be explored to address this include adjusting the location of the café to allow spill-out space at the sides, or adjusting the relationship and location of the different areas of cycle parking.	The scheme has been revised to accommodate café spill out space.

**Table 5: QRP Chair Review comments & response**

<b>QRP Chair Review Comment</b>	<b>Officer Response</b>
The panel is supportive of the scale and massing of the proposals and feels that the interventions proposed will successfully mediate between the stadium and the terrace of existing buildings (including a number of significant heritage assets) that comprise Northumberland Terrace.	Noted
The panel welcomes the site sections across the courtyard space, presented at the review. It feels that the broad principles for the design of this courtyard area are working well; however, it	It is recommended that landscaping details are reserved by planning committee.

QRP Chair Review Comment	Officer Response
<p>recommends further work to ‘flesh out’ some of the planting and landscape details.</p>	
<p>It would encourage submission of additional drawings clarifying the detailed design and materiality of some of the key ‘thresholds’ within the site; for example, the fences, gates and other boundary treatments.</p>	<p>The application does include these details, but it is recommended that details are reserved by condition to allow for refinement.</p>
<p>The Panel warmly supports the ambition to bring Northumberland Terrace back into full use, including the refurbishment of a number of significant heritage assets. It welcomes the removal of later built additions to the rear elevation.</p>	<p>Noted</p>
<p>The Panel notes that the interiors of the historic buildings are significant elements of these heritage assets. It therefore advises that alterations and additions to these should be described as fully as possible in the planning application.</p>	<p>The Listed Building Consent application includes full details of proposed interventions -which are discussed in Section 6.5.</p>
<p>The Panel supports the ‘quiet and restrained’ approach to the design of the extensions to the rear of 798 to 808 High Road, but feels that the current proposals for the extensions lack a level of refinement, and would benefit from some further consideration. This could involve using different materials (rather than brick) to express where the new additions have been made to the listed buildings. Alternatively, it may just require a different approach to the composition of the facades, alongside additional texture and detail within the brickwork - for example, reveals and header courses.</p>	<p>These issues have been discussed with the design team and a number of revisions have been made to the proposed extensions to address these points.</p>
<p>The Panel would also encourage the design team to reduce the perceived visual bulk and massing of the extension to the rear of 804-806 High Road (the two-storey performance space), for example through a ‘lighter’ approach to the design of the balustrade.</p>	<p>Revisions to this proposed extension include using a lighter colour cladding and introducing additional glazed balustrade sections</p>

QRP Chair Review Comment	Officer Response
<p>The quality of materials and construction for the extensions, the new studio block and the public realm will be essential to the success of the completed scheme. This will include the quality and type of bricks used in addition to the brickwork details. It would support planning officers in securing this through planning conditions.</p>	<p>It is recommended that all external material is reserved for subsequent approval by planning condition.</p>
<p><u>Linear Building</u> - The Panel also supports the concept of screening the car park area to Lilywhite House with a new block to the rear of the Northumberland Terrace, which will provide a stronger edge to the courtyard.</p> <ul style="list-style-type: none"> <li>- Refinements to the architectural expression of the linear studio block are also welcomed; this part of the scheme now works very well.</li> <li>- The good provision of cycle parking within the ground level of the studio block will help support the aspiration for healthier neighbourhoods.</li> <li>- The cycle storage areas will provide ventilation to the under-croft car park of Lilywhite House. It feels that the proposed adjustments to the configuration of the ground floor accommodation as presented at the review (e.g. the spill-out space for the café, and the proposed retail) will provide some activity and vitality to this elevation.</li> </ul>	<p>Noted.</p>

### *Site Layout*

- 6.4.3 The proposed Linear Building picks up the building line of the Paxton Building to the south and extends this as a new eastern edge to the existing rear yard space, running north towards Northumberland Park. This single-aspect building would run parallel to the existing blank Sainsburys elevation and face the backs of the High Road properties, forming a new terrace set back approx.18m from the existing buildings. The proposed building turns through ninety degrees as it meets and fronts Northumberland Park. The existing electricity substation near the street would be embedded within the proposed building, which would also provide a vehicular exit and pedestrian entrance/exit in a 3.7m high under croft, with a commercial unit at ground floor fronting Northumberland Park. Gates would allow the courtyard to be closed at night.

- 6.4.4 This building and extended High Road properties would provide active ground floor frontages to the High Road, Northumberland Park and the proposed landscape courtyard space. The proposed Linear Building includes two commercial units (most likely to be retail/café/restaurant uses), and two entrance/reception areas providing access to the upper floors. There would also be four gated cycle stores/locker spaces and refuse storage areas (with metal screens along the eastern edge, to maintain sufficient ventilation for the existing Lillywhite House car park).
- 6.4.5 The proposed ground floor extensions to the High Road properties would provide new accessible 'front doors' to these buildings, with reception areas. The proposed performance space at the rear of Nos. 804-806 High Road is designed to 'spill out' into the courtyard. Upper floors of the proposed Linear Building and the refurbished High Road buildings would accommodate a range of uses that would provide passive surveillance of the High Road, Northumberland Road and the courtyard.
- 6.4.6 The proposed scheme would be incorporated into the wider Stadium egress, evacuation and inclusive access strategies. The Linear Building would incorporate the existing Lillywhite House stair core within it and would provide a potential new front door to the adjoining London Academy of Excellence school and maintains their emergency egress route via a new protected lobby. The proposed scheme would also accommodate an emergency egress and escape core from the neighbouring Sainsburys building, next to the embedded substation, maintaining a route to Northumberland Park. Similarly, the adjacent Lillywhite House car park has an exit to its north west corner which needs to be maintained as part of the fire strategy and this would also be incorporated within the exit route to Northumberland Park.
- 6.4.7 Officers consider that the proposed layout is a good response to its context which deals well with the challenges posed by the complicated access and ventilation requirements of the adjoining Lillywhite House and provides active frontages to Northumberland Court and the proposed courtyard.

#### *Linear Building - Scale, Form and Massing*

- 6.4.8 The proposed part four and three-storey building successfully mediates between the scale of the historic terrace, Lillywhite House and the Stadium. It would also relate well with Paxton House to the south by being at a level half a storey below the height of that building. The main north-south element of the building would have a three-storey parapet line, with a fourth-storey set back from the courtyard and Northumberland Terrace. The undulating parapet line would be similar to the Paxton Building and would also hinge in and out in plan form to pick up subtle steps in the historic terrace opposite.



- 6.4.9 The Northumberland Terrace element of the building would be two-storeys with a set-back third floor, reflecting the scale of properties on the north side of Northumberland Park. The proposed two-storey parapet level also matches the parapet level of No. 814 High Road, as it turns the corner in to Northumberland Park.
- 6.4.10 The proposed scale and massing of the Linear Building has been well-received by QRP and officers consider that it would be a high-quality addition to the area that would replace the existing unattractive building at the rear of No. 814 High Road and provide an attractive edge to Lillywhite House. The supporting material includes two Accurate Visual Representation (AVR) views. View 1 (White Hart Lane, looking west) shows how the proposed Linear Building would just pop above the roof line of the Listed Buildings at Nos. 798-802 in this view along the street, with the much more dominant Lillywhite House building behind. View 2 (from the Junction of Northumberland Park and High Road looking towards Sainsbury's) shows how the proposed Linear Building would front on to Northumberland Park, sit comfortably alongside the corner building of No. 814 (a Locally Listed building) and would sit behind the rest of the Northumberland Terrace buildings.
- 6.4.11 The proposed scale and massing of extensions to the historic High Road buildings are discussed in detail in the Heritage section below.

*Linear Building - Appearance and Materials*

- 6.4.12 The proposed north-south element next to Lillywhite House would provide a contemporary interpretation of Georgian architectural language by using a dark brick to 'anchor' the building, with lighter more prominent storeys above and brickwork would dissolve from dark to light. The proposed undulating plan and parapet line would be complemented by finishing the angled bays in differing colours of brick to respond to the varying existing tones of the heritage buildings opposite. The upper floor windows would be offset from the opening below to present a more organic elevation and window heads would follow than angle of the set-back roof line, with this top floor being clad in standing seam zinc cladding in a light tone.
- 6.4.13 The Northumberland Park elevation would also be in brick, but with the introduction of a blue glazed brick on the ground floor. This is similar to the recent rear extension to Percy House (No. 796 High Road) and would provide a richer, more robust elevation which would be easy to clean. The proposed elevational design would tie in well with the existing elevation at No. 814 High Road by pulling through cornice, window and parapet lines. Warm, buff tone, brick would be used at first floor over the blue brick base and a red brick would be used for the set back east end bay over the substation. Red brick would also be used to pick up the header course detail above the first-floor windows along the full length of the elevation. In a similar manner to the north-south element of

the building, the top floor would be clad in light coloured zinc with standing seams and window heads which follow the angle of the roof.

- 6.4.14 It is recommended that external materials of the building are reserved by planning condition.

#### *Public Realm, Landscaping and Boundary Treatments*

- 6.4.15 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.
- 6.4.16 The proposed landscaped courtyard (approx. 1,445sqm) would tie together the new and the old buildings. Access to and through the space has been a major consideration in its design, with the proposed one-way vehicle access in from the High Road and out on to Northumberland Park (via an existing and proposed gated under crofts). Automated bollards along the southern boundary, next to Paxton Place, would be retained, with a new entrance gate centred on them, the fixed bollards removed and replaced, partly by the linear building itself, and partly with a metal screen and sliding section running across to the corner of the Percy House extension. The screen would be made of shallow fins and rise up to the datum of the top of the ground floor linear building. The space and pedestrian links through it would be open during the day, but closed at night for security reasons.
- 6.4.17 The proposed space has been designed around threshold/gateway spaces (the historic buildings, Linear Building, under crofts and Paxton Square), a north-south street and a central focus space to the rear of the proposed performance space at Nos. 804-806 High Road. The space would comprise a mixture of hard and green spaces, including terraced gardens at the rear of the historic buildings, a north-south linear rain garden, with steps and ramps to create variety in level and is designed to accommodate 'spill out' uses from the surrounding buildings – including cafes/restaurants, shops/outdoor market and live performances. Feature totem lighting would be sited around the focus space. The north-south orientation of the space and scale of the stadium's podium space immediately to the south means that it should be well lit throughout the year and receive sunlight.
- 6.4.18 Officers welcome the proposed design and functionality of the space and it is recommended that planning conditions be used to reserve hard and soft landscaping details, the management and maintenance of SuDS features, measures to ensure a net gain in biodiversity and lighting and opening times to ensure that the space is open to the public during the day.

#### *Secured by Design*

6.4.19 The site currently suffers from anti-social behaviour at present and the need to ensure a safe and secure environment is an important consideration. The design team has had discussions with the Designing out Crime Officer and these have helped inform the access and movement strategy, lighting and proposed thresholds and boundary treatments outlined above. The applicant also intends to install CCTV to the under-croft space underneath the first-floor link between No.798 and No.800 High Road and as part of the proposed new Linear Building on to Northumberland Park. It is recommended that planning conditions require Secured by Design accreditation.

#### *Inclusive Design*

6.4.20 Pedestrian approach routes to the site would be of sufficient gradient and slip resistance so as to provide compliant (greater than 1:21 gradient) access to all. The proposed design incorporates high level lighting within the courtyard from totems; wall mounted, timed, dawn to dusk fittings at under croft locations; and PIR activated lights at all building access points and within cycle stores to provide safe orientation and way finding. Proposed landscaping should provide visual interest and scent at different times of the year

6.4.21 All floors of the proposed Linear Building would be accessible by all three proposed stair and lift cores (making wheelchair accessible possible if one or two lifts are out of action due to breakdown or maintenance) and there would be accessible WCs on all floors. Likewise, all floors of the proposed performance space at Nos. 804-806 would be served by lift and include accessible WCs.

6.4.22 Wheelchair access would be less extensive in the refurbished Listed Buildings High Road properties. However, the proposed extensions and works would ensure level access to all properties from the courtyard (with a platform lift in No. 808) and include accessible WCs, meaning the ground floors of Nos. 798, 800-802 and No. 808 would be accessible for wheelchair users. The proposed recording studio in the basement of No. 800 would also be served by a lift.

#### *Development Design – Summary*

6.4.23 Overall, officers are supportive of the proposed design of the Linear Building, building extensions and courtyard space, which has benefitted from peer review by the QRP. Subject to the recommended conditions highlighted above, the proposed scheme would provide high-quality, safe and inclusive buildings and spaces that would be a positive addition to this part of Tottenham.

## **6.5 Heritage Conservation**

6.5.1 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.

- 6.5.2 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.
- 6.5.3 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.
- 6.5.4 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.
- 6.5.5 Policy NT7 makes clear that where development is likely to impact heritage assets, a detailed assessment of their significance and contribution to the wider conservation area should be undertaken and new development should respond to it accordingly.

#### *Legal Context*

- 6.5.6 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".
- 6.5.7 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."
- 6.5.8 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.”

- 6.5.9 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.
- 6.5.10 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.
- 6.5.11 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.
- 6.5.12 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*

- 6.5.13 Northumberland Terrace was built in phases and initially comprised two symmetrical detached 18th century blocks, which were joined by later development. Nos. 798, 800 and 802 High Road have been used, altered and interconnected in different ways over time to provide a variety of units that differ from their current divisions. There is some evidence that Tudor timbers from the demolished 16th century Black House having been reused in the Terrace.

- 6.5.14 The listed buildings at Nos. 790 to 802 (which include the application buildings Nos. 798, 800 and 802) form a group. This group value is an important aspect of their significance, and together they make up a prominent and historically significant part of the North Tottenham Conservation Area.
- 6.5.15 The group of listed buildings is complemented by the two magnificent Georgian houses at Nos. 810 and 812 High Road. The late 19th century buildings (Nos. 804-806 High Road) and a mid-19th century former bank (No. 814) are also identified as making a positive contribution to the Conservation Area. No. 814 is also a locally listed building.
- 6.5.16 The North Tottenham Conservation Area Appraisal and Management Plan highlights that the group of buildings at Northumberland Terrace comprises the finest ensemble of Georgian properties in the Tottenham High Road Historic Corridor, and individually some of these are heritage assets of the highest significance. Despite the recent restoration work to the grade II\* listed Percy House and its separately grade II\* listed Entrance Gateway, much of Northumberland Terrace remains in a state of neglect.
- 6.5.17 The submitted Heritage Statement sets out an understanding of the significance of the above heritage assets. In addition, submitted detailed significance plans identify existing fabric (17/18th century fabric of high significance, 19th century fabric of modern significance, 20th century fabric or modern replica of low significance and modern fabric of neutral/no significance).
- 6.5.18 The Heritage Statement included a detailed assessment of significance based on the following four values:
- Evidential (“the potential of a place to yield evidence about past human activity”);
  - Historical (“the ways in which past people, events and aspects of life can be connected through a place to the present”);
  - Aesthetic (“the ways in which people draw sensory and intellectual stimulation from a place”); and
  - Communal (“associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence”):
- 6.5.19 The Heritage Statement concludes that the existing Northumberland Terrace demonstrates the above values in the following ways:
- There is a very good extent of survival of the original form, massing, scale, symmetry, details and materials, and the surviving fabric is of a high quality. At the rear, the extent of survival is significantly less;
  - The fabric contributes significantly to the understanding of the C18 and C19 growth of the area; the architectural styles, details and materials characteristic of the period; and the social and commercial uses over time;

- The original design is readily discernible despite later changes, where key original features such as doors and doorcases, windows, cornices, steps, railings and mouldings contribute significantly to that design;
- The group has associations with the Percy family, the social events of the C19 and C20, local professionals and tradespeople, and connections with the THFC that provide added interest; and
- The Terrace is a significant landmark within the locality and the Conservation Area, because of its historic and architectural appearance, scale, massing, continuity and key position in the High Road.

### *Proposed works*

6.5.20 Alterations to the mid-18th century Listed Buildings (Listed Grade II). The scope of proposed works can be summarised as follows:

- Carrying out conservation repairs to roofs, exteriors and interiors in order to improve the longevity, use and appearance of the buildings;
- Removing ad-hoc extensions and works to interiors;
- Reinstating elevations where the extensions have been removed;
- Removing open-plan office spaces and re-ordering the layouts in order to better reveal and reinstate the original divisions between rooms and units;
- Revealing and reinstating original designs, details, layouts, volumes, spaces, elevations, windows, doors and other architectural elements that are missing or damaged;
- Providing improved, less intrusive WCs, kitchens, fire protection, ventilation and services;
- Improving access (such as to the roof) to ease ongoing maintenance; and
- Enhancing exterior spaces, boundaries, frontages and access to the buildings.

6.5.21 No. 798 (Jatko House) - Refurbishment, alterations and replacement single-storey rear extension - proposed business/community (B1/D1) (235sqm in total). The basement, ground, first and second floors would largely retain their existing layouts (with insertion of WCs and plant room in the basement). The west and eastern facades and roof would be restored and modern railings to the front (west) would be replaced to match those shown in old photographs. The proposed modest single-storey brick extension would accommodate a WC and include textured brick profiling facing the courtyard to create visual interest and would improve the character and appearance of the building. Revisions to refine the design of the proposed extension have been submitted, in response to comments made by the Chair of QRP and officers.

6.5.22 No. 800- 802 - Refurbishment, alterations and replacement rear extension - proposed music recording studio space the basement (B1(c)/D1) (870sqm in total). Works to the basement would include compartmentalising space and opening up to a propose extension, which would extend down to this level. Rooms would be divided to create sound recording studios and booths and other

existing rooms would be retained largely as is to provide break out space. A large through room at ground level would be divided to create a meeting room and waiting lounge, with other existing rooms retaining their current form the extension at this level would provide a reception and filming space. Rooms at first floor level would be retained largely as they are. There would be a greater level of intervention at second floor level to create a series of writing rooms, break-out space and a video production room.

6.5.23 The west and eastern facades and roof would be restored and modern railings to the front (west) would be replaced to match those shown in old photographs. A section of the rear (east) wall to No. 800 would need to be rebuilt. The proposed basement and ground floor extension would include a full height glazed curtain wall and roof lights next to the existing building as a transition/link to the proposed brick extension beyond. The roof and fascia down stand to the extension would be bronze coloured metal to match the existing cladding on the Paxton Building. Again, revisions to refine the design of the proposed extension have been submitted, in response to comments made by the Chair of QRP and officers.

6.5.24 The existing 20 century rear extension detracts from the heritage significance of the building and the applicant's Heritage Statement assesses this as having "low" heritage significance. The proposed basement/ground floor extension would incorporate design and soundproofing measures to ensure that it creates an appropriate internal noise environment and prevents unacceptable noise breakout. Overall, the proposed works would improve the character and appearance of the buildings.

6.5.25 Alterations to the early 18th century Listed Building (Grade II\*). The scope of proposed works can be summarised as follows:

- Carrying out conservation repairs to the roof and exterior in order to improve the longevity, use and appearance of the building; and
- Removing ad-hoc extensions and works to interiors.

6.5.26 No. 808- external restoration and replacement of rear extension - proposed business/community (B1/D1) (311sqm in total). Two-storey brick and bronze coloured metal extension to accommodate pedestrian access, stairs and lift to provide level access to the ground floor and accessible WC. Reinstatement of a door and bay window at the rear to match Nos. 810-812, conservation repair of the exterior of the building. No. 808 mirrors the adjoining Grade II\* listed No. 810/12 where planning permission and Listed Building Consent has been granted for the complete restoration and extension of the asset with a flexible occupation (*Sui Generis*) to include a mix of uses within Use Classes D1, A3 and B1. No. 808 would follow this precedent and is envisaged as a series of studios and hub for the visual arts. The Chair of the QRP was concerned at the scale and design of the proposed extension and its relationship with this Grade II\* building. Revisions have sought to lighten the appearance of the extension and



improve the relationship with the host building and officers welcome these revisions which mean that it should safeguard the character and appearance of this particularly important building.

6.5.27 A local resident has objected to the siting of air quality monitoring equipment in the front garden of No. 808 and believes that any permission/consent should be conditional on this being removed. The existing equipment relates to s106 planning obligations relating to the Stadium planning permission (HGY/2015/3000 and 3001) to monitor air quality for 10 years from the first major event in the stadium, or until Air Quality Objectives have been met consistently for five years, whichever is the sooner. The site was identified in the approved Stadium Development Air Quality Monitoring Plan (November 2018) and installed in 2019. It is recommended that an informative be included on the Listed Building Consent reminding the applicant of the need to remove the equipment and make good the front garden area as soon as possible after it is no longer required.

6.5.28 Demolition and alterations to the 19th century commercial buildings (non-Listed buildings). The scope of proposed works can be summarised as follows:

- Demolition of the two-storey stand-alone building at the rear of No.814 High Road (Locally Listed);
- Removing rear extensions, signage, services and intrusions that obscure the original shopfronts and elevations of the buildings;
- Revealing and reinstating the historic shopfronts, elevations and details, including the bas-relief mouldings; and
- Carrying out conservation repairs to the roof and exterior in order to improve the longevity, use and appearance of the buildings.

6.5.29 The existing two-storey stand-alone low-quality building at the rear of No. 814 is of no architectural or historical value and its demolition and replacement with the proposed 'Linear Building' as it fronts Northumberland Park would have a positive impact on the character and appearance of the Conservation Area.

6.5.30 The refurbishment, alteration and extension of Nos. 804-806 would allow restaurant/café, business space, community and performance space (A3/B1/D1/D2) (920sqm). Internal reconfiguration of the existing building would provide a bar and ticket office at ground floor, a bar and WCs at first floor and bar, dressing rooms and offices at second floor. Conservation repair of front and rear elevations and roof (as necessary), including removal of existing fascia level signage and introduction of doors to the existing vehicular access route between the High Road and court yard (allowing for this to be 'internalised' as additional space. Nos. 804-806 High Road sits forward of the High Road pavement line compared to other properties, and therefore afford an opportunity at their rear for a larger sympathetic extension. The large two-storey extension at the rear to accommodate a double height performance space, with an accessible roof terrace on top. The extension would comprise brick and glazing at ground level, allowing for uses to 'spill out' in to the courtyard, and a zinc clad high first floor.

The proposed extension would incorporate specific features and soundproofing measures to ensure that it prevents unacceptable noise breakout. Following comments by the Chair of QRP and officers, the proposed design for this large extension has been revised so that it is a lighter colour and includes widened glass balustrade elements add to its visual lightness. Whilst this would be a large extension, its high-quality design means that it should not detract from the character or appearance of adjoining Listed Buildings. Officers also consider that it would make a positive contribution to enhancing their setting by helping to transform and animate the proposed courtyard space.

### *Setting*

6.5.31 The proposed 'Linear Building' would make a positive contribution to the setting of the Listed and non-listed High Road properties by providing a high-quality terrace that would screen the unsympathetic blank wall and fire escape of Lilywhite House. Likewise, the proposed removal of existing unsympathetic poor-quality structures, surface level car parking and finishes at the rear of the High Road properties and their replacement with a new high-quality urban space and public realm would make a positive contribution to the setting of the existing heritage assets.

6.5.32 The supporting material includes two Accurate Visual Representation (AVR) views. View 1 (White Hart Lane, looking west) shows how the proposed Linear Building would just pop above the roof line of the Listed Buildings at Nos. 798-802 in this view along the street, with the much more dominant Lillywhite House building behind. View 2 (from the Junction of Northumberland Park and High Road looking towards Sainsbury's) shows how the proposed Linear Building would front on to Northumberland Park, sit comfortably alongside the corner building of No. 814 (a Locally Listed building) and would sit behind the rest of the Northumberland Terrace buildings.

6.5.33 To safeguard against an unsightly gap along the Northumberland Park frontage, it is recommended that a condition requires evidence of a contract for the development of the Linear Building to be submitted to and approved by the Council.

### *Built Heritage Conclusion*

6.5.34 Overall, subject to recommended planning conditions to reserves specific detail and external materials for further consideration, the proposed refurbishment, alteration and extension works would have a positive impact on the character and appearance of the Listed and non-listed High Road buildings and improve their setting. As such, the proposals would also have a positive impact on the character and appearance of the North Tottenham Conservation Area.

6.5.35 To safeguard against unnecessary loss of historic fabric and/or an unacceptable delay between demolition and replacement development, it is recommended that a planning condition requires evidence of contracts for the proposed alterations and extensions in relation to Nos, 798, 800, 802 and 808 before demolition takes place. Similarly, in order to avoid an unsightly gap along the Northumberland Park street frontage it is recommended that a planning condition requires evidence of a contract for the proposed 'Linear Building' before demolition takes place.

Historic England has offered no comments on the planning or Listed Building Consent applications and has authorised the Council to determine the application as it sees fit. Relevant regulations mean that, because the Listed Building Consent application includes proposed works to a Grade II\* Listed Building.

## 6.6 Impact on Amenity of Adjoining Occupiers

6.6.1 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*

6.6.2 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.

6.6.3 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.

6.6.4 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'.

6.6.5 The submitted Daylight and Sunlight Assessment reports four windows to a residential flat on the rear upper floor of No. 814 would fail the BRE guidelines for Vertical Sky Component (VSC). However, these would be left with a VSC of

between approx. 18 and 20%, which is considered acceptable for a dense urban area and, in any event, appear to ancillary residential spaces rather than living or bedrooms.

### *Noise*

- 6.6.6 Intend to Publish London Plan Policy D13 (Agent of Change) requires new noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses to be designed to mitigate and manage any noise impacts for neighbouring residents and businesses. This may require mitigation measures if layout and design alone is insufficient.
- 6.6.7 The submitted Planning Noise Report and revised Noise Assessment are based on a noise survey that was carried out in February 2020 (before the COVID-19 lockdown), so measurements should be representative of 'normal' traffic. They take into account the existing residential use of the upper floor of No. 814 High Road, the homes above shops on Northumberland Terrace and homes above shops on the west side of the High Road.
- 6.6.8 The submitted revised Noise Assessment assesses the likely requirements for the specification of both building fabric and glazing for proposed office use and it is recommended that details of these are secured by way of a planning condition.
- 6.6.9 Performance Space and terrace. The submitted revised Noise Assessment specifically assesses the proposed two-storey performance space at the rear of Nos. 804-806 High Road (with a stage, standing area and bar at ground floor, seating and kitchen at mezzanine level and a terrace at roof level and an existing terrace) and the use of a proposed terrace.
- 6.6.10 The assessment assumed that the venue would generally operate as a bar/eatery during the day, with amplified music (live music/DJs) in the evening and night-time and that there would be no use of open terrace after 23.00 hours or amplified music played on the roof terrace at any time and that there would be about 30 people on the terrace, with 15 speaking at any one time. These are considered to be reasonable assumptions.
- 6.6.11 Taking account of the submitted revised Assessment, officers recommend that conditions secure the following: the terrace shall only be used between the hours of 07.00 and 23.00, No amplified music to be played on the roof terrace; and details of screening to be submitted, approved and implemented before the terrace is brought in to use.
- 6.6.12 In terms of the proposed performance space, the revised Assessment sets out criteria for the noise mitigation properties external walls and glazing and mechanical ventilation (including the probable need for in-duct noise attenuators) and exit noise. It also recommends that music noise levels are limited by an

electronic noise limiter which could be calibrated upon practical completion of the building. It is recommended that all these measures are secured by condition.

6.6.13 Sound recording studio. The main studio space is proposed to be located below ground to combat noise breakout and wall build up and glazing would be specified to take account of background noise readings and it is recommended that these measures are secured by condition. Moreover, the nature of the proposed use requires excellent noise insulation to prevent noise breaking in and to allow two recording studios to be used at the same time.

6.6.14 Mechanical plant. A standard condition is recommended to control noise from any mechanical plant associated with the proposed uses.

#### *Amenity Impacts – Summary*

6.6.15 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.

### **6.7 Transportation and Parking**

6.7.1 The revised NPPF (2019) 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.

6.7.2 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.

6.7.3 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.

6.7.4 DM Policy (2017) DM32 "Parking" 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

### *Site Accessibility*

- 6.7.5 The site is served by five frequent bus services that use the High Road (149, 259, 279, 349 and W3). White Hart Lane Overground Station is approx. 250m to the west and Northumberland Park Station is approx. 1km to the north-east (linked via the W3 bus). The majority of the site currently has a PTAL of 5 and all of the site is expected to have a PTAL of 5 from 2021.
- 6.7.6 Pedestrian accessibility between the site and White Hart Lane Station has improved significantly since the White Hart Lane and Love Lane LIP improvements were carried out in 2018/19. Cycle Superhighway 1 between Liverpool Street and the THFC Stadium was completed in 2016 and the route has been extended westwards along Church Road, providing good access for cyclists to and from the south and west.

### *Site Access*

- 6.7.7 The site currently has two two-way vehicular accesses from the High Road. The southernmost access, in between No.790 High Road (Dial House) and the Stadium effectively forms the eastern arm of a crossroads arrangement with High Road and White Hart Lane. The northernmost access (Paxton Place) passes underneath the first-floor link between No.798 and No.800 High Road with a height clearance of circa 4m above ground level.
- 6.7.8 The proposal is to create a car-free development offering no parking spaces on site and only service and delivery vehicles would be expected to require access to the site. It is proposed that the majority of vehicles would enter via the existing Paxton Place access, which would be made one-way 'left-in' only, and exit onto Northumberland Park, which would be a 'left-out' only exit. Vehicles would also still be able to enter the courtyard via the existing access at the High Road signal junction. The proposed one-way working through the site would avoid the need for vehicles to turn within the site. High-sided delivery and emergency vehicles would continue to use the existing southern access (which has no height restriction).
- 6.7.9 Pedestrian and cycle access would also be via the existing Paxton Place entrance, which would benefit from improved lighting and CCTV monitoring and new gate-controlled access to the courtyard from the south (next to Paxton House) and from Northumberland Park.
- 6.7.10 The submitted Transport Assessment assumes all of the proposed floorspace is used as offices as a proxy for the trip characteristics for the proposed mix of different uses. This estimates that the busiest period would be the AM Peak and that during this time there would be 10 two-way vehicle trips, 19 arrivals by bus and 75 arrivals by rail. It goes on to note that much of the trip activity would simply be a re-allocation of trips generated by the existing land uses on site, and the lack

of on-site car parking would naturally constrain vehicle trips. Public transport trips have been quantified and these can be accommodated within the capacity of existing services.

- 6.7.11 TfL identifies the need for an Active Travel Zone assessment in order to “examine barriers to active travel as well as measures to overcome them”. However, given the footway improvements that have been carried out since the 2015 Pedestrian Environment Review System (PERS) audit by both the applicant (in relation to the new stadium development) and the Council (i.e. the White Hart Lane/Love Lane Local Improvement Scheme), officers do not consider this is necessary.

#### *Delivery and servicing*

- 6.7.12 Deliveries to the site would be coordinated to occur outside of peak morning and evening traffic periods where possible. The nature of the proposed occupiers would tend to attract more deliveries by vans rather than by large vehicles. The traffic orders on the High Road and Northumberland Park prevent loading off the highway. Therefore, all deliveries would need to enter the site which has a headroom of 3.7m. The limited headroom means that the largest vehicle serving the site would need to be no greater than 3.4m high. However, this allows access for all standard vans, including a typical Box vans up to 7.5T. There are proposed to be five set down areas within the courtyard. It is recommended that a Delivery and Servicing Plan is reserved by way of planning condition.

- 6.7.13 A standard refuse vehicle at 4.75m could not access the site due to the low headroom so the management company would need to engage a refuse collection operator with a smaller than standard refuse collection vehicle of which there are numerous vehicle types available. This height clearance complies with the headroom needed for emergency vehicle access by a pump appliance.

#### *Car parking*

- 6.7.14 The site is within the Tottenham North Controlled Parking Zone (0800 to 1830 Monday to Saturday) and the Tottenham Event Day CPZ. The current courtyard accommodates approx. 23 cars that serve existing commercial occupiers within the Terrace. The applicant is working with those occupiers to relocate them to alternative premises, along with their parking requirements. There should be no net impact therefore upon demand for on street-parking.

- 6.7.15 The proposal is not to provide car parking within the site, to allow for the creation of a high-quality courtyard space to help to reinforce sustainable travel habits, capitalising upon the good accessibility levels of the area. Instead, the scheme would make use of two existing parking spaces within Lilywhite House (spaces that are already under the control of the applicant) for accessible parking which also shows the accessible route between the spaces and the proposed development, via Paxton Place. To facilitate this, it is recommended that s106 planning

obligations prevent occupiers of the space from obtaining Business parking permits for the North Tottenham CPZ.

- 6.7.16 The Club controls 30 spaces within the Lilywhite House car park and do so for various Club-related activities on match and non-match days. They do not, however, utilise this full capacity at present with only 22 permits issued. The Club has full control over the use of these spaces and can therefore incorporate the Northumberland Terrace requirements as part of this management process. Indeed, there is capacity to do so. There is nothing in the Lilywhite House planning permissions (HGY/2011/2350 and HGY/2013/1976) that precludes this. Condition 5 limits the amount of car parking proposed to no more than 401 spaces and does not require a minimum number of regular or accessible car parking spaces.
- 6.7.17 It is recommended that a Grampian-style condition be applied to prevent the occupation of any development until such times as the 2 disabled car parking spaces are made available to occupiers of the Northumberland Terrace development. It is also recommended that a Car Parking Management Plan that includes arrangements for allocating these spaces and allows for the number to be increased in the future, if demand warrants this, is secured by condition.

#### *Cycle parking*

- 6.7.18 The site currently accommodates a cycle parking shelter (Northumberland Terrace cycle parking) with 158 spaces, which serve the London Academy of Excellence Tottenham (83 spaces), Lilywhite House (15 spaces), Paxton House (16 spaces), Skywalk (8 spaces), Tottenham Experience (10 spaces) and Minor Event Day staff (13 spaces) – with 13 surplus spaces for future growth. In addition, on a Major Event Day, the Northumberland Terrace cycle parking is used by Event Day staff.
- 6.7.19 The proposal re-provides 158 spaces for use by the Academy, Lilywhite House, Paxton House, Skywalk, Tottenham Experience and Minor Event Day staff and provides an additional 42 long-stay spaces and 13 short-stay spaces and an additional 11 spaces would be provided, bringing the total to 224 spaces, which would exceed the minimum London Plan cycle standards. At least 5% would be for larger bicycles, in accordance with standards. These would be located in two long-stay cycle stores on the ground floor of the proposed linear building, accessed from the courtyard. The short stay spaces would be provided in the courtyard.
- 6.7.20 TfL has raised some concern at the inclusion of a mixture of two-tier racks and vertical stacking racks in the proposed long-stay cycle stores. In fact, there are no proposed vertical stacking racks and the applicant has submitted a drawing to clarify proposed provision of two tier stands and Sheffield stands. The proposed Linear Building would include five showers and one shower each would be provided in Nos. 798, 800 and 802 High Road, together with 20 lockers. Officers welcome this proposed provision.



6.7.21 The proposed cycle parking arrangements are acceptable, although a planning condition is recommended to reserve the detailed location (in terms of short stay) and detailed provision for both long term and short-term spaces.

#### *Travel Plan*

6.7.22 The application is supported by a Framework Travel Plan which identifies a number of proposed objectives and targets to encourage sustainable travel. It is recommended that s106 planning obligations secure a detailed Travel Plan, the appointment of a Travel Plan co-ordinator and monitoring. The detailed Travel Plan would be expected to consider access arrangements, impacts and appropriate mitigation in relation to events in the proposed performance space.

#### *Legal Highway Agreements*

6.7.23 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.

#### *Construction Activities*

6.7.24 The submitted Construction Management Plan (CMP) outlines those measures that would manage traffic, air quality and dust, noise, water and waste during the demolition and construction phases. TfL has asked for a Construction Logistics Plan (CLP) and it is recommended that this is secured by planning condition. It is also recommended that a s106 planning obligation secures a £4,000 CMP/CLP monitoring fee.

#### *Transportation - Summary*

6.7.25 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.

### **6.8 Energy, Climate Change and Sustainability**

6.8.1 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.

- 6.8.2 The London Plan requires all new non-domestic development to be zero carbon from 2019. Intend to Publish London Plan Policy S12 requires a minimum on-site energy reduction of at least 35% beyond Building Regulations. Local Plan Policy SP4 requires a minimum of reduction of 20% from on-site renewable energy generation.
- 6.8.3 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.
- 6.8.4 The proposed linear building and Nos. 804 – 806 High Road (with its large two-storey extension) are considered to be new buildings for the purpose of applying Policy SP4, whereas the proposed refurbishment and extension of the Listed Buildings are considered to be improvements (and assessed against Part L2B of the Regulations).
- 6.8.5 Linear Building & 804/806 High Road. The proposed new building fabric would provide a 30% improvement on the notional building figures and comply with a 'fabric first' (Be Lean) approach, in accordance with the Mayor's energy hierarchy. The Be Clean energy supply would via a site-wide Air Source Heat Pump (ASHP) system and a separate ASHP providing cooling to the proposed offices spaces. This would be augmented by a Photovoltaic (PV) array on the roof of the proposed linear building (approx. 415sqm) and a separate array (approx. 300m) on the south-facing roof slopes of the unlisted Nos. 804-806 High Road
- 6.8.6 Nos. 798-812 High Road. These buildings would include local boilers and also be connected to the proposed sitewide ASHP network.

#### *Lean Carbon Savings*

- 6.8.7 The proposed energy efficiency measures include passive design, such as overhangs and window recesses to reduce overheating in the proposed 'Linear Building', levels of insulation beyond Building Regulation requirements, low air tightness levels, efficient lighting as well as energy saving controls for space conditioning and lighting and secondary glazing.

#### *Clean Carbon Savings*

- 6.8.8 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).

The proposed scheme has been designed so that it could be connected to the proposed DEN. A pipe would be connected to the proposed 'Linear Building'

rooftop plant room to connect into plate heat exchangers (replacing the ASHPs for heating). A heat meter would be installed at the point of connection. Nos 804-806 would continue to take their heat from the Linear Building. Nos. 798 to 802 would take their own connections from DEN pipework along the High Road, to avoid disruptive changes to the Listed Buildings.

- 6.8.9 It is recommended that s106 planning obligations secure the following: (a) Submit a further revised Energy Strategy for LPA approval; (b) design scheme in accordance with generic specification to allow connection to North Tottenham DEN, (c) Pay Initial Carbon Offset Contribution based on connection to DEN, (d) Use all reasonable endeavours to connect to DEN and (e) if not connected within 10 years, pay an additional Deferred Carbon Offset Contribution.

#### *Green Carbon Savings*

- 6.8.10 The applicants intend to use centralised Air Source Heat Pump (ASHP) condensers to service heating and hot water requirements and could form part of the air conditioning system. ASHP units would need to be situated outside the 'Linear Building', either on the roof or behind a louvered wall.
- 6.8.11 The applicant is also proposing PV arrays on the roof of the 'Linear Building of approx. 450sqm and on the roof of No. 804/806 of approx. 95sqm.
- 6.8.12 The proposed green technologies would save 20% in emissions over the Building Regulations (2013) Part L standards. It is recommended that the detailed location and appearance of the proposed ASHP units and PV arrays are reserved by planning condition

#### *Overall Carbon Savings*

- 6.8.13 The Applicant's revised Energy Statement sets out how the three-step Energy Hierarchy has been implemented and estimates that site-wide regulated CO<sub>2</sub> savings would be 36% for the 'Linear Building', 48% for Nos. 804-806 High Road and 55% for Nos. 798-802 High Road over Part L Building Regulations (2013). This is more than the 35% minimum called for by planning policy.
- 6.8.14 To achieve 'zero carbon' for the residential portion of the scheme, the applicant's revised Energy Statement estimates that a total of 6.6 tonnes per annum of regulated CO<sub>2</sub>, equivalent to 198 tonnes over 30 years needs to be offset by financial contributions (198 x £95 per tonne = £18,810).
- 6.8.15 However, officers are not wholly satisfied with the applicant's revised Energy Strategy and it is recommended that a condition requires the submission and approval of an updated Energy Strategy before the commencement of development. It is also 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, both amounts to be established by the required updated Energy Statement.

- 6.8.16 In accordance with Intend to Publish London Plan Policy SI 2, which introduces a fourth step 'Be Sean' to the Mayor of London's Energy hierarchy, it is recommended that a s106 planning obligation requires the applicants to submit data on energy use to the GLA, in accordance with the Mayor's 'Be seen' energy monitoring guidance' (currently pre-consultation guidance, April 2020).

#### *Overheating*

- 6.8.17 The applicant's overheating assessment concludes that (assuming an office use) the proposed 'Linear Building' would not meet the relevant criteria based on natural ventilation alone. This is due to the single-aspect nature of the majority of the proposed building, the inability to utilise night cooling, by keeping open windows, due to security issues and the need to maintain a comfortable internal environment in terms of noise and air quality. Mechanical ventilation would, therefore, be required at times.

#### *Be Seen*

- 6.8.18 In accordance with Intend to Publish London Plan Policy SI 2, which introduces a fourth step 'Be Seen' to the Mayor of London's Energy hierarchy, it is recommended that a s106 planning obligation requires the applicants to submit data on energy use to the GLA, in accordance with the Mayor's 'Be seen' energy monitoring guidance' (currently pre-consultation guidance, April 2020).

#### *Sustainability*

- 6.8.19 The submitted Energy Statement sets out a number of aspirations in relation to materials selection, security, water supply, waste, transport, air quality and other measures. The proposed linear building and Nos. 804 – 806 High Road (with its large two-storey extension) are considered to be new buildings for the purpose of applying Policy SP4, which calls for BREEAM 'Very Good' as a minimum. The submitted BREEAM Pre-Assessment demonstrates that this is achievable and it is recommended that this is secured by planning condition.

### **6.9 Flood Risk, Drainage and Water Infrastructure**

- 6.9.1 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 utilise Sustainable Urban Drainage Systems (SUDS). Policy 5.14 requires proposals to ensure adequate wastewater infrastructure capacity is available.
- 6.9.2 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.

- 6.9.3 The site is within Flood Zone 1 and has a low probability of flooding. However, it is within a Critical Drainage Area and therefore the site is supported by a Flood Risk Assessment (FRA). The FRA concludes that the risk of flooding from all sources is low. This, coupled with the proposals for non-residential 'less vulnerable' uses makes the proposals acceptable from a flood risk perspective.
- 6.9.4 As much as 93% of the site would comprise impermeable surfaces that positively drains to the proposed network. The proposals are to limit discharge rates to a Greenfield runoff rate of 5.4 l/sec as far as reasonably practicable without compromising the performance and operation of flow control devices such as a hydrobrake.
- 6.9.5 The submitted Drainage Strategy Report considers the feasibility of SuDS components in line with Intend to Publish London Plan Policy SI13, including green roofs and rainwater harvesting measures. However, the proposed flat roof areas of the Linear Building accommodate PV arrays as part of the energy strategy and the pitched roofs of the High Road buildings do not lend themselves to green roofs. The proposed roof terrace above an extension to Nos.804-806 would include some landscaping. However, accommodating the 100 year plus storm event plus a 40% allowance for climate change, needs the installation of a large attenuation storage tank (approx. 300 cubic metres) below the courtyard and use of rain gardens and tree pits. It is recommended that the management and maintenance arrangements of these SuDS features are reserved for approval.
- 6.9.6 Thames Water raises no objections in terms of surface water, foul water or water supply issues. It does, however, request that a planning condition requires approval of any piling works.

## 6.10 **Air Quality**

- 6.10.1 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.
- 6.10.2 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).
- 6.10.3 The submitted Air Quality Assessment confirms that the likely impact on air quality from road traffic would be negligible, with a low/negligible impact arising from construction dust that can be managed further through mitigation. The

development would be below the relevant air quality neutral benchmarks and will therefore be better than air quality neutral in terms of its emissions. This exceeds the requirements of London Plan policy (Policy 7.14 and draft Policy S11).

## **6.11 Waste and Recycling**

6.11.1 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.

6.11.2 The application is supported by an outline operational Waste Management and Servicing Strategy. The scheme includes two appropriately sized waste and recycling stores at ground floor level within the proposed linear building, within 5m of a vehicle stopping point within the courtyard. Waste and recycling would be collected by a private commercial waste contractor and it is currently expected that collections would be twice per week.

6.11.3 The submitted Construction Management Plan refers to the intention to prepare a Site Waste Management Plan (SWMP) to identify waste stream and re-use, recycling and reduction targets. It is recommended that this is secured by condition.

## **6.12 Land Contamination**

6.12.1 Policy DM32 requires 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.

6.12.2 The submitted Preliminary Risk Assessment concludes that, given the proposed end use, the overall risk rating for the site is assessed as 'low' and that given the Site history and the proposed development, intrusive investigation to further quantify the contamination status of the site is not required. However, it goes on to recommend, amongst other things, that a watching brief should be carried out during the construction phase and that a Construction Environmental Management Plan (CEMP) should be prepared and construction materials should be appropriately stored.

6.12.3 Given the above and comments from Environmental Health, it is recommended that planning conditions secure the above.

## **6.13 Archaeology**

6.13.1 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.

6.13.2 The submitted Archaeological Desk Based Assessment concludes that there is a low potential for Prehistoric through to Early Medieval finds and recent investigations have found no Roman finds. The Assessment finds that whilst there is a medium potential of Medieval finds, these are likely to be of low significance. It goes on to conclude that the potential is high for Post Medieval remains, with the possibility of finding remains of 'Ridley House' Inn (depicted on Dorset's 1619 map), and Victorian remains, but these are likely to be of low significance. Following comments from Historic England (GLAAS), it is recommended that a condition secures the approval and implementation of a Written Scheme of Investigation.

#### 6.14 **Fire Safety and Security**

6.14.1 Policy D12 in the Intend to Publish London Plan 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. This Statement meets the requirements of Intend to Publish London Plan Policy D12 and sets out:

- A1: Features to reduce risk to life in a fire situation: All elements of building design including compartmentation, detection & alarm (Category L1) are in excess of the minimum guidance for these building types;
- A2/B1: Construction to minimise risk of fire spread: the building comprises steel frame, composite profiled metal deck/concrete floors and brickwork exterior;
- A3: Means of Escape: Travel distances, occupancies and escape widths are in line with guidance within BS 9999;
- A4: Evacuation: Each building operates a simulations evacuation strategy;
- A5/B3/B4: Firefighting: Fire Service access is provided along the external roads and internal courtyard in line with the guidance in BS 9999. No firefighting lifts or suppression systems are present due to the height of the buildings; and
- B2/D3: Disabled Evacuation: All stair cores are provided with disabled refuge points and the majority of buildings are provided with evacuation lifts. Some of the Northumberland Terrace buildings are not provided with evacuation lifts due to their existing historic geometries.

6.14.2 It is recommended that the implementation of the Statement is secured by condition, in accordance with the Mayor of London's emerging guidance.

*Building Regulations approval*

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

## 6.15 Equalities

6.15.1 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.

6.15.2 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 as outlined under the 'Employment and regeneration benefits' heading in Section 6.3 above.

6.15.3 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 planning obligation.

## 6.16 Conclusion

6.16.1 In conclusion:

- The proposed development with its proposed mixture of high-quality refurbished and new floorspace and flexible range of uses would establish a 'cultural quarter' (with a new live performance space and music recording studio at its heart), accords with Site Allocation NT7 in the Tottenham Area Action Plan and would help make the site vibrant and active at times when the THFC stadium is not in use;
- The 'cultural quarter' would provide between 30 and 285 net Full Time Equivalent (FTE) long-term jobs based on the possible range of proposed uses, as well as 174 FTE construction jobs, and is estimated would provide between £70,000 and £660,000 net additional local spending per year;
- The resultant minor loss of residential accommodation is acceptable given the substantial increase in expected housing within the Site Allocation and from



- the applicant's separate proposals for No.807 High Road and the significant benefits that would come from the proposed uses;
- The proposed loss of retail space from the North Tottenham Local Centre accords with Local Plan Policy DM43 and the proposed uses within and adjacent to the Local Centre should improve its vitality and viability;
  - The proposed new Linear Building and landscaped space would be high-quality additions to the townscape, creating a more accessible and inclusive environment and providing a new positive frontage to Northumberland Park and publicly accessible space (during the day), which would improve community safety (with the site currently experiencing high levels of anti-social behaviour);
  - The proposed refurbishment, alteration and extension of Nos. 798 to 808 High Road would facilitate the long-term use of these heritage assets, without harming their special architectural or historic interest or the character and appearance of the North Tottenham Conservation Area;
  - The proposed demolition of the building at the rear of No.814 and the proposed Linear Building and landscaped courtyard would enhance the setting of Nos. 798 to 808 High Road and preserve and enhance the character and appearance of the North Tottenham Conservation Area;
  - Subject to detailed noise mitigation and management measures, the proposed cultural uses should not cause unacceptable harm to residential amenity; and
  - The development would be 'car free', provide good cycle parking and facilities to encourage cycling, incorporate on-site renewable energy technologies and be designed to link with the proposed North Tottenham District Energy Network too help reduce carbon emissions.

## **7 COMMUNITY INFRASTRUCTURE LEVY (CIL)**

- 7.1 Based on the information given on the plans, the estimated Mayoral CIL (£60 per square metre, £59.64 with indexation) would be £190,174 and, based on the current Haringey CIL charge rate for the Eastern Zone, the estimated Haringey is £0, there being no chargeable proposed uses.
- 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.

## **8 RECOMMENDATIONS**

- 8.1 GRANT PLANNING PERMISSION subject to conditions in **Appendix 8** and a Section 106 Legal Agreement and GRANT LISTED BUILDING CONSENT subject to conditions in **Appendix 9**.