

## REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

### 1. APPLICATION DETAILS

**Reference Nos:** HGY/2021/2283 & 2284      **Ward:** Northumberland Park

**Address:** Printworks, Nos. 819-829 High Road, N17 8ER

**Proposal:** Full planning application for the demolition of existing buildings and structures to the rear of 819-829 High Road; the demolition of 829 High Road; and redevelopment for a residential-led, mixed-use development comprising residential units (C3), flexible commercial, business and service uses (Class E), a cinema (Sui Generis), hard and soft landscaping, parking, and associated works. To include the change of use of 819-827 High Road to flexible residential (C3), cinema (Sui Generis), and commercial, business and service uses (Class E).

Listed building consent: Internal and external alterations to 819/821 High Road (Grade II), including reinstatement of hipped roof, demolition works to the rear, facade and related external works, internal alterations, and associated works.

**Applicant:** Goods Yard Tottenham Limited.

**Ownership:** Private

**Case Officer Contact:** Philip Elliott

**Site Visit Date:** 23/07/2021.

**Date received:** 06/08/2021 **Last amended:** 23/12/2021.

**Plans and Document:** See Appendix 09 to this report.

- 1.1 The applications have been referred to the Planning Sub-Committee for decision as the planning application is a major application that is also subject to a s106 agreement.

### SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposal is a well-designed, residential-led mixed-use scheme providing a range of residential accommodation (C3), flexible commercial, business and service uses (Class E), and a cinema (Sui Generis).
- The proposed scheme safeguards industrial uses on the Peacock Industrial Estate

- The proposed scheme allows for an incremental delivery of comprehensive proposals for site allocation NT5, in accordance with Policy NT5 requirements and guidelines and the adopted High Road West Masterplan Framework.
- The scheme would deliver a mix of dwelling sizes, including family sized homes, and would include 7 Low Cost Rented homes at London Affordable Rents and 23 Shared Ownership homes, representing a 35.4% provision of affordable housing by habitable room.
- The layout and design of the development optimises the potential of the site, provides acceptable levels of open space given its location, and respects the scale and character of the surrounding area and the amenity of neighbours.
- The architectural quality of the proposal is high, and the proposed height and form minimise impacts on the surrounding area and heritage assets.
- The proposal secures the future of the Listed Buildings at Nos. 819-821 High Road and the locally listed 823-827 High Road and improves their immediate setting. The 'less than substantial harm' to the wider setting and significance of a number of heritage assets would be outweighed by the significant public benefits that the proposed scheme would deliver.
- Financial contributions towards social infrastructure and CIL payments mean the proposed scheme would make a proportionate and reasonable contribution to the infrastructure that is needed to support growth.

## 2 RECOMMENDATION

- 2.1 That the Committee resolve to GRANT planning permission and that the Head of Development Management or the Assistant Director Planning, Building Standards & Sustainability is authorised to issue the planning permission and impose conditions and informatives subject to signing of a section 106 Legal Agreement providing for the obligations set out in the Heads of Terms below and a section 278 Legal Agreement providing for the obligations set out in the Heads of Terms below.
- 2.2 That the section 106 legal agreement referred to in resolution (2.1) above is to be completed no later than 10/03/2022 or within such extended time as the Head of Development Management or the Assistant Director Planning, Building Standards & Sustainability shall in her/his sole discretion allow.
- 2.3 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.3) above, planning permission is granted in accordance with the Planning Application subject to the attachment of the conditions.
- 2.4 That the Committee resolve to GRANT Listed Building Consent and that the Head of Development Management or the Assistant Director Planning, Building Standards & Sustainability is authorised to issue the Listed Building Consent and impose conditions and informatives.

- 2.5 That delegated authority be granted to the Head of Development Management or the Assistant Director of Planning, Building Standards & Sustainability to make any alterations, additions or deletions to the recommended heads of terms and/or recommended conditions (planning permission and/or Listed Building Consent) as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice Chair) of the Sub-Committee.

**Conditions Summary – Planning Application HGY/2021/2283** (the full text of recommended conditions is contained in Appendix 01 of this report).

- 1) 5-year time limit
- 2) Approved Plans & Documents
- 3) No demolition of No. 829 High Road until contract let to build the Printworks Block.
- 4) Photographic survey
- 5) Basement Impact
- 6) Accessible Housing
- 7) Cinema/Commercial Units - Ventilation/Extraction
- 8) Cinema/Commercial Units - Café/restaurant Opening Hours
- 9) Cinema/Commercial Units – BREEAM (PRE-COMMENCEMENT)
- 10) Cinema/Commercial Units – Noise Attenuation
- 11) Noise Attenuation – Dwellings
- 12) Detailed Fire Statement
- 13) Landscape Details
- 14) Trees & Planting – 5-year Replacement
- 15) Biodiversity
- 16) External Materials and Details – Printworks Buildings
- 17) External Materials and Details – Nos. 823-827 High Road
- 18) No new Plumbing on outside of Nos. 823-827 High Road
- 19) No new Grilles on outside of Nos. 823-827 High Road
- 20) Living roofs
- 21) Ground Floor Western Boundary Details
- 22) Energy Strategy
- 23) Overheating (Non-residential)
- 24) Future overheating (Dwellings)
- 25) Energy Monitoring
- 26) PV Arrays
- 27) Secured by Design
- 28) Stage I Written Scheme of Investigation of Archaeology (PRE-COMMENCEMENT)
- 29) Stage II Written Scheme of Investigation of Archaeology
- 30) Foundation Design – Archaeology (PRE-COMMENCEMENT)
- 31) Land Contamination – Part 1 (PRE-COMMENCEMENT)
- 32) Land Contamination – Part 2
- 33) Unexpected Contamination

- 34) Road Safety Audit – Brunswick Square (PRE-COMMENCEMENT)
- 35) Basement Vehicular Access Control Arrangements
- 36) Car Parking Design & Management Plan
- 37) Cycle Parking Details (PRE-COMMENCEMENT)
- 38) Delivery and Servicing Plan
- 39) Residential Waste Management Plan
- 40) Detailed Construction Logistics Plan (PRE-COMMENCEMENT)
- 41) Public Highway Condition (PRE-COMMENCEMENT)
- 42) Demolition/Construction Environmental Management Plans (PRE-COMMENCEMENT)
- 43) Management and Control of Dust (PRE-COMMENCEMENT)
- 44) Non-Road Mobile Machinery 1 (PRE-COMMENCEMENT)
- 45) Non-Road Mobile Machinery 2 (PRE-COMMENCEMENT)
- 46) Impact Piling Method Statement (PRE-COMMENCEMENT)
- 47) Business and Community Liaison Construction Group (PRE-COMMENCEMENT)
- 48) Telecommunications
- 49) Evidence of operational public hydrants/suitable alternatives

**Informatives Summary – Planning Application HGY/2019/2283** (the full text of Informatives is contained in Appendix 01 to this report).

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

**Conditions Summary – Listed Building Consent Application HGY/2021/2284** (the full text of recommended conditions is contained in Appendix 02 of this report).

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

**Informatives Summary – Listed Building Consent HGT/2019/2284** (the full text of Informatives is contained in Appendix 02 to this report).

- 1) Working with the applicant
- 2) External materials to be approved pursuant to Planning Permission (HGY/2021/2283)

### **Section 106 Heads of Terms:**

#### *Affordable Housing*

- 1) **Affordable Housing** – Affordable Housing Scheme to be submitted for approval prior to commencement of development:
  - a. Minimum of 35.4% by habitable room (75 habitable rooms)
  - b. Minimum of 40% by habitable room (86 habitable rooms) if sufficient grant is available
  - c. Tenure mix – 60% Intermediate (Shared Ownership) Housing and 40% Low Cost Rented Housing
  - d. LB Haringey to be offered first rights to purchase up to [4] Low Cost Rented homes
  - e. Low Cost Rent homes to be London Affordable Rent – or Social Rent where LBH purchases Low Cost Rent homes.
  - f. Low Cost Rent homes to be London Affordable Rent – or where LB Haringey purchases Low Cost Rent, the first [2] to be at Social Rent
  - g. Quality standards and triggers for provision (no more than 25% of Market Units occupied until 50% of Affordable Units delivered, no more than 50% of Market until 100% of Affordable Units delivered).
  - h. Location of different tenures (in Printworks Building)
  - i. Affordable housing residents to have access to the same communal amenity and play space as Market housing.

### **2) Affordability**

- a. Weekly London Affordable Rent levels to be in accordance with the Mayor of London's Affordable Homes Programme (2016-2023) as follows: 1-Bed - £161.71, 2-Bed £171.20, 3-Bed - £180.72 and 4-bed - £190.23.
- b. Intermediate homes to be Shared Ownership - sold at the minimum 25% share of equity and rental on the unsold equity up to 2.75%
- c. Approve plan for marketing homes to households living or working in:
  - o Haringey with max. annual income of £40k for 1 and 2-bed homes and £60k for 3-bed homes (index linked) – for 3 months prior to and 3-months post completion of each phase
  - o London with max. annual incomes of £90k (Index Linked) not until after 6 months of completion of each phase
  - o Provided that annual housing costs for each home do not exceed 28% of the above relevant annual gross income limits

### 3) Viability Review Mechanism

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

### 4) Infrastructure Provision – Financial contributions (£192,125):

- a) Library - £52,004.
- b) Community Space - £47,670.
- c) Publicly Accessible Open Space - £92,451 (to connect the Printworks site effectively to Peacock Gardens and to aid its delivery).

Subject to review if an approved scheme is liable to pay an increased Borough CIL levy above the base rate of £15 per square metre (indexed), so that if CIL liability increases, the infrastructure contribution will decrease by a corresponding amount.

### *Transportation*

- 5) **Future Connectivity & Access Plan** – setting out how the development shall be constructed to allow for potential future pedestrian, cycling and vehicular access across the development to and from adjacent land (Peacock Industrial Estate).
- 6) **Percival Court resurfacing** - Works to resurface Percival Court within the application site and for the length of the application site up to the High Road.
- 7) **Car Capping** – No future occupiers will be entitled to apply for a residents or business parking permit under the terms of the relevant Traffic Management Order controlling on-street parking in the vicinity of the development.
- 8) **Car Club Contributions** - Two years' free membership for all residents and £50.00 per year credit for the first 2 years; and an enhanced car club membership for the residents of the family-sized units (3+ bedrooms)

including 3 years' free membership and £100 (one hundred pounds in credit) per year for the first 3 years.

- 9) **Residential & Commercial Travel Plans** comprising:
- a) Appointment of a Travel Plan Coordinator (to also be responsible for monitoring Delivery Servicing Plan)
  - b) Provision of welcome induction packs containing public transport and cycling/walking information, map and timetables, to every new household.
  - c) £3,000 for monitoring of the travel plan initiatives.

10) **Highways Agreement** – See Section 278 Agreement Heads of Terms.

*Employment and Training*

11) **Employment & Skills Plan** - Including Construction apprenticeships Support Contribution and Skills Contribution (to be calculated in accordance with Planning Obligations SPD).

12) Commitment to being part of the borough's **Construction Partnership**.

*Carbon Management and Sustainability*

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

- a) Submission of Energy Plan for approval by LPA
- b) Ensure the scheme is designed to take heat supply from the proposed DEN (including submission of DEN Feasibility Study)
- c) Design of secondary and (on-site) primary DHN in accordance with LBH Generic Specification and approval of details at design, construction, and commissioning stages.
- d) Use all reasonable endeavours to negotiate a supply and connection agreement with the DHN within a 10-year window from the date of a planning permission.

14) **Carbon offsetting**

- Payment of an agreed carbon offset amount (residential & non-residential) plus 10% management fee on commencement.

*Telecommunications*

15) **Ultrafast broadband infrastructure** and connections to be provided.

*Construction*

16) Commitment to **Considerate Contractors Scheme**.

*Monitoring*

17) Based on 5% of the financial contribution total and £500 per non-financial contribution.

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

18) Works to widen Brunswick Square public highway

19) Works to link in with High Road public highway

20) Works to resurface Brunswick Square for the length of the application site up to the High Road

- 2.6 In the event that members choose to make a resolution contrary to officers' recommendation, members will need to state their reasons.

### **Presumption in Favour of Sustainable Development (PFSD)**

- 2.7 In the event that members choose to make a different decision to that recommended it will be necessary to consider the presumption in favour of sustainable development in the National Planning Policy Framework (NPPF). This is because the Council's delivery of housing over the last three years has been substantially below its housing target and so paragraph 11(d) of the NPPF is engaged by virtue of footnote 7 of the NPPF. Members must state their reasons including why it is considered that the presumption is not engaged.
- 2.8 That, in the absence of the agreement referred to in resolution (2.1) above being completed within the time period provided for in resolution (2.2) above, the planning application and Listed Building Consent applications be refused for the following reasons:

#### **Planning Application**

- i. In the absence of a legal agreement securing 1) the provision of on-site affordable housing and 2) viability review mechanisms the proposals would fail to foster a mixed and balanced neighbourhood where people choose to live, and which meet the housing aspirations of Haringey's residents. As such, the proposals would be contrary to London Plan Policies GG1, H4, H5 and H6, Strategic Policy SP2, and DM DPD Policies DM11 and DM13, and Policy TH12.
- ii. In the absence of a legal agreement securing financial contributions towards infrastructure provision (community space, library, and publicly accessible open space realm), the scheme would fail to make a proportionate contribution towards the costs of providing the infrastructure needed to support the comprehensive development of Site Allocation NT5. As such, the proposals are contrary to London Plan Policy S1, Strategic Policies SP16 and SP17, Tottenham Area Action Plan Policies AAP1, AAP11 and NT5 and DM DPD Policy DM48.



- iii. In the absence of legal agreement securing 1) a residential Travel Plan and financial contributions toward travel plan monitoring, 2) Traffic Management Order (TMO) amendments to change car parking control measures, 3) and car club contributions the proposals would have an unacceptable impact on the safe operation of the highway network and give rise to overspill parking impacts and unsustainable modes of travel. As such, the proposal would be contrary to London Plan Policies T5, T1, T2, T3, T4 and T6. Spatial Policy SP7, Tottenham Area Action Plan Policy NT5 and DM DPD Policy DM31.
- iv. In the absence of an Employment and Skills Plan the proposals would fail to ensure that Haringey residents benefit from growth and regeneration. As such, the proposal would be contrary to London Plan Policy E11 and DM DPD Policy DM40.
- v. In the absence of a legal agreement securing the implementation of an energy strategy, including connection to a DEN, and carbon offset payments the proposals would fail to mitigate the impacts of climate change. As such, the proposal would be unsustainable and contrary to London Plan Policy SI 2 and Strategic Policy SP4, and DM DPD Policies DM 21, DM22 and SA48.
- vi. In the absence of a legal agreement securing the developer's participation in the Considerate Constructor Scheme and the borough's Construction Partnership, the proposals would fail to mitigate the impacts of demolition and construction and impinge the amenity of adjoining occupiers. As such the proposal would be contrary to London Plan Policies D14, Policy SP11 and Policy DM1.

### **Listed Building Consent**

- i. In the absence of a planning permission for the proposed change of use of the ground floor and conversion of the upper floors to housing, the proposed removal of historic fabric and internal and external alterations would be unnecessary and unacceptable. As such, the proposal is contrary to London Plan Policies HC1, Strategic Policy SP12 and DM DPD Policy DM9.

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

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

2.10 In the event that the Planning Application is refused for the reasons set out above, the Head of Development Management or the Assistant Director Planning, Building Standards & Sustainability (in consultation with the Chair of Planning Sub-Committee) is hereby authorised to refuse any further application for planning permission which duplicates the Planning Application provided that:

- i. There has not been any material change in circumstances in the relevant planning considerations, and
- ii. The further application for planning permission is submitted to and approved by the Assistant Director within a period of not more than 12 months from the date of the said refusal.

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### **3. PROPOSED DEVELOPMENT AND LOCATION DETAILS**

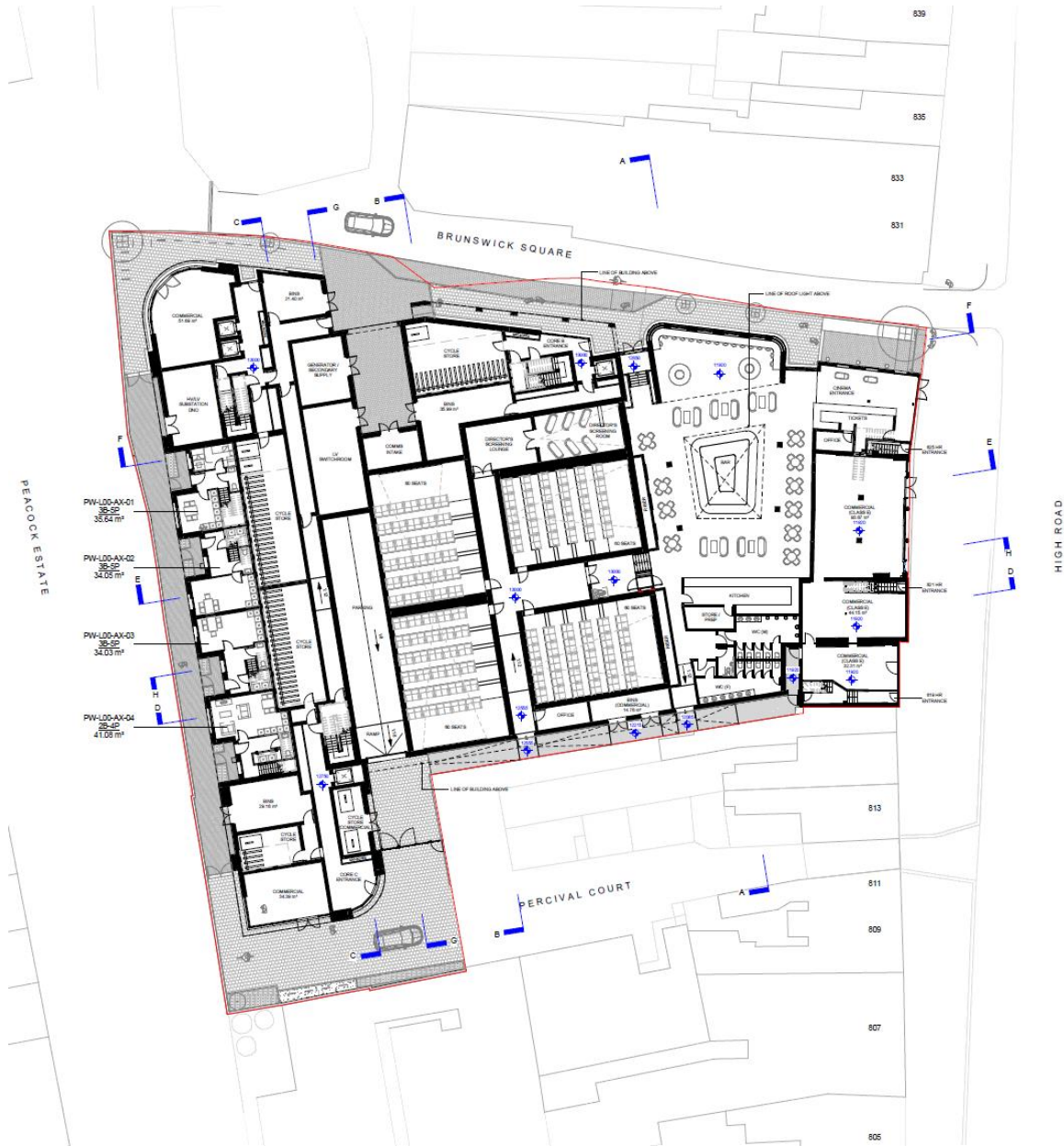
#### **Proposed Scheme**

- 3.1. The proposal consists of two applications for full planning permission for the demolition of existing buildings and structures to the rear of 819-829 High Road; the demolition of 829 High Road; and redevelopment for a residential-led, mixed-use development comprising residential units (C3), flexible commercial, business and service uses (Class E), a cinema (Sui Generis), hard and soft landscaping, parking, and associated works. To include the change of use of 819-827 High Road to flexible residential (C3), cinema (Sui Generis), and commercial, business and service uses (Class E)
- 3.2. And Listed building consent: Internal and external alterations to 819/821 High Road (Grade II), including reinstatement of hipped roof, demolition works to the rear, facade, and related external works, internal alterations, and associated works.

#### *Layout & Access*

- 3.3. Cleared land to the rear of the retained and altered frontage buildings would be redeveloped in a series of new buildings based around two courtyards and provide active frontages to Brunswick Square, Percival Court and (pulled back from the boundary by between 2.8 and 3.1m) the existing Peacock Industrial Estate and future development of this as part of the wider development of the High Rad West Site Allocation.
- 3.4. The first covered courtyard immediately to the west of the High Road frontage buildings would form part of the proposed cinema space, accessed from Brunswick Square. The second open courtyard would provide private communal open and play space for the proposed homes that would front it – with access also to proposed homes in a smaller block fronting Brunswick Square.
- 3.5. A small basement car parking area would sit under the western part of the proposed Printworks Building, accessed from Percival Court. The buildings would extend from two storeys at its High Road frontage to a maximum 7 storeys at the north-west corner, with the remainder of the proposed scheme being at lower heights – notably 6 storeys in the south-west corner, 4 storeys along the western boundary between these corner blocks, and 2/3 storeys rising from the rear of the High Road properties.

Figure 01: Proposed layout



### *Buildings and uses*

- 3.6. The proposal includes the change of use of the ground floor of the existing High Road buildings to form part of a proposed cinema (Sui generis) and the conversion of the upper floors to a different number and mix of residential apartments. The proposed cinema and ancillary spaces would extend back into the site and there would be a number of flexible commercial units (Use Class E) at ground floor, with new housing above.

Table 01: Proposed land uses and parking provision.

<b>Total floorspace</b>	<b>10,036sqm (GIA)</b>
Residential	23 x 1-bed 35 x 2-bed 13 x 3-bed 1 x 4-bed
	72 homes 6,517sqm (GIA)
4 x screen cinema ( <i>Sui generis</i> )	1,246sqm (GIA)
Commercial (Use Class E)	283sqm (GIA)
Ancillary & parking	1,936sqm (GIA)
Open Space	1,164sqm and 200sqm play space
Car parking	Residential: 8 accessible spaces (0.11 spaces per home) in basement
Cycle parking	136 long-stay residential spaces, 26 x short-stay commercial spaces (11 Sheffield Stands in public realm and 4 secure covered cycle stores)

*Building heights*

- 3.7. The proposed mansard roof extension would increase the height of Nos. 819 to 821 High Road behind the parapet by approx. 2.95m, with the proposed chimney breasts and pots rising approx. 4.5m from the existing flat roof.
- 3.8. The proposed new buildings at the rear of the retained and altered frontage buildings would be of various heights, increasing from the High Road back towards the western boundary as follows:
- 3-storeys on to Brunswick Square;
  - 3 to 4-storeys on to Brunswick Square;
  - 6 to 7-storeys on to Brunswick Square;
  - 4 to 6-storeys on to Percival Court; and
  - A central 5-storey section facing Peacock Industrial Estate to the west.
- 3.9. These heights are illustrated in Figure 02 below:

Figure 02: Proposed building heights (looking southeast)



*Demolition and alterations*

- 3.10. The proposed scheme involves the demolition of the locally listed No. 829 High Road in order to create a wider Brunswick Square public highway, together with the demolition of existing buildings and structures to the rear of the frontage buildings at Nos. 819 to 829 High Road.
- 3.11. The proposal also includes internal and external alterations to Nos. 819 to 821 High Road (for which Listed Building Consent is also sought), including reinstatement of a hipped roof, demolition works to the rear, façade and related external works and internal alterations and associated works. The proposed high road frontage is illustrated in Figure 03 below:

Figure 03: View looking west from the Northumberland Park & High Road junction



### **The Site and Surroundings**

- 3.12. The site comprises Nos. 819-829 High Road which range from 2 to 4-storeys in height and front the High Road. Nos. 819-821 are statutorily Listed (Grade II) and 823-829 are locally listed. All existing buildings are within the North Tottenham Conservation Area.
- 3.13. To the rear of the High Road, the site comprises a range of rear extensions, a large industrial shed-like extension to the Royale Banqueting Suite at Nos. 819-821 High Road and a fenced hard surface car parking yard area. All of these lie outside of the Conservation Area.
- 3.14. The site comprises a mix of PTAL 4 and 5, being immediately adjacent to local bus routes on the High Road, and c. 260m from White Hart Lane Overground Station to the south-west, c. 1km from Northumberland Park railway station.

### **Surroundings**

- 3.15. Brunswick Square to the north is a narrow public highway (3m at its narrowest point) which provides access to Peacock Industrial Estate to the west, as well as to a wedding decoration business and sign business on the ground floor of buildings to the north and the homes at the rear of Nos. 841-843 High Road. Residential flats above Nos. 831-833 High Road face directly south towards the site.



- 3.16. The High Road to the east is outside the designated Local Centre but includes a range of shops and other uses at ground floor and housing above. Nos. 831-833 High Road is identified as a 'negative contributor' to the Conservation Area and statutory Listed Buildings (Grade ii) are directly opposite on the east side of the road (Nos. 814 and 816-819).
- 3.17. To the south lie Nos. 813-817 High Road (locally listed buildings) and beyond this is Percival Court, a narrow private road. Percival Court is a private shared access lane which creates a non-signalised junction with the High Road, within an Advanced Cycle Stopline on the High Road approach arm. It is 2.78m wide at its narrowest point but widens out to the west, where it forms a boundary to the site. It does not provide through access in its current form but is used by the existing properties to its north and south. It connects with the rear of the site in its south-west corner
- 3.18. To the west of the site is the Peacock Industrial Estate (accessed via White Hart Land and Brunswick Square). Immediately to the west of the site is the Estate's access and parking area, with 2-storey industrial and warehousing units approx. 16-19m from the boundary. Existing occupiers of the nearest units include a car repair garage, window and door manufacturer and bakery.

#### *Existing Land Uses*

- 3.19. The site currently accommodates a number of uses based in buildings fronting the High Road and premises to the rear. These include 3 x health and beauty businesses (hairdressers, barbers, and nail bar), a bridal gown shop and a photography shop and the La Royale Banqueting Suite.
- 3.20. The Banqueting Suite hosts weddings, birthday celebrations, christenings, charity fundraisers, gala balls, Christmas parties, and corporate events. The venue has capacity for between 500 and 600 people. It has a frontage onto High Road (Nos. 819 and 821) and also has a large single-storey industrial shed-like extension at the rear, with a large surface car park.
- 3.21. In addition, there are also 13 x residential flats (which are understood to be occupied on a short-term leasehold basis) on the upper floors of the High Road buildings, mainly comprising studio and one-bedroom properties.
- 3.22. All existing uses/occupiers on-site would be displaced as a result of the proposals.
- 3.23. Table 02 below sets out the existing uses on the site:

Table 02: Existing uses

Use (Use Class)	Existing Floorspace (GIA)
Hairdressers, barbers, nail bar ( <i>Sui Generis</i> )	98sqm
Barbers, bridal gown Shop & photography shop (Class E)	232sqm
Banqueting Suite ( <i>Sui generis</i> )	1,942sqm
13 x residential flats (Class C3)	502sqm
	2,774sqm

## Relevant Planning and Enforcement History

### The Site

- 3.24. The use of No. 819-829 as a commercial “Banqueting Suite” was granted planning permission in November 1992 (HGY/1992/1059) (No. 819 High Road) and February 1994 (HGY/1993/0497) (No. 821 High Road). Most recently, this building was granted permission for a two-storey extension at ground and first floor in December 2005 (HGY/2005/1997).
- 3.25. A flexible change of use was granted under the Prior Approval process (HGY/2017/2925) at No. 823 High Road in October 2017. This changed the use of this property from office to a vape/e-cigarette shop on a temporary basis until October 2019.
- 3.26. An Environmental Impact Assessment (EIA) Screening Opinion (HGY/2021/1902) issued in July 2021 confirmed that a scheme very similar to the application scheme was not EIA Development.
- 3.27. High Road West (HGY/2021/3175) – current hybrid application for:  
 (1) outline component comprising the demolition of existing buildings and for the creation of a new mixed-use development including residential (Use Class C3), commercial, business and service (Use Class E), leisure (Use Class E), community uses (Use Class F1/F2) and Sui Generis uses together with the creation of a new public square, park and associated access, parking and public realm works with matters of layout, scale, appearance, landscaping and access within the site reserved for subsequent approval; and  
 (2) detailed component comprising Plot A including the demolition of existing buildings and the creation of new residential floorspace (Use Class C3) together with landscaping, parking, and other associated works.

### Wider Area

- 3.28. 807 High Road – Planning permission granted in September 2021 (HGY/2021/0441) for the demolition of the existing buildings and the erection of a replacement building up to four storeys to include residential (C3), retail

(Class E, a) and flexible medical/health (Class E, e) and office (Class E, g, i) uses; hard and soft landscaping works including a residential podium; and associated works.

- 3.29. Land at rear of Nos. 841-843 High Road (HGY/2021/1704), Certificate of Lawful Use (Existing) granted in August 2021 for the use of the property as five self-contained flats.
- 3.30. Goods Yard - Planning permission (HGY/2018/0187) granted on appeal, against non-determination, in June 2019 for a residential-led mixed use redevelopment comprising up to 316 residential units, 1,450sqm of employment (B1 use), retail (A1 use), leisure (A3 and D2 uses) and community (D1 use) uses.
- 3.31. Depot – Planning permission (HGY/2019/2929) and Listed Building Consent (HGY/2019/2930) granted in September 2020 for the conversion of Nos. 867-869 High Road and redevelopment of the rest of the site for a residential led mixed-use scheme with up to 330 residential units (class C3), 270sqm of retail/café use (Use Class A1/A3), area of new public open space, landscaping and other associated works.
- 3.32. Goods Yard & Depot – Planning permission resolved for refusal in November 2021, the GLA was content for the LPA to determine the case itself and the application was refused on 21/12/2021 (HGY/2021/1771) for (i) the demolition of existing buildings and structures, site clearance and the redevelopment of the site for a residential-led, mixed-use development comprising residential units (C3); flexible commercial, business, community, retail and service uses (Class E); hard and soft landscaping; associated parking; and associated works. (ii) Change of use of No. 52 White Hart Lane from residential (C3) to a flexible retail (Class E) (iii) Change of use of No. 867-869 High Road to residential (C3) use. An appeal was lodged with the Planning Inspectorate on 22/12/2021
- 3.33. Northumberland Terrace – Planning permission (HGY/2020/1584) and Listed Building Consent (HGY/2020/1586) granted in April 2021 for the erection of a four-storey building with flexible A1/A2/A3/B1/D1/D2 uses and change of use and alterations and extensions to a number of existing buildings (Nos. 799 to 814 High Road).
- 3.34. **Consultation and Community Involvement**
- 3.35. The applicant's Statement of Community Involvement (SCI) sets out the consultation it undertook in April and May 2021, at pre-application stage. This includes: letters, adverts in 2 x local newspapers and leaflet to 4,400 local residents and businesses inviting comment on emerging proposals and publicising two webinars; a dedicated section on the applicant's website with information about the emerging proposals and a feedback from and 2 x

webinars, with 8 and 34 attendees. Emerging proposals were also discussed at an applicant's regular Business and Community Liaison Group.

- 3.36. In total, 5 people responded formally using an online feedback form and 11 people provided written comments by email. Comments included 3 mainly positive responses in relation to public spaces and 3 mainly positive responses in relation to mix of uses. There were 2 negative comments in relation to proposed density and 2 negative comments in relation to impact on services. There were 2 comments in relation to heritage (1 positive and 1 negative). Others visited the consultation website (2,195 unique site visitors) and downloaded PDF 'exhibition boards' with detailed information for each site (109 times for the Printworks site) (09/06/21 statistics).
- 3.37. Emerging proposals were considered by Haringey's Quality Review Panel (QRP) on 15 December 2020 and 18 May 2021. The QRP Reports following these reviews are attached as Appendices 7 and 8.
- 3.38. Emerging proposals were presented to the Planning Sub-Committee at pre-application stage on 24 May 2021. The minutes of this item are attached as Appendix 5.
- 3.39. Emerging proposals were presented at a Development Management (DM) Forum on 25 May 2021. A summary of comments made at the Forum are attached as Appendix 6.

#### 4. **CONSULTATION RESPONSE**

4.1. The following were consulted regarding the applications:

##### Internal Consultees

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

##### External Consultees

- Affinity Water
- Arriva London
- Environment Agency
- Georgian Group
- Greater London Authority
- Greater London Archaeology Advisory Service (GLAAS)
- Historic England
- London Fire Brigade
- Metropolitan Police - Designing Out Crime Officer
- National Grid
- NHS Clinical Commissioning Group
- Residents Associations (Cannon Road RA, Headcorn, Tenterden, Beaufoy & Gretton RA, Northumberland Park RA, Love Lane Residents Association & Love Lane RA (TAG))
- Thames Water
- Tottenham Civic Society
- Tottenham CAAC
- Transport for London

- Tree Trust for Haringey
- UK Power Networks

4.2. An officer summary of the responses received is below. The full text of internal and external consultation responses is contained in Appendix 4.

Internal:

**Building Control (HBC)** – No objection – HBC are satisfied that the design intent approach adopted by the applicant is entirely appropriate to the proposed development and neither HBC nor LFB have any outstanding concerns. We therefore support the planning application in fire safety terms.

**Carbon Management** – The proposed scheme would achieve a reduction of 63% carbon dioxide emissions (SAP2012 carbon factors) on site and connect to the Decentralised Energy Network, which is supported. Appropriate planning conditions have been recommended following a range of clarifications and amendments to improve the fabric efficiencies and reduce overheating risk.

**Conservation Officer** – The proposed redevelopment together with the proposed refurbishment of the listed and locally listed buildings that significantly contribute to the street frontage of the Conservation Area, and the landscaped reconfiguration of Brunswick Square - would largely conserve the significance of the listed and locally listed buildings, would enhance the quality of this part of the Conservation Area and would significantly enhance the setting of both listed and locally listed buildings.

These heritage and public benefits would outweigh the low level of less than substantial harm to the significance of the Conservation Area resulting from the erection of new, larger buildings at the back of the High Road and the proposed demolition of the locally listed building at 829 High Road.

**Design Officer** – These proposals are a well thought through and elegantly designed response to this site, that will play a part, along with other neighbouring sites also anticipated to be redeveloped, like this proposal in accordance with the adopted masterplan, as it continues to evolve, in accordance with changed priorities and conditions, to contribute to a more sustainable, viable, inclusive, and appealing North Tottenham community.

**Lead Local Flood Authority** – The applicant has followed the London Plan hierarchy and the proposed SuDS features are acceptable subject management and maintenance being secured.

**Pollution** – No objection, subject to conditions on Land Contamination, Unexpected Contamination, NRRM and Demolition/Construction Environmental Management Plans.

**Public Health** – Various comments on housing quality and design, access to open space and nature, air quality, noise and neighbourhood amenity, accessibility and active travel, crime reduction and community safety, access to work and training, social cohesion and lifetime neighbourhoods and minimising the use of resources.

**School Places Planning** – Satisfied that there is sufficient school capacity – no specific comments.

**Transportation** – Following satisfactory responses to queries, no objection subject to recommended conditions and s106 obligations.

**Tree Officer** – No comment received.

**Waste Management** – No objections to the proposed waste arrangement given the constraints of the site.

External:

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

**Health & Safety Executive (HSE)** – The HSE originally commented on the planning application on the 20th of August 2021, advising they had “Significant Concern”. Following the submission of further information including confirmation from both Haringey Building Control (“HBC”) and the London Fire Brigade (“LFB”) that the proposed development was entirely appropriate from a fire safety perspective, in their opinion, HSE issued a second response on 2nd December 2021, amending their comments and advising “Some Concern”. This response raises three points:

1. Length of the horizontal run of the dry fire main.
2. Distance of travel for firefighters from the Percival Court entrance.
3. Query whether two fire hydrants are useable.

(Officer note – further detail is provided in section 6.20 and a condition has been attached to ensure the relevant fire hydrants are useable)

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

**Historic England – Archaeological Service (GLAAS)** – Recommend that a Stage 1 Written Scheme of Investigation is secured by planning condition.

**London Fire Brigade** – I have reviewed the information and can confirm that the fire brigade would be happy with the fire fighting access with the system proposed. Further detail is provided in section 6.20.

**Metropolitan Police (Designing Out Crime Officer)** – No objection in principle, subject to a planning condition requiring a ‘Secured by Design’ accreditation to be achieved for each building before the building is occupied and the inclusion of an informative.

**NHS Clinical Commissioning Group** – A planned health centre as part of the THFC stadium development is not guaranteed. In advance of this opening, further capacity is needed, and Somerset Gardens Family Health Centre could help. There is no guarantee that CIL receipts will be allocated towards increasing capacity – hence a s106 contribution of £35,845 is requested (based on HUDU Planning Contributions Model).

**Thames Water** – Waste - no objections subject to conditions

**TfL** – Support for car free and the proposed level of cycle parking. Road Safety Audit required for Brunswick Square. Request for a proportionate % contribution of delivery of NT5 masterplan impacts on transport network – specifically impacts on bus network.



## LOCAL REPRESENTATIONS

5.1. On 9 August 2021, notification was sent to the following:

- 525 Letters to neighbouring properties
- 2 site notices erected in the vicinity of the site

5.2. The number of representations received from neighbours, local groups etc. were as follows:

No of individual responses: 4.

Objecting: 1.

Supporting: 1.

Others: 2.

5.3. The main issues raised in representations from adjoining occupiers are summarised below.

Objections:

- Tottenham Conservation Area Committee has serious reservations about the proposed loss of No. 829 High Road.

Support:

- Scheme will contribute to the regeneration of Tottenham.

Other:

- Cannon Road Residents' Group supports the applicant's view that the Le Royale Banqueting Suite is not a 'community use' and queries the assessment that flood risk is low (particularly in relation to the proposed basement).
- Cllr Bevan notes the lack of observations from the Conservation Officer.

## 6. MATERIAL PLANNING CONSIDERATIONS

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

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

### 6.2 Principle of the development

#### 6.2.1 *Policy Background*

6.2.2 The current National Planning Policy Framework NPPF was updated in July 2021. The NPPF establishes the overarching principles of the planning system, including the requirement of the system to “drive and support development” through the local development plan process.

#### 6.2.3 *The Development Plan*

6.2.4 For the purposes of S38(6) of the Planning and Compulsory Purchase Act 2004 the Local Plan comprises the Strategic Policies Development Plan Document (DPD), Development Management Policies DPD and Tottenham Area Action Plan (AAP) and the London Plan (2021).

6.2.5 A number of plans and strategies set the context for Tottenham’s regeneration. These documents should be read in conjunction with the AAP. The application site is located within a strategically allocated site - NT5 (High Road West). A key

policy requirement of the site allocation is that proposed development within NT5 should accord with the principles set out in the most up-to-date Council-approved masterplan. This is the High Road West Masterplan Framework (HRWMF), which is discussed in detail below.

- 6.2.6 The Council is preparing a new Local Plan and consultation on a Regulation 18 New Local Plan First Steps documents took place between 16 November 2020 and 1 February 2021. The First Steps document sets out the key issues to be addressed by the New Local Plan, asks open question about the issues and challenges facing the future planning of the borough and seeks views on options to address them. It has very limited material weight in the determination of planning applications.

#### *The London Plan*

- 6.2.7 The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. The London Plan (2021) sets a number of objectives for development through various policies. The policies in the London Plan are accompanied by a suite of Supplementary Planning Guidance (SPGs) and London Plan Guidance that provide further guidance.

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

- 6.2.8 The Upper Lea Valley Opportunity Area Planning Framework (OAPF) (2013) is supplementary guidance to the London Plan. A Development Infrastructure Study (DIFS) in relation to the OAPF was also prepared in 2015. The OAPF sets out the overarching framework for the area, which includes the application site.
- 6.2.9 The OAPF notes the redevelopment of the High Road West area is supported by a comprehensive masterplan. The OAPF sets out the ambitions for the High Road West area to become a thriving new destination for north London, with a sports, entertainment and leisure offer supported by enhanced retail, workspace and residential development.

#### *The Local Plan*

- 6.2.10 The Strategic Policies DPD sets out the long-term vision of how Haringey, and the places within it, should develop by 2026 and sets out the Council's spatial strategy for achieving that vision. The Site Allocations development plan document (DPD) and Tottenham Area Action Plan (AAP) give effect to the spatial strategy by allocating sufficient sites to accommodate development needs.

#### *Strategic Policies*

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

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

#### *Tottenham Area Action Plan*

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

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

#### *NT5 Site: High Road West*

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

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

#### NT5 Site Requirements

- The site will be brought forward in a comprehensive manner to best optimise the regeneration opportunity.
- Development should accord with the principles set out in the most up-to-date Council-approved masterplan.
- Creation of a new residential neighbourhood through increased housing choice and supply, with a minimum 1,400 new homes of a mix of tenure,

type, and unit size (including the re-provision of existing social rented council homes, the offer of alternative accommodation for secure tenants, and assistance in remaining within the area for resident leaseholders from the Love Lane Estate).

- Creation of a new public square, connecting an enhanced White Hart Lane Station, and Tottenham High Road, to complement the redeveloped football stadium.
- New retail provision to enlarge the existing local centre, or create a new local centre, opposite to and incorporating appropriate town centre uses within the new stadium, including the new Moselle public square. This should complement not compete with Bruce Grove District Centre.
- Enhance the area as a destination through the creation of new leisure, sports and cultural uses that provide seven day a week activity.
- Improve east-west pedestrian and cycling connectivity with places such as the Northumberland Park Estate and Lee Valley Regional Park.
- The site lies within the North Tottenham Conservation Area and includes listed and locally listed buildings. Development should follow the principles under the 'Management of Heritage Assets' section of the APP.
- Where feasible, viable uses should be sought for existing heritage assets, which may require sensitive adaptations and sympathetic development to facilitate.
- Deliver new high-quality workspace.
- Increase and enhance the quality and quantity of community facilities and social infrastructure, proportionate to the population growth in the area, including:
  - A new Learning Centre including library and community centre;
  - Provision of a range of leisure uses that support 7 day a week activity and visitation; and
  - Provision of a new and enhanced public open space, including a large new community park and high-quality public square along with a defined hierarchy of interconnected pedestrian routes.

#### NT5 Development Guidelines

- Produce a net increase in the amount and the quality of both public open space and private amenity space within the area.
- To deliver transport improvements including a new, safe and attractive entrance to White Hart Lane Station and improved rail connectivity.
- Re-provision of employment floorspace lost as a result of the redevelopment as new leisure, sports and cultural floorspace and as modern, flexible workspaces.
- This could be achieved by workspaces with potential to connect to High Road retail properties, and/or through the creation of workspace behind the High Road and the railway arches.
- This central portion of the site is in an area of flood risk, and a Flood Risk

Assessment should accompany any planning application.

- This site is identified as being in an area with potential for being part of a Decentralised Energy (DE) network. Development proposals should be designed for connection to a DE network and seek to prioritise/secure connection to existing or planned future DE networks, in line with Policy DM22.
- Create a legible network of east-west streets that connect into the surrounding area, existing lanes off the High Road, and open spaces.
- Establish clear building frontages along the High Road and White Hart Lane to complement the existing character of the Local Centre.
- Incorporate a range of residential typologies which could include courtyard blocks of varying heights and terraced housing.
- In the part of the site facing the new stadium, development should respond to both the existing High Road Character and the greater heights and density of the new stadium. This needs to be carefully considered given the height differential between the existing historic High Road uses and future stadium development.
- Larger commercial and leisure buildings should be located within close proximity to the new public square linking the station to the stadium.
- Due to the size of the site and scale of development envisaged, particular consideration of the effect of the works on the nearby communities, including how phasing will be delivered. This is referenced in the High Road West Masterplan Framework (HRWMF).
- Where development is likely to impact heritage assets, a detailed assessment of their significance and their contribution to the wider conservation area should be undertaken and new development should respond to it accordingly.
- The Moselle runs in a culvert underneath the site [*although not this part*] and will require consultation with the Environmental Agency.

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

#### *High Road West Master Plan Framework (HRWMF)*

6.2.18 Policy AAP1 (Regeneration and Master Planning) indicates that the Council expects all development proposals in the AAP area to come forward comprehensively to meet the wider objectives of the AAP. To ensure comprehensive and coordinated development is achieved, masterplans will be

required to accompany development proposals which form part of a Site Allocation included in the AAP.

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

6.2.20 The Council has entered into partnership with Lendlease who has submitted a planning application (HGY/2021/3175) for alternative proposals in the same Site Allocation (including the for part the application site).

6.2.21 Other development plan designations include:

- North Tottenham High Road Conservation Area and an Archaeological Priority Area;
- Locally Listed Buildings (823 - 829 High Road);
- Grade II Listed Building (819-821 High Road);
- Northumberland Park Growth Area;
- Family Housing Protection Zone;
- A defined Tall Buildings Growth Area; and
- Critical Drainage Area.

6.2.22 The site is in an edge-of-centre location, being outside of (but directly opposite) the Tottenham High Road Local Shopping Centre boundary.

### 6.3 Policy Assessment

#### *Principle of Comprehensive Development*

6.3.1 Policy AAP1 (Regeneration and Master Planning) makes clear that the Council expects all development proposals in the AAP area to come forward comprehensively to meet the wider objectives of the AAP. It goes on to state that to ensure comprehensive and coordinated development is achieved, masterplans will be required to accompany development proposals which form part of a Site Allocation included in the AAP and that applicants will be required to demonstrate how any proposal:

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

- 6.3.2 Policy DM55 states: “Where development forms part of an allocated site, the Council will require a masterplan be prepared to accompany the development proposal for the wider site and beyond, if appropriate, that demonstrates to the Council’s satisfaction, that the proposal will not prejudice the future development of other parts of the site, adjoining land, or frustrate the delivery of the site allocation or wider area outcomes sought by the site allocation”.
- 6.3.3 Policy NT5 makes clear that ‘development should accord with the principles set out in the most up-to-date Council approved masterplan’, which as discussed above, is the approved HRWMF prepared by Arup in September 2014. This is therefore an important material consideration when determining planning applications.
- 6.3.4 Paragraph 4.6 of the AAP states that Haringey wants to ensure development proposals do not prejudice each other, or the wider development aspirations for the Tottenham AAP Area whilst enabling the component parts of a site allocation to be developed out separately. The various sites north of White Hart Lane are expressly set out in Table 2 of Policy AAP1 as requiring a comprehensive redevelopment approach.
- 6.3.5 Paragraph 4.9 of the AAP states that a comprehensive approach to development will often be in the public interest within the Tottenham AAP area. It goes on to state that whilst incremental schemes might be more easily delivered, the constraints proposed by site boundaries, neighbouring development or uses and below-ground services all have potentially limiting consequences for scale, layout and viability.
- 6.3.6 Although the HRMF seeks to ensure that the site is brought forward in a comprehensive manner, the phasing provisions of the HRWMF explicitly recognise existing land ownership. Indeed, Phase 1A (Cannon Road area) was delivered independently. This acknowledgement that component parts of site allocations may be progressed separately (subject to them not prejudicing the delivery of the Site Allocation and HRWMF) was confirmed by the Goods Yard Appeal Decision in June 2019 and again by the Council’s decision to grant permission for the extant Depot consent in September 2020.
- 6.3.7 The applicant is proposing to develop four parts of Site Allocation NT5 that it owns (this site, the Goods Yard, the Depot, and No. 807 High Road). This application is supported by a masterplan that demonstrates that the development of the site could be satisfactorily developed without prejudicing the delivery of the wider Site Allocation NT5. The applicant is understood to have had some discussions with adjoining landowners and the Council’s development partner, Lendlease, which is bringing forward planning proposals for the majority of Site Allocation NT5 (including the western part of this site, to the rear of the High Road frontage).



### *Principle of Provision of Housing*

- 6.3.8 London Plan Policy H1 sets a 10-year target (2019/20-2028/29) for the provision of 522,870 new homes across London as a whole and 15,920 for Haringey.
- 6.3.9 Policy SP2 states that the Council will maximise the supply of additional housing to meet and exceed its minimum strategic housing requirement.
- 6.3.10 The Tottenham AAP identifies and allocates development sites with the capacity to accommodate new homes. The wider High Road West area is allocated in the AAP (NT5) as an appropriate place for residential development alongside a mix of other uses and the AAP calls for a minimum of 1,400 homes and a net increase of 1,200 homes. Of the 1,400 dwellings anticipated, 222 homes have already been developed in the form of the Cannon Road housing area (HGY/2012/2128). This leaves 1,178 dwellings still to be provided.
- 6.3.11 Given the above, the principle of the provision of new homes on the site (alongside a mix of other uses) is acceptable. The proposed scheme would deliver 72 new homes and result in the loss of 13 existing homes. The proposals would therefore result in a net gain of 59 homes and make a small but welcome contribution towards delivering the outstanding requirement for Site NT5 and the borough's overall 10-year housing target.

### *Loss of Existing Housing*

- 6.3.12 London Plan Policy H7 makes clear that loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace.
- 6.3.13 The proposed scheme would deliver a net increase of approx. 6,015sqm (GIA) of residential floorspace or 59 homes. As such, the loss of the existing 13 homes would be acceptable in principle.

### *Loss of Banqueting Suite*

- 6.3.14 Local Plan Policy DM49 resists the loss of social and community facilities without replacement, (with the definition including education/training facilities, health facilities, community halls, places of worship and pubs). London Plan Policy S1 resists the loss of social infrastructure, with supporting paragraph 5.1.1 listing "health provision, education, community, play, youth, early years, recreation, sports, faith, criminal justice and emergency facilities".
- 6.3.15 Policy SP10 seeks to protect and enhance Haringey's town centres, according to the borough's town centre hierarchy and Policy DM41 promotes new retail spaces in town centres. Policy DM44 seeks to manage changes of use shops in

non-designated shopping frontages retain active frontages and ensure that there is adequate alternative shopping facilities nearby. AAP Site Allocation NT5 seeks to enlarge the existing North Tottenham Local Centre or create a new local centre and include leisure uses.

- 6.3.16 The existing banqueting suite can accommodate up to approx. 600 people and is a place of celebration, ceremony and mourning that (outside of Covid restrictions) enables large numbers of friends and relatives to mark significant life events. However, whilst it could be considered to provide a 'distinctive use with a public benefit', it comprises a private commercial *Sui Generis* use that is not publicly accessible to the wider community and operates solely as a commercial business which is available for hire for private events. As such, officers do not consider that it comprises a community facility or piece of social infrastructure and that it is not protected by policy. The Cannon Road Residents Group has written to support this view and to point out the disturbance that the existing use causes.

#### *Loss of Retail Uses*

- 6.3.17 The site falls outside of the defined North Tottenham Local Centre and outside of a potential expanded Local Centre around a new Moselle Square (referred to in the HRWMF). Officers are satisfied that there is adequate retail provision in the existing nearby Local Centre and that proposals would retain appropriate active commercial uses on the ground floor of the High Road. As such, the potential loss of retail floorspace is considered acceptable.

#### *Principle of Proposed Cinema Use*

- 6.3.18 AAP NT5 Site Allocation includes the aspiration to create a new leisure destination for London and the Site Requirements for NT5 seek the "provision of a range of leisure uses that support 7 day a week activity and visitation." The Site Guidelines for NT5 includes: "Larger commercial and leisure buildings should be located within close proximity to the new public square linking the station to the stadium."

The HRWMF, which pre-dates the AAP, focuses Local Centre expansion around Moselle Square and explicitly refers to a potential cinema (4,420sqm) as part of the mix. However, this is not a fixed requirement.

- 6.3.19 The site is outside of the Tottenham High Road North Local Shopping Centre, as defined in Policy DM43 and the Policies Map and whilst DM DPD Appendix C Table 5 refers to the extension of the local shopping centre in line with Policy NT5, the Council has not formally reviewed the boundaries of this Local Centre yet. Local centre boundaries are being considered as part of the emerging New Local Plan process. The extent of the existing local centre is shown in Figure 04 below:

Figure 04: Tottenham High Road North Local Shopping Centre (in pale blue)



6.3.20 A cinema is a “main town centre use” (as defined by the NPPF) and policy at all levels promotes a ‘town centre first’ approach for such uses. The site falls outside of the currently defined Local Centre boundary. However, Site Allocation NT5 is supportive of both ‘town centre’ and ‘other’ uses, alongside “requiring” new leisure and cultural and leisure uses to deliver a new leisure destination.

6.3.21 Whilst making clear that it does not consider one is strictly necessary, the applicant’s submitted Planning Statement includes an assessment of the availability of sites for a cinema in sequentially preferable locations – namely within the Local Centre and a Moselle Square public space between White Hart Lane Station and the stadium. In summary, this concludes that:

- a) the current Local Centre does not include vacant sites that are capable of accommodating the proposed cinema, and;
- b) Moselle Square does not yet exist (it currently forms part of the Love Lane Estate and would need to be delivered following the granting of a planning permission) and cannot be considered to be an 'available' site. It goes on to state that the application site is in a highly accessible 'edge of centre' location (the next sequentially preferred location) and that there are no alternative edge-of-centre sites which could be considered to be more assessable.

6.3.22 It should be noted that whilst the current planning application for the wider High Road West site (HGY/2021/3175) seeks permission for a cinema use (up to 3,000sqm (GEA). There is no commitment to include such a use and it is not included as part of the Illustrative Scheme.

6.3.23 The proposed 4 x screen cinema would be an appropriate use of the ground floor of the site, be of an appropriate scale, provide an active frontage to the High Road and help meet the leisure requirement of the Site Allocation. It would also complement the approved 'cultural quarter' on the other side of the High Road (at Northumberland Terrace, Nos. 798 to 808 High Road) in Site Allocation NT4. In the absence of an available sequentially preferable location within Site Allocation NT5, the proposed use is considered acceptable.

#### *Principle of Proposed Flexible Commercial Uses*

6.3.24 Tottenham AAP Policy NT2 states the Council will support development which increases job density and therefore helps to meet the employment needs of the Borough and enables small firms to start up, and grow, in flexible industrial space. Site Allocation NT5 establishes indicative development capacities for commercial (4,350sqm) and town centre uses (11,740sqm) (16,090sqm overall).

6.3.25 The principles of the HRWMF seek to create a net increase in jobs and business opportunities in the area through an increase in commercial space and provision of a range of workspaces. The principles of the plan also seek to provide a range of retail and commercial units to encourage a greater mix and wider retail offer.

6.3.26 The proposed scheme includes 283sqm (GIA) of flexible commercial floorspace use (Class E). This, together with the proposed cinema, is considered to make a proportionate contribution to NT5 allocated requirements for commercial uses and is generally consistent with guidance in the HRWMF.

6.3.27 S106 planning obligations are also recommended to secure the implementation of an approved Employment and Skills Plan to maximise employment and training opportunities for residents from the development (including during the construction phase).

#### *Principle of the Development – Summary*

6.3.28 The provision of a residential-led mixed-use scheme comprising housing, a cinema and other commercial uses is acceptable in principle. The incremental development of Site Allocation NT5 is acceptable in principle, providing that the proposed development does not prejudice the future development of other parts of the Site, Allocation, or frustrate the delivery of Site Allocation NT5 or wider area outcomes sought by the site allocation.

6.3.29 It is considered reasonable to give a 5-year planning permission, rather than the standard 3-years. The Goods Yard and Depot extant consents allow for an implementation period of between 4 and 5-years and a 5-year life for any new permission would give more time for the applicant to work constructively with the Council's development partner Lendlease over development of land to the north of White Hart Lane.

#### *Dwelling Unit Mix*

6.3.30 London Plan Policy H10 requires new residential developments to offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of evidence of housing need, the requirement to deliver mixed and inclusive neighbourhoods, the need to deliver a range of unit types at different price points and the mix of uses and range of tenures in the scheme. Strategic Policy SP2 and Policy DM11 of the Council's Development Management DPD adopt a similar approach.

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

6.3.32 The overall proposed dwelling mix is set out in Table 03 below:

Table 03: Proposed dwelling mix

Bedroom Size	No. of Units		% by unit
1 bed 2 person	23		31.9%
2 bed 3 person	26	35	48.6%
2 bed 4 person	9		
3 bed 4 person	1	13	18.1%
3 bed 5 person	11		
3 bed 6 person	1		
4 bed 6 person	1		1.4%
<b>Total</b>	<b>72</b>		<b>100%</b>

6.3.33 The proposed dwelling mix has a relatively high proportion (19.5%) of family sized housing and is not considered to represent an unacceptable over-concentration of 1- and 2-bedroom units given the site location and is generally consistent with the AAP approach to deliver smaller units in close proximity to public transportation and HRWMF principles. An assessment of the suitability of the dwelling mix as it relates to affordable housing is contained in the section below.

6.3.34 The proposed scheme would deliver 19.5% family homes, which is considered acceptable given the characteristics of the site and the proposed scheme. Dwelling mix for the proposed affordable housing is discussed below.

## 6.4 Affordable Housing

### *Policy Background*

6.4.1 London Plan Policy H5 and the Mayor's Affordable Housing and Viability SPG set a strategic target of 50% affordable housing. Policy H5 identifies a minimum threshold of 35% (by habitable room) affordable housing, whereby applications providing that level of affordable housing, with an appropriate tenure split, without public subsidy, and meeting other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor, can follow the 'fast track route' set out in the SPG; this means that they are not required to submit a viability assessment or be subject to a late stage viability review. The minimum required of affordable housing in order to take advantage of the threshold approach increases to 50% for 'industrial land'.

6.4.2 London Plan Policy H7 and the Mayor's Affordable Housing and Viability SPG sets out a preferred tenure split of at least 30% low cost rent, with London Affordable Rent as the default level of rent, at least 30% intermediate (with London Living Rent and share ownership being the default tenures), and the remaining 40% to be determined in partnership with the Local Planning Authority and the GLA.

- 6.4.3 Policy SP2 of the Local Plan requires developments of more than 10 units to provide a proportion of affordable housing subject to viability to meet an overall borough target of 40%.
- 6.4.4 Policy AAP3 sets out the affordable tenure split (DM13 A[b]) in the Tottenham AAP area should be provided at 60% intermediate accommodation and 40% affordable rented accommodation.
- 6.4.5 Site Allocation NT5 includes the requirement to create a new residential neighbourhood through increased housing choice and supply, with a minimum 1,400 new homes (1,178 net given the built Cannon Road scheme) of a mix of tenure, type, and unit size (including the re-provision of existing social rented council homes, the offer of alternative accommodation for secure tenants, and assistance in remaining within the area for resident leaseholders from the Love Lane Estate).
- 6.4.6 Haringey's Housing Strategy 2017-22 (and Haringey's Intermediate Housing Policy statement 2018) provide guidance on the preferred tenure mix for affordable housing across the borough in order to deliver the overall aims of the Local Plan and meet housing need.
- 6.4.7 Revisions to the Housing Strategy agreed by Cabinet in February 2019 set out that the Council's preference for General Needs affordable housing is Social Rent or London Affordable Rent and the preference for intermediate rented housing is London Living Rent or Discount Market Rent, at rent levels equivalent to London Living Rent.

*Amount, type, location, and phasing of Affordable Housing*

- 6.4.8 The relevant requirements of London Plan Policy H5 (C) are met as follows:
- The proposed tenure split meets the required relevant tenure split (see below);
  - The proposed scheme would meet other relevant policy requirements and obligations – including financial contributions towards community facilities and social infrastructure (Community Space, Library and Public Realm) as called for in the Site Requirements of Site Allocation NT5.
  - The applicant has committed to increase the amount of affordable housing to 40% (by habitable room) if grant is made available - taking account of the Mayor's strategic target.
- 6.4.9 Overall residential component. The overall residential accommodation is set out in Table 04 below:

Table 04: Proposed residential accommodation

Tenure	Units	Hab Rooms	% Hab Rooms
Private	49	137	64.6%
Affordable	23	75	35.4%
Total	72	212	100%

6.4.10 Tenure Split: The scheme proposes 40% Low-Cost Rent and 60% Intermediate by habitable room as set out in Table 05 below.

Table 05: Proposed Affordable Housing Tenure Split

Tenure	Units	Hab Rooms	% Hab Rooms
Low-Cost Rent	7	30	40%
Intermediate	16	45	60%
Total	23	75	100%

6.4.11 Unit Size Mix: The scheme proposes a mix of affordable housing unit sizes including 58.2% family sized (3 bed+) Low-Cost Rent homes.

6.4.12 Wheelchair accessible homes: The proposals include 11% of homes designed to meet Building Regulation M4 (3) ('Wheelchair User Dwellings'). These proposed homes are distributed across tenures as set out in Table 06 below. The proposed Wheelchair User Dwellings would be accessed via cores 3 and 5, which both have entrances from Brunswick Square

Table 06: Proposed Wheelchair User Dwellings by tenure

	Total
Market	5 (10.2%)
Low-Cost Rent	1 (14.3%)
Intermediate	2 (12.5%)
	8 (11.1%)

6.4.13 Distribution: The affordable housing would be located off the High Road in the proposed Printworks Building. The applicant's Affordable Housing Statement does not break down the indicative distribution by affordable tenures (Low Cost Rent and Intermediate).



Table 07: Proposed Tenure Distribution:

<b>Building*</b>	<b>Market</b>	<b>Affordable</b>	<b>Total</b>
Printworks Building	42	20	62
High Road Building	6	0	6
Independent Access	1	3	4
	49	23	72

6.4.14 Design & Management: All proposed homes have been designed so they are 'tenure blind' and there would be no discernible difference in external appearance of homes in different tenures. The proposed affordable homes would be managed by a Registered Provider of Affordable Housing and be able to access the same amenities and open space and the scheme has been designed to ensure estate service charges are as affordable as possible, whilst allowing all residents the right to access on-site amenities.

6.4.15 Phasing & Delivery: The scheme would be phased to ensure that all of the proposed affordable housing is delivered before all of the market housing is occupied.

6.4.16 Grant Funding: If grant becomes available, the provision of affordable housing on-site would be increased to up to 40% Affordable Housing. The exact amount, location, tenure, and unit mix of any additional affordable housing to be provided on-site would need to be agreed with the LPA.

#### *Affordability*

6.4.17 The proposed Low Cost Rent homes would be London Affordable Rent, apart from where the Council took up the option to purchase. The Council purchased homes would be at Social Rent, if required by the Council to support its estate renewal objectives.

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

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

6.4.20 The proposed Intermediate homes would be Shared Ownership. The units would be sold at the minimum 25% share of equity and rental on the unsold equity up to 2.75%. In line with the current London AMR the income threshold would not exceed £90,000. It is proposed that units would target a range of incomes dependent on the unit size and will prioritise those who live and/or work in the borough. It is recommended that s106 planning obligations ensure that marketing of the proposed Shared Ownership homes prioritises households living or working in Haringey with maximum annual incomes lower than the maximum £90,000.

#### *Viability Review*

6.4.21 In accordance with London Plan Policy H5, it is recommended that s106 planning obligations secure an Early-Stage Viability Review. It is also recommended that these secure a Development Break Review – requiring a review if an approved scheme were implemented, but then stalled for 30 months or more. These reviews would enable the provision of affordable housing to increase up to 40% (by habitable room) subject to future market conditions and delivery timescales.

#### *Contribution towards regeneration*

6.4.22 A key NT5 site requirement is the re-provision of existing Social Rented Council homes arising from the potential demolition of the Love Lane Estate. The requirements of NT5 in respect of the form of affordable housing are therefore different from those in other parts of the Borough. In order to facilitate the comprehensive redevelopment of the NT5 site and facilitate estate renewal, the application site will need to provide a proportionate quantum of Social Rented housing to address any loss on the Love Lane Estate as required by London Plan Policy H8.

6.4.23 As agreed as part of the s106 discussions in the recent Goods Yard/Depot application (HGY/2021/1771), the applicant would offer Haringey first refusal of the Low Cost Rented homes but at the equivalent value of London Affordable Rent. The applicant has offered 100% of all Low Cost Rented homes (7 total) on this basis.

#### *Affordable Housing - Summary*

6.4.24 Officers consider that both the amount and type of proposed affordable accommodation are acceptable, subject to approval of details and Early and Development Break viability Reviews.

## **6.5 Development Design**

### *Policy Background*

- 6.5.1 The recently published NPPF (July 2021) makes beauty and placemaking a strategic national policy, includes an expectation that new streets are tree-lined and places an emphasis on granting permission for well-designed development and for refusing it for poor quality schemes, especially where it fails to reflect local design policies and government guidance contained in the National Design Guide (January 2021) and, where relevant, National Model Design Code (July 2021).
- 6.5.2 Local Plan Policy SP11 and Policy DM1 are relevant to the design of developments. Policy DM1 states that all development must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. Further, developments should respect their surroundings by being sympathetic to the prevailing form, scale, materials, and architectural detailing. Local Plan Policy SP11 states that all new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe, and easy to use.
- 6.5.3 London Plan Policy D9 requires that tall buildings are only developed in locations that are identified as suitable in Development Plans. It goes on to set out a number of visual, functional, and environmental impacts of tall buildings that should be considered in planning decisions.
- 6.5.4 The Local Plan (Strategic Policies 2013-2026) included a borough-wide definition of 'tall building' as being those which are substantially taller than their neighbours, have a significant impact on the skyline, or are of 10-storeys and over (or otherwise larger than the threshold sizes set for referral to the Mayor of London).
- 6.5.5 The Upper Lee Valley Opportunity Area Framework proposes that future tall buildings will generally be in well-defined clusters in identified urban growth centres. Strategic Policy SP11 requires all new development to 'enhance and enrich Haringey's built environment and create places and buildings of high quality'. Policy AAP6 states that, in line with DM6, Tottenham Hale and North Tottenham as growth areas have been identified as being potentially suitable for the delivery of tall buildings.
- 6.5.6 The HRWMF sets out the principle that tall buildings will only be considered in parts of the masterplan area where existing character would not be affected adversely by the scale, mass, or bulk of a tall building. The HRWMF envisages a "legible tall building spine" that descends from Brook House to create an appropriate heritage setting for statutorily listed and locally listed assets.
- 6.5.7 The HRWMF also sets the principles that tall buildings should be located to minimise overshadowing of adjacent development and used as part of a way-finding and movement strategy (for example located towards the end of east-

west routes). Key views of the stadium should be considered and maintained in the profile of buildings.

*Quality Review Panel Comments*

6.5.8 Haringey’s Quality Review Panel (QRP) has assessed the scheme in full at pre-application stage twice (on 15 December 2020 and 18 May 2021). A summary of QRP comments from these reviews and an officer response to this is set out in Table 08 below.

Table 08: Summary of QRP comments & officer response:

<b>QRP Comment</b>	<b>Officer Response</b>
<i>The 8-storey building at the back of the site at 819-829 High Road appears detrimental to the historic character of the area and should be rethought to address the more human scale of its context.</i>	The scale of the building has been reduced
<i>The panel welcomes the re-use and repair of the heritage buildings, particularly those along the High Road, and the commitment to understand their history. These heritage assets should underpin the character of the scheme, especially for the 819-829 High Road site, and should inform the buildings’ massing.</i>	Noted. The proposals would deliver public benefits through re-use and repair and the scheme staggers in height away from these buildings to minimise harm.
<i>Further consideration should be given to the demolition of part of the locally listed building at 823-829 High Road. This extension contributes to the character of the Conservation Area and its removal will impact on the street frontage.</i>	Whilst this is acknowledged, this demolition is required to enable fire fighting access. This building is also of a lower quality to the rest of the terrace and efforts would be made to reintroduce a sense of its presence through the gateway installation.
<i>The scheme should explore ways of enhancing the existing historic alley leading to Brunswick Square, without demolition to widen this to become a street.</i>	As above, this was considered but would not be possible due to other important requirements. Efforts have been made in the design to minimise the harm of this loss.
<i>The proposed roof extensions and Herald Yard development on the 819-829 High Road site should be sympathetic to the adjacent heritage buildings. There is not yet enough information to judge how</i>	The proposal has finessed the designs and reached a sympathetic conclusion that maximises the opportunities from the development whilst also

<p><i>successful this element of the scheme will be.</i></p>	<p>delivering on other aims and objectives of the plan such as the preservation of heritage assets and their setting.</p>
<p>In the Masterplan, public realm, and landscape design section of the 2<sup>nd</sup> review: <i>This will be particularly relevant to the design of Brunswick Square. If the width of the space is increased by removing part of the building adjacent and setting back the building line, then this provides opportunities for a special landscape design approach in this important space that provides a key link between the High Road and the site. Consideration of the potential uses of this space would be welcomed, as this would help to define and enliven this important piece of public realm.</i></p>	<p>The applicant has committed to funding the resurfacing of the square and indicated their proposed landscaping strategy. Furthermore, efforts have been made to activate the elevations onto Brunswick Square and design layouts, so they protect internal privacy.</p>

*Site Layout & guidance in the HRWMF*

6.5.9 The HRWMF sets out the following relevant layout principles:

- Create a legible network of east-west streets that connect into the surrounding area, existing lanes off the High Road, pocket parks and other open spaces;
- Create attractive north-south links behind the High Road which connect public parks and squares, key public buildings, and the station;
- Complement the scale of the proposed street layout with appropriate building heights;
- Incorporate a range of residential typologies including courtyard blocks of varying heights and terraced housing;
- Demonstrate clear definition of fronts and back of buildings, public and private open spaces, and active street frontages; and
- Enhance the heritage value contribution of the High Road, reinforcing its fine grain and diversity of retail offer alongside improvements High Road frontages.

6.5.10 Officers consider that the Printworks application is generally based on the above layout principles as follows:

- It provides active frontages to Brunswick Square (to the north) and Percival Court (to the south);
- It allows for a future north-south route along its western boundary;
- It includes appropriate building heights (discussed further below);

- It includes courtyard blocks, albeit that the proposed fully enclosed courtyard is different from the open-sided courtyard envisaged);
- Buildings would have clear backs and fronts; and
- It would retain and refurbish the two Listed Buildings and most of the locally listed buildings on the High Road – although it would involve the demolition of the locally listed building at No.829 and the widening of Brunswick Square (discussed in detail under Heritage Conservation).

6.5.11 Figure 38 in the HRWMF sets out an overall indicative masterplan. The Goods Yard and Depot extant schemes have interpreted this and THFC’s latest indicative masterplan revises this further as proposed in the Goods Yard-Depot application (HGY/2021/1771), which the Committee has resolved to refuse. Figure 05 below sets out an extract from the HRWMF and the THFC’s indicative masterplan. This shows that the layout of Printworks application scheme is broadly in accordance with the HRWMF masterplan in terms of how it would address Brunswick Square, Percival Court and the western boundary of the site.

Figure 05: HRWMF Figure 38 & THFC indicative masterplan:



*Site Layout & the Interim Condition (with Peacock Industrial Estate)  
Relationship with existing and future development*

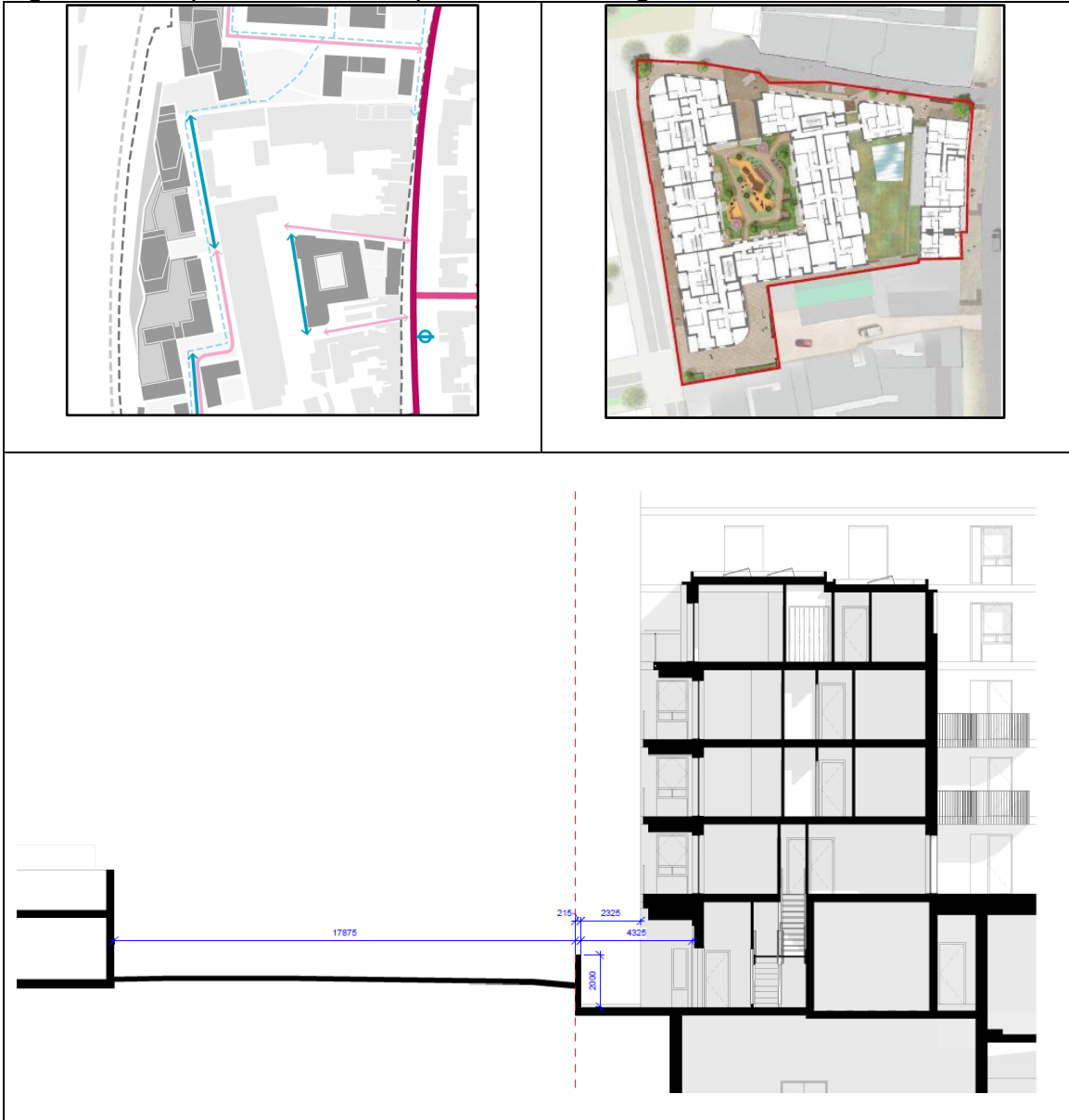
6.5.12 The Agent of Change principle set out in London Plan Policy D13 places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. In other words, the onus is on the applicant to demonstrate that its proposed development would not prejudice the continued operation of the existing nearby industrial and warehousing uses on the Peacock Industrial Estate. This principle can be extended to other matters – such as outlook, privacy and daylight and sunlight.

6.5.13 Figure 06 below sets out an extract from THFC’s indicative masterplan in the Interim Condition (with Peacock Industrial Estate in place), the proposed Printworks layout and a cross section showing the relationship between the

existing Peacock Industrial Estate and the western edge of the site. This shows that proposed homes in the western part of the Printworks building would be:

- Set back between 2.8 and 3.1m from the site boundary (Peacock Mews);
- Set down 0.8m below the level of the Peacock Industrial Estate car parking area (with a 2m high boundary wall); and
- Set back approx. 18-21m from the industrial/warehousing units.

Figure 06: Proposed relationship with the existing Peacock Industrial Estate:



6.5.14 There would be ground floor commercial units at the northern and southern ends of the western arm of the proposed Printworks building, with 4 x duplexes at ground and first floor in the middle (meaning that there would be no ground floor

bedrooms) with flats on Levels 02 to 06. All but one proposed home along this boundary would be dual aspect and officers consider that all of these proposed homes would have an acceptable outlook, daylight, and internal noise environment in the Interim Condition (as discussed further under Residential Quality below).

6.5.15 Officers are satisfied that the location, use and layout of the proposed buildings (together with the proposed boundary wall) would result in an acceptable relationship between proposed new homes and existing industrial estate and ensure an acceptable level of residential amenity for new residents which should not prejudice the continued operation of the existing uses.

#### *Development Density*

6.5.16 London Plan Policies H1 and D3 make clear that development must make the best use of land by following a design-led approach that optimises the capacity of sites (and no longer refers to a density matrix as a guide). The policy states that a design-led approach requires consideration of design options to determine the most appropriate form of development that responds at a site's context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in Policy D2). In doing so it identifies a number of requirements in relation to form and layout, experience and quality and character.

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

6.5.18 The proposed scheme would have a density of 734hr/ha (248 units/ha) based on a site area for density purposes of 0.29ha. For comparison, the density of the refused Goods Yard & Depot scheme (HGY/2021/1771) was 1,116 habitable rooms/ha (353 units/ha). The following issues are assessed in different sections of this report:

- Form and Layout – Development Design;
- Experience – (safety, security, inclusive design, housing quality and residential amenity) – Development Design, Residential Quality, Impact on Amenity of Adjoining Occupiers and Fire Safety & Security;
- Quality and character – Development Design;
- Neighbour amenity – Impact on Amenity of Adjoining Occupiers;
- Transport infrastructure – Transportation & Parking;
- Green infrastructure– Trees and Urban Greening & Ecology; and
- Social infrastructure – Social & Community Infrastructure.

6.5.19 In summary, the assessment in the above sections finds the proposed scheme to be acceptable, subject to securing necessary mitigation and officers are satisfied



that the proposed amount of development does optimise the site's potential to deliver new homes and jobs as part of a new higher density neighbourhood.

*Amount, location, and type of Open Space*

6.5.20 London Plan Policies D1-D3 and D8 calls for high-quality public realm that takes account of environmental issues, including climate change, and provides convenient, welcoming, and legible movement routes and stresses the importance of designing out crime by optimising the permeability of sites, maximising the provision of active frontages, and minimising inactive frontages. Policies DM2 and DM3 reflect this approach at the local level.

6.5.21 Local Plan Policy DM12 calls for proposed housing in areas of especially poor residential environmental quality to provide landscaping, trees and, where possible, additional open space. However, whilst the site is almost entirely within the White Hart Lane Area of Open Space Deficiency (as identified in Figure 4.1 of the Development Management DPD), it is less than 1 hectare in size and so Policy DM20 does not require the creation of additional publicly accessible open space.

6.5.22 A development guideline in Site Allocation Policy NT5 and a key principle of the HRWMF is the production of a net increase in the amount and the quality of public open space. The HRWMF identifies broad building typologies to frame open space, and the Site Allocation calls for the creation of open space in addition to the creation of a legible network of east-west streets that connect into the surrounding area and the existing lanes off the High Road. The HRWMF proposes 39,400sqm of open space in total (including publicly accessible open space, children's play space, five-a-side playing pitch and allotments), compared to 21,000 sqm of open space in the NT5 site area currently (an increase of 80%).

6.5.23 The proposed scheme includes provision for 1,164sqm of open space in total (excluding private balconies and terraces), as follows:

- Brunswick Square - public highway/public realm (additional approx. 245sqm);
- Percival Court - private street (approx. 322sqm) (this would become public realm in the masterplan scenario);
- Peacock Mews – private communal space (approx. 130sqm);
- Podium Communal Amenity Space (Level 01) (approx. 370sqm) (including 200sqm of play space); and
- Communal Amenity spaces (Levels 04 & 06) (approx. 97sqm).

6.5.24 The site measures 0.36ha, or 3.33% of the Site Allocation NT5 area (11.69ha). The proposed provision of 1,164sqm of open space amounts to 2.95% of the overall area called for in the HRWMF but as discussed in more detail under the Social and Community Infrastructure heading below, s106 planning obligations

would also secure a financial contributions towards the delivery of additional (publicly accessible) open space in Peacock Park

*Building Scale, Form and Massing*

- 6.5.25 London Plan Policy D9 (A) calls on development plans to define what is considered a tall building for specific localities, based on local context (although this should not be less than 6-storeys or 18 metres above ground to the floor level of the uppermost storey).
- 6.5.26 D9 acknowledges that Development Plans should define what is considered a tall building for specific localities. The Local Plan (Strategic Policies 2013-2026) included a borough-wide definition of 'tall building' as being those which are substantially taller than their neighbours, have a significant impact on the skyline, or are of 10-storeys and over (or otherwise larger than the threshold sizes set for referral to the Mayor of London).
- 6.5.27 The London Plan sets a minimum height for tall buildings of more than 6-storeys or 18 metres above ground to the floor level of the uppermost storey. Only the northwest corner of the building would exceed this height – in the form of a setback seventh storey. The majority of its form falls below the minimum height set in the London Plan. Haringey's local policies identify the site as a growth area potentially suitable for tall buildings and indicates that a tall building would be a building of 10-storeys or more. The proposed building would not have significant impact on the skyline, nor would it be substantially taller than its neighbours given existing, and potential for, tall buildings in the area.
- 6.5.28 Whilst the building would be taller than its immediate neighbours, there are several tall buildings in the area, such as River Apartments to the north, the towers of the Love Lane Estate to the south, and the Tottenham Hotspur stadium development to the east. In this context the proposed building would not be substantially taller than its neighbours, particularly given its form which steps up away from the High Street frontage – whereby elements are 2-3 storeys. The proposed height is largely in line with the HRW Masterplan Framework.
- 6.5.29 The stepped form of the proposed building would also have a modest impact on the skyline, it would have a negligible impact in views looking west from the High Street, and in views from the east it would be visible but commensurate with its location in an allocated site. The taller parts of the development also serve to mark the laneways of Brunswick Square and Percival Court for wayfinding purposes. As set out below the design is considered to be high quality. The proposal would not have a significant environmental impact on the surrounding area.
- 6.5.30 Strategic Policy SP11 requires all new development to enhance and enrich Haringey's built environment and create places and buildings of high quality.

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

Table 09: Proposed building heights

Proposed	HRWMF Indicative heights
<ul style="list-style-type: none"> <li>• 3-7-storeys on to Brunswick Square</li> <li>• 4-6-storeys on to Percival Court</li> <li>• Central 5-storey section facing Peacock Industrial Estate.</li> </ul>	<ul style="list-style-type: none"> <li>• 3-5-storeys</li> </ul>

6.5.32 The proposed building heights would generally accord with guidance in the HRWMF, although the northern and southern arms of the proposed Printworks building would have elements that exceed 5-storeys.

6.5.33 The proposed height of the proposal conforms to what is envisaged in the masterplans with lower rise to match the retained existing High Road fronting buildings closest to them, then rising gradually to four, five and six storeys around the podium courtyard and seven at the north-western corner, an acceptable height within the meaning of the “mansion block” typology. These heights are likely to fit in well with the rest of the masterplan, in whichever detailed form.

6.5.34 Officers do not consider that the proposed scheme, which is a maximum of 7-storeys, constitutes a ‘tall building’ for the purposes of the HRWMF assessment and Haringey Local Plan Policy. As such, it does not require assessment under London Plan policy D9 as its form in this location and context would not constitute a tall building.

6.5.35 In terms of bulk and massing, the proposals step in on all sides from the red-line boundary, although this is driven as much by necessity - to provide access, servicing, and fire compliance, it avoids overcrowding the surroundings. The scale and bulk proposed is appropriate to the intended street frontages, with the intended street to the west, where the proposed bulk and height of development is greatest, being the wider and more important, conventional street; and the scale and bulk of the Brunswick Square frontage noticeably reducing in both height and plan depth, commensurate with it being a narrow, tighter alleyway - even in its proposed, wider state.

6.5.36 To the south, the boundary steps away from Percival Court. The proposal creates a narrow servicing and fire escape passageway along the southern boundary. The eastern podium is open to the south, maintaining a separation to 813-7 except where 819 is joined on as existing. The northern side of the eastern podium is only enclosed by a two storey maisonette with a gap to the rear of the existing 827 and a glazed link to the rest of the new development, giving the separation between the existing High Road frontages of heritage significance and the main new build a spacious quality.

6.5.37 At both western corners, the proposals rise up and mark the corners with an extra storey (six at the southern end, seven at the northern), marking what will become, in the masterplan, significant crossroad street corners and in the northern case also the southern end of the proposed new public park. In urban design terms this is an appropriate response to their intended location. They also mark the culmination of the very gradual stepping up and significant separation of new built form from the historic existing High Road frontage.

#### *Townscape and Visual Effects*

6.5.38 London Plan Policies D9 and HC4 make clear that development should not harm Strategic Views, with further detail provided in the Mayor's London View Management Framework (LVMF) SPG. At the local level, Policy DM5 designates local views and the criteria for development impacting local view corridors.

6.5.39 As mentioned above, the proposed height of the proposal conforms to what is envisaged in the masterplans with lower rise to match the retained existing High Road fronting buildings closest to them, then rising gradually to four, five and six storeys around the podium courtyard and seven at the north-western corner. These heights would not harm strategic views and would preserve local views.

#### *Inclusive Design*

6.5.40 London Plan Policies GG1, D5 and D8 call for the highest standards of accessible and inclusive design, people focused spaces, barrier-free environment without undue effort, separation, or special treatment.

6.5.41 The applicant's DAS explains how the proposed scheme has been designed to meet inclusive design principles and good practice. All external routes, footway widths, gradients and surfacing would respect the access needs of different people. The proposed landscaping and play spaces are designed to be safe (as discussed above), child-friendly and provide sensory interest (changing colours and scent) at different times of the year – with no separation based on housing tenure. Building access, internal corridors and vertical access would meet Building Regulations.

6.5.42 As discussed under Transportation and Parking below, car parking provision would be focused on the needs of wheelchair users and others that may have a particular need to access a car. The proposed cycle parking also includes spaces for 'adaptive' and large bikes. The proposed surfacing improvements to Brunswick Square and Percival Court are welcomed (which are recommended to be secured by s106 planning obligation/s278 Agreement). Overall, officers are satisfied that the proposed scheme would be accessible and inclusive. The particular requirements in relation to wheelchair accessible housing are discussed under Residential Quality below.

#### *Secured by Design*

6.5.43 London Plan Policies D1-D3 and D8 stress the importance of designing out crime by optimising the permeability of sites, maximising the provision of active frontages, and minimising inactive frontages.

6.5.44 As discussed above, the proposed layout incorporates a good front to back relationship and includes active ground floor frontages in the form of flexible commercial units, duplex/ maisonettes with front doors on the streets and communal residential entrances. This should all help ensure a safe and secure development and an active public realm – particularly along Brunswick Square. The detailed design of the public realm, including proposed landscaping and lighting, are also considered acceptable.

6.5.45 The applicant's DAS sets out a number of detailed access features and gates that are intended to be incorporated into the scheme. The Designing Out Crime Officer (DOCO) raises no objection in principle, subject to conditions. If planning permission were to be granted, it would be possible to use a planning condition to require Secured by Design accreditation and ensure the DOCO's continued involvement in detailed design issues.

## **6.6 Residential Quality**

6.6.1 London Plan Policy D6 sets out housing quality, space, and amenity standards, with further detail guidance and standards provided in the Mayor's Housing SPG. Strategic Policy SP2 and Policy DM12 reinforce this approach at the local level.

6.6.2 The majority of proposed homes would be single level flats. However, a number of independently accessed duplex/maisonettes would be included on the ground and first floors of blocks fronting the proposed streets and squares to maximise 'doors on the street', introduce variety and increase housing choice.

#### *Accessible Housing*

6.6.3 London Plan Policy D7 and Local Plan Policy SP2 require that all housing units are built with a minimum of 10% wheelchair accessible housing or be easily

adaptable to be wheelchair accessible housing. London Plan Policy D5 requires safe and dignified emergency evacuation facilities, including suitably sized fire evacuation lifts.

- 6.6.4 The proposed scheme includes 11% of homes designed to meet Building Regulation M4 (3) ('Wheelchair User Dwellings'). These proposed homes are distributed across tenures and dwelling sizes. The proposed wheelchair homes would be of various sizes and tenures and provide a good level of choice for wheelchair users.
- 6.6.5 Five of the proposed wheelchair accessible dwellings would be within Core A (the western most wing of the proposed building) and three would be in Core B (the wing closest to the High Road frontage buildings). They would all be accessed via a lobby from a reconfigured Brunswick Square, with a separate pedestrian footway. Core A would be served by 2 x lifts and (the smaller) Core B would be served by 1 x lift. All lifts would provide direct access to the proposed basement car park. Proposed emergency evacuation provision is addressed under Fire, Safety and Security below (and is considered acceptable).
- 6.6.6 The proposed basement car park would provide 8 x accessible car parking spaces, in line with London Plan Policy T6.1. It is recommended that s106 planning obligations secure a Car Parking Management Plan which prioritises and manages access to these proposed spaces.

#### *Indoor and Outdoor Space Standards*

- 6.6.7 All of the proposed homes would meet the minimum internal space and floor to ceiling heights (2.5m) standards called for in London Plan Policy D6. Proposed layouts are generally good and the number of homes per core would be no more than 6, better than the maximum of 8 allowed for in the adopted and emerging Mayoral guidance.
- 6.6.8 All flats except for four apartments in the refurbished Nos. 819-821 High Road (Listed Buildings) would have private amenity space in the form of private balconies/ terraces and/or patio spaces. In addition, all homes (other than those in the High Road block) would also have access to a proposed communal podium garden space.

#### *Unit Aspect, outlook, and privacy*

- 6.6.9 A good proportion of the proposed homes (74%) would be at least dual aspect. There would be five east/west facing single-aspect homes, as well as one south facing single aspect home. There would be no north-facing single aspect homes.
- 6.6.10 The proposed disposition of blocks and layout and design of the proposed homes and outdoor spaces means that all proposed homes would have an acceptable

outlook and there should be no unacceptable overlooking (distances across the proposed communal podium garden (on Level 01) are approx. 19-20m and distances between homes in the eastern wing of the proposed new building and the High Road block would be between approx. 12 and 18m).

- 6.6.11 The 4 x proposed duplex homes facing the western boundary (Peacock Industrial Estate) would have a small patio space and be accessed from the proposed private Peacock Mews. Proposed homes at podium garden level would have a 1-2m threshold space between residential windows and the communal open space.
- 6.6.12 The proposed homes that would face the Peacock Industrial Estate until such times as this site is redeveloped warrant particular attention. Homes here would be offset between 2.8 and 3.1m from the boundary car parking area, with the ground floor approx. 0.8m below the adjoining Peacock Industrial Estate. The industrial/warehousing units themselves would be approx. 18-21m away from the proposed homes.
- 6.6.13 A private 'Peacock Mews' amenity space (approx. 130sqm) would run along the majority of this boundary. This would be gated and accessible for residents and maintenance vehicles only. A proposed brick and green screened wall, 2.0m high when measured from the Site, would act as an acoustic and visual screen.
- 6.6.14 There would be ground floor commercial units at the northern and southern ends of the proposed building, with 4 x duplexes at ground and first floor in the middle (meaning that there would be no ground floor bedrooms) with flats on Levels 02 to 06. All but one proposed homes along this boundary would be dual aspect and officers consider that all of these proposed homes would have an acceptable outlook, daylight, and internal noise environment in the Interim Condition, with the industrial estate in place (as discussed below).
- 6.6.15 It is recommended that the details of the proposed boundary wall are reserved by planning condition, so that officers can be assured that the wall would be of sufficient mass and design to safeguard residential amenity. Recommended Condition 21 (Ground Floor Western Boundary Details) requires this.

*Daylight/Sunlight/overshadowing – Future Occupiers*

- 6.6.16 The applicant's Daylight and Sunlight Report (July 2021) reports on an assessment of all 72 proposed homes (212 proposed habitable rooms).
- 6.6.17 The full nature of the application, with detailed proposed floor plans, allows Average Daylight Factor (ADF) to be used to consider daylight. The assessment found that 163 (77%) of proposed habitable rooms tested would satisfy the relevant ADF figures for different room types (with this increasing to 83% if the less stringent living room target of 1.5% is applied to Living/Kitchen/Dining and Living/Dining Rooms).

6.6.18 The assessment of sunlight used Average Potential Sunlight Hours (APSH). This found that 37 (48%) of the main living rooms with a southerly aspect would satisfy the BRE guidelines. This is considered reasonable for a proposed high-density flatted scheme and the overall level of residential amenity homes is considered good.

6.6.19 The applicant's assessment also tested likely Sun on Ground for the proposed podium level communal garden against the BRE guidelines that spaces should receive 2 hours sun over at least 50% of the area on March 21. This found that the proposed space would meet this standard, with 51% of the space receiving two hours sun on that day.

#### *Noise and vibration – Future Occupiers*

6.6.20 London Plan Policy D13 introduces the concept of 'Agent of Change', which places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on proposed new noise-sensitive development. Policy D14 sets out requirements to reduce, manage and mitigate noise. London Plan Policy D14 also seeks to separate noise generating uses from housing or ensure that there is appropriate mitigation where this is not possible and minimise noise from development and to improve health and quality of life. Similar objectives are included in Local Plan Policy DM23.

6.6.21 Noise from the Peacock Industrial Estate and crowd/concert noise from the Tottenham Hotspur stadium is not expected to contribute to the overall noise climate of the proposed homes as this would be less than the ambient noise level associated with trains (further to the west) and road traffic on the High Road. The proposed homes on the western edge of the site would be approx. 5m from the boundary and car parking area and be between approx. 18 to 21m from the industrial/warehousing units themselves. A 2m high brick wall would be located along the boundary and the proposed homes would be mainly dual aspect.

6.6.22 As the masterplan is developed, the need for the wall will fall away. The wall is a temporary solution which would enable the proposal to fit in with the existing arrangement and enable the existing uses to coexist with those proposed in a way that safeguards the needs of the Peacock Estate and those of the future residents of the proposal.

6.6.23 The applicant's Noise Impact Assessment sets out sound insulation requirements to ensure that the internal noise environment of homes meets the relevant standards and recommends that mechanical ventilation be installed for these blocks, so that windows can be kept closed. The Assessment also considers overheating and identifies the need for the inclusion of an acoustically attenuated façade louvre that could be opened or closed by occupiers on facades that are considered 'medium' or 'high' risk of overheating, and these have been



incorporated into the proposed detailed design. It is recommended that further details of the proposed glazing, mechanical ventilation and louvres are secured by way of a planning condition.

- 6.6.24 It is recommended that conditions are attached to a planning permission to control mechanical plant noise by way of a standard planning condition (calibrated to reflect the site-specific noise environment). It would also be possible to use planning conditions to secure adequate mitigation to prevent undue noise transmission between the proposed ground floor commercial units and cinema and the proposed homes above and to limit the hours of use of any café/restaurant to 07.00 to 23.00 (Monday to Saturday) and 08.00 to 23.00 (Sundays and Public Holidays).

#### *Residential Quality - Summary*

- 6.6.25 The number of proposed wheelchair accessible homes and quality of these homes would meet requirements. The proposed homes and associated private and communal open space would generally be high quality and officers are satisfied that future residents would enjoy an acceptable residential amenity in terms of outlook and privacy, daylight and sunlight, wind/microclimate, noise and vibration and overheating. The proposed layout and disposition of uses takes account of the existing Peacock Industrial Estate and subject to securing appropriate glazing/ventilation arrangements, officers are satisfied that the proposed scheme would be compatible and comply with the Agent of Change principle.

## **6.7 Social and Community Infrastructure**

### *Policy Background*

- 6.7.1 The NPPF (Para. 57) makes clear that planning obligations must only be sought where they meet the tests of necessity, direct relatability and are fairly and reasonably related in scale and kind to the development. This is reflected in Community Infrastructure Levy (CIL) Regulation 122.
- 6.7.2 London Plan Policy S1 states adequate provision for social infrastructure is important in areas of major new development and regeneration. This policy is supported by a number of London Plan infrastructure related-policies concerning health, education, and open space. London Plan Policy DF1 sets out an overview of delivering the Plan and the use of planning obligations.
- 6.7.3 Strategic Policy SP16 sets out Haringey's approach to ensuring a wide range of services and facilities to meet community needs are provided in the borough. Strategic Policy SP17 is clear that the infrastructure needed to make development work and support local communities is vital, particularly in the parts of the borough that will experience the most growth. This approach is reflected in the Tottenham Area Action Plan in Policies AAP1 and AAP11. DPD Policy DM48

notes that planning obligations are subject to viability and sets a list of areas where the Council may seek contributions. The Planning Obligations SPD provides further detail on the local approach to obligations and their relationship to CIL.

- 6.7.4 The Council expects developers to contribute to the reasonable costs of new infrastructure made necessary by their development proposals through CIL and use of planning obligations addressing relevant adverse impacts. The Council's Annual Infrastructure Funding Statement (December 2021) sets out what Strategic CIL can be used for (infrastructure list) and how it will be allocated (spending criteria).

*Site Allocation NT5 Infrastructure Requirements and the HRWMF*

- 6.7.5 The NT5 Site Allocation envisages large scale redevelopment giving rise to infrastructure obligations above those that may be required on smaller and less complex sites addressed by CIL. The overarching vision for the High Road West area is for a significant increase in the provision of community facilities and envisages that the local community will have the best possible access to services and infrastructure. Key to the AAP site delivery for NT5 is the creation of new leisure, sports and cultural uses that provide 7 day a week activity. The infrastructure requirements for the wider NT5 site are broadly identified in the NT5 Site Allocation, including:

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

- 6.7.6 Haringey's Infrastructure Delivery Plan (IDP) Update (2016) draws on the HRWMF and sets out an indicative list of infrastructure with associated costings to deliver the NT5 Site Allocation (amounting to £57.33m). The IDP Update notes these items and costs may be subject to change as feasibility studies continue to be developed. The North Tottenham Infrastructure list sets out the costed obligations into 7 areas that accord with the vision and principles of the HRWMF. The Council expects the applicant to make a proportionate contribution to these costs.

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

*Proposed site-specific infrastructure provision*

- 6.7.8 Library, community space and publicly accessible open space. The need for and proposed provision of overall open space, public realm and publicly accessible open space is addressed under Development Design above. In summary, this finds that there would be a shortfall of publicly accessible open space provision.
- 6.7.9 An approach to s106 financial contributions to address the AAP site-specific infrastructure requirements was considered as part of the appeal into what is now the extant Goods Yard permission, when the overall High Road West NT5 site was expected to accommodate a total of 1,200 homes (net additional). At this time, an overall package of £1,000,000 contributions was agreed for 316 dwellings (£3,165 per dwelling) (£463,060 towards a new Library, £424,471 towards Community Space and £112,469 towards Highways and Public Realm).
- 6.7.10 The issue was re-visited when determining what is now the extant Depot consent, where, given proposed provision of a significant part of Peacock Park (1,695sqm) and connectivity with streets in the Cannon Road area, it was considered unreasonable to require financial contributions towards Highways and Public Realm. This reduced the total infrastructure financial contributions that were secured to £926,640 for 330 dwellings (£2,808 per home) (£483,450 towards a new Library and £443,190 towards Community Space).
- 6.7.11 The development context has since changed since the Goods Yard and Depot applications were approved. The current Lendlease application is proposing up to 2,929 new homes, a net increase of approx. 2,600 across Site Allocation NT5. The proposed 53 additional homes in this application would represent approx. 2.27% of the likely net additional increase in homes that the Lendlease application would result in.
- 6.7.12 Given the above, the following financial contributions have been agreed:
- Library: £52,004 (2.7% of 2016 IDP index linked cost);
  - Community space: £47,670 (2.7% of 2016 IDP index linked cost);
  - Publicly Accessible Open Space: £92,451 (2.7% of 2016 IDP index linked cost of Peacock Gardens); and
  - + s278 highway works (widening Brunswick Square and tying in with the High Road) and the separate resurfacing works to Percival Court.
- 6.7.13 Officers consider that, given the changed development context, the proposed overall financial contributions of £192,125 (£2,668 per home) plus highway works are fairly and reasonably related in scale and kind to the proposed scheme.
- 6.7.14 School Places. The proposed scheme is estimated to result in approx. 12 x school-aged children (7 x primary and 5 x secondary). The site is within School

Place Planning Area 4 and the Council’s School Place Planning Lead has confirmed that there are sufficient school places in this planning area to cope with the estimated child yield. Separate comments on the Lendlease scheme for up to 2,927 homes (a net increase of approx. 2,600 homes) across a large part of Site Allocation NT5 also confirm that, cumulatively, there should be sufficient school places.

6.7.15 Health. The Clinical Commissioning Group (CCG) notes that this is part of the High Road West NT5 Site Allocation and that it is in discussion with the Council regarding new healthcare provision as part of the wider proposed regeneration. However, any new facility is unlikely to come forward before 2028-29, with timing uncertain. In the meantime, the two closest GP practices (Tottenham Health Centre and Somerset Gardens Family Health Centre) have no surplus capacity and the CCG say that investment in the Somerset Gardens Centre is needed in advance of any new facility.

6.7.16 Using the HUDU Planning Contributions Model, the CCG has calculated the requested contribution of £35,845. However, Haringey’s Planning Obligations SPD and Annual Infrastructure Funding Statement make clear that health contributions should be dealt with through Strategic CIL rather than S106 planning obligations. Therefore the need for additional primary health care provision should be addressed by considering the use of Strategic CIL to support a new facility to cater for the needs arising from the wider High Road West site rather than through S106 planning obligations.

## 6.8 Child Play Space

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

6.8.2 Using the GLA’s Population Yield Calculator (October 2019), the proposed scheme estimates an on-site child population of approx. 22 (rounded) (9 x 0-4-year olds, 7 x 5-11-year-olds and 5 x 12+ year-olds). This generates an overall need for 217sqm of play space. The application proposes the following:

Age Group	Requirement (sqm)	Provision (sqm)
0-4	93	100
5 to11	72	100
12+	52	0
	217	200

- 6.8.3 The proposed play space would be provided within the proposed podium level communal open space, with the amount of space for the 0-4 and 5-11 age groups exceeding policy requirements by 35sqm. Officers accept that it is not possible to provide play space on-site for the 12+ age group due to the highly constrained, urban nature of the site which make it unachievable and impractical.
- 6.8.4 The applicant proposes, therefore, that off-site provision would be made within 800m of the site. The HRMWF proposes a major public park (Peacock Park) to the immediate west of the site as part of the future masterplan phases, with the applicant already proposing to deliver the northern part of this as part of the extant Depot consent. Recommended financial contributions to help deliver open space (as discussed under Social Infrastructure) would mitigate the slight under-provision of 17sqm.

## 6.9 Heritage Conservation

- 6.9.1 Paragraph 196 of the revised NPPF sets out that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 6.9.2 London Plan Policy HC1 is clear that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail and places emphasis on integrating heritage considerations early on in the design process.
- 6.9.3 Policy SP12 of the Local Plan seeks to maintain the status and character of the borough's conservation areas. Policy DM6 continues this approach and requires proposals affecting conservation areas and statutory listed buildings, to preserve or enhance their historic qualities, recognise and respect their character and appearance and protect their special interest.
- 6.9.4 Policy AAP5 speaks to an approach to Heritage Conservation that delivers "well managed change", balancing continuity and the preservation of local distinctiveness and character, with the need for historic environments to be active living spaces, which can respond to the needs of local communities.
- 6.9.5 Policy NT5 requires consistency with the AAP's approach to the management of heritage assets. The High Road West Master Plan Framework's approach to managing change and transition in the historic environment seeks to retain a traditional scale of development as the built form moves from the High Road to the west of the Master Plan area.
- 6.9.6 The HRMWF promotes the adaptable reuse of heritage assets with appropriate future uses identifying how various individual buildings will be used, what works

they will require including restoration and refurbishment works to adapt to the proposed use.

### *Legal Context*

- 6.9.7 The Legal Position on the impact of heritage assets is as follows. Section 72(1) of the Listed Buildings and Conservation Areas Act 1990 provides: “In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.” Among the provisions referred to in subsection (2) are “the planning Acts”.
- 6.9.8 Section 66 of the Act contains a general duty as respects listed buildings in exercise of planning functions. Section 66 (1) provides: “In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”
- 6.9.9 The *Barnwell Manor Wind Farm Energy Limited v East Northamptonshire District Council* case tells us that “Parliament in enacting section 66(1) intended that the desirability of preserving listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given “considerable importance and weight” when the decision-maker carries out the balancing exercise.”
- 6.9.10 The judgment in the case of the Queen (on the application of *The Forge Field Society*) v *Sevenoaks District Council* says that the duties in Sections 66 and 72 of the Listed Buildings Act do not allow a Local Planning Authority to treat the desirability of preserving listed buildings and the character and appearance of conservation areas as mere material considerations to which it can simply attach such weight as it sees fit.
- 6.9.11 If there was any doubt about this before the decision in *Barnwell*, it has now been firmly dispelled. When an authority finds that a proposed development would harm the setting of a listed building or the character or appearance of a conservation area or a Historic Park, it must give that harm considerable importance and weight.
- 6.9.12 The authority’s assessment of likely harm to the setting of a listed building or to a conservation area remains a matter for its own planning judgment but subject to giving such harm the appropriate level of weight and consideration. As the Court of Appeal emphasized in *Barnwell*, a finding of harm to the setting of a listed

building or to a conservation area gives rise to a strong presumption against planning permission being granted.

6.9.13 The presumption is a statutory one, but it is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. An authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the strong statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering.

6.9.14 In short, there is a requirement that the impact of the proposal on the heritage assets be very carefully considered, that is to say that any harm or benefit needs to be assessed individually in order to assess and come to a conclusion on the overall heritage position. If the overall heritage assessment concludes that the proposal is harmful then that should be given "considerable importance and weight" in the final balancing exercise having regard to other material considerations which would need to carry greater weight in order to prevail.

#### *Existing Buildings and Significance*

6.9.15 The two 3-storey Georgian townhouses at Nos. 819-821 High Road (Listed Grade II) date from circa 1725. In the 19<sup>th</sup> century they provided the Head Offices of the Tottenham and Edmonton Weekly Herald newspapers (with a former printworks behind). They now accommodate the Le Royale Banqueting Suite on the ground floor, with homes above, and with large 3-storey extensions and a large industrial-shed like building at the rear. The interior of the buildings have been extensively altered but include some original features.

6.9.16 The 19<sup>th</sup> Century 2-storey buildings at Nos. 823, 825 and 827 are locally listed buildings and are occupied by various shops and commercial uses on the ground floor with homes above. The 2-storey locally listed building at No.829 is a later building dating from circa 1902. Nos. 827 and 829 have been extended at the rear and buildings have been extensively altered inside and out.

6.9.17 The above frontage buildings are within the North Tottenham Conservation Area, which is in a fragile condition, and it is currently designated a "Conservation Area at Risk" by Historic England. The Listed and locally listed buildings on the site and the adjoining narrow Brunswick Square make a positive contribution to the character and appearance of the Area. The unattractive 20<sup>th</sup> century 3-storey buildings immediately to the north of Brunswick Square (Nos. 831-833 High Road) are identified in the Appraisal and Management Plan as being 'Negative Contributors.'

#### *Proposed works and Assessment*

- 6.9.18 Refurbishment and alteration to Nos. 819-821 (Listed Buildings). The proposed comprehensive refurbishment and repair of these buildings includes the removal of the existing 3-storey unsympathetic rear extensions and replacement with a single-storey extension, reinstatement of a former hipped roof and chimneystack, reinstatement of original layout at upper level, removal of satellite dishes and other clutter from the front facade, repair of brickwork and joinery, and the replacement of poor quality modern internal and external doors, windows and shopfront with more sympathetically designed features.
- 6.9.19 The ground floor and proposed ground single-storey extension would form part of the proposed cinema and the extended upper floors would remain as housing. Officers welcome the proposed works and uses. It is recommended that a condition prevents demolition works until a contract for replacement development has been entered into.
- 6.9.20 Demolition of No. 829 (Locally listed building). The existing Brunswick Square is a narrow public highway. Whilst it functions as a 2-way street, it is only 3.4m wide at the High Road frontage and only approx. 3m wide at its narrowest point and there are no passing points, making it unsuitable as a vehicular access for a fire tender and refuse vehicle to serve the site in the interim condition – in advance of development of the wider masterplan, which would provide vehicular access to the site from new streets to the west. The proposal is to demolish this building to enable a wider carriageway of at least 3.7m, a servicing bay, a separate footway and public realm areas.
- 6.9.21 No. 829 High Road, in itself, has little inherent conservation value or significance. Its value derives mainly from its contribution to the group of heritage buildings that it is part of and in defining the narrow Brunswick Square. The loss of the ‘tightness’ of grain at the High Road entrance and the greater exposure of the unattractive building at Nos. 831-833 would be offset by the proposed planting of a specimen tree, an arch over the proposed footway, signpost and high-quality surface treatment.
- 6.9.22 The proposed buildings along Brunswick Square would replace the large hardstanding area continue to reinforce the tight grain townscape – making Brunswick Square more attractive, safer, and more accessible. Overall, officers consider that the loss of this building would be acceptable. It is recommended that a condition prevents its demolition until a contract for the construction of the proposed Printworks building and landscaping works has been entered into. It is also recommended that a photographic survey of the building be submitted before its demolition.
- 6.9.23 Refurbishment and alteration to Nos. 823 to 827 (Locally listed buildings). The proposed comprehensive refurbishment and repair of these buildings includes the removal of the existing 3-storey unsympathetic rear extension to No. 823, removal of clutter from the front facades, repair of brickwork and joinery, and the



replacement of poor-quality shopfronts, modern internal and external doors and windows to a more sympathetic design. The ground floor would form part of the proposed cinema and the upper floors would remain as housing. Officers welcome the proposed works and uses.

6.9.24 North Tottenham Conservation Area. Whilst the proposed removal of No. 829 High Road and widening of Brunswick Square would have a negative effect on the character and appearance of the Conservation Area, this has been mitigated by the proposed landscape features at the junction with the High Road and good-quality frontage buildings and public realm further back from the High Road. The comprehensive refurbishment and alterations to the Listed Buildings and retained locally listed buildings would be beneficial. Overall, officers consider that the proposals would have a positive effect on the appearance and character of the Conservation Area.

#### *The planning balance*

6.9.25 Taking full account of the Council's statutory duty under sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, paras 202 and 203 of the NPPF this harm has been given significant weight and requires a balancing exercise against public benefit.

6.9.26 The proposed development would result in both heritage harm and benefits, which affect the Listed buildings at Nos. 819-821, the North Tottenham Conservation Area, and the locally listed buildings at Nos. 823-829. This results in a complex interaction of harm and benefits.

6.9.27 The applicant's Planning and Regeneration Statements set out what the applicant considers to be the public benefits of the proposed scheme. Taking account of this and their own assessment, officers summarise the public benefits as follows:

- Securing the long-term future of the Grade II listed 819-821 High Road and the locally listed buildings at 823-827 High Road;
- Integrating the statutorily and locally listed buildings at 819-827 High Road within the development, better revealing their significance in the process and enhancing their overall appearance and setting within the Conservation Area;
- Responding to Haringey's acute housing needs including the delivery of family and affordable housing, which is of particular importance given Haringey's low housing delivery in recent years;
- Creating a new, high-quality entranceway to Brunswick Square that opens views into a well-designed and active streetscape. Coupled with the creation of a high-quality, accessible, and secure public realm along Brunswick Square, this represents a significant improvement to the existing alleyway which is unattractive and unsafe;

- Achieving a better townscape legibility and integration of the site within the wider site allocation;
- Making a meaningful contribution to the wider regeneration objectives for North Tottenham and Site Allocation NT5;
- Attracting new investment and visitors to North Tottenham, with the proposed cinema and other commercial uses bringing new attractions and spending to the local area. Together with annual household spending from the new homes each year in the local area;
- The creation of new employment opportunities during the construction and operational phases, with opportunities for local recruitment and skills development;
- Acting as a catalyst for investment and further regeneration of Site Allocation NT5 and the wider area, redressing inequality and halting further decline in Tottenham without prejudicing other development in the vicinity;
- Generation of a total New Homes Bonus of c. £110,000 alongside circa. £100,000 a year in council tax revenue of which 71% would be retained by the LBH; and
- Complementing the ongoing regeneration of Tottenham that has taken place to the east, notably within the NDP and Northumberland Terrace.

6.9.28 Having carefully considered issues, officers consider that the public benefits of the proposals, as summarised above, outweigh the less than substantial harm that would be caused by the loss of the non-designated No. 829 High Road.

#### *Heritage Conclusion*

6.9.29 Historic England makes no comment on the proposals but advises that the LPA should seek the views of its specialist conservation advisers.

6.9.30 Officers are bound to consider the strong presumption against granting permission for development that causes harm to the setting of a listed building or to a conservation area in line with the legal and policy context set out above.

6.9.31 The proposed scheme would retain and enhance the two Listed Buildings and three locally listed buildings within the site and improve their setting and would, overall, have a positive effect on the character and appearance of the Conservation Area. The demolition of the locally listed building at No. 829 would result in the total loss of a non-designated heritage asset of some, though limited, heritage significance. This limited loss of significance has to be weighed proportionally in the planning balance, in accordance with paragraphs 202 and 203 of the NPPF. Officers consider that the resultant harm falls in the less than substantial category.

6.9.32 As such, paragraph 202 of the NPPF is engaged, requiring the public benefits to be weighed against the heritage harm. The resultant harm has been given significant weight, but, in accordance with guidance in the NPPF paras (202 and

203) is considered to be outweighed by substantial public benefits referred to above.

## 6.10 Impact on Amenity of Adjoining Occupiers

6.10.1 London Plan Policy D6 notes that development proposals should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

6.10.2 The Mayor's Housing SPG (2016) reinforces the need for privacy but cautions against adhering rigidly to minimum distance requirements and also calls for the BRE guidance on daylighting and sunlighting to be applied flexibly and sensitively to proposed higher density development, especially in town centres – taking account of local circumstances, the need to optimise housing capacity and the scope for the character and form of an area to change over time.

### *Daylight/Sunlight, overshadowing - Methodology*

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

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

6.10.5 The BRE Guidelines recommend that a room with 27% VSC will usually be adequately lit without any special measures, based on a low-density suburban model. This may not be appropriate for higher density, urban London locations. The NPPF advises that substantial weight should be given to the use of 'suitable brownfield land within settlements for homes...' and that LPAs should take 'a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site'. Paragraph 2.3.47 of the Mayor's Housing SPG supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city.

6.10.6 The acceptable level of sunlight to adjoining properties is calculated using the Annual Probable Sunlight Hours (APSH) test. In terms of sunlight, the

acceptability criteria are greater than 25% for the whole year or more than 5% between 21st September and 21st March.

6.10.7 A Sun Hours on Ground (SHOG) assessment considers if existing amenity spaces will receive the levels of sunlight as recommended within the BRE guidelines – which recommend that at least half of a space should receive at least two hours of sunlight on 21 March (Spring Equinox), or that the area that receives two hours of direct sunlight should not be reduced to less than 0.8 times its former value (i.e. there should be no more than a 20% reduction).

*Daylighting and Sunlight Assessment*

6.10.8 The applicant's Daylight Sunlight Report reports on an assessment of likely impact on the following 40 residential properties:

- 838 to 810 (evens) High Road (east side, 8 properties);
- 843 to 831 (odds) High Road (west side, 5 properties);
- 817 to 791 (odds) High Road (west side, 10 properties);
- 1 to 7 (odds) White Hart Lane (south side, 3 properties);
- 9-39 White Hart Lane (south side, 1 property); and
- 2 to 30 (evens) White Hart Lane (north side, 13 properties).

6.10.9 Of the 325 windows assessed for daylight in the neighbouring 40 properties, 315 (97%) would satisfy the VSC guidelines. Of the 247 habitable rooms assessed, 239 (97%) would satisfy the NSL guidelines. Three surrounding properties would experience any daylight impacts outside the guidelines, as follows:

- Nos. 831-833 High Road, immediately to the north of the site on the other side of Brunswick Square - 4 x rooms serving 2 flats in (2 x and 2 x living /dining rooms). Whilst there would be a noticeable loss of daylight to these rooms, the bedrooms would be left with VSC values 15.4-23.4% and the living rooms with VSC values of 18.2-26.7%;
- Nos. 813-817 High Road, to the south of the site - 5 x rooms serving 2 flats in (4 x bedrooms and 1 x living/kitchen/dining room). Whilst there would be a noticeable loss of daylight to these rooms, the bedrooms would be left with VSC values of between 18.3 and 24.4% and the living rooms with VSC values of 25.8% and 31%; and
- No. 811a High Road - 3 x rooms in (a kitchen, a bedroom, and a living/kitchen /dining room). Again, whilst there would be a noticeable loss of daylight to these rooms, they would be left with VSC values in the low to mid-twenties.

6.10.10 Of the 88 windows assessed for sunlight, 84 (95%) would satisfy the BRE guidelines for both annual and winter APSH. Two surrounding properties would experience sunlight impacts outside the guidelines, as follows:

- Nos. 831-833 High Road – 1 x bedroom at first floor, which would meet the annual BRE guidelines by retaining more than 25% APSH but fall just short of the winter sunlight guidelines (3% APSH as opposed to the 5% guideline).

- Nos. 813-817 High Road – 2 x bedrooms at first and second floors, where annual and winter sunlight would be reduced to between 0.70 and 0.67 times the current value.

6.10.11 Most of the affected rooms are bedrooms, which have a lower requirement for daylight and sunlight and are less sensitive. It should also be borne in mind that a large part of the site comprises either an open hardstanding or single-storey buildings. In such cases a greater impact than the BRE's default numerical guidelines may be unavoidable.

6.10.12 Residual VSC values in excess of 20% are reasonably good and appeal decisions for schemes in London have found that VSC values in the mid-teens are deemed acceptable. All residential windows tested for daylight would be left with such levels. Overall, officers consider that, the levels of daylight and sunlight conditions would be acceptable – particularly as other residential amenity factors are also considered acceptable (see Overlooking/Privacy and Noise below).

#### *Overlooking/privacy*

6.10.13 Outlook from homes in the proposed smaller new build block on Brunswick Square towards existing windows in the western façade of Nos. 231-233 High Road would be oblique, with a separation distance of approx. 14m, and is considered acceptable.

6.10.14 Windows in the proposed larger block would be approx. 20m away from the consented (but not yet built) No.807 High Road (Block B) on the south side of Percival Court. This separation distance is considered acceptable.

#### *Noise*

6.10.15 The mainly residential nature of the proposed scheme means that, subject to using planning conditions to limit hours of use of the proposed cinema and any café/restaurant in the proposed commercial units and to control noise from mechanical plant, it should not cause undue disturbance to neighbouring residents. The applicant's Site Construction Management Plan also sets out minimum standards and procedures for managing and minimising noise during construction (which it is recommended are secured by planning condition).

#### *Amenity Impacts – Summary*

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

### **6.11 Transportation and Parking**

- 6.11.1 The NPPF (Para. 110) makes clear that in assessing applications, decision makers should ensure that appropriate opportunities to promote sustainable transport modes have been taken up and that the design of streets and other transport elements reflects national guidance (including the National Design Guide).
- 6.11.2 London Plan Policy T1 sets a strategic target of 80% of all trips in London to be by foot, cycle, or public transport by 2041 and requires all development to make the most effective use of land. Policy T5 encourages cycling and sets out cycle parking standards and Policies T6 and T6.1 to T6.5 set out car parking standards.
- 6.11.3 Other key relevant London Plan policies include Policy T2 – which sets out a ‘healthy streets’ approach to new development and requires proposals to demonstrate how it will deliver improvements that support the 10 Healthy Street Indicators and Policy T7 – which makes clear that development should facilitate safe, clean and efficient deliveries and servicing and requires Construction Logistics Plans and Delivery and servicing Plans.
- 6.11.4 Policy SP7 states that the Council aims to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by promoting public transport, walking, and cycling and seeking to locate major trip generating developments in locations with good access to public transport. This approach is continued in DM Policies DM31 and DM32.
- 6.11.5 DM Policy (2017) DM32 states that the Council will support proposals for new development with limited or no on-site parking where there are alternative and accessible means of transport available, public transport accessibility is at least 4 as defined in the Public Transport Accessibility Index, a Controlled Parking Zone (CPZ) exists or will be provided prior to the occupation of the development parking is provided for disabled people; and parking is designated for occupiers of developments specified as car capped.
- 6.11.6 A key principle of the HRWMF is to create a legible network of east-west streets that connect into the surrounding area, existing lanes off the High Road pocket parks and other open spaces.

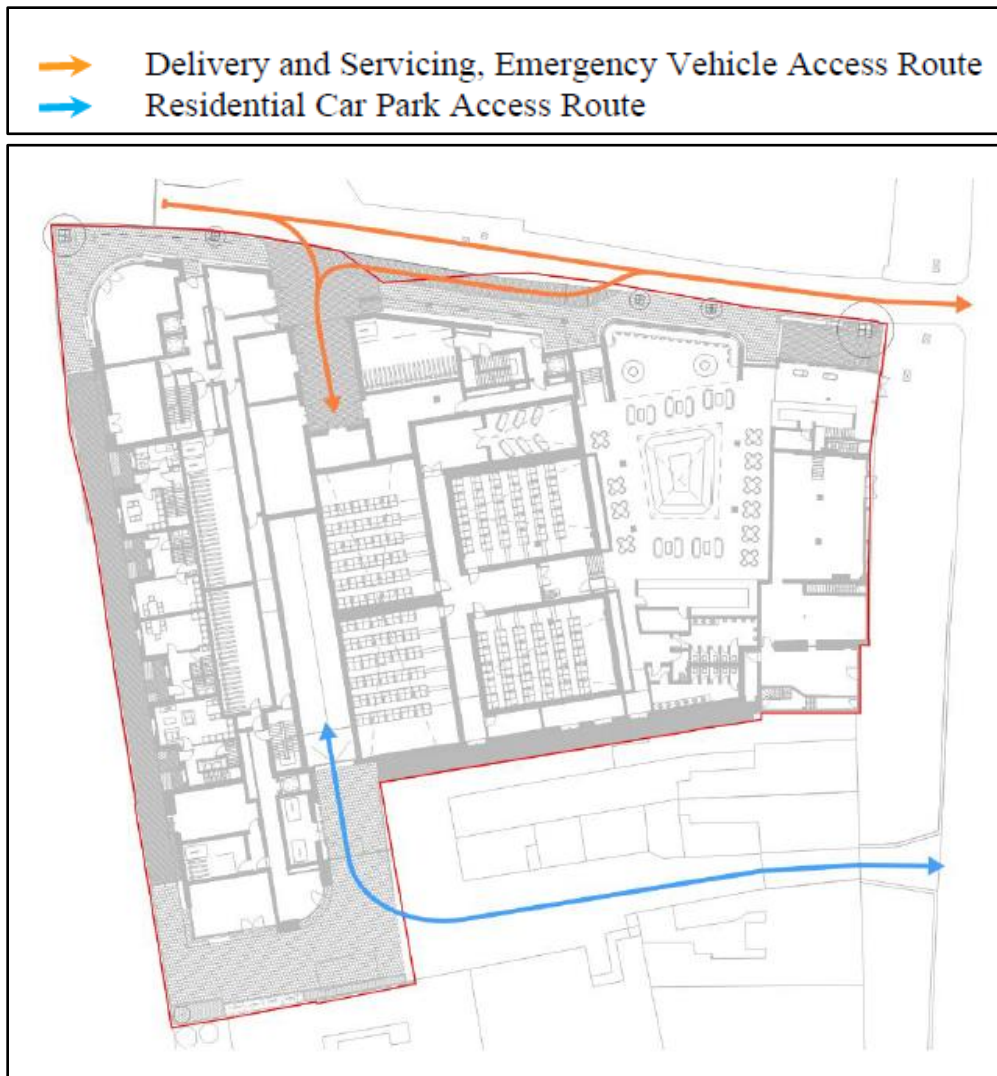
#### *Transport Assessment*

- 6.11.7 The majority of the site has a PTAL 4, with the southwestern part having a higher PTAL of 5). The site is also located in the Tottenham North CPZ. The application is supported by a Transport Assessment (TA), which incorporates a draft Delivery and Servicing Management Plan, Framework Travel Plan and Outline Construction Logistics Plan.

#### *Site Access – Interim Condition*

- 6.11.8 The application sets out details of proposed access arrangements for both the interim condition and a future master planned context, where land to the west, in the wider NT5 Site Allocation, is developed.
- 6.11.9 In the interim condition, a widened Brunswick Square would be used as a two-way access route for refuse collection, servicing and delivery, and emergency vehicle access. Delivery and servicing vehicles for both the proposed housing and commercial uses would access parallel loading bays along the southern side of Brunswick Square. The bays would be able to accommodate up to two 8m long rigid heavy goods vehicles (HGVs) (7.5tonne) vehicles simultaneously. A new footway adjacent to the southern side of Brunswick Square would provide a traffic free pedestrian route to the Printworks building and beyond.
- 6.11.10 To enable delivery and servicing vehicles (including refuse lorries) to turn around and leave in forward gear, a turning head would be recessed into the northern part of the Printworks building. Waste storage and collection is discussed in detail under Waste & Recycling below.
- 6.11.11 Percival Court would provide access to residential car parking that would be provided at basement level, with access via a one-way traffic light-controlled access ramp. It is recommended that details of access control measures are reserved by condition. In the interim state a gated access is proposed between the site and the remainder of Percival Court.
- 6.11.12 Both Brunswick Square and Percival Court would be relatively lightly trafficked and be used by pedestrians, wheelchair users and cyclists. It is recommended that s106 planning obligations require the applicant to use Best Endeavours to work with other owners to improve the surface of Brunswick Square (similar to as was agreed in relation to No. 807 High Road, HGY/2021/0441).

Figure 07: Proposed Interim Access Arrangements



*Vehicular Site Access – Long-term Masterplan Condition*

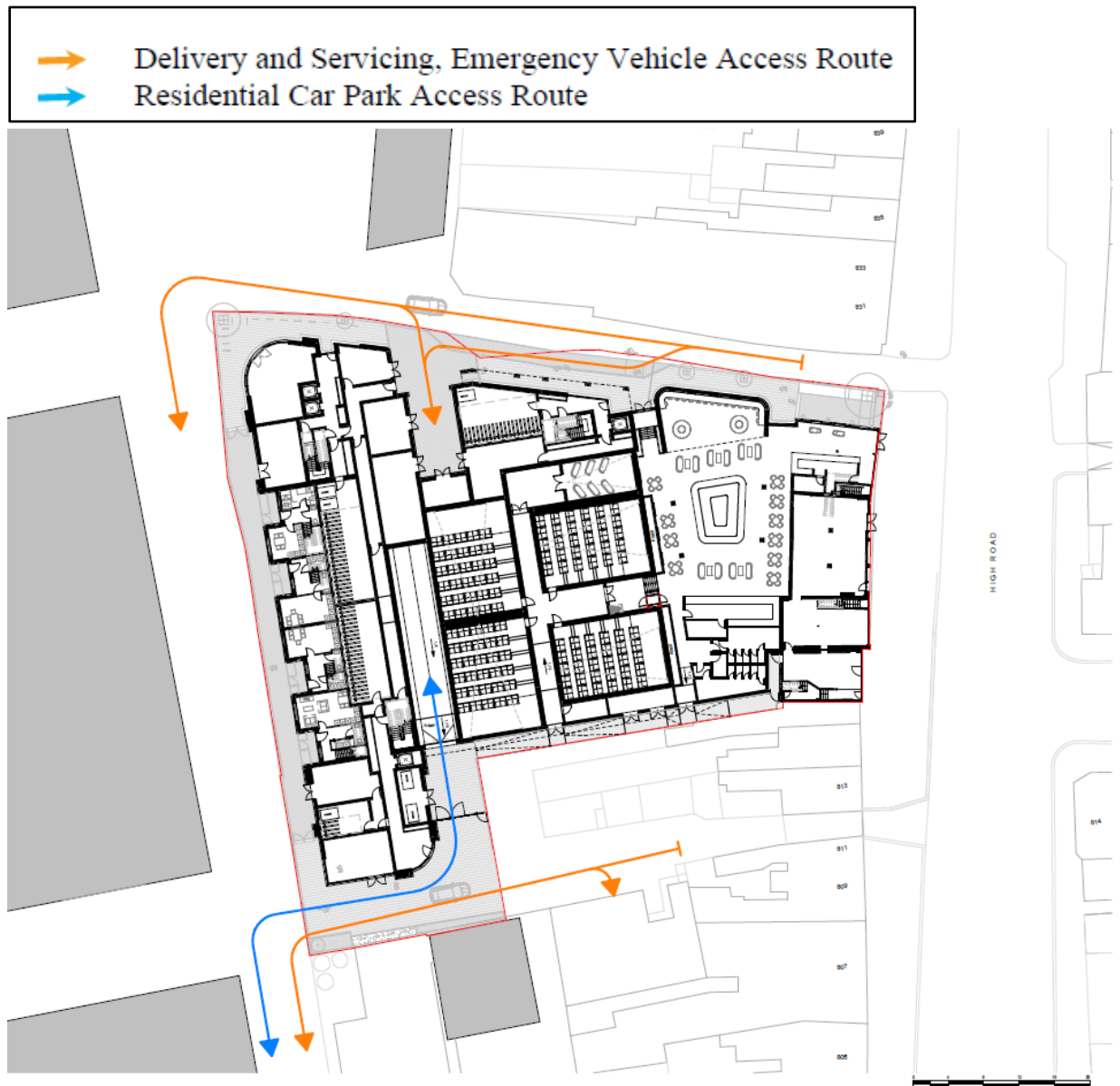
6.11.13 In the future masterplanned context, there would be a north-south aligned street along the eastern edge of what is currently the Peacock Industrial Estate, and the western edge of the site. This route would be the primary vehicular access for the wider High Road West Site Allocation (north of White Hart Lane) and connect with Percival Court and Brunswick Square.

6.11.14 In the future masterplanned context, the proposed residential car parking would continue to be accessed from Percival Court but via the internal masterplan street network only, with no through access along Percival Court to High Road. In the end state the gated access would be removed to allow pedestrian and cycle access to the wider masterplan. Landscape features such as planters would be used to prevent vehicular through access whilst retaining sufficient width for cycle access.



- 6.11.15 Similarly, following the implementation of a connection between Brunswick Square and a masterplan internal road network, delivery and servicing vehicles would be able to access the loading bays along Brunswick Square via the masterplan access to the south on White Hart Lane. Thus, the implementation of the wider masterplan and internal street network would allow all vehicular access to and from the site to be via the wider High Road West site to the west, with access from High Road no longer required.
- 6.11.16 However, the layout of the development is such that some flexibility in the future use of Brunswick Square is allowed for, to cater for the future requirements of the remainder of the masterplan. One-way operation of Brunswick Square, from the High Road to the internal streets of the masterplan, however, is the most likely future operational scenario.
- 6.11.17 It is noted that the exact arrangements cannot be fully determined until the wider masterplan design evolves.

Figure 08: Proposed Long-term Master Planned Access Arrangements



*Future Vehicular Access Points*

6.11.18 To enable satisfactory future connections with adjoining land part of the High Road West masterplan area and to help ensure the successful development of the wider Site Allocation NT5, it is recommended that S.106 planning obligations require a Future Connectivity and Access Plan to secure the right for pedestrians, cyclists and vehicles (including delivery and servicing) to access and egress the site and Percival Street from and to any future streets internal to the masterplan area, including a new street running along the western boundary of the site (and eastern boundary of the current Peacock Industrial Estate). This would enable land and buildings fronting Percival Court (including the approved development at No.

807 High Road) (HGY/2021/0441) to be accessed by vehicles from the west instead of via the High Road.

#### *Legal Highway Agreements*

- 6.11.19 The proposed widening and other works to Brunswick Square, including its junction on the High Road would need to be the subject of a legal agreement under Section 278 of the Highways Act 1980. This would secure details of how the proposed new streets tie in with the existing highway and junction. It is recommended that a planning condition requires pre and post-development highway condition surveys, to ensure that footways are restored after development is complete, and a combined Stage 1/2 Road Safety Audit, to ensure that the detailed vehicular access/junction arrangements are satisfactory.

#### *Pedestrian and cycle movement*

- 6.11.20 Pedestrians and cyclists would be able to access the site from the High Road, Brunswick Square, Percival Court, and any future street to the west that is provided as part of wider masterplan proposals. The proposed widened Brunswick Square would provide a much more attractive, safer, and accessible route, not just for the proposed development, but for existing (and future) businesses and homes that the street serves. It is also recommended that s106 planning obligations require the applicant to use Best Endeavours to work with other owners of Percival Court to improve this private street (similar to what was agreed in relation to No. 807 High Road) (HGY/2021/0441)

#### *Cycle Parking*

- 6.11.21 The proposed scheme makes provision for 160 cycle parking spaces (138 residential and 22 commercial) including long and short-stay parking for both. This is in accordance with London Plan Policy T5 and is acceptable. Long-stay residential and commercial cycle parking would be provided in ground floor cycle parking stores. Access routes to cycle stores have been designed to be as direct as practicable, with the number of doors to be passed through minimised, whilst considering Secured by Design advice. Doors that cyclists are required to pass through would be at least 1.2m clear width. All short stay spaces in the public realm would be provided as Sheffield stands.
- 6.11.22 However, there is insufficient detail on the location and detailed provision of these spaces to ascertain that this meets guidance in the London Cycling Design Standards (including the aspiration for at least 20% provision as Sheffield stands for standard cycles, and the need for 5% provision as wider spaces for non-standard cycles. There is also the need to ensure provision of locker and changing facilities for the proposed commercial space. It is recommended that these details are reserved by way of a planning condition.

#### *Car Parking*

6.11.23 The proposal scheme includes 8 x accessible car parking spaces in a proposed basement. This amounts to one space per proposed 'wheelchair accessible dwelling' and complies with London Plan Policy T6.1. No other car parking is proposed. All of the spaces would be equipped with Electric Vehicle Charging Points (EVCP), with 20% having active provision from the outset and the remainder having passive provision for their future installation. It is recommended that planning conditions require the implementation of an approved Car Parking Management Plan and that s106 planning obligations include a car-capped agreement, prohibiting residents (other than Blue Badge holders) from obtaining a permit to park in the CPZ.

6.11.24 It is noted that the Car Parking Management Plan would include a mechanism whereby wheelchair-accessible car parking spaces not allocated to disabled residents after a certain period of time after first occupation would be released on a temporary basis on short-term leases for general use by other residents of family dwellings as a priority. All on-site car parking spaces would be leased.

#### Car Club

6.11.25 To help reduce car ownership and reduce pressure for car parking, it is recommended that s106 planning obligations secure financial contributions from the developers to ensure two years' free membership for all residents and £50.00 per year credit for the first 2 years; and an enhanced car club membership for the residents of the family-sized units (3+ bedrooms) including 3 years' free membership and £100 (one hundred pounds in credit) per year for the first 3 years.

#### *Trip Generation*

6.11.26 The applicant's TA estimates likely trip generation for various modes based on applying trip rates derived from TRICS, as set out in Table 10 below.

Table 10: Peak hour total multi-modal development trips

Mode	AM Peak Hour		PM Peak Hour	
	In	Out	In	Out
Rail	3	7	14	6
Bus	4	10	13	9
Taxi	0	0	0	0
Motorcycle/scooter	0	0	0	0
Driving car/van	1	8	5	3
Passenger in car/van	1	4	2	1
Cycle	1	1	1	1
Walk	3	12	48	33
Delivery & Service	0	0	2	0
<b>Total</b>	<b>13</b>	<b>42</b>	<b>85</b>	<b>53</b>

6.11.27 At officers' request, a revised cumulative impact assessment has been carried out in the context of the key local committed schemes. The cumulative impact assesses the likely impacts associated with the proposed scheme and consented nearby schemes (including HGY/2020/1584 Northumberland Terrace and HGY/2015/3000 South of THFC Stadium) plus the Goods Yard and Depot scheme (HGY/2021/1771). It is acknowledged that the Goods Yard and Depot scheme was refused, therefore the cumulative impact assessment presented below in Table 11 is considered robust.

Table 11: Cumulative committed and proposed development total multi-modal trip generation

Mode	AM Peak Hour		PM Peak Hour	
	In	Out	In	Out
Rail	239	130	277	226
Bus	128	130	157	94
Cycle	20	49	60	36
Walk	153	395	431	325
Vehicle driver and motorcycle	102	175	190	129
<b>Total</b>	<b>642</b>	<b>879</b>	<b>1,115</b>	<b>810</b>

6.11.28 TfL has raised some detailed concerns about methodology and have asked for further assessment, including of likely rail and bus use. Additionally, at TfL's request, the impact of the wider High Road West masterplan (namely that of the then emerging Lendlease scheme) has been considered. At the time of undertaking this additional study, the Lendlease application had not yet been submitted to the Council.

6.11.29 In response, the applicant has undertaken an assessment that takes account of the proposed scheme, local committed schemes and the emerging Lendlease application for approx. 2,600 homes, by factoring an additional 1,966 homes (2,612 assumed for the emerging Lendlease scheme, minus 646 homes in the extant Goods Yard and Depot consents). It should be noted that these are gross figures and do not take account of the existing 297 homes on the Love Lane Estate that would be replaced. In summary, this demonstrates that:

- No significant impact on London Overground line capacity (with utilisation rate estimated to increase from 72% to up to of 79% of maximum capacity between Bruce Grove and Seven Sisters in the AM Peak and from 20% to up to 24% of maximum capacity between Seven Sisters and Bruce Grove in the PM Peak);
- No significant impact on bus services (528 additional two-way trips in the AM Peak hour and 431 additional trips in the PM Peak. Approx. 43 buses per hour in each direction use. The worse impact, 200 additional trips heading south in the AM Peak hour, would add four to five trips per bus); and
- No discernible impact on loadings on the Victoria Line.

6.11.30 Whilst officers still have some concerns about the level of accuracy and robustness of the cumulative impact assessment upon local bus services, the overall public transport impact analysis undertaken at TfL's request is satisfactory. The cumulative bus trip impact assessment would benefit from a more granular approach to consider the impact upon relevant bus services for each direction of travel to identify the impact upon individual routes and bus capacities. However, for the purposes of this application, based on 10 additional bus trips in the AM peak, officers do not consider that obligations towards additional bus services would meet the test for planning obligations set out in the NPPF and legislation. This approach was accepted on the extant permission for 867- 879 High Road which would have a greater impact on bus usage.

*Impact, management, and mitigation*

6.11.31 Subject to the recommended Road Safety Audit, to ensure the creation of a safe revised Brunswick Square/High Road junction, together with other transport-related recommended conditions and s106 planning obligations, the proposed development by itself would have no discernible impact on highways or public transport.

6.11.32 The cumulative impact assessment highlights that, by taking account of the local committed schemes, the overall effect of the proposed development would not be material. The cumulative impact of the Lendlease application indicates that the additional trips by public transport would be accommodated within the existing capacities, however, alongside the impact upon the local

pedestrian, cycle, and highway networks, this will be further assessed as part of the detailed review of the Lendlease application itself (HGY/2021/3175).

### *Travel Planning*

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

### *Delivery and Servicing*

- 6.11.34 The applicant's draft Delivery and Servicing Plan estimates that there would be around 2 delivery and servicing trips in the AM Peak hour and 6 in the delivery and servicing peak, which has been identified as 11.00 to 12.00 Noon. It is proposed to accommodate these trips at an on-street loading and unloading bay on Brunswick Square (capable of accommodating two delivery vehicles). The proposed arrangements and draft Plan are considered acceptable, however, it is recommended that s106 planning obligations are utilised to secure implementation (with a Travel Plan Co-Ordinator being responsible for monitoring).

### *Construction Activities*

- 6.11.35 The applicant's Outline Construction Logistics Plan (CLP) sets out vehicular routeing and access parameters and identifies strategies to reduce potential impacts. It includes a commitment to consult with LBH, TfL and other contractors/developers in the area to minimise disruption as much as possible. It is recommended that a condition secures the approval of a detailed CLP.

### *Transportation - Summary*

- 6.11.36 The overall public transport impact analysis undertaken at TfL's request is satisfactory. With the transport-related recommended conditions and s106 planning obligations, the proposed development by itself would have no discernible impact on highways or public transport. The cumulative impact assessment highlights that the overall effect of the proposed development would not be material.

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

- 6.12.1 London Plan Policy SI2 sets out the Mayor of London's energy hierarchy: Use Less Energy (Be Lean); Supply Energy Efficiently (Be Clean); Use Renewable Energy (Be Green) and (Be Seen). It also sets a target for all development to achieve net zero carbon, by reducing CO2 emissions by a minimum of 35% on-site, of which

at least 10% should be achieved through energy efficiency measures for residential development (or 15% for commercial development) and calls on boroughs to establish an offset fund (with justifying text referring to a £95/tonne cost of carbon). London Plan Policy SI2 requires developments referable to the Mayor of London to demonstrate actions undertaken to reduce life-cycle emissions.

- 6.12.2 London Plan Policy SI3 calls for major development in Heat Network Priority Areas to have a communal low-temperature heating system, with the heat source selected from a hierarchy of options (with connecting to a local existing or planned heat network at the top).
- 6.12.3 London Plan Policy SI4 calls for development to minimise overheating through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.
- 6.12.4 London Plan Policy SI5 calls for the use of planning conditions to minimise the use of mains water in line with the Operational Requirement of the Buildings Regulations (residential development) and achieve at least BREEAM 'Excellent' standard for 'Wat 01' water category or equivalent (commercial development).
- 6.12.5 London Plan Policy SI7 requires applications referable to the Mayor of London to submit a Circular Economy Statement demonstrating how it promotes a circular economy within the design and aim to be net zero waste.
- 6.12.6 Local Plan Strategic Policy SP4 requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L of the 2013 Building Regulations) and a minimum reduction of 20% from on-site renewable energy generation. It also requires all non-residential developments to achieve a BREEAM rating 'Very good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable.
- 6.12.7 Haringey Policy SP6 requires developments to seek to minimise waste creation and increase recycling rates, address waste as a resource and requires major applications to submit Site Waste Management Plans.
- 6.12.8 Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout, and construction techniques. The Sustainability section in the report sets out the proposed measures to improve the overall sustainability of the wider scheme, including transport, health and wellbeing, materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy and CO2 emissions and landscape design.

### *Energy*



- 6.12.9 The principal target is to achieve a reduction in regulated CO2 emissions over Part L 2013 Building Regulations. The London Plan requires the 'lean', 'clean', 'green' and 'seen' stages of the Mayor of London's Energy Hierarchy to be followed to achieve a 'Zero Carbon' Standard targeting a minimum onsite reduction of 35%, with 10% domestic and 15% non-domestic carbon reductions to be met by energy efficiency. All surplus regulated CO2 emissions must be offset at a rate of £95 for every ton of CO2 emitted per year over a minimum period of 30 years.
- 6.12.10 'Be Lean.' The proposed scheme adopts a 'fabric first' approach, including façade configuration and specification that balances the desire to have winter passive solar gains but avoid summer overheating; high performance glazing, reduced air permeability and good insulating fabric, use of high-efficiency mechanical ventilation and heat recovery, use of LED lighting and efficient cooling for the proposed commercial units. These proposed measures are expected to save 15.8 tonnes of carbon dioxide per year (a 12% saving above the Building Regulations 2013) (based on SAP2012 carbon factors).
- 6.12.11 'Be Clean.' The applicant is intending to connect to the Energetik Heat Network, using heat generated at an Energy Centre located to the northeast of the site on the Edmonton Eco-Park close the North London Waste Authority Energy Recovery Facility (ERF). The ERF is currently pending construction and will provide low carbon heat when it comes on stream in 2025/26. Energetik currently plan to provide a heat network to Fore Street (closer to the site to the north) by January 2023.
- 6.12.12 This is in advance of the proposed ERF becoming operational, so initially heat would be supplied by back-up gas boilers at the Energetik Energy Centre, with the energy source being switched from gas to lower carbon heat from waste as soon as the ERF is operational. Connection to the proposed DEN is expected to save 57.9 tonnes of carbon dioxide per year (a 45% saving above the Building Regulations 2013) (based on SAP2012 carbon factors).
- 6.12.13 The Council has committed plans to deliver a North Tottenham District Energy Network (DEN) to connect to the Energetik Heat Network.
- 6.12.14 'Be Green.' Photovoltaic (PV) arrays comprising 138 panels is proposed, covering approx. 242sqm of roof space. The proposed PV panels are anticipated to save 20.6 tonnes of carbon dioxide per year (a 16% saving above the Building Regulations 2013) (based on SAP2012 carbon factors).
- 6.12.15 Overall – 'Lean', 'Clean' and 'Green'. Table 12 below sets out the overall carbon emission savings:

Table 12: Regulated carbon dioxide emissions savings (SAP12 carbon factors)

	CO2 savings (Tonnes CO2/year)	Percentage savings
Be lean	15.8	12%
Be clean	50.7	40%
Be green	20	16%
Total savings	86.5	68%
	CO2 savings off-set	
Off-set	41.2	

6.12.16 'Be Seen.' An energy monitoring system is proposed and sub-metering/energy display devices in each home would allow residents to monitor and reduce their energy use. An energy monitoring system is proposed and sub-metering/energy display devices in each home would allow residents to monitor and reduce their energy use. It is recommended that a planning condition requires the development owner to submit monitoring results to the GLA (in accordance with the Mayor of London's draft guidance).

6.12.17 Carbon Offsetting. Despite the adoption of the 'Lean', 'Clean' and 'Despite the adoption of the 'Lean', 'Clean' and 'Green' measures outlined above, the expected carbon dioxide savings fall short of the zero-carbon policy target for proposed domestic and non-domestic uses. Overall, the amount of carbon to be offset (once connected to the proposed DEN) would be 41.2 tonnes per year (based on SAP10 carbon factors). Based on 30-years of annual carbon dioxide emissions costed at £95 per tonne, this amounts to £117,420 (or £129,162 including a 10% management fee). It is recommended that s106 planning obligations secure this sum or any different agreed sum that may be appropriate in the light of additional carbon savings that arise from more detailed design agreed with the LPA, by way of s106 planning obligations.

6.12.18 Energy conclusion. The overall anticipated on-site carbon emission reductions over Building Regulations (2013) (SAP2012 carbon factors) of 68% and associated offsetting payments would meet London Plan Policy SI2. The proposed connection to an off-site DEN would also meet London Plan Policy SI4.

6.12.19 The proposed 'Lean' savings fall below London Plan Policy SI2 requirements for at least 10% for domestic and 15% for non-domestic. The proposed reduction of 8% for the residential element does not comply, however,

the applicant is confident that the remaining 2% can be met through the detailed design stage and by including more realistic performance factors for aspects such as thermal bridging. A 10% reduction will therefore be conditioned to overcome this and meet policy requirements.

6.12.20 The proposed '9% 'Green' savings would be below the 20% called for by Local Plan Strategic Policy SP4. However, officers are satisfied that the amount of proposed roof top PV arrays have been optimised, given other demands for roof-top space.

#### *Overheating*

6.12.21 The applicant's Sustainability and Energy Statement includes overheating and cooling analysis. The proposed scheme mitigates against the risk of overheating through the passive design measures set out below and active cooling measures are only proposed for the proposed commercial units:

- Solar gain control (Façade shading elements, rationalised glazing ratios and low solar transmittance glazing);
- Natural ventilation (openable windows and acoustic louvres); and
- Additional mechanical ventilation (mechanical ventilation systems with heat recovery and summer bypass and ceiling fans where necessary).

6.12.22 The applicant's assessment using London Weather Centre files show full compliance with the relevant CIBSE TM59 overheating risk criteria (with ceiling fans in place for the highest risk homes). The application generally meets London Plan Policy SI4. If planning permission were to be granted, it would be possible to use a planning condition to require details of passive provision for ceiling fans in the identified homes and additional homes that could be at risk in the future. This would be achieved through Condition 24 which relates to overheating.

#### *Environmental sustainability*

6.12.23 Construction waste. The applicant's Site Construction Management Plan states that a Site Waste Management Plan (SWMP) is developed to reduce and manage/re-use waste during demolition and construction. It is recommended that is secured by a planning condition.

6.12.24 Water consumption. In order to ensure compliance with London Plan Policy SI5, it is recommended to use a planning condition to minimise the use of mains water in line with the Operational Requirement of the Buildings Regulations (residential development) to achieve mains water consumption of 105 litres or less per head per day and achieve BREEAM 'Excellent' standard for 'Wat 01' water category or equivalent (commercial development).

- 6.12.25 Building Performance. The applicant's Sustainability and Energy Statement includes a BREEAM pre-planning assessment (Shell & Core space and Fully Fitted Leisure and Assembly) which demonstrates that the proposed new commercial units could achieve an 'Very Good' rating, meeting the minimum requirement of Local Plan Policy SP4. It is recommended that this is secured by use of a planning condition.
- 6.12.26 Considerate Constructors Scheme. The applicant's Site Construction Management Plan states that the principal contractor would be required to manage sites and achieve formal certification under the Considerate Constructors Scheme. If planning permission were granted, this could be secured by a s106 planning obligation
- 6.12.27 Other environmental sustainability issues. Movement and transport, landscape and ecology, air quality, noise, daylight and sunlight, flood risk and drainage are addressed in detail in other sections of this report.

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

- 6.13.1 Development proposals must comply with the NPPF and its associated technical guidance around flood risk management. London Plan Policy SI12 requires development proposals to ensure that flood risk is minimised and mitigated, and that residual risk is addressed.
- 6.13.2 London Plan Policy SI13 and Local Policy SP5 expect development to utilise Sustainable Urban Drainage Systems (SUDS).
- 6.13.3 Policies DM24, 25, and 29 continue the NPPF and London Plan approach to flood risk management and SUDS to ensure that all proposals do not increase the risk of flooding. DM27 seeks to protect and improve the quality of groundwater.
- 6.13.4 London Plan Policy SI5 requires proposals to ensure adequate wastewater infrastructure capacity is available.

#### *Flood Risk*

- 6.13.5 The site is entirely in Flood Zone 1 and has a low probability of flooding from tidal and fluvial sources. The nearest watercourse is the Moselle River, which is culverted below White Hart Lane approx. 70m to the south of the site.
- 6.13.6 The submitted Flood Risk Assessment (FRA) considers flooding from pluvial, groundwater and from sewers also to be low. The central part of the site has a Low to Medium risk of surface water flooding. Surface water is proposed to be discharged by gravity to the Thames Water surface water sewers in High Road at a rate of 5.0l/s for the 1 in 100-year event, inclusive of climate change allowance. This represents a significant reduction in the current peak rate of 47.5l/s and the

risk of surface water flooding is reduced to Low. Since the proposed surface water drainage strategy represents an improvement in surface water flood risk, officers agree that this meets the requirements for development within Critical Drainage Areas within Policy DM26.

6.13.7 Foul water from the proposed development is proposed to be discharged to the existing Thames Water foul sewers at a peak rate of approx. 3.9l/s, which would represent a significant increase from the estimated foul water discharge from the existing site (0.36l/s). Since all surface water is proposed to be discharged to a dedicated surface water sewer and there are no known issues associated with lack of capacity of the existing foul water sewer network, the risk of flooding from the foul sewers is considered to be Low.

#### *Drainage*

6.13.8 The proposed surface water drainage strategy takes account of likely increased rain fall as a result of climate change, factoring in a 40% increase in peak rainfall intensity. A variety of SuDS features are proposed to be incorporated, in accordance with the London Plan drainage hierarchy.

6.13.9 For assessment purposes it has been assumed that rainwater harvesting would not be implemented (although it remains a possibility) and whilst rainwater infiltration has been considered, it has been discounted as the ground conditions consist of impermeable London clay. Areas of living/blue roofs, podium level gardens, tree pits and below ground cellular storage crates with permeable surfaces would attenuate water in order to reduce the peak flow rate of surface water discharge to approx. 5.0l/s. This exceeds the calculated greenfield runoff rate of 2.03l/s. However, it represents an 89% improvement on the existing discharge rate of 47.5l/s reaching the Thames Water sewer. In doing so, it reduces rates as much as possible and manages run-off as close to the site as possible and therefore accords with London Plan SI3 (which aims to achieve greenfield rates).

6.13.10 Thames Water has raised no objection to the proposed scheme, subject to requested conditions and informatives. The Lead Local Flood Authority (LLFA) likewise has not objected, subject to maintenance of SuDS features. It is recommended that a SuDS management and maintenance plan be secured by condition.

#### **6.14 Air Quality**

6.14.1 London Plan Policy SI 1 requires development proposals to not worsen air quality and be at least Air Quality Neutral and calls for large-scale EIA development to consider how local air quality could be improved. The London Plan is supported by the Control of Dust and Emissions during Construction and Demolition SPG.

- 6.14.2 Policies DM4 and DM23 require development proposals to consider air quality and be designed to improve or mitigate the impact on air quality in the Borough and improve or mitigate the impact on air quality for the occupiers of the building or users of development. Air Quality Assessments will be required for all major developments where appropriate. Where adequate mitigation is not provided planning permission will be refused. Haringey is an Air Quality Management Area (AQMA).
- 6.14.3 The application is supported by an Air Quality Assessment, which includes an Air Quality Neutral Assessment. The applicant's Site Construction Management Plan also sets out minimum standards and procedures for managing and minimising dust and air quality impacts.
- 6.14.4 The applicant's Assessment considers the exposure of future residents to poor air quality and finds that the site would meet relevant air quality objective levels without the need for further mitigation (over and above the proposed limited on-site car parking, electric vehicle charging points and connection to an off-site District Energy Network), meaning the site as a whole is considered acceptable for housing.
- 6.14.5 Given the features referred to above, the proposed scheme is predicted to be 'Air Quality Neutral' (with expected emissions associated with transport and buildings falling below air quality benchmark values).
- 6.14.6 It is recommended that conditions manage and minimise impacts during demolition and construction, in line with the applicant's Site Construction Management Plan and the measures highlighted by LBH Pollution.

## 6.15 **Trees**

- 6.15.1 The NPPF (Para. 131) stresses the importance of trees and makes clear that planning decisions should ensure that new streets are tree-lined. London Plan Policy G7 makes clear that development should seek to retain and protect trees of value and replace these where lost.
- 6.15.2 There are no existing trees on the site or on nearby land. The proposed scheme includes the provision of 19 trees (6 at ground level and a further 13 across the proposed podium and roof gardens) and would see a significant net increase in trees on the site, including along the proposed streets.

## 6.16 **Urban Greening and Ecology**

### *Urban Greening*

- 6.16.1 London Plan Policy G5 sets out the concept and defines Urban Greening Factor (UGF) as a tool used to evaluate and quantify the quality of urban greening

provided by a development and aims to accelerate greening of the built environment, ensuring a greener London as it grows. It calls on boroughs to develop their own UGF targets, tailored to local circumstances, but recommends an interim target score of 0.40 for proposed development that is predominantly residential.

6.16.2 In addition to new trees referred to above, the proposed scheme includes flower rich perennial planting, rain gardens and biodiverse intensive and extensive green roofs as follows:

- Sedum roof – with PV arrays 238sqm;
- Sedum roof – without PV arrays 143sqm;
- Biodiverse green roof on top of the mixed-use cinema/residential block 330sqm
- Biodiverse green roof on courtyard roof 355sqm;

6.16.3 The applicant's Design and Access Statement includes a calculation of the UGF for the proposed scheme, based on the Mayor of London's March 2021 pre-consultation draft London Plan Guidance. This demonstrates that the scheme would have a UGF of 0.42, thus exceeding the relevant London Plan proposed interim target score.

### *Ecology*

6.16.4 London Plan Policy G6 calls for development proposals to manage impacts on biodiversity and to aim to secure net biodiversity gain.

6.16.5 Local Plan Policy SP13 states that all development must protect and improve sites of biodiversity and nature conservation. In addition, Policy DM19 makes clear that development on sites adjacent to internationally designated sites should protect and enhance their ecological value and Policy DM20 supports the implementation of the All London Green Grid.

6.16.6 The applicant's Ecological Appraisal Report sets out the findings of a Phase 1 habitat survey, which concludes that the site is dominated by hardstanding and buildings, offering limited ecological value. No bats or evidence of bats was identified during the ground level assessment of the site and building, and emergence surveys found no evidence of roosting bats within the buildings and no incidental bat activity on the site.

6.16.7 The Report recommends the integration of bird and bat nest boxes into buildings and within proposed trees in communal amenity spaces and concludes that these, together with the proposed tree planting and green roofs outlined above, the scheme would have a beneficial effect on local biodiversity (and result in a Biodiversity Net Gain). It is recommended that planning conditions require provision of bird and bat boxes in trees and buildings to encourage biodiversity.

### *Habitats Regulation*

- 6.16.8 Given the proximity of the application site to two designated European sites of nature conservation, it is necessary for Haringey as the competent authority to consider whether there are any likely significant effects on relevant sites pursuant to Section 63(1) of the Conservation of Habitats and Species Regulations 2017 (“the Habitats Regulations”).
- 6.16.9 The application site is approx. 1.6km west of the Lea Valley Special Protection Area (SPA) at its closest point. The Lea Valley area qualifies as a SPA under Article 4.1 of the Birds Directive on account of supporting nationally important numbers of species. This area is also a Ramsar site. The Lee Valley SPA/Ramsar comprises four underpinning Sites of Special Scientific Interest (SSSIs).
- 6.16.10 The application site lies approx. 4.8 km west of the Epping Forrest Special Area of Conservation (SAC) at its closest point. However, it is within the Zone of Influence (ZOI) of 6.2km as defined by Natural England in their Interim Guidance. The Epping Forest SAC is one of only a few remaining large-scale examples of ancient wood-pasture in lowland Britain and has retained habitats of high nature conservation value. Epping Forest SAC is also underpinned by a SSSI designation.
- 6.16.11 The Lea Valley SPA site is carefully managed to avoid impacts, with only limited access allowed to the wetland itself, with access closed seasonally to avoid impacts to wintering bird populations. As such, adverse effects as a result of increased recreational pressure are not considered likely. Likewise, the proposed scheme, with its limited car parking provision and promotion of use of electric vehicles by providing Electric Vehicle Charging Points is not expected to result in an adverse air quality effect.
- 6.16.12 The applicant’s assessment also notes that the Habitat Regulations Assessments (HRA) for alterations to the Strategic Polices and The Tottenham Area Action Plan both conclude that there will be no likely significant effect on Epping Forest SAC through increased recreational pressure as nowhere within the Borough lies within the core recreational catchment for the site. The applicant’s assessment concludes that potential risks to the SAC are further reduced by the proposed integration of greenspace within the proposed scheme, providing a link between residents and nature and that no direct or indirect significant adverse effects on Epping Forest SAC are expected as a result of the proposed scheme.
- 6.16.13 Natural England has reviewed the application and has raised no comment. Given the applicant’s assessment and Natural England’s response, officers consider the development would not give rise to likely significant effects on European designated sites (Lee Valley SPA and Epping Forest SAC) pursuant to Section 63(1) of the Conservation of Habitats and Species Regulations 2017 (“the Habitats Regulations”). An integrity test is therefore not required, and the proposal



is in accordance with Policies SP13 and DM19. The site is greater than 500m from the Lee Valley SPA, so Policy AAP6 does not apply.

## 6.17 Waste and Recycling

6.17.1 London Plan Policy SI7 calls for development to have adequate, flexible, and easily accessible storage space and collection systems that support the separate collection of dry recyclables and food. Local Plan Policy SP6 and Policy DM4 require development proposals make adequate provision for waste and recycling storage and collection.

6.17.2 The applicant's Waste Management Plan has been developed in accordance with guidance provided by Waste officers and BS 5906:2005 Waste management in buildings – a code of practice. The key principles include:

- Commercial and residential waste would be collected separately;
- The waste collector would not be required to pull full containers more than 10m to the collection vehicle;
- A minimum clear space of 150mm would be allowed between containers;
- Waste rooms would be designed and fitted out so they could be washed down and fire resistant;
- Waste collection vehicles would not be required to reverse more than 12m;
- Access roads for waste vehicles would have a minimum clear width of 5.0m and a maximum gradient of 1:12; and
- Storage and loading areas would be level, smooth, hard surfaced and provide drop kerbs and have a maximum gradient of 1:14 if the ground slopes down towards the collection vehicle.

6.17.3 Residential waste, recycling and food waste would be collected weekly and storage space has been provided in accordance with the generation rates provided by waste officers. Space has also been provided for bulky/non-standard waste items. Residents would not be required to walk further than 30m (horizontal distance) between their home and their allocated waste store. Stores for residential Cores A and B would be within 10m of the proposed collection point on Brunswick Square. In the interim condition, waste from residential Core C (southwestern part of the site) would be moved to the Brunswick Square collection point by on site management staff.

6.17.4 In the longer term, as and when the Peacock Industrial Estate is developed in line with the HRWMF, collections from residential Core C would be able to be made directly from a new north-south street. Residents of the proposed 6 High Road flats would take out their waste to the High Road kerb side on bin collection day. It is recommended that a Residential Waste Management Plan that captures the proposed arrangements and responsibilities is secured by planning condition

6.17.5 The proposed commercial waste rooms have been sized for two days' worth of waste storage, although collections are anticipated to be daily. Each proposed block has a commercial waste store sized to accommodate the anticipated amount of waste generated by the commercial tenants in that block. Waste would be taken to the stores by the tenants and collected directly from the stores by the appointed commercial waste contractor. Commercial tenants would collect residual, mixed dry recyclable, glass and food waste separately. Commercial waste would be collected each day from a collection point next to Brunswick Square

6.17.6 LBH Waste officers have advised that they are resistant to waste having to be presented on the High Road. However, they accept this arrangement given that this is an existing arrangement and given the fact that the proposal would reduce the number of homes using this arrangement. Waste Officers have also acknowledged that heritage and activation factors prevent internal storage and that other options are unworkable due to distance. In this context, waste officers accept the presentation of waste on street during allotted time bands by the units above ground floor on the High Road.

6.17.7 Following discussions between the applicant and Waste Officers the applicant has amended the plans to show the proposed incorporation of a dedicated discreet and small (but appropriately sized) bin store along Brunswick Square. This would be for the exclusive use of the residential flats above the High Road properties and addresses the concerns around the leaving of refuse bags on the High Road. This would further mitigate the issues with refuse being presented on the street.

## **6.18 Land Contamination**

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

6.18.2 The applicant's Land Contamination Assessment (Phase 1) reports on an initial Conceptual Site Model and a Preliminary Risk Assessment – taking account of ground conditions and the current and previous uses of the site. It concludes by identifying Low to Moderate potential risks to a range of receptors, including construction workers and residents and recommends that an intrusive ground investigation is carried out to appraise the extent of Made Ground, the gas regime, and the shallow groundwater regime. It also recommends that an Unexploded Ordnance survey is undertaken.

6.18.3 LBH Pollution officers raise no objection, subject to standard conditions on Land Contamination and Unexpected Contamination.

## **6.18.4 Basement Development**

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

6.18.6 The proposed scheme includes a single-level basement car parking area under the western part of the site to a maximum proposed depth of approx. 5.8m.

6.18.7 The submitted BIA notes that the proposed basement would be close to existing buildings, including approx. 9m away from the locally listed No. 813 High Road and approx. 14m away from the Listed (Grade II) and locally listed Nos. 819 to 827 High Road. Given this, the Assessment recommends a relatively 'stiff' system of excavation support (e.g. use of temporary propping), possible underpinning of Nos. 819 to 827, condition surveys and monitoring.

## 6.19 Archaeology

6.19.1 The NPPF (para. 194) states that applicants should submit desk-based assessments, and where appropriate undertake field evaluation, to describe the significance of heritage assets and how they would be affected by the proposed development.

6.19.2 London Plan Policy HC1 states that applications should identify assets of archaeological significance and avoid harm or minimise it through design and appropriate mitigation. This approach is reflected at the local level in Policies AAP5 and DM9.

6.19.3 The site forms part of an Archaeological Priority Area, due to evidence of a Medieval settlement with possible Anglo-Saxon roots and the presence of a former Roman road (Roman Ermine Street). The application is supported by an Archaeological Desk Based Assessment that reports on an assessment of the likely below ground archaeological potential of the site.

6.19.4 This finds that the site can be considered likely to have a theoretical archaeological potential for the Roman period, associated with the road alignment running along the eastern boundary, together with a low to moderate archaeological potential for the Medieval period. The available information indicates that areas of the site were developed from the eighteenth century onwards. The Assessment concludes by noting that if hitherto unknown archaeological remains were to be present within the site, they are considered most likely to be of local significance.

6.19.5 The Greater London Archaeological Advisory Service (GLAAS) has assessed the proposal and called for a two-stage process of archaeological investigation comprising evaluation to clarify the nature and extent of any surviving remains, followed, if necessary, by a full investigation. It is recommended that planning conditions secure this approach.

## 6.20 Fire Safety and Security

6.20.1 London Plan Policy D12 makes clear that all development proposals must achieve the highest standards of fire safety and requires all major proposals to be supported by a Fire Statement. The Mayor of London has published draft guidance of Fire Safety (Policy D12(A), Evacuation lifts (Policy D5(B5) and Fire Statements (Policy D12(B).

6.20.2 The application is supported by a Fire Statement that, following revisions, meets the requirements of a Fire Statement required by London Plan Policy D12 (A). The application has been the subject to a Gateway 1 consultation with the Health and Safety Executive. Gateway 1 is a relatively new requirement since summer 2021 with a new 'shadow' body within the HSE being established in advance of a formal building safety regulator being set up pending legislation currently going through parliament.

6.20.3 The HSE initially commented advising it had "Significant Concern". The Applicant's fire consultant provided further information which was supported by confirmation from both Haringey Building Control (HBC) and the London Fire Brigade (LFB) that the proposed development was appropriate from a fire safety perspective. The HSE was re-consulted and subsequently issued a second response, amending its comments and advising "Some Concern". The subsequent HSE response raises three main points:

1. Whether the length of the horizontal run of the dry fire main is suitable;
2. Whether the distance of travel for firefighters to the Percival Court entrance is acceptable; and
3. Whether two public fire hydrants are useable and sufficient to service the development.

6.20.4 The applicant has responded on these points and HBC and LFB remain of the view that the proposed development is appropriate and acceptable in fire safety terms. Whilst Points 1 and 2 are not in strict compliance with guidelines, this is not a definitive requirement and both HBC and LFB have provided assurances that in respect of both aspects they would be satisfied that the LFB could safely serve what is a tight, urban site in fire safety terms.

6.20.5 There must be a recognition that there are evidently site circumstances which dictate a different approach in this instance. In this case, the local parties responsible for considering the appropriateness of the fire strategy and addressing any fire issues on site (i.e. HBC and LFB) have confirmed that the scheme is acceptable.

6.20.6 In respect of Point 3, Condition 49 is imposed that requires the developer to show that the proposed public hydrants are operational, or if not demonstrate what the alternative solution is and prove its acceptability.

6.20.7 It is recommended that, in accordance with the Mayor of London's draft guidance, it should include a planning condition requiring the development to be carried out in accordance with the planning fire safety strategy (included in the Fire Statement).

6.20.8 The development would be required to meet the Building Regulations in force at the time of its construction – by way of approval from a relevant Building Control Body, including as part of Gateway 2. As part of the plan checking process a consultation with the London Fire Brigade would be carried out. On completion of work, the relevant Building Control Body would issue a Completion Certificate to confirm that the works comply with the requirement of the Building Regulations.

## 6.21 Equalities

6.21.1 In determining this planning application, the Council is required to have regard to its obligations under equalities legislation including obligations under the Equality Act 2010. In carrying out the Council's functions due regard must be had, firstly to the need to eliminate unlawful discrimination, and secondly to the need to promote equality of opportunity and to foster good relations between persons who share a protected characteristic and persons who do not share it. Members must have regard to these duties in taking a decision on this application.

6.21.2 As noted in the various sections in this report, the proposed scheme would provide a range of socio-economic and regeneration outcomes for the Tottenham area including a new cinema, commercial space and 72 new homes (including 7 x Low Cost Rent). This overall housing provision would add to Haringey's stock of market and affordable homes.

6.21.3 An employment skills and training plan, which is recommended to be secured by a S106 planning obligation, would ensure a target percentage of local labour is utilised during construction and a financial contribution towards apprenticeships. This would benefit priority groups that experience difficulties in accessing employment.

6.21.4 The proposed scheme would add to the stock of wheelchair accessible and adaptable dwellings in the locality and planning conditions could help ensure that the proposed layout and landscaping would help ensure that inclusive design principles are followed, in accordance with London Plan and local planning policy requirements.

## 6.22 Conclusion

6.22.1 The proposed scheme would result in a residential-led mixed-use development of approx. 3.33% of the High Road West NT5 Site Allocation. The incremental development of the Site Allocation is acceptable in principle and the proposed scheme would satisfactorily (i) safeguard the continued operation of industrial uses on the Peacock Industrial Estate in the existing context and (ii) not prejudice the ability of the adjoining land to be developed in general accordance with Policy NT5 requirements and guidelines and the adopted High Road West Masterplan Framework in the longer term.

*The proposed application scheme*

6.22.2 The loss of existing uses would be acceptable given that the existing banqueting suite it is not protected by policy, there is adequate retail provision in the nearby Local Centre, and the proposals would retain active commercial uses on the ground floor of the High Road. The proposed homes would make a notable contribution to meeting Haringey's London Plan housing target and the proposed cinema and flexible non-residential units would help mitigate loss of existing employment and enliven street frontages.

6.22.3 Officers welcome the proposed site layout, which locates the taller elements away from the heritage assets and the historic High Road. The scheme would also improve the surfacing and legibility of Brunswick Square and Percival Court. The scheme would also connect with and generally relate well with the existing situation whilst enabling incorporation into future proposals for NT5 as they come forward.

6.22.4 The affordable housing offer is based on a Fast Track approach (not supported by a Financial Viability Appraisal) of 35.4% affordable homes (by habitable rooms, raising to 40% with grant), split 60:40 Low Cost Rent and Shared Ownership. The proposed scheme would deliver 19.5% family homes, which is considered acceptable given the characteristics of the site and the proposed affordable homes would be satisfactorily integrated with Market housing across the site. The Council would also have the option of purchasing all 7 (100%) of the proposed Low Cost Rent homes to provide at Social Rent levels and London Affordable Rent levels to assist the redevelopment of Love Lane Estate. Officers consider that the offer would be acceptable, subject to s106 planning obligations securing viability reviews and ensuring affordability.

6.22.5 The scheme proposes a financial contribution towards off-site provision of open space (likely to be Peacock Park – as part of the future masterplan phases. The financial contributions to help deliver open space (as discussed under Social Infrastructure) would mitigate the slight under-provision of 17sqm. Financial contributions towards providing other social infrastructure (replacement library, community space and public realm) that is identified in Policy NT5 is also proposed. The proposed scheme is not expected to have a significant adverse effect on school places or primary health care provision and, in any event, CIL

payments could help fund planned additional provision to meet the demands from the new residents.

6.22.6 The proposed scheme would have a density of approx.248 units/ha which is considered acceptable given its location and access to amenities, and high public transport accessibility level. 10% of homes of various sizes would be 'wheelchair accessible'. The proposed homes would generally be high-quality and future residents would enjoy an acceptable level of amenity (in terms of aspect, size of homes, open space, play space, outlook/privacy, daylight and sunlight, noise, wind conditions, air quality and overheating). The proposed fire strategy set out in the submitted Fire Statement is also considered acceptable.

6.22.7 Officers do not consider that the proposed scheme, which is a maximum of 7-storeys, constitutes a 'tall building' for the purposes of the HRWMF assessment and Haringey Local Plan Policy. The form of the building steps up in height away from the heritage assets to the High Road and the taller elements are useful for wayfinding and are likely to fit in well with the rest of the masterplan. Officers are satisfied that the architectural quality of the proposed buildings is of a sufficiently high-quality to justify their proposed height and form and their likely effects on surrounding townscape. As such, it is considered that the proposed buildings would meet the policy tests established by the NPPF, London Plan Policy D9, Strategic Policy SP11, AAP Policy AAP6 and DPD Policies DM1 and DM6).

6.22.8 As set out in under Heritage Conservation, whilst officers consider that the proposed scheme would result in 'less than substantial harm' to the wider setting and significance of several heritage assets, they consider that the proposed scheme would result in the following significant public benefits that would outweigh this harm:

- Securing the long-term future of the Grade II listed 819-821 High Road and the locally listed buildings at 823-827 High Road;
- Integrating the statutorily and locally listed buildings at 819-827 High Road within the development, better revealing their significance in the process and enhancing their overall appearance and setting within the Conservation Area;
- Responding to Haringey's acute housing needs including the delivery of family and affordable housing, which is of particular importance given Haringey's low housing delivery in recent years;
- Creating a new, high-quality entranceway to Brunswick Square that opens views into a well-designed and active streetscape. Coupled with the creation of a high-quality, accessible, and secure public realm along Brunswick Square, this represents a significant improvement to the existing alleyway which is unattractive and unsafe;
- Achieving a better townscape legibility and integration of the site within the wider site allocation;
- Making a meaningful contribution to the wider regeneration objectives for North Tottenham and Site Allocation NT5;

- Attracting new investment and visitors to North Tottenham, with the proposed cinema and other commercial uses bringing new attractions and spending to the local area. Together with annual household spending from the new homes each year in the local area;
- The creation of new employment opportunities during the construction and operational phases, with opportunities for local recruitment and skills development;
- Acting as a catalyst for investment and further regeneration of Site Allocation NT5 and the wider area, redressing inequality and halting further decline in Tottenham without prejudicing other development in the vicinity;
- Generation of a total New Homes Bonus of c. £110,000 alongside circa. £100,000 a year in council tax revenue of which 71% would be retained by the LBH; and
- Complementing the ongoing regeneration of Tottenham that has taken place to the east, notably within the NDP and Northumberland Terrace.

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

6.22.10 The proposed scheme would improve connectivity and permeability between the masterplan area and High Road and White Hart Lane, without creating a rat-run for motor traffic. The scheme would have blue badge limited car parking and sufficient cycle parking, in line with policy requirements, and additional road traffic would be relatively small. Assessment by the applicant demonstrates that (when taking account of the proposed scheme, committed development and the emerging Lendlease proposals, there is unlikely to be significant impacts on London Overground line capacity or bus capacity and no discernible impact on the Victoria Line. Planning conditions and s106 planning obligations could help manage on and off-site car parking and ensure that Car Club provision, travel planning, delivery and servicing and construction activities are satisfactory.

6.22.11 The proposed buildings, open space, landscaping, and sustainable drainage features have generally been designed to take account of climate change and to reduce carbon emissions (although expected carbon savings from built fabric performance is below what policy expects). Planning conditions could secure commitments in relation to water usage, BREEAM 'Very Good' for the commercial units and measures to further the Circular Economy agenda. Subject to s106 planning obligations, the scheme would be connected to the proposed Heat Network and include some roof level PVs to help deliver 68% carbon emissions savings (SAP2012 carbon factors) (with offsetting financial contributions making up the shortfall). This is also likely to improve as the detailed design comes forward.



6.22.12 Recommended planning conditions require provision of bird and bat boxes in trees and buildings to encourage biodiversity and deliver a Biodiversity Net Gain. Officers do not consider that the scheme would give rise to significant effects (recreational pressure or air quality) on the Lee Valley or Epping Forest important European nature conservation sites.

6.22.13 Flood risk is low and likely environmental impacts, including noise, air quality, waste and recycling and land contamination, basement impact and archaeology could be made acceptable by use of planning conditions.

6.22.14 The proposed scheme would provide an accessible and safe environment and additional affordable homes. Subject to securing the delivery of various features and provisions identified in this report as well as local employment and training obligations, officers consider that the proposed scheme would have a positive equalities impact.

#### *Overall*

6.22.15 Subject to the recommended planning conditions and s106 planning obligations to secure necessary mitigation and policy objectives, officers consider that the proposed scheme is acceptable on its own merits, when considered against the development plan and all other material considerations.

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

7.1 Based on the information given on the plans, the Mayoral CIL would be £312,582, and the Haringey CIL charge would be £190,288. These are net figures and take into account social housing relief.

7.1.1 If planning permission were granted, the CIL would be collected by Haringey after/should the scheme is/be commenced and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation. An informative should be attached to any planning permission advising the applicant of this charge and advising them that the scheme is judged to be phased for CIL purposes.

7.1.2 The Council is proposing to increase the current Haringey CIL charge rate for the Eastern Zone of the borough from a base of £15 to £50 per square metre and consulted on a Draft Charing Schedule (DCS) between 18 December 2019 and 11 February 2020. The DCS was submitted for examination in September 2021 and, subject to the outcome of examination and Council adoption, will take effect at some point in 2022. The proposed development would be liable to pay the Haringey CIL rate that is in effect at the time that any permission is granted.

## **8 RECOMMENDATIONS**

8.1 GRANT planning permission for the reasons set out in Section 2 above.