

GREATER LONDON AUTHORITY

Good Growth

Graham Harrington
Principal Planning Officer
Haringey Council
Development Management
Civic Centre, 55 the High Road
N22 8LE

Our ref: GLA/2021/0718/S1/01
Your ref: HGY/2021/1771
Date: 23 August 2021

Dear Graham

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008
The Goods Yard and the Depot, High Road West, Tottenham
Local Planning Authority reference: HYG/2021/1771

I refer to the copy of the above planning application, which was received from you on 25 June 2021. On 23 August 2020 the Deputy Mayor for Planning Regeneration and Skills Jules Pipe MBE considered a report on this proposal, reference GLA/0718/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that the application does not fully comply with the London Plan for the reasons set out in paragraph 127 of the above-mentioned report. However, the possible remedies set out in that report could address these deficiencies.

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

Please note that the Transport for London case officer for this application is Juan Sanclemente, e-mail: juan.sanclemente@tfl.gov.uk

Yours sincerely

A handwritten signature in black ink that reads "John Finlayson" with a long horizontal flourish extending to the right.

John Finlayson
Head of Development Management

cc Joanne McCartney, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG
Danny Calver, TfL
James Beynon, Quod

The Goods Yard and The Depot, High Road West, Tottenham

Local Planning Authority: Haringey

local planning authority reference: HGY/2021/1771

Strategic planning application stage 1 referral

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

The proposal

Full planning application for the residential-led mixed use redevelopment of the site comprising 867 homes (36% affordable housing by habitable room), 1,878 sq.m. of flexible commercial, business, community, retail and service use (in Class E use), together with public open space, landscaping, parking, with building heights ranging from 6 to 32-storeys.

The applicant

The applicant is **Goodsyard Tottenham Ltd** and the architect is **F3**

Strategic issues summary

Land use principles: Further optimisation of the site's potential development capacity over and above the extant planning permission is supported as part of a comprehensive residential-led mixed use scheme (paragraphs 25 to 31).

Housing and affordable housing: 36% affordable housing (by habitable room) comprising 40% low cost rent and 60% intermediate housing is proposed, with provision for the overall quantum of affordable housing to be increased to 40% affordable housing with grant. The proposed tenure split complies with the Tottenham Area Action Plan. However, further discussion is required to verify the appropriate blended affordable housing threshold for the site, in accordance with the London Plan. Further details are required to confirm the affordability of intermediate housing (paragraph 33 to 57).

Urban design: The layout, landscaping, density and residential quality is supported. The legibility and quality of the southern entrance should be improved, with pedestrian access provided on both sides of the footway (paragraph 58 to 95).

Tall buildings: Tall buildings are proposed in a location which is identified as suitable for tall buildings. The same number of towers are proposed as the extant permission but with an increase in height and changes to the massing arrangement. The scheme generally complies with the qualitative assessment criteria in Policy D9 in respect of visual, functional, environmental and cumulative impacts. However, the design and materiality of the tops of the towers should be reconsidered to ensure they have a positive townscape impact (85 to 91).

Heritage: The scheme would cause less than substantial harm to a number of designated heritage assets. As such, the public benefits associated with the application will need to outweigh this harm. This could be the case in this instance, subject to these benefits being secured at Stage 2 and further clarification on a number of issues (73 to 80).

Transport: Clarification is required on the trip generation assessment to enable officers to establish the impact (and cumulative impacts) on public transport (London Overground and bus services) in the context of the High Road West Masterplan site. Further details on the design quality of cycle parking facilities is required. A review of the proposed southern site access is required, together with Stage 1 Road Safety Audits (paragraph 97 to 107)

Climate change and environmental issues: The energy, urban greening and drainage strategies are acceptable. The applicant is proposing to connect the site to the planned Lee Valley District Heat Network. This is strongly supported and should be secured (paragraph 108 to 123).

Recommendation

That Haringey Council be advised that the application does not fully comply with the London Plan for the reasons set out in paragraph 127. However, the possible remedies set out in this report could address these deficiencies.

Context

1. On 25 June 2021 the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following categories of the Schedule to the Order 2008:
 - Category 1A: "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."
 - Category 1B(c): "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - outside Central London and with a total floorspace of more than 15,000 square metres."
 - Category 1C(c): "Development which comprises the erection of a building which is more than 30 metres high and is outside the City of London."
3. Once Haringey Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.
5. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>

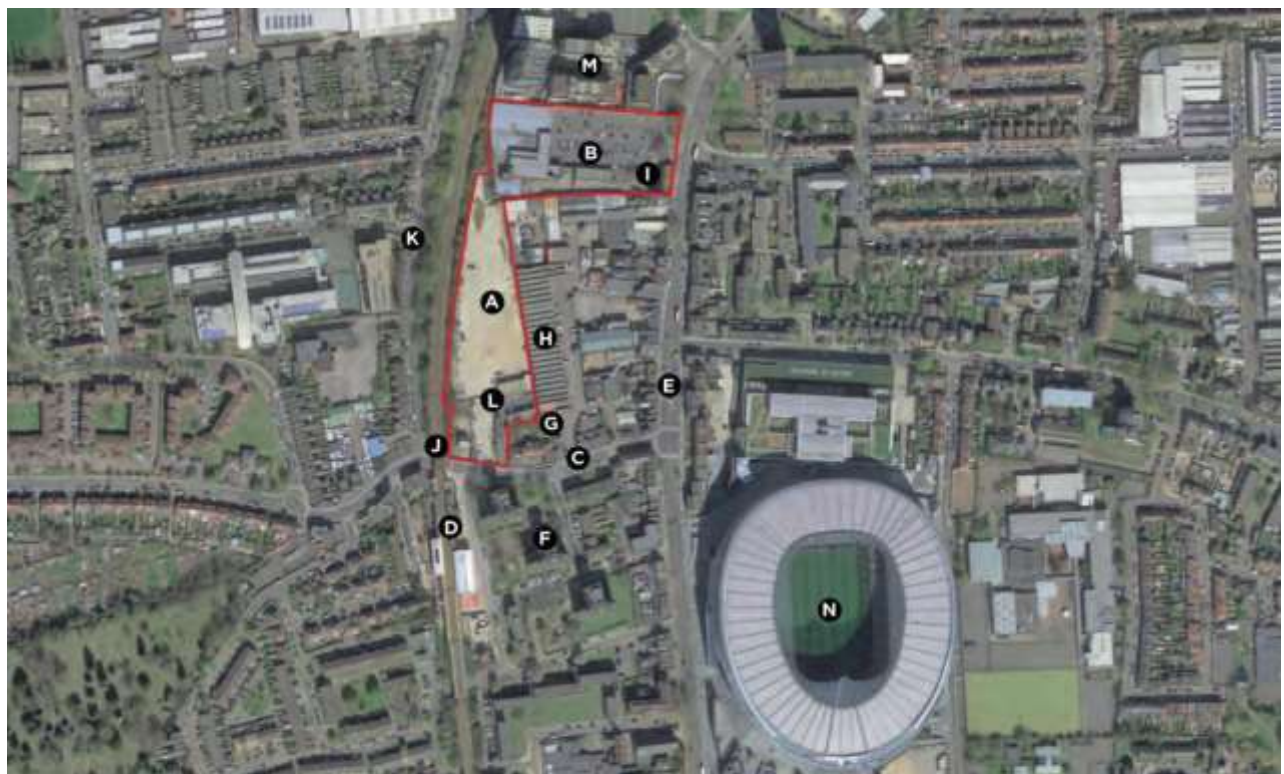
Site description

6. The site is 2.5 hectares in size and is located in Tottenham within the Lee Valley Opportunity Area and Northumberland Park Growth Area. The site comprises two elements: the Goods Yard; and the Depot, which are shown below in Figure 1. Both sites benefit from separate extant planning permissions for residential-led mixed use development (as set out in more detail below) and fall within the High Road West Masterplan Area.
7. The Goods Yard is bounded by an elevated railway line and tree-lined embankment to the west; the Peacock Industrial Estate to the east; and White Hart Lane to the south. The majority of the Goods Yard comprises cleared land which was used as a construction compound for the Tottenham Hotspur Stadium development. The southern part of the Goods Yard site closest to White Hart Lane includes the Carberry Enterprise Park which comprises two-storey light industrial units. In addition, a two-storey Victorian building (Station Master's

House) falls within the site boundary and fronts White Hart Lane. This property is locally listed and is currently vacant.

8. The Depot site is to the north of the Goods Yard and is bounded by Tottenham High Road to the east; the Cannon Road Development to the north; the railway embankment to the west; and light industrial buildings to the south. The Depot site comprises a large footprint two-storey retail building which is occupied by B&M Stores (previously Sainsbury's) and a large surface car park. In addition, the site includes five small retail units to the south. The majority of these units are understood to be vacant. To the east, the site includes Nos 867-869 High Road which is a Georgian three-storey Grade II listed property.

Figure 1 – The Goods Yard and The Depot site and surrounding context



KEY

■ Site Boundary	D Overground Station	H Peacock Ind. Estate	L Carbery Enterprise Park
A Goods Yard Site	E High Road	I 867-869 High Road	M Cannon Road Development
B The Depot Site	F Love Lane Estate	J Station Master's House	N Tottenham Hotspur Stadium

9. The Depot site includes the Grade II listed 867-869 High Road and the Goods Yard site includes the locally listed Station Master's House. These areas of the site fall within the North Tottenham Conservation Area. There are a number of heritage assets in the immediate and wider area, as set out in more detail below.
10. The site has a Public Transport Access Level (PTAL) ranging between 3 and 5 (on a scale of PTAL 0 to 6b, where 6b represents the highest level of public transport access). White Hart Lane Station (London Overground and Greater Anglia services) is immediately to the south of the site and has been recently upgraded, with a new station building, entrance and ticket hall and step-free access provided. Northumberland Park station (National Rail services) is

approximately 1 kilometre to the east. Seven Sisters station (London Underground Victoria Line and London Overground) is 3 kilometres to the south. The nearest bus stops to the site are located along the High Road, White Hart Lane and Northumberland Park. Six daytime bus routes are served from these bus stops.

11. The A1010 High Road forms part of the Strategic Road Network (SRN) and is adjacent to the site. The nearest points of vehicular access to the Transport for London Road Network (TLRN) is the A10 Bruce Grove / A1010 High Road junction and the A406 North Circular Road / A1010 Fore Street junction, located approximately 1 kilometre to the south and north respectively. Cycleway 1 (from Tottenham to Liverpool Street) is located approximately 400 metres to the south of the site.

The surrounding context

12. The site has a close proximity to a number of listed buildings. The Grade II listed the Grange (34 White Hart Lane) is immediately adjacent to the site to the south. There are a number of other Grade II listed buildings along the western side of High Road, including: 797 and 799 High Road; 819 and 821 High Road; 859-863 High Road. On the opposite (eastern) side of the High Road is the Grade II* listed Dial House, Percy House and 808-810 High Road, together with the Grade II listed Nos. 792-794, 798-802 and 816-822 High Road.
13. The North Tottenham Conservation Area covers the High Road and White Hart Lane. It is one of five conservation areas which make up the wider Tottenham High Road Historic Corridor which from the borough boundary down to Seven Sisters and South Tottenham, including Tottenham Green, Bruce Grove, Scotland Green and Seven Sisters Conservation Areas. Other conservation areas in the wider area include the Tottenham Cemetery Conservation Area, Bruce Castle Conservation Area to the south west. Fore Street Angel and Fore Street South Conservation Areas are to the north of the North Circular, along the High Road and fall within Enfield.
14. The surrounding area is undergoing significant change with a number of completed and approved large-scale mixed use developments. This includes the Northumberland Development Project (NDP) and the new Tottenham Hotspur Stadium which opened in April 2019. The second phase of the NDP will comprise a mix of hotel, residential, sport/leisure and community uses with two 19-storey towers, 27 and 36-storey towers and a 51 metre AOD high sports centre building (LPA ref: HGY/2015/3000). The Cannon Road development to the north of the Depot site comprises residential blocks ranging in height from 6 to 10, together with a 22-storey tower (Brook House) and a primary school.
15. To the south is the Love Lane Estate which currently comprises residential buildings of between 10 and 4-storeys. The housing estate is currently the subject of an estate regeneration / redevelopment proposals as part of the wider High Road West Masterplan. The Council has recently commenced a ballot consultation with residents on the emerging estate regeneration proposals. The area to the west of the railway comprises two to three-storey Victorian terraces, some more recent four-storey blocks and Haringey Sixth Form College.

Details of this proposal

16. Full planning permission is sought for the residential-led mixed use redevelopment of the site comprising:
- 867 homes (36% affordable housing by habitable room);
 - 1,878 sq.m. of flexible commercial, business, community, retail and service use (in Class E use);
 - change of use of the locally listed Station Master's House (52 White Hart Lane) to a flexible retail, food and beverage use (Class E);
 - change of use of the Grade II listed 867-869 High Road to residential;
 - on-site public and private open space, including a new public park within the Depot site;
 - associated parking and hard/soft landscaping; and
 - building heights ranging from 6 to 32-storeys.
17. The layout, height and massing of the scheme is shown below in Figure 2.

Figure 2 – layout, height and massing



18. A total of 14 blocks are proposed, together with the change of use of Station Masters House and 867-869 High Road. Three towers are proposed ranging in height from 27, 32 and 29-storeys, from south to north. The Goods Yard scheme proposes 8 blocks ranging in height from 3, 5, 6, 7, 7 and 32-storeys. The Depot scheme proposed 6 blocks ranging in height from 5, 6, 9 and 29-storeys. The northern section of a proposed public park (Peacock Park) is also proposed which would be fronted by Blocks B, D and G within the Depot site. The remainder of this public open space is anticipated to be provided on land to the east, as envisaged in the High Road West Masterplan (2014). This would necessitate the adjacent sites coming forwards which are in separate ownership.
19. This application proposes an uplift of 221 homes and 330 sq.m. of non-residential floorspace above the extant planning permissions. Within the Depot site Blocks D, E, F and G are identical to the extant planning permission in terms of scale, layout and use. An extant Listed Building Consent (LBC) exists for the

conversion of 867-869 High Road to residential use and the proposals for this element of the scheme remains unchanged (LPA ref: HGY/2019/2930).

Case history

20. Two separate extant planning permissions are in place on the site which are summarised below:
 - The Goods Yard site is subject to a hybrid planning permission (part detailed / part outline) which was granted at appeal in June 2019 (LPA ref: HGY/2018/0187). This permission comprised up to 316 homes, employment, retail, leisure and community uses with two residential towers of 18 and 22-storeys with building heights stepping up in height from south to north and maximum heights ranging from 3 to 8-storeys on the remaining blocks. The appeal was lodged under grounds of non-determination.
 - The Depot is subject to hybrid planning permission (LPA ref: HGY/2019/2929) for up to 330 homes, with retail and cafe use and the northern section of the new public open space. This consent included a 29-storey tower to the west, with a part 7 and part 9-storey building to the north and building heights ranging from 6 to 3-storeys on the remainder of the site, stepping down towards the High Road.
 - In terms of affordable housing, the permitted Goods Yard scheme proposed 35% (by habitable room), based on a tenure split of 40% affordable rent and 60% intermediate (shared ownership). In addition, the applicant stated that it would be willing to deliver 40% affordable housing (by habitable room) if housing grant is available, which was secured via S106 agreement. The permitted scheme on the Depot secured 35% affordable housing based on a 40:60 tenure mix of social rent / LAR and intermediate, weighted towards intermediate housing provision.
21. In relation to the current proposals, a GLA pre-application in principle meeting was held with the applicant and Council on 5 May 2021 in relation to which an advice note was issued on 14 May 2021. This supported the land use, housing provision, layout and design. Further discussion and a more detailed assessment was required to determine the affordable housing threshold for the site and in relation to tall buildings, heritage, townscape and environmental impact.

Strategic planning issues and relevant policies and guidance

22. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the Development Plan in force for the area comprises the Haringey Strategic Policies DPD (2017); the Haringey Development Management DPD (2017); the Tottenham Area Action Plan (2017); and, the London Plan 2021.
23. The following are also relevant material considerations:
 - The National Planning Policy Framework and National Planning Practice Guidance;
 - The Mayor's Affordable Housing and Viability SPG;

- The Upper Lee Valley Opportunity Area Planning Framework (OAPF) (2013)
- Haringey Council - High Road West Masterplan (2014)
- Haringey Council – North Tottenham Conservation Area Appraisal & Management Plan (2017)
- Haringey Council – Bruce Castle and All Hallows Conservation Area Appraisal and Management Plan (2019)
- Haringey Council – Tottenham Cemetery Conservation Area Appraisal and Management Plan (2019)
- Enfield Council – Church Street and Fore Street Conservation Area Appraisal (2016)

24. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:

- Land use principles *London Plan;*
- Housing, affordable housing and play space *London Plan; Affordable Housing & Viability SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; the London Housing Strategy; Good Quality Homes for All Londoners draft LPG;*
- Urban design and heritage *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Good Quality Homes for All Londoners draft LPG;*
- Inclusive access *London Plan; Accessible London: Achieving an Inclusive Environment SPG;*
- Climate change and sustainable development *London Plan; Sustainable Design and Construction SPG; the London Environment Strategy; Circular Economy Statements draft LPG; Whole-life Carbon Assessments draft LPG; ‘Be Seen’ Energy Monitoring draft LPG;*
- Transport *London Plan; the Mayor’s Transport Strategy*

Land use principles

25. The sites fall within the Lee Valley Opportunity Area and the Northumberland Park Growth Area. It is allocated for residential-led mixed use development as part of the wider site allocation ‘NT5 – High Road West’. The two sites are subject to extant planning permissions as detailed above, which establish the acceptability of the residential-led mixed use redevelopment in land use terms.

26. The AAP site allocation NT5 (2017) sets out the Council's aspiration for the wider 11.7 hectare site to be developed in a comprehensive masterplan-led manner, providing a minimum indicative housing capacity of between 1,200 to 1,400 homes, including new public open space and improved community infrastructure. This development capacity figure was informed by the original High Road West Masterplan (2014) prepared by Arup and establishes a baseline minimum development capacity figure for the site.
27. London Plan Policy H1 sets a London wide 10-year housing target for 522,870 net additional homes to be completed by 2029, with Haringey set a 10-year target of 15,920 homes during this period. To meet these targets, Policy H1 requires potential housing capacity on suitable and available brownfield sites to be optimised, especially within PTALs 3 to 6 or within 800 metres of a station or town centre.
28. The London Plan sets an indicative capacity of 21,000 homes and 13,000 jobs across the Lee Valley Opportunity Area. London Plan Policy SD1 sets out how the Mayor will work with boroughs to ensure that opportunity areas realise their growth and regeneration potential, ensuring housing choice, employment opportunities, mixed and inclusive communities and infrastructure provision.
29. The application proposes to increase the permitted number of homes from 646 to 867 (+221 homes). The scheme would therefore make a substantial contribution towards meeting the minimum London Plan housing targets and the benchmarks for the opportunity area. The greater optimisation of the site's development potential is therefore strongly supported.
30. The revised application has been progressed through a design-led approach, in accordance with the London Plan, as set out in more detail below. The scheme broadly maintains the layout and public open space framework established by the High Road West Masterplan and existing planning permissions, whilst also ensuring an increase in open space compared to the existing planning permissions (+4,470 sq.m.). The provision of affordable housing would be increased by 70 additional affordable homes compared to the extant planning permission. Similarly, the quantum of family sized housing is increased (+69 homes) and the quantum of play space provision has also been increased (+290 sq.m.). This is supported. The quantum of additional flexible commercial floorspace in Class E use (+330 sq.m.) is acceptable.
31. GLA officers note that ongoing discussions are being undertaken with the local planning authority to establish the social infrastructure requirements for the site, which should be agreed and secured by planning obligation, in accordance with London Plan Policy D2 and Policies S1-3.
32. To conclude, the further optimisation of the site's development capacity as part of a comprehensive residential-led mixed use redevelopment is strongly supported and accords with the London Plan Policies H1 and SD1 of the London Plan.

Housing

33. The Mayor has set a strategic target for 50% of all new homes to be affordable, as set out in Policy H4 of the London Plan. Policy H5 of the London Plan identifies a minimum threshold of 35% affordable housing (by habitable room), with a higher threshold of 50% applied to public sector owned land and industrial sites where the scheme would result in a net loss of industrial capacity.

The Fast Track Route

34. To be eligible for the Mayor's Fast Track Route, applications must meet the applicable affordable housing threshold (by habitable room), in line with the required tenure mix without public subsidy. An early stage review mechanism would need to be secured via a Section 106 agreement. Applicants should seek to maximise affordable housing provision by seeking grant funding. Where additional affordable housing is provided above the relevant affordable housing threshold, the tenure mix requirements are flexible, as set out in Policy H6 of the London Plan.
35. Applications which do not meet these requirements should follow the Viability Tested Route, with a Financial Viability Appraisal (FVA) submitted and schemes subject to both early and late stage review mechanisms.

Tenure split

36. In terms of tenure split, Policy H6 of the London Plan sets out the Mayor's preference for at least 30% low cost rent (social rent or London Affordable Rent) and 30% as intermediate housing products, with the remaining 40% to be determined by the Council (and comprising either low cost rented homes or intermediate based on identified need). There is a presumption that the 40% to be decided by the borough will focus on low cost rent; however, in some cases a more flexible tenure may be appropriate, for example due to viability constraints or to achieve mixed and inclusive communities. Appropriate tenure splits should be determined through the Development Plan process or by supplementary planning guidance.
37. In this instance, Policy AAP3 of the Tottenham Area Action Plan (AAP) states that the Council's normal Local Plan tenure mix requirements is altered within the Tottenham AAP area where, in this specific location, the Council will seek 60% intermediate housing and 40% affordable rent accommodation.

Affordable housing threshold

38. The Depot site is in retail use (B&M store), so is subject to the 35% threshold for affordable housing. The Carberry Enterprise Park accounts for 6% of the site area of the Goods Yard site and comprises non-designated industrial land, providing 1,125 sq.m. (GEA) of light industrial floorspace. This part of the site is in industrial use and therefore subject to the 50% affordable housing threshold, which has been agreed by the applicant. The affordable housing threshold for the remainder of the Goods Yard site was subject to discussion at pre-application stage and during the course of the original application which was determined at appeal.

39. The applicant has stated that, in its view, the only part of the site which should be considered industrial and subject to the 50% affordable housing requirement is the Carberry Enterprise Park. It does not consider that the remainder of the Goods Yard should be considered as industrial land for the reasons set out below. The applicant has sought a Counsel opinion dated 17 May 2021 which supports their view in this respect and is included as an appendix to its planning statement (Christopher Katowski QC).
40. The remainder of the Goods Yard site currently comprises vacant cleared former industrial land which has been used for a number of years as a construction compound associated with the Tottenham Hotspur Stadium development, as part of a temporary planning permission. A further temporary planning permission has been recently issued to enable the site to be used as a car park to enable the safe return of fans to the Tottenham Hotspur Stadium, as a result of the Covid-19 pandemic.
41. Historically, this part of the site was previously used as a scrap yard / car breaker's yard (Sui Generis use), which is the last permanent use of the site. GLA officers understand that, once the temporary planning permissions have expired, the lawful use of the site would, as a matter of planning law, revert back to the original scrap yard / car breaker's yard (Sui Generis use). However, the site was last used as a scrap yard in 2015 and the site has been cleared of all buildings and infrastructure associated with this former use. In addition, the applicant secured the removal of the Environmental Permit associated with the scrap yard use.
42. The applicant has stated that it would not be possible to reinstate the former scrap yard use for two reasons: (i) firstly, there is no environmental permit granted for this use; and (ii) secondly, planning permission would be required for the operational development necessary to reinstate the scrap yard use. This planning application would be contrary to the Development Plan which allocates the site for comprehensive, residential-led redevelopment through the Tottenham Area Action Plan (site allocation Ref. NT5). Any planning application within Allocation NT5 would also need to demonstrate that it would not prejudice the future developments of other parts of the site, adjoining land, or frustrate the delivery of the site allocation, as required by Policy DM55 of the Haringey Development Management DPD.
43. The applicant has stated that it considers the site should be subject to a blended affordable housing threshold, with the Carberry Enterprise Park subject to a 50% threshold and the Depot and remaining Goods Yard subject to the 35% threshold. Taking into account the respective site areas (in sq.m.) the applicant has stated that the site should have a blended affordable housing threshold of 36%. The site areas are shown below.

Table 1 – applicant's assessment of the affordable housing threshold for the site

Site component	Site area (sq.m.)	Proportion of site	Threshold
Carberry Industrial Estate	1,546	6%	50%

Other land	23,479	94%	35%
Total	25,025	100%	36%

Figure 3 – site components



44. Having reviewed the specific circumstances of this case, GLA officers recognise that it is a matter of planning judgement as to whether the Goods Yard should be considered industrial land for the purposes of London Plan Policy H5. The practical difficulties and planning challenges associated with the prospect of re-activating the previous industrial scrap yard use on the site is noted. However, this is often the case where former industrial land is allocated for comprehensive residential-led mixed use redevelopment. Furthermore, there is concern that temporary planning permissions should not be used as a justification for a site no longer being considered industrial land for the purpose of the London Plan threshold approach to affordable housing, as this would circumvent and undermine the purpose and application of the policy. The rationale for the threshold approach is based on the differences in values between industrial and residential development, as set out in paragraph 4.5.7 of the London Plan. Further discussion and re-assurance on this matter is therefore required prior to Stage 2.

The applicant's affordable housing proposal

- 45. The applicant is proposing 36% affordable housing by habitable room (34% by unit). The tenure split would be 60% intermediate housing and 40% low cost rent by habitable room, with a 66:34 tenure split by unit.
- 46. The applicant has also stated that its baseline affordable housing offer would not be contingent on grant / public subsidy. If grant becomes available, the applicant has stated that it would increase the overall affordable housing to up to 40%, with the exact amount, location, tenure and unit mix of the additional affordable housing to be provided to be agreed with the Council, with a mechanism for securing this proposed within the S106 agreement. This would mirror the approach secured on the previous extant planning permission.

47. Compared to the extant planning permissions, the application proposes an additional 221 homes overall, and a net increase of 70 affordable homes (296 compared to 226 affordable homes). In terms of affordable housing, the additionality would comprise an additional 20 low cost rent units and an additional 50 intermediate units. The overall affordable housing percentage and tenure mix by habitable room would remain the same as in the extant planning permission, with a 40:60 split proposed weighted towards intermediate housing.
48. In addition, as with the previous planning permission, the Council would be able to elect up to 61 of the 101 new low cost rent homes to be used in association with the Love Lane Estate (with rents set at those comparable to the existing social rent tenants). The applicant has stated that this would also be secured via S106 agreement. Where these units are required by the Council for the estate regeneration decant, they would be provided as social rent tenure. This would need to be secured in the S106 agreement.

Eligibility for the Fast Track Route

49. The applicant has not submitted a Financial Viability Appraisal (FVA) as it considers that the application is eligible for the Fast Track Route. GLA officers are of the view that, whilst the tenure split and 'with grant' scenario proposed complies with the criteria for the Fast Track Route, further discussion is required between the Council, applicant and GLA officers to confirm whether or not the Goods Yard should be considered industrial land for the purposes of Policy H5 of the London Plan, noting the concerns set out above (paragraph 44).

Housing affordability

50. The low cost rent units are proposed to be let at either London Affordable Rents or social rent, which would be secured via Section 106 agreement. This is supported. The intermediate housing is proposed as shared ownership.
51. London Shared Ownership units should be affordable to households on incomes up to a maximum of £90,000 a year and a range of affordability levels should be provided below the maximum £90,000 household income cap for an initial marketing period of three months. Any intermediate rent products, such as Discount Market Rent (DMR) or London Living Rent (LLR) should be subject to a maximum income cap of £60,000. Furthermore, all intermediate tenure households should not be required to spend more than 40% of their net income on overall housing costs, including service charges. These requirements should be secured via Section 106 obligations.

Housing choice

52. Policy H10 of the London Plan states that new development should generally consist of a range of unit sizes and sets out a range of factors which should be considered when determining the appropriate housing mix on a particular scheme. This includes housing need; the requirement to deliver mixed and inclusive neighbourhoods; the nature and location of a site in relation to town centres and public transport access; the aim to optimise housing potential; and the mix of land uses on a scheme.

53. The proposed housing mix includes a range of unit sizes, including 136 three-bedroom units and 11 four-bedroom units. Of the affordable rent tenure housing proposed, 49% would comprise three and four-bedroom units. The intermediate housing is weighted towards 1 and 2-bedroom units to ensure affordability, but with 10% of this tenure proposed as 3-bedroom units. This is strongly supported and accords with London Plan Policy H10.

Play space provision

54. Policy S4 of the London Plan states residential developments should incorporate high quality, accessible play provision for all ages, of at least 10 sq.m per child. Play space provision should normally be provided on-site; however, off-site provision may be acceptable where it can be demonstrated that this addresses the needs of the development and can be provided nearby within an accessible and safe walking distances, and in these circumstances contributions to off-site provision should be secured by Section 106 agreement. Play space provision should be available to all housing tenures within the immediately adjacent blocks and courtyards to promote social inclusion.
55. Based on the updated GLA play space calculator, the scheme would generate an overall requirement for 3,090 sq.m. of play space provision. This assumes a child yield of approximately 309, with provision based on the standard set out above.
56. The application proposes 2,900 sq.m. of play space. The majority of this would be provided within the public realm through public open spaces at Peacock Park, Brook House Yard, the northern and southern squares and along Embankment Lane. Additional play provision is also proposed at podium level within the blocks. This overall strategy is supported and would ensure the majority of play space is available to the public and all tenures within the scheme. There does not appear to be any segregation of play space by tenure within courtyard spaces.
57. The moderate shortfall in play space should be met on site, for example, potential opportunities along the landscaping within Goods Yard Walk adjacent to the railway embankment. Alternatively, a financial contribution towards further play provision should be secured, which could be accommodated on the remaining sites within the High Road West Masterplan area.

Urban design

58. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, residential quality, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.

Design changes from the extant planning permissions

59. Compared to the extant planning permissions, the key design changes proposed in this application are summarised as follows:
- Further optimisation of the site's development potential to increase the number of residential homes from 646 to 867;
 - Increase in the height of the consented towers (from 18, 22 and 29-storeys) to 27, 32, 29-storeys (north to south);
 - Changes to the relationship of the proposed heights to create a rise and fall in the heights of the proposed towers, whereas the previous permitted schemes proposed a gradual / incremental increase in the height of the towers from south to north;
 - Relocation of the main north-south vehicular, pedestrian and cycle route from the western boundary of the Goods Yard to the eastern boundary, so that it sits more centrally within the masterplan area;
 - Creation of the 'Goods Yard Walk' - a communal landscaped space along the western boundary of the site.
60. As noted above, Blocks D, E, F and G within the Depot site are identical to the extant planning permission in terms of scale, layout and use. Only Blocks A, B and C are revised.

Design, layout, landscaping and public realm

61. Policies D1-D3 and D8 of the London Plan and the Mayor's Housing SPG apply to the design and layout of development and set out a range of urban design principles relating to the quality of public realm, the provision of convenient, welcoming and legible movement routes and the importance of designing out crime by optimising the permeability of sites, maximising the provision of active frontages and minimising inactive frontages.
62. The main design and layout changes proposed are supported and would ensure a more legible and better connected public realm, with additional public open space and a clearer route through the site for pedestrians and cyclists, better connecting the proposed Peacock Park with White Hart Lane. The permitted scheme for the Goods Yard site included a main public / shared surface route to the rear of blocks running adjacent to the railway embankment to the west of the site. In the current proposal, this area of the site would be revised to comprise 'Goods Yard Walk' – a linear communal green space for residents. The main route through the site would be moved to the east adjacent to the Peacock Industrial Estate.
63. When entering the site from the south, pedestrians would be led through White Hart Gateway, a new Southern Square, through to Embankment Lane and then on to a Northern Square linking to Peacock Park. The taller buildings would terminate views along these routes to assist wayfinding and legibility, with active ground floor frontages proposed in the form of duplex / maisonette units with front doors, communal residential entrances to mansion blocks and some flexible commercial uses. These design changes create a much better front to back

relationship, ensuring a more clearly defined and legible public realm and is therefore strongly supported.

64. The ground and first floor level of the scheme would create a strong relationship with the public realm ensuring good levels of overlooking and ownership and activation fronting Peacock Park, the north and south square, the spaces to the rear of the Station Master's House and the proposed pocket square. Bins and cycle stores would be internalised where possible to avoid these having a negative impact on the quality of the public realm. Residential units would also line the Goods Yard walk to the rear of the site, with this route likely to be closed during evening hours, but open during daytime.
65. The proposals would also ensure the adjacent Peacock Industrial Estate (which turns its back on the proposed Embankment Lane) can be maintained without its operation or functionality being in any way compromised, whilst also ensuring it can be brought forwards in the future and plug into the proposed street network in a comprehensive manner, in line with the aspirations set out in the HRW Masterplan and Local Plan.
66. The siting of the three tallest elements is broadly similar to the extant planning permissions. Their location adjacent to the railway line (furthest away from the heritage assets and conservation area) is in accordance with the massing strategy set out in the High Road West Masterplan (2014). A 50-metre distance would be maintained between the development and residential homes fronting Pretoria Road, with a degree of screening provided by the elevated railway and ecological corridor.
67. Existing mature London Plane trees on the High Road at the entrance to the Depot site would be retained, which is strongly supported. This would ensure a mature and well-established landscaped entrance to the site from the High Road into the Depot site. The landscaping and public realm proposals for Embankment Lane, Pickford Lane and the first phase of Peacock Park are supported and would ensure a high quality public realm which is generously landscaped and pedestrian and cycle friendly.
68. Overall, the design and layout accords with the master planning principles set out in the High Road West Masterplan Framework and is supported. However, further details and CGIs should be provided to more clearly show the quality and legibility of the main entrance routes to the site from White Hart Lane and the High Road. A pedestrian footway should be provided on both sides of the street at the southern entrance adjacent to Grade II listed the Grange to ensure this key approach route for pedestrians is as generous and welcoming as possible.

Residential quality

69. Minimum quantitative standards for private internal space, private outdoor space and floor to ceiling heights apply to all tenures and types of self-contained housing, as set out in Policy D6 of the London Plan. Single aspect units should normally be avoided and only provided where these units would constitute a more appropriate design solution in terms of optimising the capacity of a particular site whilst ensuring good design. Potential issues associated with single aspect units in terms of passive ventilation, privacy, daylight, overheating

and noise should also be adequately addressed and single aspect units that are north facing, contain three or more bedrooms, or are exposed to significant adverse noise impacts should normally be avoided.

70. The Housing SPG (2016) also sets out benchmark unit per communal core per floor ratio (8 units). Private amenity space should normally be provided to serve upper floor flats in the form of balconies, unless there are exceptional circumstances which demonstrate that site constraints mean that balconies cannot be provided. Where this is the case, the required quantum of space should be provided within the dwelling as mitigation / compensation.
71. Overall, the scheme proposes 54% dual aspect units. No north facing single aspect units are proposed, or south facing single aspect units, with all of the non-dual aspect units either east or west facing. The larger units (3 and 4-bedrooms) all appear to be dual aspect which is welcomed. A number of duplex / maisonettes are proposed over ground and first floor levels. These would have their own front gardens and front door entrances, with private rear gardens provided at podium level. This is strongly supported. Taking into account the particular site circumstances and the proposed density, GLA officers are satisfied that the provision of dual aspect units has been maximised in line with London Plan. Potential noise, air quality, overheating and air quality issues would be addressed and mitigated. Further conditions should be secured to ensure the proposed mitigation measures are incorporated in the completed scheme.
72. The core arrangement and unit to core per floor ratio is acceptable and accords with the Housing SPG benchmark. Private amenity space is proposed for all units in the form of balconies and terraces. Overall, the application complies with London Plan Policy D6 and the residential quality is acceptable.

Heritage impact

73. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should “*have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*”. In line with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, planning decisions must also give special attention to the desirability of preserving or enhancing the character or appearance of the conservation areas which may be affected by a proposed development. If it is judged that harm to the heritage asset/s would arise from the proposed development, considerable importance and weight must be attributed to that harm, in order to comply with the statutory duties.
74. NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset’s conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Where a proposed development will lead to ‘substantial harm’ to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a

development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. . In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset

75. NPPF paragraph 203 states that in relation to non-designated heritage assets that "a balanced judgement will be required having regard to the scale of harm or loss and the significance of the asset". Locally listed buildings are defined as non-designated heritage assets for the purposes of the NPPF.
76. London Plan Policy HC1 states that development proposals affecting heritage assets and their settings should conserve their significance and should avoid harm. Policy HC1 also applies to non-designated heritage assets.
77. GLA officers have reached the following conclusions in respect of the level of harm caused to the significance of nearby heritage assets, as set out in Table 2. This follows a detailed review of the site and surroundings, noting the existing and permitted development context and a review of the height and massing of the scheme, taking into account the potential visual, heritage townscape and landscape impact as detailed in the applicant's and Townscape and Visual Impact Assessment (TVIA) and noting the significance of the heritage assets in question as set out in the Heritage Statement.
78. GLA officers consider that less than substantial harm would be caused by the development to the significance of heritage assets arising from the height and massing of the scheme, most notably, in the case of the Grade II listed buildings closest to the site on the High Road, White Hart Lane and the North Tottenham Conservation Area. This harm must be given due weight and importance in the planning decision making process and must be outweighed by public benefits associated with the proposal. As harm would be caused to heritage assets, the application does not comply with London Plan Policy HC1.
79. In this case, the application proposes a number of public benefits. This includes the substantial quantum of housing and affordable housing, as well as public open space and publicly accessible play space provision within Peacock Park, new public routes and improved pedestrian and cycle permeability through the site and the proposed public open space. GLA officers consider that these public benefits could potentially outweigh the level of harm caused to the designated heritage assets. GLA officers note that this was broadly the conclusion of decision makers on the two extant planning permissions, albeit the exact impacts and proposed public benefits package will need to be re-examined, given the increased density and height of the proposals and the revised design and massing.
80. However, the proposed public benefits would need to be further clarified at Stage 2 and appropriately secured. Matters relating to affordability; the scheme's overall compliance with the London Plan affordable housing policies; and the social infrastructure requirements and provision/ mitigation measures will require further discussion and agreement and will need to be robustly secured for these to be given full weight in the balancing exercise.

81. Table 2 – harm to designated heritage assets

Heritage asset	Level of harm	Scale	TVIA view
Listed buildings			
Grade II Listed 867-869	Less than substantial harm	Medium	View 10, 11, 12
Grade II listed the Grange, 34 White Hart Lane	Less than substantial harm	Medium	View 25
Grade II listed 797 & 799 High Road	Less than substantial harm	Medium	View 5
Grade II listed 819-821 High Road	Less than substantial harm	Medium	View 6
Grade II* Dial House	Less than substantial harm	Low	View 4
Conservation areas			
North Tottenham Conservation Area	Less than substantial harm	Medium	Views 4, 5, 5N, 6
Bruce Castle Park Conservation Area	Less than substantial harm	Low	View 16
Tottenham Cemetery Conservation Area	Less than substantial harm	Low	View 18, 19, 20
Fore Street Angel (Enfield)	Less than substantial harm	Low	View 8
Fore Street South (Enfield)	Less than substantial harm	Low	View 9

82. GLA officers have considered the impact of the application on the locally listed Station Master’s House which is a non-designated heritage asset. Whilst its setting would be altered, GLA officers consider that the scheme would not harm its overall significance.

Architectural and materials quality

83. London Plan Policy D3 requires new development to be of a high quality of architectural design which responds to local character and ensures appropriate detailing and the use of attractive, robust and durable materials.

84. The majority of the medium density blocks would be clad in a variety of brick tones ranging from beige, red and grey, with Block E proposed to be clad in bronze metal. Appropriate levels of detailing, depth and articulation would be incorporated within the proposed elevations through recessed bay window reveals and ground floor openings, decorative brickwork and metalwork details and a variety of bronze cladding panels and balcony balustrades. This would create attractive and varied character and sense of place.

85. The towers would be clad in three shades of glazed brick (green, orange and blue) as shown below. This would contrast with a cooler grey-tone glazed brick

used on the recessed elements and tops of the buildings. The coloured bay elevations would be angled and projected slightly to create a faceted appearance which is considered successful. However, the tops and inner skin of the buildings appears as a separate feature (see TVIA views 4, 5, 6)

Figure 3 – TVIA view 6 showing the proposed towers behind the High Road (from Northumberland Park)



86. The overall architectural quality of the scheme as a whole and the majority of blocks is supported and would ensure the provision of a visually interesting, cohesive scheme. However, in relation to the three towers, further architectural and tonal refinement is required to ensure the grey clad ‘top hats’ and recessed inner skin of these buildings responds appropriately to the surrounding townscape and heritage context. This should ensure the buildings have a positive impact on the surrounding townscape views and skyline, given these buildings will be highly visible in the immediate and wider surrounding area, in accordance with London Plan Policy D9.

Height, massing and tall buildings

87. London Plan Policy D9 seeks to ensure that there is a plan-led and design-led approach to the development of tall buildings across London and that the visual, functional, environmental and cumulative impacts of tall buildings are addressed to avoid adverse or detrimental impacts.
88. Part B of Policy D9 states that boroughs should determine which locations are appropriate for tall buildings (subject to meeting the other requirements of the Plan) and states that tall buildings should only be developed in these suitable locations.
89. Part C of Policy D9 sets out the qualitative criteria for assessing the impact of tall buildings where tall building developments are proposed. A variety of long-range, mid-range and immediate views should be assessed to ensure tall buildings contribute positively to the character of the area and avoid harm to heritage

assets. The architectural and materials quality of tall buildings should be of an exemplary standard. Tall buildings should aid legibility and wayfinding and have a positive impact on the public realm. The environmental impacts including wind, microclimate, daylight/sunlight, glare impacts should be assessed. Cumulative visual, function and environmental impacts should also be assessed, taking into account other permitted developments.

90. In this case, the site falls within a location which is identified as being suitable for tall buildings, as set out in the Tottenham Area Action Plan (2014). The AAP does not set out a prescriptive building height policy framework in terms of what heights could be considered suitable or considered a maximum height parameter. The High Road West Masterplan Framework (2014) suggests heights of 10 to 18-storeys. The massing principles set out in the HRWMF are for taller buildings to be placed towards the railway line, following the character established by Brook House to the north. This seeks to avoid adverse impacts on the surroundings in terms of the conservation area and listed buildings, with buildings heights stepped down towards the High Road.
91. The extant planning permissions already exceeded this indicative height at 18, 22 and 29-storeys. As set out above, the application would increase the height based on the extant planning permission and vary the massing moving south to north (from 18, 22 and 29-storeys in the consent) to 27, 32, 29-storeys.
92. The surrounding existing and emerging context is also relevant. There is a completed 22-storey residential tower (Brook House) immediately to the north on the site within the Cannon Road development. To the east is the new Tottenham Hotspurs Stadium which is of a significant size and scale (59 metres AOD). The wider Northumberland Development Project also includes the provision of towers ranging in height from 19, 27 and 36-storeys.
93. To conclude, the application complies with the locational requirements set out in Part B of Policy D9. GLA officers have assessed the visual, heritage, environmental, functional and cumulative impacts of the proposal, noting the permitted and Local Plan context as set out above. Overall, GLA officers consider that the height and massing of the scheme could comply with the qualitative assessment criteria set out in Policy D9. However, further architectural refinement is required to ensure the towers achieve an exemplary quality of architecture and respond positively to the surrounding townscape and skyline, as detailed above (paragraph 85).

Density and design review

94. London Plan Policies D1 to D4 seek to optimise the development potential of a site through a design-led process to ensure development makes the best use of land, with consideration given to a range of factors including site context, public transport, walking and cycling accessibility and the capacity of surrounding infrastructure. Development proposals which are referable to the Mayor should have undergone a design review or local borough process of design scrutiny where the proposed development comprises a tall building, or where the density exceed 350 dwellings per hectare.

95. This requirement for additional design scrutiny is triggered in this instance, as the scheme contains tall buildings and would have a density of 380 dwellings per hectare and comprises a number of tall buildings. A number of design reviews have been undertaken at pre-application stage, as detailed in the applicant's Planning Statement, together with numerous pre-application meetings with Havering Council planning and design officers and the GLA. This design-led approach complies with the above strategic policies.

Fire safety

96. A fire statement has been prepared by a third party suitably qualified assessor and submitted as part of the planning application, as required by London Plan Policy D12. This covers a range of fire safety related matters including: building materials and construction; means of escape and evacuation, including evacuation lifts; fire safety systems (including suppression, detection and alarm systems) and smoke control measures; measures to prevent fire spread in terms of external walls; and fire brigade access and facilities. Sprinkler protection is proposed throughout the development in all dwellings, car parks, plant and refuse stores and non-residential uses.

Inclusive design

97. Policy D5 of the London Plan require that all new development achieves the highest standards of accessibility and inclusive design. All new self-contained homes should meet the Building Regulations M4(2) standard for 'accessible and adaptable dwellings', with at least 10% of homes designed to meet the M4(3) standard for 'wheelchair user dwellings', as set out in London Plan Policy D7. The application complies with these requirements, which should be secured by condition.

Transport

Site access arrangements

98. Access by all modes to the southern part of the site is provided from White Hart Lane approximately at the same location of the existing crossover into The Goods Yard. The applicant is recommended to review the southern access route traffic arrangement, including the walking and cycling infrastructure in order to integrate the southern section of masterplan area and provide for safe and secure movement across White Hart Lane. As set out above, the southern access route should provide footways on both sides. A Stage 1 Road Safety Audit (RSA) should be completed prior to determination.
99. The proposal seeks to accommodate basement parking facilities through ramp arrangements access via signal control system/give way arrangements to manage movements. Entrance points should not impact safety or impede vehicle or pedestrian flow. This should be subject to further detailed assessment with further details provided for assessment prior to commencement as part of conditions.

Healthy Streets and Vision Zero

100. The Transport Assessment (TA) includes an Active Travel Zone (ATZ) assessment and a Healthy Streets Check for Designers (HSCD) for highway works. The optimised development will see an increase in pedestrian and cycle trips to/from the site and the local area. Whilst the TA focuses on the integration of the Peacock Industrial Estate and the future Peacock Park to the east and the High Road, as well as some recommendations from the ATZ, the TA should consider how the on-site route will connect to the wider cycle network in the area, including CS1 and the southern section of masterplan area.

Cycle parking

101. A total of 1,708 cycle parking spaces are proposed, including long and short stay spaces for residential units, as well as non-residential parking spaces. This complies with the minimum quantitative standards in the London Plan. The applicant should address issues regarding the quality of the cycle parking, specifically the layout and aisle width and suitability for large bicycles. Further detail on the cycle parking provision is therefore required, which could be secured by condition. All cycle parking must be in accordance with the London Cycling Design Standards (LCDS), including at least 20% Sheffield stands and further 5% wider spaces for non-standard bicycles. Lockers and changing facilities for cyclists should be provided for the non-residential uses.

Car parking

102. In total, 145 residential car parking spaces are proposed. This includes 87 disabled persons' parking bays, 52 standard spaces, 4 car club spaces and 2 visitor car parking spaces. This equates to a car parking ratio of 0.17 spaces per residential unit. This is in line with extant permissions and complies with London Plan Policy T6.1. The majority of car parking would be off-street either at basement or podium, with a limited number of on-street car parking proposed, which would be interspersed with landscaping, which is supported. Given the proposed uplift above the extant planning permissions, consideration should be given to allocate five of the spaces to car clubs.

103. The London Plan requires 20% of parking to be fitted with active electric vehicle charging infrastructure, with passive provision for all remaining spaces. This must be applied and secured by condition. A Car Parking Management Plan (CPMP) has been provided which is strongly supported. This should be secured by condition. A Controlled Parking Zone (CPZ) permit free agreement should also be secured as part of the S106 agreement.

Trip generation and highway and public transport impact

104. The methodology applied in the TA is generally acceptable. However, clarification is required in respect of residential person trip rates for the AM peak and the low modal share assumed for rail. The applicant is required to provide a further assessment of the cumulative impact of the application on the public transport network, taking into account other permitted developments and other emerging developments in the wider masterplan area. In particular, this additional work should clarify the impact on White Hart Lane station in terms of passenger flows to and from each platform and should identify any places where the existing capacity is exceeded during peak periods. This review should be

focused on the heaviest loaded link on the route to estimate the impact on London Overground line loadings in both directions during peak periods. Where mitigation is required, this should be secured via financial contribution.

105. Sensitivity analysis should also provide accumulative trip generation figures so that the impact on the bus network capacity can be determined. Subject to the outcome of any additional assessment, TfL may seek mitigation towards enhancing bus priority measures and/or fund infrastructure upgrades.

London Overground Infrastructure Protection

106. Infrastructure asset protection and operational protection related conditions are likely to be required given the proximity of the site to the railway lines.

Travel plan

107. The applicant has submitted a framework Travel Plan, which sets out specific objectives in support of London policy. The focus on encouraging active modes (walking and cycling) and facilitating opportunities to achieve a healthy lifestyle for all users are welcomed. The final Travel Plan and all agreed measures should be secured, enforced, monitored and reviewed through the Section 106 agreement, in accordance with London Plan Policy T4.

Deliveries and Servicing and Construction Logistics

108. The draft Delivery and Servicing Management Plan (DSMP) and outline Construction Logistic Plan (CLP) are acceptable. However, the applicant should confirm the proposed phasing of construction and occupation in relationship to the rest of the masterplan site. The CLP should also be aligned with major stadium events. A 3.7 metre kerb to kerb alternate way working refuse collection loading/unloading emergency access is proposed at the northern end of The Goods Yard. A Stage 1 Road Safety Audit should be completed prior to determination due to potential for conflict between vehicles and vulnerable road users.

Sustainable development

Energy strategy

109. Based on the applicant's energy strategy, the proposed development would achieve a 79% reduction in carbon emissions on the residential element above baseline Building Regulations, with the non-residential element achieving a 54% reduction in carbon emissions. This exceeds the minimum 35% on-site requirement for reductions in carbon emissions which are set out in the London Plan.
110. The proposed efficiency measures would achieve a 7% reduction in carbon emissions on the residential element and a 10% on the non-residential element. This falls short of the minimum on-site energy efficiency targets in the London Plan (which are 10% and 15% respectively). As such, additional energy efficiency measures should be considered and incorporated within the final

design of the blocks within the scheme, in accordance with London Plan Policy SI2.

111. The energy strategy is predicated on connection to the wider planned district heat network (DHN) which is under construction at Meridian Water (the Ecopark energy centre, Energetik). Based on the discussions which have been undertaken with the DHN provider Energetik, the applicant has stated that connection to the DHN would be possible from 2023 via connection at Fore Street to the north of the North Circular and confirming that the network could have the capacity to serve the new development. This approach is strongly supported, in accordance with the Policies SI2 and SI3 of the London Plan and should be secured via the S106 agreement or conditions. Further correspondence between the applicant and DHN provider Energetik should be provided to verify the potential to connect the site to the DHN and cater for the site's heat requirements.
112. The potential for solar panels to be incorporated within the available roof space has been assessed which shows that 533 solar panels (944 sq.m.) could be accommodated, with plans provided to demonstrate this. This approach is acceptable and further details should be secured by condition.
113. The risk of overheating within residential units and communal corridor spaces has been assessed. This has needed to take into account the noise constraints associated with the site's close proximity to the elevated railway line and the need for acoustic design mitigation measures. A mechanical ventilation with heat recovery system is proposed and all of the residential units would benefit from openable windows. Ceiling fans are recommended to address extreme heatwave events. This is generally acceptable, subject to further details being secured by condition.
114. London Plan Policy SI2 requires the energy performance of completed developments to be monitored, verified and reported following construction ('Be Seen').
115. The remaining reductions in carbon emissions required to ensure compliance with the London Plan zero carbon target should be secured via a financial contribution / carbon off-set payment. This should cover both the residential and non-residential elements and should be calculated based on the recommended price per tonne, as set out in the London Plan.

Whole Life Carbon

116. A Whole Life Carbon Assessment has been undertaken in accordance with the London Plan. This reviews the embodied carbon emissions associated with the proposed development, taking into account the materials quantities and loads, the operational energy consumption of the built scheme, with total emissions estimated and compared to the GLA benchmarks. The report outlines a range of opportunities which could be undertaken to reduce the carbon associated with the development at detailed design stage. This further review should be secured via pre-commencement condition.

Circular Economy

117. A Circular Economy Statement has been submitted which takes into account the GLA's draft guidance (2020) and outlines how circular economy principles will be incorporated in the design, construction and management of the proposed development, including through minimising materials use and the sourcing and specification of materials; minimising and designing out waste at various stages; and by promoting reusability, adaptability, flexibility and longevity. This is supported and complies with London Plan Policy SI7. A post-completion report is proposed by the applicant which would provide further details which should be secured via planning condition.

Environmental issues

Urban greening, trees and biodiversity

118. Policy G5 of the London Plan requires new development to contribute towards urban greening. Policy G7 requires development proposals to ensure that, wherever possible, existing trees of value are retained and that the loss of trees as a result of development is mitigated through the provision of replacement trees of an adequate value. Policy G6 states that development proposals should manage the impact on biodiversity and aim to secure net biodiversity gain.
119. A range of urban greening methods are proposed as part of the applicant's landscape strategy. Wetland habitat and open water areas are proposed within the ecological corridor (Goods Yard Walk). Within the public realm a range of street trees, rain gardens, flower rich perennial planting beds, hedges and lawns are proposed, together with permeable paving. Intensive and extensive green roofs and green walls proposed within podium gardens. GLA officers are satisfied that the landscape strategy is well-considered and has generally maximised the potential for urban greening within the site. The applicant has undertaken an Urban Greening Factor (UGF) assessment which demonstrates that the scheme would achieve an overall UGF score of 0.45. This exceeds the London Plan target, which is strongly supported.
120. The vast majority of the existing site comprises hard-standing and buildings. There are existing trees lining the west of the site within the railway embankment, which falls within a locally designated ecological corridor. A large number of these trees fall outside the application site boundary and ownership area. In addition, there are a number of mature London Plane trees located on the High Road at the entrance to the Depot site.
121. All of the mature London Plane trees would be retained, which is strongly supported. This complies with the requirements of London Plan Policy G7.
122. An ecological appraisal has been undertaken. This identifies the existing landscape embankment and woodland area running alongside the railway to the west as being of the highest ecological value. This area would be largely retained and enhanced as an ecological corridor through the introduction of Goods Yard Walk and the proposed landscape and habitat improvements. This is strongly supported.

123. The applicant's ecological report concludes that there would be a net increase in the number of trees and habitat areas within the site, with the proposed new trees and amount of habitat areas proposed exceeding those which are lost as part of the development. The report concludes that the development would enhance the site from the existing baseline conditions in terms of biodiversity, ensuring net biodiversity gains overall. Details of the proposed landscaping and biodiversity improvements should be secured, as well as the recommended mitigation measures. Subject to appropriate conditions being included, the application accords with London Plan Policy G6 in terms of managing the impacts on biodiversity and ensuring net biodiversity gain.

Sustainable drainage and flood risk

124. A range of sustainable urban drainage systems (SuDs) are proposed within the site to attenuate and reduce surface water run-off and contribute to urban greening and biodiversity, in accordance with the London Plan. This includes rain gardens, tree pits, swales, bioretention areas and planting beds, permeable paving and geo-cellular below ground water attenuation tanks (with a total volume of 2,492 cubic metres). This overall strategy is supported and accords with the drainage hierarchy in the London Plan. Details should be secured by condition.

Local planning authority's position

125. Haringey Council planning officers are currently assessing the application and are targeting a Planning Committee in the Autumn.

Legal considerations

126. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

127. There are no financial considerations at this stage.

Conclusion

128. London Plan policies on housing, affordable housing, play space, urban design, tall buildings, heritage assets, transport, energy, climate change, urban greening, biodiversity and trees are relevant to this application. The application does not fully comply with these policies, as summarised below:

- **Land use principles:** Further optimisation of the site's development potential (over and above the extant planning permission) is supported as part of a comprehensive residential-led mixed use scheme.
- **Housing and affordable housing:** 36% affordable housing (by habitable room) comprising 40% low cost rent and 60% intermediate housing, with provision for the overall quantum of affordable housing to be increased to 40% affordable housing with grant. The proposed tenure split complies with the Tottenham Area Action Plan. However, further discussion is required to verify the appropriate blended affordable housing threshold for the site, in accordance with the London Plan. Further details are required to confirm the affordability of intermediate housing.
- **Urban design:** The layout, landscaping, density and residential quality is supported. The legibility and quality of the southern entrance should be improved, with pedestrian access provided on both sides of the footway.
- **Tall buildings:** Tall buildings are proposed in a location which is identified as suitable for tall buildings. The same number of towers is proposed as the extant permission but with an increase in height and changes to the massing arrangement. The scheme generally complies with the qualitative assessment criteria in Policy D9 in respect of visual, functional, environmental and cumulative impacts. However, the design and materiality of the tops of the towers should be reconsidered to ensure they have a positive townscape impact.
- **Heritage:** The scheme would cause less than substantial harm to a number of designated heritage assets. As such, the public benefits associated with the application will need to outweigh this harm. This could be the case in this instance, subject to these benefits being secured at Stage 2 and further clarification on a number of issues.
- **Transport:** Clarification is required on the trip generation assessment to enable officers to establish the impact (and cumulative impacts) on public transport (London Overground and bus services) in the context of the High Road West Masterplan site. Further details on the design quality of cycle parking facilities is required. A review of the proposed southern site access is required, together with Stage 1 Road Safety Audits.
- **Climate change and environmental issues:** The energy, urban greening and drainage strategies are acceptable. The applicant is proposing to connect the site to the planned Lee Valley District Heat Network. This is strongly supported and should be secured.

For further information, contact GLA Planning Unit (Development Management Team):

Andrew Russell, Principal Strategic Planner (case officer)

email: andrew.russell@london.gov.uk

Reece Harris, Team Leader – Development Management

email: reece.harris@london.gov.uk

Allison Flight, Deputy Head of Development Management

email: alison.flight@london.gov.uk

John Finlayson, Head of Development Management

email: john.finlayson@london.gov.uk

Lucinda Turner, Assistant Director of Planning

email: lucinda.turner@london.gov.uk

We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.