Appendix 5 Internal and External Consultee Representations

<table>
<tr><th>Stakeholder</th><th>Comment</th><th>Response</th></tr>
<tr><td colspan="3">INTERNAL</td></tr>
<tr><td>Climate Change</td><td>
Energy – Overall

Policy SP4 of the Local Plan Strategic Policies, requires all new domestic development to be zero carbon (i.e. a 100% improvement beyond Part L (2013)). The Intention to Publish version of the New London Plan (2019) further confirms this in Policy SI2. As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4.

It is not clear what the overall predicted reduction in CO_2 emissions are for the development. The baseline emissions are 139 tCO_2 (SAP2012) or 102 tCO_2 (SAP10). It is not clear what the total emissions are after be lean, clean and green measures.

Please address the following:
- The reporting of carbon emissions is inadequate in this report.
  ○ Summary tables should be provided alongside bar graphs as per Tables 3, 5, 6 & 7 in section 6 of the GLA guidance (split by new build and refurbished elements). The tables provided in the report are insufficient. Please follow the guidance in this link: https://www.london.gov.uk/sites/default/files/energy_assessment_guidance_2018.pdf
  ○ Report in tCO_2/year
  ○ Report total emissions for all buildings, split by new build and refurbished elements, and consistently report for individual buildings (not selectively).
  ○ Submit BRUKL sheets for all proposed units
  ○ Confirm whether the report has been done with SAP2012 or SAP10 carbon factors

Energy – Lean
It is not clear what the proposed improvement is of beyond Building Regulations through improved energy efficiency standards. A minimum 15% reduction should be achieved on the new build and the applicant should demonstrate how it has reduced emissions in the existing buildings.

The following u-values, g-values and air tightness are proposed:

<table>
<tr><th></th><th>New build</th><th>Existing buildings</th></tr>
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</td><td>The recommended conditions address the comments, including the need for an updated energy strategy, overheating, MVHR, BREEAM accreditation. Recommended s106 planning obligations to facilitated connection to a future DEN.</td></tr>
</table>

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Floor u-value	0.15 W/m^{2}K	1.98 W/m^{2}K
External wall u-value	0.18 W/m^{2}K	1.5 W/m^{2}K
Roof u-value	0.13 W/m^{2}K	0.35 W/m^{2}K (80% improvement)
Window u-value	1.12 W/m^{2}K	1.12 W/m^{2}K (80% improvement)
G-value	0.4 (E, S, W) 0.6 (N)	0.6
Air permeability rate	3 m^3/hm^2 @ 50Pa	10 m^3/hm^2 @ 50Pa
Mechanical ventilation with heat recovery	91% efficiency	
Lighting	100 lumens/Watt	100 lumens/Watt

Please address the following:

- Confirm that sub-metering will be installed for all units and installation of an energy use and generation display unit at reception areas.
- Measures to reduce thermal bridging and set out the what the proposed Psi (Ψ) values are.
- Construction of building – frame/insulation. Where will concrete be exposed to make use of thermal mass?
- Unregulated emissions and demand side response to reducing energy: smart grids, smart meters, battery storage
- Energy demand summary, delivered energy requirement at point of use – MWh/year – by use
- Demonstrate the cooling hierarchy has been followed
    - Internal heat generation, i.e. heat distribution infrastructure
    - Heat entering building, i.e. shutters, trees, vegetation, blinds
    - Manage heat through thermal mass and high ceilings
    - Passive ventilation, i.e. openable windows, shallow floorplates, dual aspect, stack effect
    - Mechanical ventilation, i.e. free cooling from outside air in shade, by-pass for summer mode

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	- Model the energy demand for the active cooling, if required. Then include these energy demands into the carbon footprint of the development and update any offsetting requirements based on this. - How will the passive ventilation work? Please provide a diagram to demonstrate the system and confirm how many air changes per hour this will achieve. In relation to the existing buildings, please address the following: - Estimate of existing performance in existing condition, before any works - Outline the source of these assumptions, such as a building condition survey, Energy Performance Certificate (EPC) conventions, industry benchmarks etc. - The baseline for change of use applications should be estimated assuming the existing building is the same as the proposed end use - Detail what measures will be undertaken to make the retained listed buildings more energy efficient (what type of insulation, how the building will be made more airtight, etc)? - More emphasis needs to be placed on reducing the energy demand from control systems like lighting, ventilation, equipment and appliances. It is not clear whether lighting will be replaced, advanced lighting/space conditioning controls, smart metering is proposed for the listed building. **Energy – Clean** The applicant is proposing to include a site-wise Air Source Heat Pump system under Be Clean measures. This is not acceptable. The Council are progressing a neighbourhood DEN at the High Road and this scheme should make provisions to connect to this when this comes forward. As confirmed during the pre-application stages, the entirety of the proposed development should obtain heat and hot water from a site wide heating system: 1) Designed in accordance with the principles in the embedded generic specification in order to facilitate connection to the North Tottenham District Energy Network (NT DEN), (with a condition to submit details of design including calculations, etc. for approval) 2) Fed from on-site communal gas boilers 3) Carbon performance should be calculated using the SAP2012 carbon factors in the following circumstances: a. Based on communal gas boilers; and b. As if obtaining all heat from the NT DEN assuming a carbon performance for the heat of 0.09 $kgCO_2e/kWh$ 4) The calculations above shall be used to determine the offset payment due	

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	a. If the development connects to NT DEN (i.e. based on 3 b.); and b. The additional offset which would be due if the development does not connect to NT DEN (i.e. based on the difference between 3) a. and 3) b.) A s106 agreement will be expected to include obligations to: a. Design the scheme in accordance with the generic specification and to allow connection to NT DEN (see separate attached Technical Specification for Developers, February 2018) b. Pay an initial carbon offset based on 4) a. c. Use all reasonable endeavours to negotiate with the Council, or the Council's nominated energy company, to seek to secure a connection to NT DEN if an approach is made within 10 years, and, to connect if a viable offer is made (such offer may include a connection charge to account for the developer's savings from connecting by avoiding the deferred payment described below in iii) d. If the scheme has not connected within 10 years, pay an additional deferred carbon offset as per 4) b. **Energy – Green** The application has reviewed the installation of various renewable technologies. The report concludes that air source heat pumps (ASHPs) and solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. No details have been provided to set out ASHP location, efficiency, number of units, type of system and the carbon reductions. It is not clear whether the proposed required solar array peak output would be 14.8 or 127.6 kWp, for the new build elements only, on a roof area of 83 m^2 or 716 m^2 on top of the linear building. It is also not clear what the reduction in emissions under Be Green would be. **Carbon Offset Contribution** The carbon shortfall cannot currently be calculated as the Energy Assessment is incomplete. Remaining carbon emissions will need to be offset at £95/tCO_2 over 30 years. A deferred carbon offset contribution mechanism will apply to this scheme as it is expected to connect to the DEN when this has been built. The applicant should present two carbon reduction table scenarios: • Scenario 1: Connection to the DEN scenario (residual tCO_2 over 30 years)	

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	• Scenario 2: Communal heating and gas boilers (residual tCO_2 over 30 years) The carbon offset contribution for scenario 1 will be due at the commencement of development and the difference in the offset contribution between the first and second scenarios will be deferred for 10 years and indexed accordingly. 1. Payment for the residual emissions in the DEN scenario (Scenario 1) would be due at commencement of development. 2. A deferred carbon offset contribution is calculated through the difference in the offset contribution: Scenario 2 – Scenario 1 = Deferred Payment. 3. If, after 10 years the development has <u>not</u> connected to the DEN, the deferred payment (+indexation) is due. 4. If, after 10 years the development has connected to the DEN, the deferred payment would not be due but this amount would be available as a connection charge to the DEN. **Overheating** A TM52 assessment had been requested at pre-application stage. The BREEAM Pre-Assessment states that this has been done. Please submit this as part of the planning application to demonstrate the development will not rely on active cooling, and will not overheat with suitable overheating mitigation where required. This should include modelling for Design Summer Years 1, 2 and 3 and for 2020s, 2050s and 2080s weather files. The applicant must install suitable mitigation measures in line with the Cooling Hierarchy for DSY1 (2020s weather file) and implement as much mitigation as feasible for DSY 2 and 3. Weather files 2050s and 2080s must be used to propose a retrofit plan that should demonstrate the proposed future mitigation measures can be installed and will reduce overheating effectively. **Sustainability** Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The applicant has prepared a BREEAM Pre-Assessment Report for the new build elements of the scheme: Linear Building, 804/806 extension. Based on this report, a score of 66.9% is targeted, equivalent to 'Very Good' rating. A potential score of 92.3% could be achieved ('Outstanding'). This element of the development is policy compliant, however an Excellent score is encouraged as the applicant has demonstrated a potential score of 92.6%. **Living Roofs**	

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	The development is proposing an intensive green, landscaped amenity roof on the extension of 806. Living roofs are supported in principle, subject to detailed design. Details will need to be submitted as part of a planning condition. Appropriate conditions will be recommended. Extensive living roofs are proposed on the linear building as well, to be installed under the solar array. This will provide suitable co-benefits to the PV efficiency and weather management to the living roof. Please incorporate this into the proposals. **Conclusion** Overall, it is considered that the application **cannot currently be supported** on grounds of carbon reduction and overheating. **Updated comments** The applicant submitted a revised Energy Strategy (dated 18 September 2020) by Hydrock and BRUKL reports as appendices on 18/09/2020. **Interim heating strategy** As discussed, and stated above, we do not accept air source heat pumps as an interim heating technology prior to connecting to the DEN. Proposing ASHPs undermines the viability for connection for all other sites and the connection to the Energy from Waste heat source. The acceptable interim solution is the installation of gas boilers. The scheme could be future proofed by installing ASHPs in the future if the site does not connect to the DEN. However, the proposed system that hydraulically separates the systems would not be appropriate for ASHPs as it would reduce their efficiency and could be simplified. Haringey Council continues to be committed to delivering the DEN in North Tottenham. All applications in the area are therefore still expected to connect to the DEN when this is built and make future provisions within their red line. Therefore, a revised Energy Strategy will need to be submitted to revise its interim heating strategy. It would be preferable for this to be submitted prior to determination, but the detailed revised strategy can also be submitted prior to commencement of development through planning conditions/s106 obligations. **Further information required**	

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	Information to be submitted must include: - Revised heating strategy for gas boilers (instead of ASHPs), using SAP2012 carbon factors - Demonstrating the space allowance to retrofit ASHP in the future if not connecting to the DEN, i.e. plant space, plans showing layout of heating and cooling system. - Evidence of how the future DEN connection will work on plans, e.g. conduit space on the High Road that is big enough for pipes, centralised plant room with space for heat exchangers, layout of pipes, etc. Further detail will need to be submitted through the s106. **Overheating** The revised report does not fully justify the use of air conditioning to mitigate overheating and has not demonstrated how the design of the scheme has followed the cooling hierarchy to reduce demand for cooling. Furthermore, it does not set out the energy demand (space cooling, not energy used) area-weighted average demand in MJ/m^2 and total MJ/year, or the efficiency of equipment. The submission of this information is recommended to be submitted via a planning condition. **Planning conditions** <u>*Energy Plan*</u> *(a) Prior to the commencement of development, an updated Energy Assessment should be submitted to the Local Planning Authority for approval. This should demonstrate that the development will connect to the Decentralised Energy Network (DEN) at North Tottenham, with an interim gas boiler heating solution. This report shall also set out the calculated deferred carbon offset contribution and plans showing how the development will be future proofed in case it does not connect to the DEN.* *(b) Prior to the commencement of development, the following details must be submitted to demonstrate the scheme has made sufficient provisions to connect to the North Tottenham DEN:* • *A plan to show the required layout of infrastructure (including conduit space, pipes and plant room) to connect to the future DEN;* • *Set out detailed design of the heat network and how this complies with CIBSE CoP1 and the LBH Generic Specification. This should include detail of pipe routes and lengths, pipe sizes (taking account of F&R temperatures and diversification) and insulation to determine heat loss from the pipes in W/dwelling in order to demonstrate losses have been minimised;*	

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	• *Buried pipe (dry and filled with nitrogen) to LBH's approved specification from the ground floor plant room to a manhole at the boundary of their site and evidence of any obstructions in highway adjacent to connection point;* • *A clear plan for Quality Assurance of the network post-design approval through to operation, based on CP1;* • *A clear commercial strategy identifying who will sell energy to residents and how prices/quality of service will be set;* • *Determine how the offsets will be split between 'initial offset' (100% of which to be paid on commencement) and 'deferred offset'.* *(c) Prior to occupation, evidence shall be submitted that the proposed solar photovoltaic array of at least 7.8 kWp and associated monitoring equipment has been installed correctly. The solar PV array shall be maintained and cleaned at least annually thereafter.* *(d) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.* ***Reason**: To ensure the development can comply with the Energy Hierarchy in line with London Plan 2016 Policy 5.2, draft New London Plan (Intend to Publish) Policy SI2 and Local Plan Policy SP4.* *<u>Overheating</u>* *(a) Prior to commencement of development, a revised overheating assessment shall be submitted and approved for the new build elements of the proposed development which shall consider designing out the need for active cooling and demonstrate it has followed the GLA's cooling hierarchy to reduce the demand for cooling. This will be based on thermal dynamic modelling in line with CIBSE TM52, with TM49 weather files. This should include:* - *Evidence how the design has been amended to reduce cooling demand in line with the cooling hierarchy (if feasible);* - *Results for current and future weather files (2020s, 2050s and 2080s) for DSY1, DSY2 and DSY3 for the development without active cooling and results for the development with mitigation measures;* - *A retrofit plan setting out how future overheating risk will be mitigated, confirming these measures can be incorporated into the design of the development, prioritising passive design measures.*	

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	***Reason**: To enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with Policy 5.9 of the London Plan, Draft Policy SI4 of the draft New London Plan, and Policies SP4 and DM21 of the Local Plan.* *<u>MVHR</u>* *Prior to installation, details of the Mechanical Ventilation and Heat Recovery (MVHR) systems shall be submitted to the Local Planning Authority. Details should include the efficiency, location of the units to ensure easy access for servicing, plans showing the rigid ducting.* ***Reason**: To ensure the new homes are adequately ventilated as required by London Plan Policy 5.9.* *<u>Living Roofs</u>* *(a) No development shall commence above ground floor until details of Living Roofs and photovoltaic array have been submitted to and approved in writing by the Local Planning Authority. These details shall include:* *i) A roof plan identifying where the living roofs and solar panels will be located and what surface area they will cover;* *ii) Sections demonstrating substrate of no less than 120mm for extensive living roofs, and no less than 250mm for intensive living roofs (including planters);* *ii) Plans showing details on the diversity of substrate depths and types across the roof to provide contours of substrate, such as substrate mounds in areas with the greatest structural support to provide a variation in habitat;* *iv) Details of the location of log piles / flat stones for invertebrates;* *v) Details on the range of native species of wildflowers and herbs planted to benefit native wildlife. The living roof will not rely on one species of plant life such as Sedum (which are not native);* *vi) Relationship with photovoltaic array;* *vii) Irrigation, management and maintenance arrangements.* *(b) The approved Living Roofs and photovoltaic array shall be provided before the buildings are first occupied and shall be managed thereafter in accordance with the approved management arrangements.*	

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	***Reason**: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with regional policies 5.3, 5.9 and 5.11 of the London Plan (2016) and Policy SP4, SP5, SP11 and SP13 of the Haringey Local Plan (2017).* *<u>BREEAM Accreditation</u>* *(a) Prior to commencement on site, a design stage accreditation certificate must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM 'Very Good' outcome (or equivalent), aiming to achieve a minimum score of 66%.* *(b) None of the flexible units shall be occupied (Use Class A1/A2/A3/B1/D1/D2) until a final Certificate has been issued certifying that a BREEAM (or any such equivalent national measure of sustainable building which replaces that scheme) rating of 'Very Good' for that unit has been achieved. The Accreditation of 'Very Good' shall be maintained thereafter unless otherwise agreed in writing with the Local Planning Authority.* ***Reason**: To ensure sustainable development in accordance with London Plan 2016 Polices 5.1, 5.2, 5.3 and 5.9 and Local Plan Policy SP4.*	
Conservation Officer	The development site is extremely sensitive from an heritage-conservation perspective, due to the architectural quality and age of the historic houses onsite, among the best examples of Georgian townhouses, also due to the group value of the full terrace stretching from the grade II* listed Dial House at No 790 up to the locally listed building at No 816. This terrace, as an outstanding example surrounded by many other listed and locally listed Victorian d Georgian buildings, is emblematic of the linear continuity and built enclosure which characterise the protected townscape along the High Road of North Tottenham Conservation Area. The terrace significantly forms the southern gateway to the Conservation Area and plays an important landmark role within the experience and appreciation of the historic character of North Tottenham, while the adjacent stadium and surrounding contemporary development, located immediately to the south-east of the terrace, strongly define the developing character of Tottenham. Within this challenging context the development proposal focuses on the grade II Georgian buildings at Nos 798-802, the undesignated building at Nos 804-86 and the grade II* listed Queen Anne building at No 808. The development 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 which has been developed in discussion with the Council with the aim to provide a mature design	The recommended conditions would enable officers to scrutinise detailed design and chose of materials

Stakeholder	Comment	Response
	response capable to coherently address the historic buildings in the terrace both as individual heritage assets of intrinsic value and as an ensemble of townscape importance within the Conservation Area and as key drivers for the regeneration of the yard behind them. The yard represents the spatial interface between the historic town and the contemporary character of Tottenham, which is still being shaped as part of the wider redevelopment revolving around the new Stadium and offers a unique opportunity to regenerate the area on the basis of its unique heritage. The proposed internal and external works to 798-808 High Road, including the demolition of rear extensions Nos. 798, 800-802, 804-806 and 808 High Road are aimed at accommodating a creative industries hub within these buildings with maximum retention and repair of historic fabric as well as architectural and decorative features of special interest of the listed buildings. The 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 will also 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 equally welcome and 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 extensions are indeed designed as lightweight transitional features between the internal spaces of the listed buildings and the openness of the yard. These elegant and unobtrusive extensions appear to successfully complement, and, at the same time unveil, the architecture of the rear elevations of the listed buildings, with the substantial extension to the rear of unlisted Nos 806-808 representing the focal point of the reconfigured yard. The proposed rear extensions to the listed buildings, each one bespoke designed to complement the host building, convincingly emphasise the uniqueness of each listed building while linking into the contemporary character of the new yard. Careful detailing of these extensions, as well as of the entire yard is necessary to ensure the highest design quality to complement the listed terrace. The listed buildings have been substantially altered over the centuries, mostly internally, and have been variously used still retaining most of their character and architectural quality. It is therefore	

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	felt that the proposed uses and related sensitive reconfiguration and extension of these buildings would protect and future-proof their heritage status as well as the quality of the Conservation Area. The contemporary buildings proposed along the new yard, especially the new linear building leaning towards Lilywhite house and flanking the distinctive Paxton house appear as 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 entire design of 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	**Context** The entire terrace extends from no. 790, known as Dial House, at the southern end, to no. 816, a Paddy Power bookmaker, at the northern end. It is not a single consistent terrace of buildings designed together and built at the same time, but nevertheless has a significant degree of consistency and quality, with the majority being Georgian, 18th Century buildings of similar neo-classical "townhouse" design, and by virtue of having nearly all of the gaps between buildings later filled in, a continuous building form. It also forms a pivotal role in the urban form of this stretch of the High Road, and helps define a distinct and notable "village centre" of North Tottenham, clustered around the T-junctions with White Hart Lane, opposite the terrace, and Northumberland Park, at the northern end of the terrace, with the High Road. The way Dial House pushes forward from the prevailing building line of most of the rest of the terrace to the pavement edge, combined with a corresponding push forward of three shops opposite, and of the Coach & Horses pub and nos. 867-869 at the northern end to form "gateways" to North Tottenham, contrasting the fine-grained, historic "village centre" with the more modern, larger scaled urban form outside it. This urban contrast is strongest and most dramatic at this site, where the new 60,000 capacity Tottenham Hotspur Football Club Stadium is immediately south of Dial House. At this point the width of the High Road immediately steps out on this side, and will also on the west side when the High Road West Masterplan (of which more below, under "Principles…") is eventually implemented, with a paved forecourt in front of the stadium and a series of steps and ramps leading up to the higher podia to its sides. A new ticket office and club shop building, Paxton House, tucks into the angular space between the rear of the terrace, the side of the stadium and	

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	the rear corner of the supermarket. Its irregular triangular plan form establishes frontages facing both the stadium and a yard space behind the terrace, and responding to the rising levels of the stadium podium, this irregular plan form is extended into an irregular, angular elevational form. The final important contextual influence on this site is the approx.10-year old Sainsbury's supermarket. This faces onto Northumberland Park, an important local distributor street which runs east from the High Road at the northern end of Northumberland Terrace. Apart from a shopfront, the whole of its ground floor is car parking, with the supermarket, one of the largest in London, at 1st floor. Further floors on top of this, known as Lillywhite House, contain a Further Education college and offices for the football club. They gradually step back from the north side, and are accessed off the stadium podium to its south. However, it presents a blank, white, cladding panel wall to the site, open to the car park at ground level (to provide ventilation), and rising some 4-5 floors equivalent, visible above the roofs of the terrace. At ground level it presents an ill-observed utilitarian range of underused bicycle racks (not being considered secure), services, blank facades and a fire escape stair to the informal yard spaces along the back of Northumberland Terrace, compounded by irregular and out-of-character later additions to the terrace buildings and open aspects onto Northumberland Park to the north. There is also a small free-standing electricity sub-station towards the north-east corner of the site. This project therefore aims to protect and secure the future of the heritage assets, provide vibrant town centre uses across the site, complimentary with the neighbouring football stadium and other neighbours, and tidy up the irregular, dysfunctional space behind the terrace and the unsightly flank to the supermarket building / Lillywhite House. **Masterplan & Principle of Development** The proposals are for employment, cultural, leisure and entertainment uses that would be compatible with both the neighbouring Tottenham Hotspur Football Stadium and the council's ambitions for North Tottenham's emergence as a new town centre. This accords with the adopted Tottenham Area Action Plan (AAP, adopted July 2017 as part of the Local Plan). It also accords with the High Road West Masterplan for the area on the opposite side of the High Road from this site; covering from directly opposite the stadium to north of the North Tottenham local centre, from the High Road west to the Overground railway. This envisages creation of a new town square providing a new pedestrian link from the overground station to the High Road opposite the station, with town centre, public services and entertainment uses around it, residential-led development along the railway edge, and commercial / employment uses focussed around "yard spaces" behind retained buildings along the High Road.	

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	The proposals also accord with, and bring into a coherent masterplan, works already done, previously planned, and intended to come after this application, for the wider Northumberland Terrace site, that is the whole of the terrace from Dial House (no. 790) to Paddy Power (816), and the whole of the area behind up to the supermarket building, and to bring those into harmony with the two neighbouring masterplans for the development of the stadium itself; the earlier masterplan which only got as far as the supermarket building and the later rethought masterplan that has produced the current stadium, the Tottenham Experience on the High Road to its south and the as yet unbuilt health centre and residential developments to its north-east and south-east. This application encompasses nos. 798 to 808 High Road. Pre-app discussions and design review, at the council's Quality Review Panel (QRP), were held on the basis of the whole site, including the three properties at the southern end, 790 (Dial House)-794, where a similar strategy, of cultural activities in restored heritage buildings with rationalised extensions and landscaping behind, is proposed, but the number of outstanding questions led to the applicants deciding to treat that as a future phase after further pre-application discussion. 790-794 are separated from this application site by no. 796, the Grade II* listed Percy House, which was restored and extended by Spurs in an earlier scheme (HGY/2015/1488) as offices to house their charitable foundation. It forms a model for this application scheme. At the northern end of the terrace, the second to last property is no. 810-12; it forms a semi-detached property with no. 808, which is part of this application. 808-812 are of outstanding heritage significance, early 18th century Grade II* listed, and 810-12 were restored 2007-9 by the Haringey Building Preservation Trust, to secure its fabric. There is an unimplemented live planning permission, HGY/2017/1181 by Spurs, which permits its business / community use and an extension to its rear, again, along similar lines to Percy House and to this application. The latter acknowledged the need for the rest of the terrace to follow these along similar lines. Therefore, the approach of this application to restoration of the existing buildings of the terrace and for modest contemporary extensions to them accords with the two permitted (one implemented) schemes at nos. 796 & 810-12 and the masterplan for 760-794. The final property of the block facing the High Road, that also forms the corner of Northumberland Park, is no. 814, is a nineteenth century former bank building, currently a Paddy Power betting shop, and not in the applicant's ownership or considered as part of the masterplan. However, the small, utilitarian, 2 storey red brick building next to it on Northumberland Park is, as is the electricity sub-station next to the supermarket, set back from the street. The proposals replace the brick building and enclose the substation in a modest new three-storey terrace enclosing the central yard space, screening it from the busy traffic of Northumberland Park and giving	

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	Northumberland Park a continuous active frontage from the High Road to the supermarket entrance, as the ground floor is of shop frontages and an archway through to the yard space behind. This Northumberland Park element of the proposals also forms a continuation of the new build terrace along the east side of the proposals. The new build terrace itself also forms a continuation of a completed development, that of Paxton House, the ticket office and club shop building at the south-eastern corner of the site, that also links it to the Stadium itself. This building, HGY/2016/3310, was approved in 2016 as additional to the Stadium masterplan to fill in a "forgotten" corner between the stadium concourse, the supermarket building / Lillywhite House and the existing Northumberland Terrace group of buildings. Its architectural approach references elements of the Tottenham Experience / Warmington House, part of the stadium development, where a retained Grade II listed Georgian former house has been incorporated into a club shop and museum that also resolves the spatial difference between the open, "fluid" spaces of the stadium concourse and the regular, street facing layout of the High Road, including the level change between the higher parts of the southern concourse and street level, and the angular plan geometry as the curved stadium and stadium concourse meets the straight High Road. The angular plan, level change and contrast in contexts between the steel and glass of the stadium and the brick and render of Warmington House and other buildings along the High Road is picked up in a vertically ribbed, dark grey cast iron cladding between vertical glass slots and angular, raking roof parapet. In Paxton House, these elements were reflected in a similar angular plan form and relationship to the ramp rising to the higher northern concourse of the stadium to is south-east, with vertically ribbed copper cladding containing glass slots more like windows, around the prow of the angular building, sitting over a dark brick base, changing to a buff brick to its north, all with an angular, raking parapet and a set-back, light grey, metal top floor, itself with an angular, raking parapet, and also tucked against the south-west corner of the supermarket building. Therefore the main new-build terrace of the proposals, needing to hide the blank side of the supermarket, enclose and enliven the yard space to the back of the heritage terrace, therefore acts as a diminishing continuation of Paxton House, dropping gradually in height, toning down but continuing it's jocular, rakish architecture, and curling round to enclose the yard. **<u>Height, Scale, Massing and Density</u>** The height scale, massing and density of the proposals is modest and appropriate to the context. The new terrace continues the job started by Paxton House in mediating between the very large scale of the stadium (and the supermarket building) and the existing retained terrace	

Stakeholder	Comment	Response
	buildings of significant heritage values and of the prevailing context along the High Road. Their height drops from four lofty storeys in Paxton House (top floor set back), through four more modest storeys where it backs onto the supermarket (again with the top storey set back), to three at the northern end, also facing Northumberland Park (once again top storey set back). The height, scale and massing of the majority of the rear extensions to the existing buildings is a very modest single storey, also slimmer in width, in all clearly subsidiary to the significant heritage assets of the listed buildings, The one exception in the extensions to the terrace is that of the proposed performance and entertainment venue at 804-806. This recognises and exploits the different nature of the existing building here, the only building in the terrace (excepting 814) that is *not* statutorily listed, and the only one (excepting the bookends at either end, 790 & 814) who's building line steps out to the pavement edge. It is also of later date (mid-late 19th century), and lower floor levels, with its ground floor approximately at pavement level rather than half a floor (or about 6 steps) above; it can therefore also have level access without ramps. As a building set further forward, its existing rear building line (excluding later extensions) is further back from the yard than the others. It is therefore capable of having a different sort of rear extension, that does not have to avoid hiding the existing building, and can be bolder, bulkier, and house a more substantial internal performance space, a two storey extension, of intermediate height between the modest extensions to the heritage assets and the existing buildings themselves, with a striking façade that acts as a centrepiece for the entire yard space. **Rhythm, Fenestration and Architectural Detailing** There will be a series of distinct and different elements, expressing their different functional and urban roles, and yet acting in harmony together to make a coherent whole and contribute to the surrounding city streets and spaces. The new terrace is detailed as a series of distinct vertical bays, of a similar scale and width to the distinct original houses of the historic terrace, generally of three or five window width, or of the infills of the terrace, generally of 2 windows' width. In contrast to the strongly orderly existing High Road frontages to the historic terrace, where the original houses generally have a four-square symmetry or pairing, with either a central door and tow windows either side or they are a pair with a door to each side and two windows width to each pair, their rears are generally less orderly, with staircase windows at intermediate heights and occasional variations to symmetrical composition. Reflecting this, the proposed extensions evade symmetry, making their identity that of the single house extended in the case of symmetrical pairs,	

Stakeholder	Comment	Response
	and in the four-square houses with their wings, stressing one side or another. Similarly, the new terrace, whilst reflecting the rhythm of units or bays, evades symmetry within those bays to stress they contemporaneity and greater, more playful irregularity. Architectural detailing of the extensions to the heritage buildings is simple and made up of a limited palette of brick, metal and glass, with bricks chosen to be distinct and different to the existing building and glass designed to reveal the gaps between existing and extension and lighten their appearance. Flat roofs are designed to appear slender and a palette of different metallic tones are designed to be subtly different across the masterplan, with the potentially bulky appearing metal clad box of the centrepiece performance space behind 804-4 in a lightened metal with glass elements, including widened glass balustrade elements, to add to its visual lightness. **<u>Landscaping and Public Realm</u>** The proposals promise to create a lively and engaging new street, the yard space, between the extensions to the heritage buildings and the new terrace, open to the stadium concourse, yet perceived as separated by the gateway effect of the extensions tightening the mouth at its southern end (which will also contain the ability to be physically gated), more separated form but still permeable to Northumberland Park to its north, through the proposed archway (which can also be gated), and accessible from the High Road through the existing arch between 798 & 800 (also directly opposite the junction with White Hart Lane, so, keyed into the wider street network). The gates themselves have been designed to securely and legibly define public and private indifferent opening conditions, when the yard space is open or closed, and the key gating and screening to the open areas for ventilation and secure cycle storage along parts of the base of the new terrace, screening the open parts of the car park to the supermarket / Lillywhite House. The buildings of the terrace will also have a dual relationship to the public realm; a more formal *front door* to the High Road, accessed through a front garden in every case except the entertainment venue at 804-6, and a more informal *back door* onto the yard, generally via a landscaped buffer, used to resolve level differences. This is also an important function of the yard space, as the mostly Georgian heritage buildings have a characteristic raised ground floor, with ornamental steps to their front doors, which would not be accessible to the disabled. Otherwise, levels are carefully designed to ensure a seamless flow along the main public routes of apparently level ground, with the actual fall in levels barely noticeable. The yard is enlivened with active functions from the centrepiece performance space and retail units strategically positioned around the new build terrace, as well as each entrance / reception to	

Stakeholder	Comment	Response
	the office spaces of the terrace upper floors and existing terrace uses visible too, to ensure life around its edges. More importantly, the yard is designed to accommodate a lively street life, with the central areas, between the planted buffers to the listed buildings and particularly around the central space beside the performance box, designed to host street markets, outdoor performances and festivals. Planters, seating, lighting and provision of power points are designed in to support this, with particular care having been given to lighting design to provide good levels along key circulation, a bold installation of columns to create flexible events lighting around the central space and unobtrusive highlight lighting elsewhere. **<u>Daylight and Sunlight</u>** Of relevance to this section, Haringey policy in the DM DPD DM1 requires that: *"…D Development proposals must ensure a high standard of privacy and amenity for the development's users and neighbours. The council will support proposals that:* *a. Provide appropriate sunlight, daylight and open aspects (including private amenity spaces where required) to all parts of the development and adjacent buildings and land;* *b. Provide an appropriate amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and residents of the development…"* The applicants provided Daylight and Sunlight Report on their proposals and of the effect of their proposals on neighbouring dwellings. These have been prepared fully in accordance with council policy following the methods explained in the Building Research Establishment's publication "Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice" (2nd Edition, Littlefair, 2011), known as "The BRE Guide". There are virtually no existing residences within the area of effected by this development, only the flat above the Paddy Power bookmakers at no. 914 High Road. Furthermore, there are no proposed residences in the proposed development. Nevertheless, the applicants have assessed the daylight and sunlight effect of their proposals on all the retained existing buildings in the development and neighbouring, as well as the levels achieved in the proposed development. This is valid as the policy quoted above does not distinguish between residential and non-residential users and neighbours and the BRE Guide notes that some workers have an equally valid expectation of natural light as residents, depending on the sort of work being carried out; in particular, office workers and creators of visual arts would want good daylight (although probably not sunlight), and external amenity space needs sunlight whatever the user.	

Stakeholder	Comment	Response
	The assessment finds that the impact of the development on the rear windows of the existing neighbouring residential property, 814 is generally harmful for daylight, but their street facing windows are not harmed and they lose no noticeable sunlight. They further note that the affected windows are thought to be to ancillary rooms, not habitable rooms. This would seem like a reasonable assumption given that they currently look onto a narrow gap of only about a metre onto the existing red brick building on Northumberland Park, to be replaced by a new building of only one floor higher, and that their existing daylight levels are already well below the minimum recommended Vertical Sky Component. It seems likely that this flat gets most of its daylight from its large windows on its north and west sides facing the street. The applicant's assessment finds the daylight and sunlight levels to both the retained existing and proposed buildings within the development to be generally good, providing good task lighting conditions for office and visual arts purposes. The occasional exceptions are to ground and lower ground floor windows in some of the existing buildings, which are planned to be for ancillary uses or for work not requiring daylight, such as music recording, and to some flank windows to spaces that will be well lit by other windows. Unfortunately, no assessments were made of the outdoor amenity spaces. Nevertheless, it is considered unlikely that the sunlight levels to this space will be poor, as it is a long, south facing space, with only modest height buildings to its immediate west. It is considered likely it will get several hours of sunlight in the middle of the day and early afternoon, with late afternoon sun hitting the new terrace, as is noted in the applicant's architects Design and Access Statement.	
Drainage	The site is in CDA_61, and is less than a hectare, a flood risk assessment was not required for this proposed development, however, the applicant has supplied a separate FRA, and the site falls within flood zone 1, which has a low risk of flooding from rivers or tidal surges, the flood risk comes from surface water flooding during intense rainfall events. Based on the information supplied, the existing drainage system will require a CCTV, survey carried out to determine the condition of the drainage and whether connection can be made on the existing network and enough capacity to receive the surface water from the proposed development. Thames Water, will need to consent to any proposed connection to their network. The run off rate from the site will be 3 x greenfield rate, this equates to 5.4 l/s based on existing rates this will be a betterment of 95%.	

Stakeholder	Comment	Response
	The SuDs, hierarchy has been referenced in the strategy and the chosen solution is an underground attenuation tank, consideration was given to include green roofs and rain water harvesting that are at the top of the SuDS, hierarchy, but after further investigation the applicant has not included these and has provided comments to justify this. We welcome the inclusion of the rain gardens and tree pits these will provide additional drainage and biodiversity benefits to the site. Water butts could also be included the rainwater collected can be used for irrigation purposes of the soft landscaping. A management maintenance plan will be required and details of who will be responsible to ensure the system is functioning effectively, this must be in place for the lifetime of the development. The LLFA, has no concerns with the drainage strategy that has been provided for this proposed development.	
Economic Development	No response.	
Pollution	No objection to the proposed development in relation to air quality and land contamination, subject to conditions and an informative addressing the following: Land Contamination, Unexpected Contamination, Non-Road Mobile Machinery, Combustion and Energy Plan, Demolition/Construction Environmental Management Plan and Asbestos Survey (informative)	The recommended planning conditions and informatives address these issues.
Tottenham Regeneration	The design proposals are generally well received and successfully addresses a number of tricky site constraints to create a well activated new public square which improves the setting of a number of heritage assets. Proposed use. The concept of culture quarter is supported and aligns well with the Local Plan aspirations, and the awareness of the local breadth of talent and creative energy is welcomed. In general, the Regeneration Service supports the range of land uses on the basis of their contribution to the health of the town centre, opportunities for sustainable and quality employment for local people and contributing to the local character and community cohesion in the area. However, as the Performance Space Feasibility Study included within the application highlights, it is estimated that 30% of small gig venues have closed in the last decade, and initial analysis demonstrates that this sector has been particularly hard hit by the current COVID crisis, and the next steps will be crucial for the recovery and renewal of these businesses. As such, further	Discussed within the body of the report

Stakeholder	Comment	Response
	information is needed to demonstrate that the proposed music focus remains viable in the post COVID climate, and supports and complements rather than competes with existing local cultural infrastructure across the surrounding area through their recovery. This should include future proposals, particularly proposals at High Road West but also other proposals such as the leisure land uses proposed at Meridian Water. A Leisure Demand Study should demonstrate the sustainability of the proposed land uses and facilities, including their relationship to the business plan in relation to the wider stadium complex. As a proposal, the applicant should further explore securing an anchor tenant / delivery partner from the outset to optimise the mutual benefit gained through this in terms of design input and ensuring established gravitas for the new music venue. This would also enable the applicant to further explore non-performance music uses to support this such as good quality/professional rehearsal space which is incredibly limited in the borough at present. Transport accessibility. The application draws reference from a number of cultural hubs across London, including King Cross and Shoreditch. A notable difference between these precedents and the proposal is transport accessibility, with the site being served by several bus routes, Overground services from WHL and Network Rail services from Northumberland Park, but no tube link. Given the focus on the night-time economy, it needs to be understood what physical enhancements and management measures will be put in place, and how operation would work alongside stadium events to create a premier leisure destination. Community access and engagement. The statement of community engagement fails to provide details of engagement with the surrounding residential community, community groups, schools and youth provision, particularly related to the north Tottenham area. The community are an integral part of any successful regeneration project and a summary of community and resident engagement should be provided, outlining how community feedback has informed the development of the proposal in terms of design and access. Free access for schools and local groups alongside preferential hire rates for local organisations and musicians must be explored to ensure the scheme supports and harnesses the borough's talent and support that talent's journey from grassroots to notoriety, and the applicant should explore actively supporting a number of music or creative sector specific activities in borough as part of the offer. Alongside this we would welcome the applicant identifying a suitable creative youth engagement/support organisation to help realise these ambitions from the outset. An affiliation prior to commencement would be advantageous in ensuring that the community buy into the scheme from the outset; that young people in particularly could be involved in the build process and plan to be a part of its future.	

Stakeholder	Comment	Response
	Employment & Skills. The regeneration statement outlines the benefits of the scheme, including a number of employment opportunities generated. There is a wealth of talent in the local area and a great demand for opportunities for training and employment. 1656 people are on Universal Credit for unemployment related reasons in Northumberland Park, this is the largest figure of all wards in the borough. Proportions of residents with no qualifications is also almost double the Haringey average at 25.3% and yet business growth is high in north Tottenham at between 19% - 27% (Companies House, 2019). Further information is required on how the economic benefits generated will support the local Haringey community, for example through pathways to employment, community access to facilities, opportunities for young people and local supply chain. The applicant should set out how they will maximise opportunities for the borough's food and beverage providers and entrepreneurs, for example by promoting these businesses to the applicant's wider audience through leasing space to local businesses and prioritising local producers (such as the borough's many breweries) within the supply chain. It's critical the cultural quarter works to meets the challenge and commits to providing pathways that support local Haringey residents to access industries that can be closed off, including opportunities linked to the wider music sector through a rounded approach to wider skills that could be developed into meaningful sustainable careers. The end use does not provide enough detail on supporting those furthest from the labour market to access work. Many of the jobs created in the industry require higher level technical skills. In Northumberland Park, the proportion of residents with qualifications at level 3 or higher is the lowest of all Haringey wards, meaning residents, and especially young people, could miss out on the opportunities presented by this application. The application would benefit from a proposal for providing creative pathways for young people, with early engagement of a creative college for delivering this. This should be a key focus for any partnership with an anchor institute for the recording studio. Local opportunities must not be limited to the construction phase, and we encourage the applicant to use levers with end use tenants to secure level 3 and level 4 apprenticeships in music technology, content, events and marketing. The creative sector has a powerful impact on Haringey's economy and contributes significantly to the borough's jobs base. Pre Covid19, employment in the sector was up 25%, growing at a faster rate in Haringey than the London average. However, this sector has been disproportionately impacted by Coronavirus, lockdown measures and the ongoing need for social distancing. We therefore welcome a cultural quarter which can support recovery of a critical growth sector, subject to stronger proposals for local pathways into end use jobs.	

Stakeholder	Comment	Response
	The application should note all reference to local people should relate to those living in Haringey borough, not using a definition of local as a radius from the site which may include neighbouring boroughs.	
Transportation	Access Arrangements. This site currently has three existing crossovers off the public Highway, two off the High Road, and one on Northumberland Park (which is not currently in use). The southernmost of the accesses/crossovers (between Nos. 798/800 High Road) enables access to a small courtyard area that accommodates around 15 vehicles. It is on the White Hart Lane/High Road signalised junction but is not signal controlled. The northernmost off the High Road (adjacent to the Co-op Funeral Director) also leads to a small courtyard area able to accommodate around 8 vehicles. The existing crossover on Northumberland Park is adjacent to the crossover and paved area for the substation adjacent to the Sainsburys store. The development is proposed as a car free site, with physical access enabled and permitted only for visiting delivery and service vehicles and for refuse and recycling collections. It is proposed that the majority of vehicles will enter via Paxton Place at the southern end of the site, with a one-way northbound arrangement within the site, and exit onto Northumberland Park. Paxton Place is to the immediate south of this site, and already in place from the stadium redevelopment, accessed directly off the High Road. Inbound vehicles will also still be able to access via the existing access off the High Road at the High Road signalised junction with White Hart Lane. This does mean that one of the crossovers off Tottenham High Road (adjacent to the funeral directors) will be able to be reinstated, and the physical works to do this will be able to be covered by the development Section 278 Agreement or similar with the applicant meeting all of the Highway Authority costs. It is detailed that the accesses will be gated, the arrangements for these must be so that any vehicles waiting to enter or leave do not wait on the public highway, all vehicles accessing must be able to wait without overhanging the footway. It appears that the gates are set well back from the rear edge of the footway, however details for these gates and the layouts proposed can be covered by condition. The access to be retained off the High Road has a 3.4m height restriction. This will enable fire appliance access but not standard Council refuse/recycling collection vehicles. The submission does refer to arrangements to be made for an alternative type of vehicle to pick up waste and	The recommended planning conditions and s106 planning obligations pick up all of the requested issue.

Stakeholder	Comment	Response
	recycling, this has not been specified, and that can be done within the final Delivery and Servicing Plan. Cyclists will be able to access the site via High Road, Northumberland Park and Paxton Place. Pedestrians will also access the site via High Road, Northumberland Park and Paxton Place, and the internal space is designed as a pedestrian focused space, facilitating safe and convenient pedestrian movements through the area. The existing access onto the High Road, adjacent to the Funeral Undertakers will be permanently closed off as part of the development. Via the S278 Agreement, this crossover can be reinstated and a full height kerb and footway re provided, which will make an improvement to the pedestrian environment at this location along the High Road. Likewise, any changes needed to the Northumberland Park crossover can be covered by the S278. Trip Generation. The land uses will provide up to 5,995m2 of floorspace. Although the final land use allocation has not been defined, trip rates have been extracted for a B1 office use considered as a proxy for the trip characteristics for the flexible and creative land uses expected. This assumes a 'worst case' basis as commented by the applicant. The applicant's trip generation summary is shown in the table below;	

Stakeholder	Comment	Response

	AM Peak						PM Peak					
	Trip Rate			Trip Generation (5955m²)			Trip Rate			Trip Generation (5955m²)		
	Arr	Dep	Total	Arr	Dep	Total	Arr	Dep	Total	Arr	Dep	Total
Total People	2.073	0.123	2.196	123	7	130	0.177	1.962	2.139	11	117	128
Vehicles	0.128	0.041	0.169	8	2	10	0.041	0.107	0.148	2	6	9
Pedestrians	0.255	0.062	0.317	15	4	19	0.082	0.374	0.456	5	22	27
Cycles	0.082	0.000	0.082	5	0	5	0.000	0.091	0.091	0	5	5
Bus	0.313	0.012	0.325	19	1	20	0.016	0.296	0.312	1	18	19
Rail	1.267	0.012	1.279	75	1	76	0.037	1.045	0.182	2	62	64

Table 6.2 Trip Generation – B1 Office

The trip generation exercise predicts that there will be 8 vehicle arrivals and 2 departures in the AM peak period (busiest of the two) along with 19 arrivals by bus, and 75 by rail.

It is assumed these are the peak hour periods, TfL normally require sight of the 3 hours periods in the AM and PM peaks.

There is an existing use at the site, which is of course a trip generator, however there has been no details provided of the quantum of trips from the existing floor space/user. This in itself is not an issue, given the low number of vehicle trips predicted with this development, when considering the capacity and operation of the highway Network. The absolute numbers of peak trips on rail and bus services are not expected to create any network capacity implications however TfL will need to provide their comments with respect to this.

Part of the proposed development is a recording studio and performance space with a capacity of 120 seated/300 standing at ground floor, and 60 seated at first floor. In terms of trips, it is expected that these will primarily be on evenings to live events and functions, however there could also be community and educational uses during the working day.

Stakeholder	Comment	Response
	The Travel Plan will need to consider the arrangements, impacts and appropriate management arrangements with respect to events to minimise transportation and parking impacts. Car parking. The development is proposed as a car free development. There is no residential component to the development. The first observation with respect to parking is that there are currently 23 spaces in use in the off-street space behind Nos. 798 - 808. It is not completely clear who uses these spaces at present, there is a consideration with respect to whether some of these demands will migrate to on street spaces. Any associated with the existing residential units should not be an issue given there is no residential component to this development. The TA doesn't include any parking stress surveys or analysis of this, first thoughts are that the opportunities within the 200m walk distance for on street parking are relatively limited, there are some side streets to the western side of the High Road, and Northumberland Park. The applicant has provided some additional commentary on this and referenced relocating parking for some of the displaced existing users, but not offered any detail beyond that statement. To address the above, it will be appropriate for this development to be a permit free/car free development, with no ability for occupiers to obtain Business parking permits for this CPZ. The applicant will need to enter into the appropriate planning agreement and meet the associated costs (£4000). With respect to the provision of blue badge parking, it is proposed to allocate two spaces for this development in the adjacent Lilywhite House car park, within which the TA detail the club controls 30 spaces for club related activities and match days. Apparently only 22 permits have been granted for these spaces, so their full capacity of 30 spaces is not fully utilised at present. Within the TA it is detailed that the two spaces are located close to the Paxton Square entrance to the development, and there is an accessible at grade walk route to this development from them. The walk distance to the southern end of this development is approximately 75 metres. Given that there are still 6 unallocated spaces within the club's 30 spaces, it is suggested that the ability to provide more blue badge parking for this development be included via a mechanism for	

Stakeholder	Comment	Response
	adding to the two spaces be put in place, using a parking management/ allocation plan. The mechanism for this can be detailed in the plan, which can be covered by condition. The Parking Management Plan can also include details of alternate proposed provision for any existing parking displaced by the development. Cycle parking. It is detailed within the TA that this development will provide a total of 223 cycle parking spaces. 158 of these spaces are to replace the existing spaces provided for current users in the Tottenham Academy of Excellence, Lilywhite House, Paxton House, Skywalk, The Tottenham Experience and Minor Event Day staff. The remaining 66 spaces are for this development. The quantum for this development has been derived from the new floor space of 3,133 sqm, and is based on the provision required for B1 floor space (the exact space for different use classes is yet to be confirmed, the use of B1 for the cycle parking ensures the highest provision of the potential use classes). The requirements for the new floor space (B1) are 42 long stay and 13 short stay spaces and 66 are to be provided. Some more detailed information has been provided by the applicant with respect to the system intending to be used, and scaled drawings showing the manufacturer's installation specification can be met, along with dimensions of the store rooms and headroom. The cycle parking stores are located to the eastern side of the development, and these will contain two tier cycle parking units plus a provision of Sheffield stands to accommodate larger cycles. There is also reference to 12 short stay space located within the open area of the development. The northernmost pair of the cycle parking stores will be for this development and the other two to the south will be for the provided cycle parking. Key fob security/access control is proposed for the cycle parking stores, and it appears that sufficient width of doorways and spacing between banks of cycle racks will be provided in the cycle parking stores (2.5m is the minimum requirement behind two tier cycle racks) The recently provided details also confirm that there will be 20 lockers in the development for cyclists plus changing rooms. Delivery and servicing arrangements. All delivery and servicing demands need to be met within the site and off of the public highway and this is what has been proposed with this development.	

Stakeholder	Comment	Response
	Vehicles will access either from the southern end of the site from Caxton Place or from the retained vehicle access from Tottenham High Road between Nos. 798/800. There are 5 set down spaces proposed for the central open space to the development. Swept path plots have been provided for a 7.5 tonne truck and these appear satisfactory. The TA references that deliveries to the site will be coordinated to arrive outside of peak morning and evening traffic periods where possible. It also comments that the nature of the occupiers on site as a Creative Quarter will tend to attract more deliveries by vans rather than by large vehicles. The TA comments that typical dwell times for delivery vehicles are expected to be for between 10 and 30 minutes, generally towards the shorter of these durations, and that around 10 service vehicles will access the site in the busiest hour and around 5 vehicles per hour in the off-peak periods. Therefore, the 5 set down/dwell spaces in the central open area should be able to accommodate the predicted service demands and associated dwell times. With regards to refuse and recycling collections, the low headroom restriction of 3.4m means that a standard Council type refuse collection vehicle will not be able to access (4/75m vehicle height). Therefore, the facilities management company will need to engage a refuse collection operator with a smaller than standard refuse collection vehicle of which there are numerous vehicle types available. The vehicles type has not been confirmed. It is proposed that there will be two collections each week for refuse and two for recycling. Haringey's waste team will need to confirm whether the proposed storage capacities are sufficient for the frequencies of collection referred to in the TA. Overall, a Delivery and Servicing Plan will be required to finalise the proposed details and arrangements for the development, this can include the options for refuse and recycling collection vehicles that will service the development. This can be covered by condition. <u>Travel Plan</u>. There is a draft of a Framework Travel Plan for the development submitted with the application, this is overall fine in terms of the proposed scope and content, the objectives of it and the intended management of it. The approach proposed is for the framework to be an overarching policy and oversight document, that will include the survey and mode share information. The tenants/occupiers will be required to provide their 'occupier' travel plans which will be unit specific	

Stakeholder	Comment	Response
	and include the measures and actions that they will be employing to contribute towards achieving the wider travel plan objectives and mode share targets. Overall, the approach proposed and content provided so far are fine, and a refreshed version of the Framework TP can be worked up in the normal manner upon completion of the first occupier travel mode survey to agree suitable mode share targets for the development. Of particular interested will be the occupier travel plan for the live music venue, this has the potential to attract a proportionally high number of visits and sight of this occupier TP will be sought. It is noted that the expectation is for a travel plan life of ten years rather than the initial five, and taking this into account it is appropriate for the developer to may a payment for a travel plan monitoring fee of £4000. <u>Construction Management Plan</u>. A skeleton draft of a Construction Management Plan has been included in the application, this is an outline preliminary version, that has key facts and some detail, but it is noted that it cannot be updated to a detailed draft until a contractor is appointed. From the transportation perspective, the following is noted: An 18 month build out/programme is expected: Peak hours movements will be minimised as much as possible, smaller construction vehicles will be utilised to avoid the necessity for any reversing movements on the highway; a one way through route inbound from the High Road and out onto Northumberland Park will be utilised for construction vehicles. The principles and details submitted are fine, prior to commencement of the works, a fully detailed CMP/CLP will be required, and this can be covered by condition. This will need to include the following; • Detailed programme and phasing of the works • Types and sizes of construction vehicles servicing the works • Weekly breakdowns of vehicles and well times • Arrangements for slot booking to ensure no vehicles wait on the highway • Vehicle arrivals and departures to be times to avoid peak periods, the exact period/durations will be determined by Haringey Network Management Officers.	

Stakeholder	Comment	Response
	• The CLP must take into consideration other sites being developed locally and where possible coordinate movements to and implement also measures to safeguard and maintain the operation of the local highway network. • Following on from above participation in the local network Traffic Management groups where all developers and contractors liaise with Haringey Officers will be required, along with payment of a CMP/CLP Monitoring fee of £4000 to cover Officer time associated with oversight of the build out on the Highway Network. Summary. This application is for redevelopment of 798 – 808 High Road Tottenham, and includes alterations and extensions to the existing buildings fronting Tottenham High Road, plus erection of a new 'L' shaped building to the eastern side of the plot. In total, there will be an uplift in floor area of 3313 sqm to bring the total at the site to 5280 sqm, along with the creation of an internal shared surface type area to the development. The development is proposed as a car free development. There will be access changes compared to existing with one highway access off The High Road able to be reinstated, and a through route provided for service and delivery vehicles from the southern end of the development (Caxton Place/High Road) exiting onto Northumberland Park. The predicted peak hour arrivals and departures by vehicles are not considered to create any adverse impacts or concerns with respect to the highway, neither are the public transport trips on public transport networks. Two blue badge parking spaces are proposed for location within the adjacent car park, whilst this meets London Plan requirements, as there are unallocated spaces, it is suggested that the ability to provide additional blue badge spaces is provided, via a Parking Management Plan. This can be covered by condition. Cycle parking is proposed to meet the numerical requirements of the forthcoming/draft London Plan for this development, along with relocated cycle parking associated with the existing users at the site. A total of 224 spaces is proposed. Full details of the proposed arrangements and store areas is required to confirm that the manufacturer's installation specifications are met and to ensure that the cycle parking is both attractive and easy to use. Again, this can be covered by condition. The proposed delivery and servicing arrangements are acceptable, and provision of a Delivery and Servicing Plan to clarify arrangements for refuse and recycling collections will be appropriate.	

Stakeholder	Comment	Response
	Draft Travel and Construction Logistics Plans accompany the application and these are considered acceptable in principle, however they will need to eb fully worked up prior to commencement of the development. Overall, the application is considered acceptable to transportation subject to the following conditions and S106 items; Conditions • Cycle Parking details for visitor and long stay cycle parking • Delivery and Servicing Plan • Travel Plan Including Event Plan for Venue and £4000 travel plan monitoring fee • Construction Logistics Plan and Monitoring fee of £4000 • Parking Management Plan S106 • Development to be CPZ Permit Free (No Business Permits) • S278 agreement for Highway Changes	
Waste	Any Commercial enterprise must arrange for a scheduled waste collection with a Commercial Waste Contractor. The business owner will need to ensure that they have a cleansing schedule in place and that all waste is always contained. Commercial Business must ensure all waste produced on site are disposed of responsibly under their duty of care within Environmental Protection Act 1990. It is for the business to arrange a properly documented process for waste collection from a licensed contractor of their choice. Documentation must be kept by the business and be produced on request of an authorised Council Official under section 34 of the Act. Failure to do so may result in a fixed penalty fine or prosecution through the criminal Court system. The above planning application has been given a RAG traffic light status of N/A for waste storage and collection.	Noted – addressed in report.

Stakeholder	Comment	Response
Historic England	On the basis of the information available to date, we do not wish to offer any comments. We suggest that this application should be determined in accordance with national and local policy guidance and that you seek the views of your specialist conservation adviser. Historic England has drafted the necessary letter of authorisation (attached) for your authority to determine the application as you see fit and referred the case to the National Planning Casework Unit (NPCU). The LPA will be able to issue a formal decision once NPCU have returned the letter of authorisation to you, unless the Secretary of State directs the application to be referred to them.	Noted
Historic England (GLAAS)	The planning application lies in an area of archaeological interest. The site faces the Roman road and has been occupied since at least the seventeenth century. Works may expose early evidence of the area's development. Recommend a specific condition to secure a Written Scheme of Investigation.	Recommended planning condition picks up on this issue.
Metropolitan Police (DOCO)	No objection in principle, subject to suitably worded planning conditions.	See recommended planning condition.
Thames Water	Waste Comments. Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. Water Comments. The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if	Recommended conditions and informatives pick up on these issues.

Stakeholder	Comment	Response
	you're considering working above or near our pipes or other structures. https://developers.thameswater.co.uk/Developing-a-largesite/ Planning-your-development/Working-near-or-diverting-our-pipes. Should you require further information please contact Thames Water. Email:developer.services@thameswater.co.uk There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor- diverting-our-pipes If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater. On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.	
Transport for London	A PERS audit undertaken in 2015 is included within the Transport Assessment (TA) however TfL requests the applicant undertakes an Active Travel Zone (ATZ) assessment in line with our updated planning applications guidance. TfL's ATZ guidance is available here: <http://content.tfl.gov.uk/atz-assessment-instructions.pdf>. The ATZ assessment should examine barriers to active travel as well as measures to overcome them in line with policy T2 (Healthy Streets) of the Intend to Publish London Plan. This should be undertaken and shared with TfL for review prior to the application being determined by the Council. TfL may seek developer contributions towards improvements identified in the ATZ assessment in line with policy T4 (Assessing and mitigating transport impacts) of the Intend to Publish London Plan.	Discussed in the body of the report.

Stakeholder	Comment	Response
	TfL is satisfied with the level of cycle parking proposed exceeding the minimum requirements set out in table 10.2 (Minimum cycle parking standards) of the Intend to Publish London Plan. However long stay cycle parking is proposed as a mixture of two-tier racks and vertical stacking racks. Vertical stacking racks are not supported and this does not comply with TfL's London Cycling Design Standard (LCDS) guidance (available at: http://content.tfl.gov.uk/lcds-chapter8-cycleparking.pdf) and must be amended prior to the application being determined by the Council. Specifically, a proportion of long stay cycle parking should be provided as Sheffield stands as they are accessible for all in line with section 8.2.1 of TfL's LCDS guidance. TfL requests the applicant confirms through labelled scale drawings of the long stay cycle parking proposed that a minimum aisle width of 2500mm is provided beyond the lowered frame of the two-tier racks in line with section 8.2.6 (Two-tier stands) of the LCDS. The spacing between enlarged bays for the adapted/larger cycles should comply with figure 8.1 (Recommended cycle parking space requirements) of the LCDS. TfL is satisfied with the delivery and servicing arrangement proposed. The development proposed is car free which is supported in line with policy T6 (Car parking) of the Intend to Publish London Plan. 2 disabled parking bays will be provided which is supported in line with policy T6.5 (non-residential disabled persons parking). A Construction Logistics Plan (CLP) produced in line with TfL guidance should be secured by condition and discharged in consultation with TfL in line with policy T7 (Deliveries, servicing and construction) of the Intend to Publish London Plan.	