Appendix 2: Internal and External Consultee Representations

Stakeholder	Comment	Response
INTERNAL		
Arboricultural Officer	I hold, from an arboricultural point of view, no initial objections to the hybrid planning application yet to be fixed (excluding Plot A). The 8.57 hectare site is within the North Tottenham Conservation Area. An Arboricultural Impact Assessment and Tree Survey has been carried out by Waterman Infrastructure Limited dated October 2021. The report has been carried out to the British Standard 5837: 2012 Trees in Relation to Design Demolition, and Construction- Recommendations. I mostly concur with the findings of the report and the quality assessment and the categorisation of the trees on site. There are 134 trees in total: • Two category A • 61 category B • 66 category C 67 arboricultural features are proposed to be removed. Of these: • 27 category B • 39 category C It is proposed to plant 236 new trees. This is a 4:1 ratio for the loss of the above. A vast majority of these replacement trees will be suitable heavy standards to make an instant impact, and standards. This is to replace the loss, ensure increased future continuity of cover, and an opportunity for species diversity. An illustrative Landscape Plan titled Illustrative Landscape Masterplan has also been submitted. This shows the extent of the planting, throughout the site with new planting to the north where industrial estates, lacking trees and vegetation, currantly exist. The detailed proposals will require an Arboricultural Method Statement. Tree and root protection areas are not to be compromised for the trees to be retained. The fixed Landscape Plan will require specifications, and a species list. A five year aftercare plan will also be required to ensure independence in the landscape. London Plane trees T1, 3, 4, 5, 63, 64, and 65 are the largest trees on and adjacent to site. All are shown on the trees for retention map 0311-SEW-ZZ-DR- A- 001- 100 however, T1, 3, 4, 5, 63, 64, 65, 148, 147 have been left off the Illustratiive Landscape Masterplan.	Landscape and arboricultural conditions are proposed to be attached to the permission.

Stakeholder	Comment	Response
	The trees for retention map shows T64 Plane tree to be retained. However, the survey recommends removal. This appears to be a street tree already under management. Confirmation will be required.	
Building Control	The BiA submitted reflects the Planning Application and is outline in nature and as such a detailed BiA will be required for the scheme when the detailed application is submitted. The principles noted in the BiA and its format are correct, however more detail is required that is not currently available. The fire safety statement is also like the BiA, outline and lacks specific detail as that is not known at this stage. Everything noted in the statement is correct (very much states that it will comply with all the relevant codes), but without the detailed knowledge of each building, it is outline in nature and a detailed fire safety statement for each building should be requested with the detailed planning application.	Detailed BIA and Fire Safety Statements will be secured by planning condition.

Carbon Management Team	**Carbon Management Response 21/12/2021** In preparing this consultation response, we have reviewed: • Energy and Sustainability Statement (Parts 1-3) prepared by (dated October 2021) • Outline Whole Life Carbon Report, prepared by Buro Happold (dated October 2021) • Detailed Whole Life Carbon Report Plot A, prepared by Buro Happold (dated October 2021) • Outline Circular Economy Statement, prepared by Buro Happold (dated October 2021) • Detailed Circular Economy Statement, prepared by Buro Happold (dated October 2021) • GLA carbon emission reporting spreadsheet • Relevant supporting documents. 1. Summary The development achieves a reduction of 44% carbon dioxide emissions on site overall, which is supported in principle. This will be achieved primarily through a connection to the Decentralised Energy Network. The detailed element of the hybrid application (Plot A) is proposed to reduce emissions by 91% overall, which is supported in principle. However, this plot does not fully comply with Policy SI2(B), which will need to be addressed. It also does not comply with Policy SI4 as the overheating strategy is not acceptable. Some further information is requested in relation to the Whole Life Carbon Assessment and the energy strategy for the outline element. Appropriate planning conditions will be recommended once this information has been provided. 2. Energy – Overall Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L (2013)). The London Plan (2021) further confirms this in Policy SI2. The overall predicted reduction in CO2 emissions for the development shows an improvement of approximately 44% in carbon emissions with SAP2012 carbon factors, from the Baseline development model (which is Part L 2013 compliant). This represents an annual saving of approximately 2,137 tonnes of CO2 from a baseline of 4,871 tCO2/year. London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations. The calculated unregulated emissions are: 7,052 tCO2 for the outline and detailed elements. The operational energy use requirement is calculated to be less than 43 kWh/m2 /year (including regulated and unregulated energy).	Planning conditions and planning obligations will be attached to the permission to secure the energy strategy, detailed carbon lifecycle assessment, boiler details, DEN details, carbon offsetting payments, Overheating assessment and mitigation, BREEAM accreditation, living roof details and management and details circular economy statement.

The ESS reports the reduction in emissions based on SAP10 carbon factors. SAP2012 carbon factors have been quoted below, in line with GLA guidance on carbon factors for sites connecting to a DEN.

	Residential (detailed)		Residential (outline)		Non-residential		Site-wide	
(SAP2012 emission factors)	tCO_2	%	tCO_2	%	tCO_2	%	tCO_2	%
Baseline emissions	40.1		3,789		1,042		4,871	
Be Lean savings	2.5	6%	371	10%	190	18%	563	12%
Be Clean savings	29.1	72%	1,293	34%	210	20%	1,532	32%
Be Green savings	4.8	12%	60	2%	13	1%	79	2%
Cumulative savings	36.3	91%	1,724	46%	413	40%	2,137	44%
Carbon shortfall to offset (tCO_2)	3.8		2,064		629		2,698	

Energy – Lean

Detailed: Plot A

The applicant has proposed a saving of 2.5 tCO2 in carbon emissions (6%) through improved energy efficiency standards in key elements of the build, based on SAP2012 carbon factors. This does not meet the minimum 10% reduction set in London Plan Policy SI2, so this is not in line with policy and must be addressed.

Outline

The applicant has proposed a saving of 371 tCO2 in carbon emissions (10%) for the residential and a saving of 190 tCO2 (18%) for the non-residential elements of the outline through improved energy efficiency standards, based on SAP2012 carbon factors. This meet the minimum 10% and 15% reduction respectively set in London Plan Policy SI2, so this is supported.

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

Thermal bridging	Accredited Construction Details		
Low energy lighting	100%	LEDs	100 lm/W lamp 60 lm/W display
Heating system (efficiency / emitter)	Communal gas boilers (89.5%, SAP heat losses 1.05 – Be Lean only)	Communal gas boilers (89.5%, radiators, SAP heat losses 1.05 – Be Lean only)	FCUs supplied via heat interface from DEN Direct electric hot water (retail)
Cooling	TBC	None	VRF / split system, EER/SEER 4.5
Thermal mass	Low		
Space heating requirement	40.2 kWh/m^2/y (Block A1) 42.5 kWh/m^2/y (Block A2/3)		
Improvement from the target fabric energy efficiency (TFEE)	13% improvement		

Actions:
- The carbon reduction under Be Lean for Plot A should be increased to at least 10% with SAP 2012 carbon factors.
- What is the g-value for windows on Plot A?

Overheating is dealt with in more detail below.

Energy – Clean

The Be Clean strategy to connect to the DEN is generally acceptable.

Detailed

The applicant proposes a temporary arrangement for Plot A before it is connected to the DEN. This would include installing high-efficient communal gas boilers within a centralised plant room in Plot A. This includes the same inputs as under Be Lean.

Outline

The development will connect into the southern Energy Centre (EC), to enable a connection to the Energy from Waste heat from Edmonton.

A backup solution has been proposed for the southern EC in case the connection into the Meridian Water Heat Network is unfeasible. This would be powered by an air source heat pump district heating solution, based in the

	northern EC for the wider High Road West site. The 3MW ASHPs would operate with a heat fraction of >90%, with 9.2 MW back-up gas boilers. The system would include external air coolers and a 50 m2 thermal store. The applicant will need to demonstrate that they will provide the following details prior to the commencement of construction: a) Buried pipe (dry and filled with nitrogen) to our specification from the GF plant room to a manhole at the boundary of their site and evidence of any obstructions in highway adjacent to connection point; b) A good quality network within the building – 60/40 F&R, R, <50W/dwelling losses from the network – ideally to an agreed standard in the S106; c) A clear plan for QA of the network post-design approval through to operation, based on CP1; d) A clear commercial strategy identifying who will sell energy to residents and how prices/quality of service will be set. Further comments from the Energy Infrastructure Manager will be included separately. Energy – Green As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4. The application has reviewed the installation of various renewable technologies. The report concludes that solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 79 tCO2 (2%) reduction of emissions are proposed under Be Green measures. Detailed The solar photovoltaic array peak output would be circa 36 kWp, which is estimated to produce around 18,000 kWh/year of renewable electricity per year, equivalent to a reduction of 4.8 tCO2/year. Outline The estimated solar photovoltaic array peak output is modelled at 1,274 kWp, with an annual generation of 955,739 kWh/year. Actions: - How will the solar energy be used on site (before surplus is exported onto the grid)? Will this feed into the centralised plant room and communal areas? Is there an option to provide the benefit equally to residents? Energy –Seen Detailed The estimated energy demand for Plot A is 204,243 kWh/year for electricity and 258,888 kwh/year for the district heating. The development will have smart meters installed per dwelling. 3. Carbon Offset Contribution	

A carbon shortfall of 2,698 tCO2/year remains, based on the development connecting to the DEN. The remaining carbon emissions will need to be offset at £95/tCO2 over 30 years.

A deferred carbon offset contribution mechanism will apply to this scheme as it is expected to connect to the DEN when this has been built.

The applicant should present two carbon reduction table scenarios:

- Scenario 1: Connection to the DEN scenario (residual tCO2 over 30 years)
- Scenario 2: Communal heating and gas boilers (residual tCO2 over 30 years)

Two carbon offset payments will be calculated. The carbon offset contribution for scenario 1 will be due at the commencement of development and the difference in the offset contribution between the first and second scenarios will be deferred for 10 years and indexed accordingly.

1. Payment for the residual emissions in the DEN scenario (Scenario 1) would be due at commencement of development.
2. A deferred carbon offset contribution is calculated through the difference in the offset contribution: Scenario 2 – Scenario 1 = Deferred Payment.
3. If, after 10 years the development has not connected to the DEN, the deferred payment (+indexation) is due.
4. If, after 10 years the development has connected to the DEN, the deferred payment would not be due but this amount would be available as a connection charge to the DEN.

	Base Carbon Offsetting Contribution (Communal gas boiler scenario; tCO_2)		Carbon Offsetting Contribution (Connecting to DEN scenario; tCO_2)	
	Residential	Non-residential	Residential	Non-residential
Baseline				
Total cumulative savings per annum (tCO_2, %)	(%)	(%)	(%)	(%)
Shortfall to offset	X1	Y1	X2	Y2
Carbon offset payment due for scenario	(X1+Y1) x 30 x £95 = £A		(X2+Y2) x 30 x £95 = £B	
Carbon Offsetting Contribution payment due at commencement of development			£B	
Deferred Carbon Offsetting Contribution (+indexation) payment due if not connecting to the DEN			£A - £B = £C	

4. Overheating
London Plan Policy SI4 requires developments to minimise adverse impacts on the urban heat island, reduce the potential for overheating and reduce reliance on air conditioning systems. Through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.

Detailed Overheating Assessment Plot A
In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 weather files, and the cooling hierarchy has been followed in the design. The Overheating Report prepared by Aecom (dated October 2021) is contained in the ESS.

Overheating Commentary and Actions:

Weather centre

- As outlined during pre-application discussions, the model needs to be redone with London Weather Centre data (not Heathrow) to represent the urban heat island effect. Further justification was also included in the emails dated 29th October, demonstrating that Tottenham (and this area in particular) suffers from ‘high heat risk’, which is the highest level of risk, on the GLA Climate Risk Metrics map (screenshot added below – ref Image 1). In addition:
o The proposed development and forthcoming development surrounding this site will cumulatively worsen the urban heat island effect, strengthening the need to undertake modelling with the London Weather Centre file.
o The site is in a unique position with noise/air pollution impacts from surrounding uses. The stadium is an additional contributor to noise, and with the stadium events being increased, this impact will be greater for local residents. This means the newhomes in this area must be built to address of concerns of noise (amongst other issues).
o This site will accommodate affordable housing. Occupants in affordable housing are more likely to be vulnerable in terms of their physical or mental health and wellbeing, may be restricted in their ability to leave their home during heatwaves, and may go into coolth poverty due to the need to install expensive cooling solutions. As such, it is even more important that such future occupants are protected from the overheating risks so that their homes will support them and not make their living situation worse.

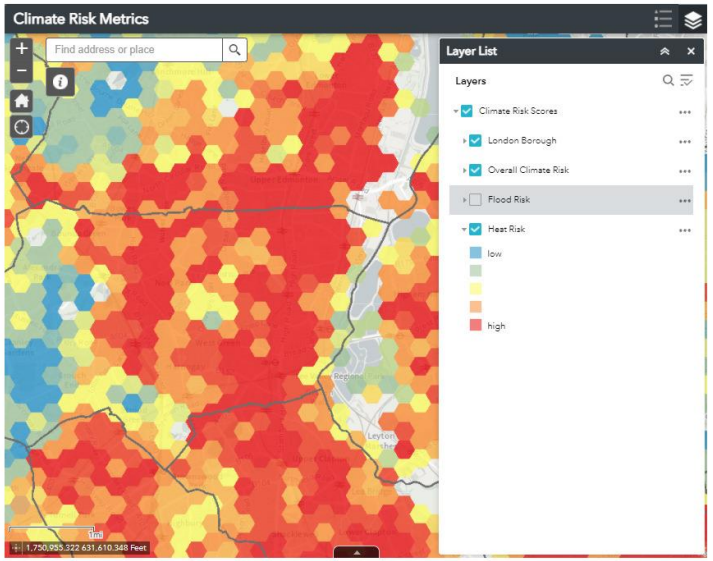

Image 1: GLA Heat Risk Map for Tottenham Haringey (dark red is highest risk)

Modelling further weather files

- The applicant has not modelled DSY 2 or 3 (2020s) or DSY1 (2050s and 2080s) for the development. Please also model these and ensure the design has incorporated as many mitigation measures to pass DSY 2 and 3 as feasible. These files should be used to inform what mitigation measures should form part of the retrofit plan to reduce future overheating risk, demonstrating that these measures can theoretically be accommodated within the current design in terms of structure/space requirements. This retrofit plan should be included within the submission. This is in line with the approach taken for the northern part of High Road West.

Additional modelling of dwellings
- The report has modelled 6 dwellings (10% of total apartments), under the London Heathrow files (this should be London Weather Centre). No rooms were modelled in Blocks A1 or A3, which is not considered acceptable. The applicant even notes in their report that further spaces should be modelled.

- Additional modelling should take place for representative dwellings in Blocks A1 and A3. Whilst it is acknowledged that dwellings in Block A2 may represent the 'worst case' in terms of noise levels, the other dwellings may not need noise attenuation/mitigation and therefore will require a different overheating strategy.

o Please model the following most likely to overheat rooms in these blocks:
At least 15% of all rooms across the development site;
All single-aspect dwellings facing west, east, and south;
At least 50% of rooms on the top floor;

	75% of all modelled rooms will face South or South/western facing; Rooms closest to any significant noise and / or air pollution source or on the ground floor, with windows closed at all times (unless they do not need to be opened and confirmed in the Noise and the Air Quality Assessments). - Include further modelling of the corridor in Block A3. Showing location of modelled spaces - The assessment doesn't show any floorplans annotating which flats and corridors have been modelled, nor does it specify why the 6 flats have been chosen. It's hard to tell from the 3D images. The applicant noted during pre-application discussions that this would be addressed in the report submitted in the planning application, in addition to further rationale for which dwellings were chosen. Principle of natural vs mechanical ventilation for modelling - Due to the noise constraints of this site being adjacent to the railway line, the TM59 criteria for predominantly mechanically ventilated dwellings apply (assuming windows need to remain closed based on a fixed temperature test). The assessment identifies that the top three floors (eastern façade A2) and top two floors (eastern façade A3) are deemed 'high risk' in terms of noise levels. - The overheating report has modelled the sample dwellings based on the principle of relying on natural ventilation. Constraints for residents to open windows have been identified, including noise from the railway and risk of crime for ground floor habitable rooms. In principle, where no mitigation is proposed, the overheating model should be based on mechanically ventilated dwellings with different criteria. a. The report does not clearly set out 1) which constraints apply to which dwellings, 2) proposed mitigation to noise/crime constraints, 3) which overheating criteria should be met. A plan should be included annotating which dwellings are subject to adverse noise constraints, which will have mitigation (and what mitigation), and whether they will be assessed under the natural or the mechanical ventilation (closed windows scenario) criteria. b. The report notes that the worst-case six dwellings have been modelled. If no acoustic mitigation is proposed for the dwellings that are subject to adverse noise levels, these should be assumed closed, and the assessment should assume they are mechanically ventilated. The applicant has Options 1-6 assuming open windows with various levels of mechanical ventilation/window opening and solar gain mitigation, without noise mitigation. c. Paragraph 1.6.1.2 notes that the rooms exposed to noise levels would not pass TM59 assuming closed windows without supplementary mechanical ventilation or temperature lopping. Paragraph 1.6.1.5 notes that acoustic mitigation was investigated but discounted (but no details). The applicant notes that enhanced mechanical ventilation 6-9ach would be suitable for closed windows, or temperature lopping. However, no modelling has been undertaken to demonstrate compliance. d. The applicant stated in pre-application discussions that secure by design measures were included in the design to allow residents to open their windows at night. No mitigation measures have been proposed to this effect. b. In summary: the applicant needs to clearly respond to point (a). Then, the overheating model needs to be done for natural/mechanical ventilation criteria, mitigating the overheating risk with measures in line with the Cooling Hierarchy. This means that passive design solutions need to be implemented before seeking enhanced mechanical ventilation or temperature lopping.	

	Further detailed comments to report: - The Executive Summary should be clear on what the parameters/inputs of the modelled options are before summarising their results. - Please set out the difference in energy demand, level of control and comfort between enhanced ventilation (6-9ach) and temperature lopping. - The assumed pipework heat losses of 11W/m may be a little high depending on the diameter of the pipe and how the system is designed. - Confirm that Haringey Council will own the overheating risk when the building is occupied (not the residents). Overheating Design Guidelines Outline Plots Design guidelines for the outline plots are described in Section 6. In summary this includes: - Natural ventilation preferred approach - Optimising passive design o Cross-ventilation through openable windows in dual aspect rooms and flats o MVHR o Balcony placement to reduce solar gain on southern facades o Deep window revels (200-300mm) o Set maximum glazing area to maximum 25% of its floor area o Reduce floor-to-ceiling glazing in favour of more horizontal glazing o Consider orientation and massing in relation to layouts 5. Sustainability Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. BREEAM Communities – masterplan level The applicant has prepared a BREEAM Communities Pre-Assessment Report for the whole masterplan. This holistic approach to sustainability is supported as part of this hybrid application and it will continue to help shape the development with a community focus thereafter. A 'Very Good' rating should be achievable according to the Pre-Assessment. The tracker assessed that a score of 76.8% is achievable for Step 1 (with 22% of potential extras for Step 1); this results in an overall achievable score of 27.3% so far. The applicant is aiming to achieve 'Excellent', which should be attainable as well. BREEAM Requirement – plot level Policy SP4 requires all new non-residential developments to achieve a BREEAM rating 'Very Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable. BREEAM New Construction will sought at plot level in addition to the BREEAM Communities accreditation. Furthermore, Home Quality Mark (HQM) will be	

sought for the new homes at plot level. The dwellings at Plot A are predicted to achieve a 4-star rating (256 credits), according to the HQM Pre- Assessment.

Living roofs

All development sites must incorporate urban greening within their fundamental design, in line with London Plan Policy G5. The development is proposing living roofs in the development.

All landscaping proposals and living roofs should stimulate a variety of planting species. Mat-based, sedum systems are discouraged as they retain less rainfall and deliver limited biodiversity advantages. The growing medium for extensive roofs must be 120-150mm deep, and at least 250mm deep for intensive roofs (these are often roof-level amenity spaces) to ensure most plant species can establish and thrive and can withstand periods of drought. Living walls should be rooted in the ground with sufficient substrate depth. Living roofs and walls are supported in principle, subject to detailed design. Details for living roofs will need to be submitted as part of a planning condition.

Whole Life Carbon
Policy SI2 requires developments referable to the Mayor of London to submit a Whole Life Carbon Assessment and demonstrate actions undertaken to reduce life-cycle emissions.

Plot A	Estimated carbon emissions	Meets benchmark?
Modules A1-A5	415 $kgCO_2e/m^2$	Meets GLA target (800 $kgCO_2e/m^2$) and LETI aspirational target (500 $kgCO_2e/m^2$)
Modules B-C (excl. B6 and B7)	218 $kgCO_2e/m^2$	Meets GLA target (400 $kgCO_2e/m^2$) and LETI aspirational target (240 $kgCO_2e/m^2$)

Action:
- The applicant's outline WLC report is not loading correctly which means information is missing (sentences or words). Please submit a new version of the pdf to receive comments.

Circular Economy

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. 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.

The applicant has submitted a hybrid CES and a detailed CES for Plot A.

The principles used for this development are:
- Long-term habitation

	- Phased development over 10 years, including meanwhile uses, especially to support repair and storage capacity. - Robustness and maintenance in terms of public realm design appropriate for large pedestrian numbers - Integration of social aspects into the masterplan circular economy - Future proofing the site for new economic and social trends - Based on the Lendlease Sustainability Standards (Sustainable Economic Growth, Vibrant & Resilient Communities and Cities, and Healthy Planet and People) - Designing for longevity of residential - Designing for flexibility and adaptability of all uses - Promoting flexible spaces for all open and green spaces - Using new materials responsibly and sustainably, re-using and using less materials, sitewide - Restoring and enhancing the community - Reusing materials from existing buildings with a Pre-Demolition Audit (included in Appendix E for Plot A) - Minimise operational waste and provide adequate space for recycling site-wide Outline: The report sets out the Outline Application Key Commitments (Table 4-1), Recycling and waste reporting form (Table 4-2). Bill of materials is not available at masterplan level. The report includes a circular economy narrative and implementation strategy. Plot A: The report sets out the Key Commitments (Table 3), Bill of materials (Table 4) and Recycling and waste reporting form (Table 5). 6. Conclusion Overall, it is considered that the application cannot currently be supported as it does not comply wholly with London Plan Policies SI2, SI4 and Local Plan Policies SP4 and DM21. Planning Conditions To be secured (with detailed wording TBC): - Energy strategy - Overheating - BREEAM Communities Certificate - BREEAM New Construction Commercial Certificate(s) - Home Quality Mark Certificates - Living roofs and walls - Circular Economy - Whole-Life Carbon - Biodiversity Planning Obligations Heads of Terms - Be Seen commitment to uploading energy data - Deferred carbon offset mechanism (and associated obligations), including a 10% management fee	

- Connect to the DEN within 10 years of the permission, if it doesn't come forward a lowcarbon fallback position should be submitted and agreed by the Local Planning Authority.

Carbon Management Response 04/03/2022

In preparing this consultation response, we have reviewed:

- Plot A TM59 Overheating Report, prepared by Aecom (dated February 2022);
- Lendlease Consultant response to CM comments on overheating issued 21 December 2021, rev 01;
- Lendlease Consultant response to CM comments issued 21 December 2021, dated 15th February 2022;
- GLA carbon emission reporting spreadsheet for Plot A (in two sheets and a third sheet summarising);
- Relevant supporting documents.

Summary
The proposed development now complies with the relevant London Plan and Local Plan planning policies in relation to carbon reduction and sustainability, subject to securing the conditions as listed at the end of this response.

Energy
Discussions with the applicant confirmed the justification for using SAP2012 carbon factors.

Plot A
A revised table for Plot A has been issued – copied below.

	Plot A carbon reductions			
	Interim gas boiler scenario		Connection to DEN scenario	
(SAP2012 emission factors)	tCO_2	%	tCO_2	%
Baseline emissions	80.9		80.9	
Be Lean savings	4.9	6%	4.9	6%
Be Clean savings	0	0%	44.2	54.6%
Be Green savings	9.2	11.4%	9.2	11.4%
Cumulative savings	14.1	91%	58.3	72.1%
Carbon shortfall to offset (tCO_2)	66.8		22.6	
Carbon offset contribution	£190,380		£64,410	

An initial offset contribution for Plot A of £64,410 + 10% management fee would be due.

If the development does not connect to the DEN, a deferred offset contribution of £125,970 + 10% management fee will be due (£190,380 - £64,410).

Overheating

The following changes have been made to the report that are of note:

- The sample units as noted above have now been reworked with the London Weather Centre file.
- Additional units have been modelled, increasing the sample size from 6 to 23 (15 in A1; 2 duplex units in A2/A3).

Other considerations/responses are:

- Noise from the stadium was considered to be blocked by the massing of Block D.
- Noise from stadium crowds travelling to or waiting at White Hart Lane were not considered within the response.
- 10 units (top three floors on eastern façade of Blocks A2 and top two floors of Block A3) will be constrained by noise due to its orientation facing the railway. These will be mitigated through mechanical ventilation or a peak lopping system.
- Natural ventilation openable to 90 degrees (with 100mm night-time restrictors), g-values of 0.47 and internal blinds (shading coefficient of 0.353 and short-wave radiant fraction of 0.68), will be achieved for all other units similar to the sampled dwellings.

The initial overheating assessment was carried out on block A2 (which also represents block A3 as they have the same layouts).

Various options were modelled:

- Option 1 - 100mm restrictors on the side hung windows were removed, all windows open to 90°.
- Option 2 - As option 1, with a more intelligent user behaviour by the occupier, i.e. windows are shut to preventing warm external air entering space at peak times, allowance of night-time trickle ventilation through the windows using the 100mm restrictors.
- Option 3 - As option 2, with the openings updated: all side hung windows that are not opening onto a balcony are restricted to 100mm, bottom pane windows are openable via bottom hung with 100mm opening restrictions. All balcony doors are closed, one of the two balcony doors in each apartment is opaque, 1100mm windowsill (balconies) has a fully openable window to 90°.
- Option 4 – As option 3, with restrictors on the side hung windows increased to 300mm.
- Option 5 – As option 4, with restrictors on the side hung windows increased to 600mm. Internal blinds applied to the closed balcony doors.
- Option 6 – As option 5, side hung windows no longer have restrictors and are fully openable to 90°.
- Option 6a includes the same parameters as option 6 above, however fully openable windows now feature blinds that only operate when the windows are closed. The blinds feature a shading coefficient of 0.353 and short-wave radiant fraction of 0.68 were applied to the closed balcony doors.

Compliance with DSY1 2020s								
Unit	Base case	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 6a
A2.02.01	Fail	Fail	Fail	Fail	Fail	Pass	Pass	Pass
A2.02.02	n/a	n/a	n/a	Fail	Fail	Pass	Pass	Pass
A2.02.03	Fail	Fail	Fail	Fail	Fail	Fail	Pass	Pass
A2.05.01	Fail	Fail	Fail	Fail	Fail	Fail	Pass	Pass
A2.05.02	n/a	n/a	n/a	Fail	Fail	Fail	Fail	Pass
A2.05.03	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Pass

Compliance of Option 6a	
	Number of habitable rooms pass TM59
DSY1 2020s	24/24
DSY2 2020s	9/24
DSY3 2020s	10/24

Overheating risk in corridors

These assessments have been done in the event that the windows in the corridor could not be opened.

TM59 assessment result – Communal corridor overheating results			
Ventilation rate	No. hours > 28ºC	% Annual hours > 28ºC	Significant overheating risk?
1ach	2986	34.1	Yes
2ach	1271	14.5	Yes
3ach	377	4.3	Yes
4ach	200	2.3	No

Retrofit options for future reduction of overheating risk

To be considered in order of the Cooling Hierarchy:

- More efficient internal lighting installations to further reduce internal gains
- Efficient LTHW pipework to minimise heat loss and heat gain to spaces.
- Consider additional external shading, louvres, fins and canopies.
- Internal shading devices upgrades
- Glazing replacement strategies – improve solar control (g-value)

- Consider retrofits to allow windows/doors to remain more open at night.
- Improve cross ventilation by considering fire louvred/dampers above internal doors to allow additional air flow.
- Increased mechanical ventilation rates
- Addition of temperature lopping units and or increase cooling capacities
- Consider air movement fans to assist comfort temperatures, i.e. ceiling fans, standalone fans

Conclusion
The overheating strategy is considered generally acceptable, subject to securing a planning condition.

Planning Obligations Heads of Terms

- Energy Plan and Sustainability Review by phase
- Be Seen commitment to uploading energy data
- Deferred carbon offset mechanism (and associated obligations), including a 10% management fee
- Connect to the DEN within 10 years of the permission, if it doesn't come forward a low-carbon fallback position should be submitted and agreed by the Local Planning Authority.

Planning Conditions

Energy Strategy (Plot A)
The development hereby approved shall be constructed in accordance with the Energy Statement for Plot A prepared by Aecom (dated October 2021) delivering a minimum 72% improvement on carbon emissions over 2013 Building Regulations Part L, with SAP2012 emission factors, high fabric efficiencies, connection to the Decentralised Energy Network and a minimum 36 kWp solar photovoltaic (PV) array.

(a) Prior to above ground construction, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:

- *Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;*
- *Confirmation of the necessary fabric efficiencies aiming to achieve a minimum 10% reduction in SAP2012 carbon factors, including details to reduce thermal bridging;*
- *Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the units;*
- *Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp);*
- *A metering strategy.*

The development shall be carried out strictly in accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.

	(b) Within six months of first occupation, evidence that the solar PV installation has been installed correctly shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, a six-month energy generation statement, and a Microgeneration Certification Scheme certificate. *(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.* *Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.* *<u>Gas Boilers (Plot A)</u>* *The combination gas boilers that are to be installed throughout the development shall achieve a minimum seasonal space heating energy efficiency rating of 92% as defined under the Energy-related Performance Directive (ErP), without relying on additional technologies to control the operation of the boiler. The applicant shall demonstrate compliance by supplying installation specification within three months post-completion of the development. Once installed these boilers shall be operated and maintained as such thereafter.* *Reason: In the interest of reducing the impacts of climate change, in accordance with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM21.* *<u>Energy Strategy (Reserved Matters Applications)</u>* *(a) Each application for the first reserved matters relating to Appearance, Layout or Scale submitted by phase/block shall be accompanied by an Energy Strategy. This phase block shall achieve the minimum requirements in line with the most up to date planning policy framework at the time of submission and shall achieve no less than a reduction in carbon emissions of 46% (residential) or 40% (non-residential) compared to a Building Regulations Part L 2013 compliant building with SAP2012 carbon factors.* *The strategy will set out:* - *Confirmation of how this phase/block will meet the zero-carbon policy requirement in line with the Energy Hierarchy;* - *How this phase/block will achieve minimum carbon reductions at the Be Lean Stage in accordance with the most up-to-date planning policy requirements, but no less than 10% (residential) or 18% (non-residential) with SAP2012 carbon factors;* - *The proposed heating, renewable energy and ventilation strategies (including their efficiency, output and layout);* - *How the phase/block will contribute to the site-wide minimum solar PV array output of 1,274 kWp, demonstrating that the roof spaces have been maximised to deliver the maximum amount of solar PV output;* - *Calculate carbon offset contribution for that phase/block;* - *A metering strategy;*	

	- *Design of the energy centre detailing space for a sub-station to connect to the off-site (primary) network and on-site (secondary) network, as well as dry primary pipework from the energy centre to the agreed point of connection.* *The final agreed energy strategy shall be installed and operation prior to the first occupation of the relevant phase/block. The development shall be carried out strictly in accordance with the details so approved and shall be operated and maintained as such thereafter.* *Should the agreed target not be able to be achieved on site through energy measures as set out in the aforementioned strategy, then any shortfall should be offset at the most up-to-date approved cost per tonne of carbon plus a 10% management fee. Should an increased level of CO_2 reduction be achieved, any carbon offset payment would be reduced in line with this price.* *Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.* *<u>Energy Strategy (Commencement of each Block/Phase)</u>* *(a) Prior to the commencement of construction works for each blocks/phase, details relating to the Energy Strategy must be submitted to and approved by the local planning authority. This shall include:* - *A metering strategy;* - *Detail of pipe routes and lengths, pipe sizes (taking account of flow and return temperatures and diversification) and insulation to determine heat loss from the pipes in Watts per dwelling in order to demonstrate losses have been minimised;* - *Further detail of how the developer will ensure the performance of the system will be safeguarded through later stages of design (e.g., value engineering proposals by installers), construction and commissioning including provision of key information on system performance required by CoP1 (e.g. joint weld and HIU commissioning certificates, CoP1 checklists, etc.);* - *Any outstanding requirements set out in a response to the Energy Strategy by the local planning authority or GLA submitted for relevant Reserved Matters Application of that plot/block.* *(b) Within six months of completion of each block, evidence shall also be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.* *Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.* <u>Overheating (Plot A)</u> *Prior to the commencement of development, or at the submission of any amendment application for Plot A concerning the design and layout, a revised Overheating Assessment shall be submitted to and approved by the Local Planning*	

	Authority. The overheating model will assess the overheating risk in line with CIBSE TM59 (using the London Weather Centre data) and demonstrate how the risks have been mitigated and removed through design solutions. These mitigation measures shall be operational prior to the first occupation of the development hereby approved and retained thereafter for the lifetime of the development. *This report will include:* - *Additional overheating modelling for Units in Block A1 for a representative sample of dwellings;* - *Remodelling of the sample dwellings modelled for Blocks A2 and A3 incorporating any design changes following planning permission;* - *Annotated floorplans showing which spaces/dwellings have been modelled. The report should model all single-aspect dwellings, min. 75% of rooms facing south or south-west, min. 50% of top-floor rooms, and rooms closest to any risk of crime / noise and / or air pollution source that assume windows closed at all times (unless the constraint is mitigated to allow for openable windows as confirmed in the Noise and the Air Quality Assessments).* - *Details of the mitigation design measures incorporated within the scheme (including details of the feasibility of prioritising passive cooling and ventilation measures in line with the Cooling Hierarchy) to ensure adaptation to higher temperatures are addressed, the spaces do not overheat, and the use of active cooling is avoided.* - *Information supporting the assumed pipework heat losses as required under the Energy Strategy condition.* *REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.* *<u>Overheating (Outline - Residential)</u>* *(a) Each application for the first reserved matters relating to Appearance, Layout or Scale submitted by phase/block shall be accompanied by a detailed Overheating Assessment. The Overheating Assessment shall be submitted for the written approval of the Local Planning Authority and shall be informed by Dynamic Thermal Modelling based on CIBSE TM59 for the residential spaces and TM49 weather files. The assessment shall be undertaken in line with the following:* *i. The London Weather Centre dataset;* *ii. Mandatory pass of DSY1 for 2020s file, with the necessary mitigation measures in line with the Cooling Hierarchy;* *iii. Demonstrate the reduction in overheating risk for future weather patterns (DSY2 and DSY3 2020s, DSY1 2050s). Mitigation for the 2020s period must be integrated into the design through passive design measures as far as feasible. The risks and the mitigation strategy for the periods of the 2050s should be set out in a retrofit plan, confirming that measures can be fitted in the future and who will own the overheating risk;* *iv. Include any replacement / repair cycles and the annual running costs for the occupiers;* *v. Floor plans highlighting the modelled dwellings across the development and showing all rooms (with unique reference number). The applicant is expected to model the following most likely to overheat dwellings:* • *At least 15% of all rooms across the development site;*	

	• *All single-aspect dwellings facing west, east, and south;* • *At least 50% of rooms on the top floor;* • *75% of all modelled rooms will face South or South/west;* • *Rooms closest to any risk of crime / noise and / or air pollution source, with windows closed at all times (unless mitigation measures demonstrate that these windows can be opened, as confirmed in the Noise and the Air Quality Assessments).* *(b) Any overheating mitigation measures set out in an approved Overheating Assessment shall be implemented before any of the dwellings in the Block to which they relate are first occupied and retained thereafter for the lifetime of the development.* *REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.* *<u>Overheating (Outline - Non-residential)</u>* *At least six months prior to the occupation of each non-residential area, an Overheating Report must be submitted to and approved by the Local Planning Authority if that space is to be occupied for an extended period or will accommodate any vulnerable users, such as office/workspace, community, healthcare, or educational uses.* *The report shall be based on the current and future weather files for the CIBSE TM49 London Weather Centre dataset. It shall set out:* - *The proposed occupancy profiles and heat gains in line with CIBSE TM52* - *The modelled mitigation measures which will be delivered to ensure the development complies with DSY1 for the 2020s weather file.* - *A retrofit plan that demonstrates which mitigation measures would be required to pass future weather files (DSY2 and DSY3 2020s; DSY1 2050s), with confirmation that the retrofit measures can be integrated within the design.* *The mitigation measures hereby approved shall be implemented prior to occupation and retained thereafter for the lifetime of the development.* *REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.* *<u>Living roofs/Living walls</u>* *(a) Prior to the commencement of development, details of the living roof(s) and/or living wall must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:* *i. A roof plan identifying where the living roof(s) will be located;*	

	ii. A ground floor plan identifying where the living wall(s) will be rooted in the ground, if any, and a section showing the soil planting depth; *iii. A section demonstrating varying settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);* *iv. Roof plans annotating details of the substrate: showing at least two substrate types across the roof, annotating contours of the varying depths of substrate;* *v. Details of the proposed type of invertebrate habitat structures on the roof(s) with a minimum of one feature per 30m^2 of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m^2, rope coils, pebble mounds of water trays;* *vi. Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m^2) and density of plug plants planted (minimum 20/m^2 with roof ball of plugs 25m^3) to benefit native wildlife, suitable for direct sunshine/shading of the different living roof spaces. The living roof will not rely on one species of plant life such as Sedum (which are not native);* *vii. Roof plans and sections showing the relationship between the living roof areas and photovoltaic array, if any; and* *viii. Management and maintenance plan, including frequency of watering arrangements.* *(b) Prior to the occupation of 90% of the dwellings of the Block to which the living roof(s) and/or living wall(s) relate, evidence must be submitted to and approved by the Local Planning Authority that the living roof(s) have been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roof(s)/wall(s) have not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roof(s)/wall(s) shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.* *Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.* *<u>BREEAM (Communities)</u>* *(a) Prior to commencement on site, a BREEAM Communities design stage accreditation certificate must be submitted to and approved by the Local Planning Authority confirming that the development will achieve a BREEAM "Very Good" outcome (or equivalent), aiming for "Excellent".* *The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.*	

	(b) At least six months prior to occupation, a BREEAM Communities post-construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved. *In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority's approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.* *Reasons: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.* *<u>BREEAM (New Construction)</u>* *(a) Prior to commencement on site, a BREEAM New Construction design stage accreditation certificate for every type of non-residential use must be submitted to and approved by the Local Planning Authority confirming that the development will achieve a BREEAM "Very Good" outcome (or equivalent), aiming for "Excellent".* *The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.* *(b) At least six months prior to occupation, a BREEAM New Construction post-construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval for every type of non-residential use, confirming this standard has been achieved.* *In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with two months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within three months of the Local Authority's approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.* *Reasons: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.* *<u>Circular Economy (Outline applications)</u>* *Each application for reserved matters shall be accompanied by a detailed Circular Economy Statement and Operational Waste Management Strategy in line with the GLA's Circular Economy Statement Guidance, which shall be submitted to and approved in writing by the Local Planning Authority. The statement shall adhere to the principles set out in the draft Circular Economy Statement. The development shall be carried out in accordance with the details so approved.*	

	Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials. *<u>Circular Economy (Post Completion Reports)</u>* *Prior to the occupation of any phase, a Post Completion Report setting out the predicted and actual performance against all numerical targets in the relevant Circular Economy Statement shall be submitted to the GLA at: circulareconomystatements@london.gov.uk, along with any supporting evidence as per the GLA's Circular Economy Statement Guidance. The Post Completion Report shall provide updated versions of Tables 1 and 2 of the Circular Economy Statement, the Recycling and Waste Reporting form and Bill of Materials. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation.* *Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials.* *<u>Whole Life Carbon</u>* *Prior to the occupation of each building, the post-construction tab of the GLA's whole life carbon assessment template should be completed accurately and in its entirety in line with the GLA's Whole Life Carbon Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage, including the whole life carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. This should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation of the relevant building.* *Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings.*	

Stakeholder	Comment	Response
Conservation Officer	1 Site: The extensive development site forming the High Road West masterplan is in North Tottenham, where a well-preserved, mainly Georgian, and Victorian townscape survive as part of the North Tottenham Conservation Area. The setting of this valuable historic townscape and street frontage is set to gradually change and become progressively complemented in the background by residential, high rise contemporary developments to both sides of the High Road as part of the adopted vision of the Council for the urban regeneration of the North Tottenham area. This extensive development site encompasses in its current configuration various character areas and buildings of various age, various degrees of architectural and urban quality which coexist in a juxtaposed fashion and include parts of the North Tottenham Conservation Area which is interrupted between Moselle place and Brereton Road where a terrace of locally listed buildings still survives, the light industrial buildings sitting just at the back of the historic frontage and forming the Peacock Industrial Estate, the Goods yards site which borders the Overground railway line and the modern residential estates , including the Whitehall street estate located to the west of the railway line, comprised between the south of White Hart Lane and Brereton Road where the gap in the North Tottenham Conservation Area ends and the Conservation Area boundary resumes and is signposted by the locally listed St Francis de Sales school. The immediate surrounding of the development site is framed to the north by the five storey Brook House primary school, the six storey Mallory Court Apartments and the 23 storey high Rivers Apartment tower. To the immediate east of the development site which extends along the northernmost stretch of Tottenham High Road and its Conservation Area the existing townscape is characterised by a prevailing two-to-three storey historic frontage interspersed with modern buildings up to 5 storeys high and one-to-two light industrial buildings to the back. To the south the development site is defined along Brereton Road by the two storeys, locally listed St Francis De Sales church and single storey annexed school both included within the North Tottenham Conservation Area. To the west the site is bound by the Overground railway line serving White Hart Lane station. The proximity to and the overlapping of the development site with the North Tottenham Conservation Area and the locally listed buildings comprised between Moselle Place and Brereton Road are fundamental considerations to understand and address the heritage sensitivities and constraints related to this project. The Conservation Area and its heritage assets also represent unique opportunities to design the most heritage-sensitive and appropriate development proposals tailored to this unique and irreplaceable historic environment. 2 The Conservation Area- overview	Officers are confident that the submitted control documents would ensure the concerned raised can be addressed through reserved matters applications. The less than substantial harm arising to designed and non-designated heritage assets is considered to be outweighed by the significant public benefits arising from the development including but not limited to new housing (including affordable housing, substantial, public realm improvements, new access routes, new civic square, new public

Stakeholder	Comment	Response
	Tottenham High Road Conservation Area is a linear Conservation Area within a densely built-up urban setting with an almost intact 19th century townscape incorporating notable surviving examples of earlier periods. The areas immediately to the east and west of the High Road have changed dramatically over the centuries. Despite these changes the townscape retains a high degree of historical continuity, maintaining a contained linear street pattern forming a sequence of linked spaces and sub spaces, with a notable variety and contrast in architectural styles and materials. The street width and alignment still follow the form established by the mid-19th century. The development site runs along the northern part of the Conservation Area, which is the best surviving townscape section of the High Road, containing some outstanding Georgian architectures as part of a built sequence reflecting changing patterns of development from the early/mid-18th century through the 19th to the 20th century. The buildings of varying ages contribute to a cohesive and contained streetscape due to the general conformity in scale, height, and materials together with the variation in silhouette or roofline. Especially the section of the High Road contained between Brantwood Road and White Hart Lane, is the most complete part of the Conservation Area in terms of its surviving historic buildings and townscape form. The western frontage of the Conservation Area It is useful to focus more in detail on the western side of the Conservation Area and its most valuable heritage buildings as this part and related street frontage will be immediately adjoined by the proposed development: the High Road's northern 'entrance' is defined on the west side by listed buildings Nos. 867-869, an imposing group of early-18th century of houses, and by the Coach and Horses public house opposite, of early-19th century origins, which announce the predominantly Georgian character of the northernmost stretch of the High Road. This short entry sequence terminates with a gap site fronting the timber yard (Nos. 855-863), enclosed by unsightly hoardings, and is marked by the mature street tree on the west side of the High Road. Buildings at Nos 867-869 High Road offer an opportunity for preservation and enhancement of the character of the gateway into the Conservation Area from north where the new development will be largely legible in the background of the Conservation Area. Further to the south, along the High Road the continuous building frontage on the west side contains a mix of 18th, 19th and 20thcentury buildings. The three locally listed early-18th century houses at Nos. 847-851 have modern shop fronts and like the early-19th century building at No. 845 have been altered due to painting, rendering and replacement windows. The Edwardian public house at Nos. 841-843 is an important punctuation in the street scene with its mock Tudor style and taller gable roof with brick chimney stacks. South of the pub at Nos 835-839 stand three early-19th century houses with shops, originally a uniform terrace that may have also incorporated the two houses replaced by the	park, new employment and training opportunities and new community infrastructure.

Stakeholder	Comment	Response
	Chequers; No. 835 is an altered yet neutrally contributing building, whereas the poorly proportioned post-war building at Nos 831-833 detracts from the character of the Conservation Area. To the south of Brunswick Square passageway, the locally listed building at No. 829, dating from the early-19th century, was a public house in the 1880s, and No. 827, rebuilt c1900, has a projecting gable and well-preserved 1900's shop surrounds. The locally listed building at Nos. 823-825, rebuilt in the late-19th century, has a decorative plaster frieze below the cornice and a good shop front with Corinthian columns. The west side of the High Road is further defined to the south by a significant sequence of locally listed properties at Nos 813-817 High Road, by grade II listed properties at Nos 819-821 High Road which are grade II listed as an early C18, relatively well-preserved pair of three-storey Georgian townhouses with late C19 shops on the ground floor and a symmetric façade composition complemented by original features. These buildings have been progressively converted, redeveloped, altered externally and to a greater degree internally and have lost their original use. But despite all these alterations this pair retains many original C18 features and the legibility of their original façade and spatial composition. From here to the corner with White Hart Lane the street frontage continues with a good sequence of 18th and 19thcentury Locally listed buildings, including properties at Nos. 809-811 characterised by double-pitched mansard roof front and back with a central valley gutter. The rear elevation appears to have early sash windows with frames flush with the brickwork. They possibly date from the early/mid18th century although the shop fronts were added later. The grade II listed building at Nos 797-799 The locally listed corner building at Nos. 793-795 which returns on White Hart Lane is a late-19th century commercial building with cast-iron cresting at roof level and pilasters to ground floor. To the south of White Hart Lane properties at Nos 769-781 are a group of locally listed buildings which conclude the northern part of the Conservation Area. These buildings reflect the early phase of Victorian commercial development along the High Road. Nos. 773-779 is a mid- 19th century terrace built with original shop fronts. The prominent keystones and cornice line still contribute to the street scene although the terrace and shop fronts have been extensively altered. Nos. 769-771 originally part of a row of five, also with shops, is of a similar date, with the facades now rendered. The late-19th century building immediately to the south on the corner of Moselle Street, just-outside the Conservation Area, and the buildings at Nos 743-759 comprised between Moselle Place and Whitehall Street are a consistent group of locally listed assets. Property at Nos. 743-757 is a three storey terrace of houses with projecting ground floor shops, notable for its prominent keystones and cornice but otherwise much altered in appearance by rendering and painting of the façade, replacement windows and modern shop fronts. This terrace bears townscape and group value.	

Stakeholder	Comment	Response
	The street frontage comprised between Whitehall Street and Brereton Road is characterised by a much-altered Victorian terrace with commercial parade and by a mid-20th century block of flats located at No. 729 High Road and considered a good example of its period incorporating a public library extension and a locally listed, small early-20th century Gothic-style brick sub-station. Just to the south of the development site lies the southern stretch of the North Tottenham Conservation Area with the locally listed 1895 Church of St Francis de Sales prominently standing on the corner between the High Road and Brereton Road with the main façade fronting the high road and the adjacent presbytery and school fronting Brereton Road. The historic townscape surrounding the junction between the High Road and White Hart Lane is especially significant from the heritage conservation perspective because the east side of the High Road, almost opposite White Hart Lane, stand some of the most highly graded and best-preserved Georgian houses known as Northumberland Terrace. The Georgian terrace comprises properties located at Nos. 790 to 802, and 808-810 which together with the opposite street frontage form a densely bult, almost continuous original development two-three storey high that greatly contribute to the sense of enclosure and character of the historic High Road. 2.2 The Conservation Area at White Hart Lane White Hart Lane is characterised between the High Road and the Overground station by a varied yet much altered townscape which encompasses various periods from Georgian through mid to late Victorian up to post-war housing. The south street frontage is characterised by post-war public housing whereas the north side is defined by a much-altered 19th-century terrace that remains significant only for its group value as a contribution to the street enclosure. On the north side of White Hart Lane, starting from the High Road property at Nos. 2-4 is a pair of modest houses that have been much altered. The locally listed building at No 6 was originally one of a pair of small houses, partly rebuilt after the adjoining house was demolished to widen the entrance to Chapel Place which links White Hart Lane with the High Road through the archway between Nos. 811 and 813 High Road. The locally listed former Catholic Chapel and Pastor's house date from 1826 but the building is now surrounded and obscured by modern sheds and extensions The late-19th century two-storey terraces at Nos. 8-18 and 24-30 on the north side have been substantially altered and were originally one but properties at Nos. 20-22 was demolished early in the 20th century.	

Stakeholder	Comment	Response
	Well set back from the northern street frontage of White Hart Lane and just beside the much-altered property at No. 30 stands the grade II listed The Grange, a mid-18th century house with two wings added to either side in the early to mid-19th century. The setting of the listed building is negatively affected by the poor quality of the neighbouring Victorian terrace on one side and the open yard entrance with security fencing on the other. Further to the west of the north side of White Hart Lane the locally listed building at No. 52 is a detached two-storey house built as the Station Master's house following the opening of White Hart Lane station in 1872. On the south side of White Hart Lane, the street frontage is characterised by Nos. 1-5, a three-storey terrace with shops including an original carriageway, otherwise all much altered. The grade II listed house at No. 7 is an 1840 villa set back from the neighbouring Victorian terrace and uncomfortably located between the Victorian development to its left and the void created by the post-war housing development behind. 2.3 Views in Conservation Area Views north and south from Brantwood Road, at the northern end of the Conservation Area, illustrate the open character looking north, contrasting with the enclosed character of the High Road looking south. Views of the Conservation Area along the linear form of the High Street, in both directions are especially important to read the urban and architectural quality of the area. Views in and out of the Conservation Area from junctions with side roads and from some passageways and alleys also contribute to the experience and understanding of the character of the area. Views from the side streets such as Northumberland Park and White Hart Lane each illustrate a distinct change in scale and character from that along the High Road. 3 Policy: Development in Conservation Area should preserve the character or appearance of the area and development affecting a listed building should preserve the building or its setting or any features of special architectural or historic interest which it possesses. The proposed application should be assessed according to the NPPF, London Plan Policies D3, D4, D9, HC1 and Haringey Development Plan policies SP11, SP12, DM1 and DM9 would apply. 4 Proposal: Hybrid Planning application seeking permission for demolition of existing buildings and creation of new mixed-use development including residential, commercial, business & service, leisure, community uses, and Sui Generis uses together with creation of new public square, park & associated access, parking, and public realm works with matters of	

Stakeholder	Comment	Response
	layout, scale, appearance, landscaping, and access within the site reserved for subsequent approval. The application includes a detailed development proposal for Plot A including demolition of existing buildings at 100 Whitehall Street & Whitehall & Tenterden Community Centre and erection of new buildings of 5-6 storeys containing 60 new affordable homes together with landscaping, parking, and other associated works. 5 Comments: The development proposal brings forward the council's vision for the regeneration of the High Road West area as outlined in the 2014 Tottenham High Road West Framework Masterplan and in the Site Allocation NT5 of the 2017 Tottenham Area Action Plan Development Plan Document. Other high-rise schemes related to Nos. 44-52 White Hart Lane ('the Goods Yard' Planning Ref: HGY/2018/0187) and Nos. 867 – 879 High Road ('the Depot' Planning Ref: HGY/2019/2929) and seeking the partial redevelopment of this site have already secured planning consent, therefore the principle of redevelopment of this extensive site to include high rise buildings in the setting of the Conservation Area is consolidated and accepted. The proposed masterplan acknowledges the heritage constraints surrounding the site and the search for the most effective site layout, Plot location, massing and height distribution on the wider development site have been extensively explored across a number of years of multidisciplinary preapplication discussion that has progressively highlighted the potential offered by this large yet inconsistent and under-developed urban area characterised by limited residential capacity, poor connectivity, fractured street frontages, low quality buildings, lack of public spaces and green spaces. This extensive design exploration has led to the proposed site layout, development Plots, distances and spatial relationships, proposed masses , circulation and landscape design which are supported by a good site analysis, have been informed by pre-application and design review advice and aim to provide a consistent and unifying re-configuration of the development area as well as aiming to enhance the fruition of the development site intended as setting of the adjacent Conservation Area with its heritage assets , as clearly shown in the parameters plans illustrating the carefully thought through Access and Circulation, the Public Realm and Open Space proposal as well as the proposed mix of uses across the site. The Illustrative floor plans provide at the outset a clear overview of the proposed uses immediately backing the historic frontage of the High Street and usefully describe the emerging reconfiguration of the site, its future built proportions, its spatial relationship, and links into the Conservation Area. The overall site layout, proposed public spaces and landscape design, altogether seem to successfully respond to the built and natural constraints of the site, to its topography, its proximity to the densely built historic frontage along the	

Stakeholder	Comment	Response
	High Road and to the opportunities for re-development and repair of the much more fragmented and permeable frontage along White Hart Lane. The characteristic features, sensitivities and opportunities offered by the Conservation Area as well as the need to preserve its primacy and consistent legibility along the High Road have been amply discussed at pre-application stage and are addressed to various degrees in the proposed parameter plans, Design Codes, townscape views. The parameter and illustrative plans show that the carefully planned access and circulation strategy including the sensitively located new access points into the new development from the High Road can ensure minimum disruption to and retention of the dense street frontage in Conservation Area while maximizing the opportunities for creating new access into the site through the Conservation Area frontage along White Hart Lane which will benefit from high quality new development to complement the surviving listed and locally listed buildings there located. At the outset, the illustrative site plans present to many extents a contextually coherent development proposal which is broadly supported form the conservation standpoint. In terms of scale massing and heights, the proposed scheme very sensitively allocates the highest rise Plots along the western edge of the development site, along the Overground railway line, well distanced from the Conservation Area and its High Road street frontage, so that the spatial and visual relationship of the largest and tallest Plots with the two- three storey Conservation Area frontage is softened by the gradually lower height of the intermediate Plots as well as by the soft and hard landscaped openness of the proposed Peacock Park and Moselle Square. The proposed gradual increase in built scale and height from east to west is welcome and supported from conservation grounds as this strategic mass and height allocation is successfully designed to mitigate the potentially overwhelming jump in scale between the two-three storey Conservation Area and the new development with its large buildings and tall towers peripherally located by the western boundary of the development site. Also, the gradual increase in scale and height from south to north in the immediate surrounding of the Grade II listed The Grange and the locally listed Station's master house along White Hart Lane is welcomed in principle as a heritage sensitive approach to the reconstruction of the street frontage and to the integration of the listed and locally listed buildings in the proposed scheme. The Design Code and Architectural Codes provide useful guidelines for design in heritage setting, together with the specific parameters of each individual block and provide the necessary flexibility for future detailed applications to shape the new buildings accordingly to the specific constraints and opportunities posed by neighbouring and surrounding heritage assets. The submitted townscape views further help to understand the specific proportional and architectural relationship between each proposed blocks and neighbouring heritage buildings and related Conservation Area. Focusing on the immediate relationship between proposed new development Plots and surviving	

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	heritage assets, the proposed illustrative and maximum parameters outline the range of possible impacts of the proposed development on several heritage assets and ultimately provide a useful indication of the most heritage-sensitive massing and height options which are often achieved with the illustrative parameters in such a heritage-sensitive context. As an example, the illustrative plans for Plot I show the opportunity for a large, four storey new development immediately flanking the grade II listed The Grange along the north side of White Hart Lane. The proposed development will form part of an almost totally reconfigured street frontage which is anyway deeply heritage bound, due to the presence of a number of heritage buildings which can still help reinforcing the character of this part of the Conservation Area and consequently Plot I should be sympathetically configured in future detailed applications as largely subordinate to the proportions of the listed asset and should bring the scale of The Grange across the street frontage so to reinforce the primacy and legibility of the listed building and should also more gradually step-up in height so to bridge the existing scale with the proposed increased development along Chapel place. It is unclear at this outline planning stage how the proposed Plots H and I immediately surrounding the listed building at the back and to the eastern flank off the grade I listed building will related to one another and to The Grange in architectural, landscape and spatial terms and it is also unclear at this stage what type of improvements or alterations, if any, will benefit The Grange. The submitted parameters plans, specific Plots' codes and views helpfully show that the illustrative parameters for the Plots H and I, located in the setting of The Grange would already challenge the proportions, height and massing of the Listed Building and its Conservation Area and while these illustrative new Plots may constitute the maximum acceptable built quantum in such sensitive setting, the implementation of the proposed maximum parameters would very likely raise concerns about the overwhelming impact that a coalescing group of bulkier, taller and more imposing new buildings would have on The Grange and on this stretch of the Conservation Area. While the site layout and the potential landscape and architectural aspects of the development proposal surrounding The Grange is positive and welcome in principle, the national importance of the listed building would require a higher level of definition of the proposed developments at Plots H and I directly impacting on its immediate surrounding to achieve the most appropriate development response which can be certainly guided by this masterplan scheme, but is fundamentally deferred to a future detailed application where the optimal design response to The Grange and to this stretch of the Conservation Area will be sought. On the south side of White Hart Lane the parameter plans for Plot G immediately adjacent to the grade II listed White Cottage at No 7 White Hart Lane show a relatively modest illustrative scheme starting at 3 storey height and gradually increasing to 6 storey , but also show the potential for a maximum scale, massing and height of development which risk to overwhelm the small scale, two storey height of the listed house, whose street presence and townscape legibility are already impaired by the recessed building line. The listed building will be flanked by a new building that depending on the plan form, mass and height configuration could constitute a relatively gentle, heritage-sensitive and acceptable transition in scale as per illustrative parameters, but greater heights an masses may prove harmful and will have to be carefully considered and assessed at detailed application stage which will also be the necessary stage to understand how the new development will be materially connected to the listed building without harming its historic fabric and to the character of the White Cottage. The Design Code for Block G states at paragraph 5.9.1 that Plot G	

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	should be no taller than 3 storeys at the junction with the grade (II) listed building (7 White Hart Lane), however this guidance should be more rigorous and focused on the entire height and bulk of the proposed building, whose developed design is deferred to a later stage, given that the broad suggestion for a modest there storey junction between existing and proposed buildings cannot on its own outweigh the negative impact of a new building whose overall scale and height largely exceed the proportions of the Listed Building The national importance of this listed building requires a much greater level of design definition of the proposed development to fully appreciate its relationship with the heritage asset, but this outline proposal b seems already to confirm that building according to the proposed maximum parameters for Plot G is potentially harmful to the character and significance of the listed house and its Conservation Area. The proposed scheme has benefitted from a number of dedicated design reviews which have contributed to hone various aspects of the masterplan and have highlighted, among others, the need to not only retain the most valuable groups of buildings of the Conservation Area, which would not be sufficient on its own to revive and enhance the experience of the historic environment, but also to strive to complement and reinforce the character of the Conservation Area and its heritage buildings, especially where this character strenuously survives despite having been partially eroded through insensitive alterations, demolitions and insertion of incongruous new buildings such as along the White Hart Lane, or along the stretch of the High Road comprised between Moselle square and Brereton road. The latter is a glaring example of how the distinctive townscape of the historic High Street frontage is such an established and defining feature in this part of the borough that it is still legible to various degrees of architectural quality and intactness throughout the consistently proportioned, locally listed terrace at 759-743 High Road and the neighbouring terrace to the south of Whitehall Street at Nos 741-731 High Road. The surviving locally listed and unlisted Victorian street frontage still retains its coherence and legibility, regardless of the clashing proximity of the neighbouring apartment block building at No 729 High Road incorporating the Coombes Croft Library, which does not belong to the urban and architectural realm of the historic High Road frontage and which, notwithstanding any intrinsic architectural interest, is from an historic townscape perspective an overwhelming and heritage -unsympathetic anomaly and a dividing element imposingly located on the corner of the High Road with Brereton Road, just in between the consistent sequence of surviving Victorian terraces and the locally listed Church landmark. This1950's building represents an intrinsic weakness for the High Road frontage, can be considered at best an historic built exception and evidently sets a clear precedent for maximum height capacity in the redevelopment of that specific corner Plot identified in the proposed masterplan as Plot C where it is unclear if the locally listed gothic style substation adjoining the Coombes Croft Library will be retained. It is evident in the Design Codes and townscape views that the proposed parameter plans start from a conservative illustrative proposal of 6 storey in height, slightly taller than the existing, to allow up to 8 storeys according to maximum parameters which would generate a much taller building than the existing one and this 8 storey building prominently located on the corner of the high road would dominate in views of the western side of the High Road while the two storey St Francis Church would It is therefore evident that while the illustrative parameters may be acceptable in this case, the heritage assets immediately surrounding the development site don't allow for a successful implementation of the proposed maximum parameters for Plot C and the Design Codes accordingly state at paragraph 2.2.6:	

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	The following Plots must respond to the setting and scale of statutory and non-statutory listed buildings on High Road by preserving their prominence when viewed from the Conservation Area. a. Plot E b. Plot C c. Plot K1 d. Plot K2 It would be useful to re -consider the height parameters for Plot C which could beneficially start at less than 5 storeys, so to achieve an implementable range of heights consistent with the guidance provided in the Design Code which also indicates the most appropriate architectural approach for this plot. The Code and suggested architectural approach are inconsistent with the current maximum parameters and risk to be ineffective as no architectural treatment and finishes can successfully mitigate the impact of excessively tall new blocks in the immediate vicinity of heritage assets. The Design Codes are silent about the heritage-sensitive context of Plot B despite this is in the setting of the locally listed church, school and related Conservation Area and the proposed density, mass articulation and height of Plot B seem substantial and impactful on the setting of the heritage assets due to minimum heights comprised between six and twenty-six storeys. The illustrative scheme for Plot B appears incongruous with the established scale and experience of the neighbouring Conservation Area and Locally listed Church and school to the southside of Brereton Road and the Design Code for Plot B should accordingly acknowledge both the locally listed buildings along Brereton Road and the Conservation Area boundary so to provide useful design guidance for future detailed applications. The Design Codes are silent about the heritage-sensitive context of Plot B despite this is in the setting of the locally listed church, school and related Conservation Area and the proposed density, mass articulation and height of Plot B seem substantial and impactful on the setting of the heritage assets due to minimum heights comprised between six and twenty-six storeys. The illustrative scheme for Plot B appears incongruous with the established scale and experience of the neighbouring Conservation Area and Locally listed Church and school to the southside of Brereton Road and the Design Code for Plot B should accordingly acknowledge both the locally listed buildings along Brereton Road and the Conservation Area boundary so to provide useful design guidance for future detailed applications. Looking at the proposed development scheme in its complexity and richness, it is accepted from the conservation perspective that the built background to the views of the Conservation Area and its heritage buildings as experienced both along Tottenham High Road and along White Hart Lane has been changing over the last decades and will change even more. It is also accepted that a brand new, progressively taller urban development with its markedly contemporary character and architectural language will complement the fruition and experience of the High Road and its Conservation Area, however the TVIA and related AVR and massing model views show that while the illustrative development will generate groups of discretely located, separate, vertical bult elements of various heights which will intrude to various degree in the background of established views form and towards Conservation Areas and heritage	

Stakeholder	Comment	Response
	assets, the potential new development configured according to the proposed maximum parameters would instead appear in most instances as coalescing and overwhelming for the historic built environment in several views into and across the impacted Conservation Areas. This seems one more reason to carefully refine the parameter plans and Design Codes for the proposed development refining the design guidance in relation to heritage assets. The cumulative change introduced by the proposed development, immediately located along and behind the Conservation Area is quantitively and qualitatively different and greater from the impact that the Football Stadium, referred to as comparison term, has had on many heritage assets on the east side of the High Road, and the findings of the Heritage Assessment that there is no harmful impact at all to the significance of any heritage are largely unconvincing. The TVIA comprehensively identifies the heritage assets affected by the proposed development and is informed by 26 accurate visual representations whose viewpoints have been agreed during the preapplication process. The additional non-verified views further inform the assessment of the impact of the Proposed Development on heritage, townscape, and visual receptors. However, Table 2.1 attributes heritage value Criteria which seem to directly depend on the listed grading of heritage assets, which is a different attribute clearly explained in the DCMS grading of heritage assets. Therefore, the visual impact of the proposed development on heritage assets rest on an arguably low value attributed to many heritage assets intended as receptors of the views and on an equally arguable assessment of impact on these heritage assets. It is therefore unconvincing that the proposals will only give rise to some residual, less than substantial harm to nationally important heritage assets such as the North Tottenham CA; Tottenham Cemetery CA; Bruce Castle CA; 819 and 821 High Road N17 (grade II); 7 White Hart Lane (grade II); and 797 and 799 High Road (grade II). The following views show the overwhelming effect of the proposed development on the character and experience of the Conservation Areas and heritage buildings: - View 15: Bruce Castle Park, South of Kings Road, Oriented North-East - View 23: High Road, Oriented North, At Junction Wit H Bromley Road, - View 32: High Road, Opposite Junction Wit H White Hart Lane, Oriented North-West - View 41: High Road North of Brent Wood Road - View 42: Northumberland Park, South of Junction Wit H Bennetts Close - Additional Views in Appendix 1 are very useful to show the negative impact of the proposed development on the Conservation Areas and heritage buildings, especially with maximum parameters: • Views A and B include the locally listed St Francis church • Views C1 and C2 along High Road show a uniform wall of new buildings behind the high road • Views D1 and D2, show massive buildings near Moselle place • Views from E to I all show the overwhelming scale proposed development with the maximum parameters whose effect on the historic context would be seriously negative. Conclusions The proposed scheme offers in principle a positive opportunity for improvement of both the North Tottenham area and the setting of the Conservation Area and its heritage buildings, it is a scheme guided by a thorough urban design exploration, a good contextual analysis and heritage awareness and is fully supported from the conservation standpoint. However, the heritage sensitivities and opportunities disseminated across the site and along the High Road frontage, would benefit from a heritage-led implementation of the proposed parameters as well as requiring more detailed and stringent design guidance for the proposed scheme so to ensure that future detailed	

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	schemes respect and positively respond to neighbouring heritage assets. Plots H, I, G, E, C and B directly impacting on the Conservation Area and on heritage buildings would especially benefit from conservation -led design guidance which should rase awareness on the heritage sensitivities and most suitable development opportunities and should be consistent with the proposed parameter plans. This masterplan will generate a totally new, unprecedented, high rise new urban development which will supersede the Victorian and post-industrial townscape still prevailing in the area. The new development will rise at the centre of North Tottenham side by side with the surviving Conservation Areas, historic buildings, neighbouring parks that characterise the area and its surrounding. This development will significantly change and improve the urban environment of North Tottenham but will also change the immediate surrounding where we experience heritage assets and their views. Even in their illustrative, most heritage-sympathetic configuration the tallest elements of the new development dominate to various degrees in the background of currently undeveloped, or modestly developed, uncluttered open views towards the development site as experienced from various standpoints including Bruce Castle Park, from White Hart Lane, from Northumberland Park and along the High Road. This would lead to a level of harm at the mid-range of 'less than substantial' affecting several designated and undesignated heritage assets and the tests set at paragraphs 196 and 203 of the NPPF will apply.	
Design Officer	**<u>Summary</u>** This is a hugely significant development, and is designed with an ambition to create a new neighbourhood of excellent design and living conditions, supporting a vibrant new town centre that would contribute to changing North Tottenham from a place dominated by the presence of Tottenham Hotspurs Football Club as a disruptive monster descending every 2 weeks on a sleepy, economically deprived suburb, to a town centre where Spurs are a welcome part of a more rounded, vibrant economy and a safer, more pleasant place to live. It is also notable for the ambition of the architecture, with two grand new public spaces, one a green park, the other a civic square, a parade of tall buildings rising toa dramatic pinnacle beside the new station building, and a landmark new home for the local library, expanded into a learning centre, anchoring the opposite side to the stadium in community, to have a woodland climbing over it and to be designed by an open competition. With such ambition comes danger, that the living conditions will not be great, and the spaces between buildings feel oppressive, between such tall buildings and dense blocks. There are refinements and modifications I would still like to see, to the design quality of Plot B, to the precise location of the tall building in Plot F and the precise form of Plot G and the White Hart Lane frontage. But with changes or responses to those points, I am confident this proposal could be well designed, a vibrant and exciting town centre, a pleasant place to live and something of beauty. **<u>Context, & Structure of the Application</u>** 1. High Road West is one of the most significant developments proposed in the whole of Haringey and is of London wide significance, both for the amount of development and number of new houses it should be able to provide and for its potential to transform its location and surrounding neighbourhood, catapulting the centre of North Tottenham, from being a sleepy and poverty stricken neighbourhood with an economy and lifestyle dominated by	Officers are confident that the submitted control documents would provide a high quality mixed use developments that broadly delivers on the AAP and HRWMF vision and principles. The final design will be secured at reserved matters stage which will be subject to further daylight, sunlight, overheating,

Stakeholder	Comment	Response
	the shadow of the Spurs Football Stadium, lively only on match days, to a vibrant all-week, mixed economy, better paid town centre. 2. Other developments also contribute to this, particularly the redevelopment of the stadium itself, that has done so much to broaden the offer it provides, with other businesses and much more tourism opportunity in and immediately around the stadium and with a striking, well designed appearance set in well considered, designed and built public spaces, restored buildings of heritage significance and more new development to come. The High Road here also contains a collection of some of the best built heritage in Haringey, including Grade II* Listed Queen Ann and Georgian buildings of national significance and a sense of coherence and enclosure around the wider stretch where Northumberland Park and White Hart Lane meet it, at the heart of the North Tottenham Conservation Area, then compressing at the northern end, forming a townscape gateway to Edmonton, and southern end, a similar gateway to the stadium frontage. Ongoing restoration of significant heritage buildings and shopfronts also contribute to this North Tottenham renaissance. 3. But the High Road West development has the potential to complete and round off the elevation of North Tottenham. It will provide a grand setting to the newly improved and expanded White Hart Lane Station, provide a visible, direct pedestrian route from the station to the stadium that will safely accommodate crowds on match and other event days, yet become a vibrant town square at other hours, accommodating sizable commercial, cultural and community uses, to rival in use and architectural form the stadium and provide the economic functions of a town centre. It will also provide a new park, relieving the northern part of the location of its Open Space Deficiency, and reprovided employment uses in yard spaces suitable for a wide range of knowledge, craft and maker businesses. As well as a lot of new homes. 4. This application is for the bulk of the High Road West Site Allocation, NT5 in the Tottenham Area Action Plan DPD (adopted July 2017) and fulfils all the site allocation requirements and guidelines. To accompany the Site Allocation, a more detailed High Road West Masterplan Framework was prepared by Arups for the Council. The areas within the site allocation not part of this application are some of the properties fronting the High Road, generally those where no redevelopment of existing buildings is envisaged. Nevertheless, the masterplan within this application establishes clear principles for those properties. The proposals within this application also accommodate wholesale those other proposals that had received planning approval recently in the northern half of the site. 5. One small part of the site is a Detailed Planning Application, whilst the rest is in Outline. The detailed part is the only part of the site that is to the west of the overground railway that runs north-south, marking the western boundary of the Outline Site. The Detailed Site, known as Whitehall Mews, and its surrounding residential context, has an urban character and feels very detached from the land to the east of the railway, whilst still having easy connections through two bridges. Therefore, in this document, the Detailed Site is dealt with completely separately, after the Outline Site.	and microclimate assessment as well as design scrutiny and subsequent determination by the Local Planning Authority.

Outline Scheme

Masterplan & Street Layout

6. The Outline Site stretches from Brereton Road at the southern end of the site to the Cannon Road development to the north, with White Hart Lane cutting east-west across the centre of the site. Its western boundary is the raised, London Overground, Liverpool Street to Enfield Town and Broxbourne railway, with White Hart Lane Station immediately south of White Hart Lane itself. North of White Hart Lane there are no bridges over or under the railway until quite a considerable distance north of the site, whilst south of White Hart Lane there is a pedestrian link through within the new station building, and two vehicular streets, Whitehall Street close to the southern edge of the site and Orchard Pace on its southern boundary. The Masterplan Framework asks for provision to be made for a pedestrian bridge in the north-west corner of the site and this application retains provision in the approved scheme for this part of the site.

7. The proposed masterplan would create a series of coherent development blocks that frame existing and new streets, as well as the new urban square. being known as Moselle Square (names to be confirmed, & in all likelihood to be different), at the heart of the southern half of the site and the new park, known as Peacock Park, at the heart of the northern half. These streets are extremely well integrated into surrounding existing streets where they are available; connecting to Cannon Road to the north via the two intended southern links in that development, while to the south, Whitehall Street, Brereton Road and Orchard Place remain in place.

8. The eastern boundary is generally the backs of properties fronting the High Road or of properties accessed from the High Road, with two exceptions, to the north and south. At the southern end, the proposals include new High Road frontage between Brereton Road and Moselle Street, south of the Conservation Area and opposite the new Spurs Stadium, including a new Library and Learning Centre in an architectural landmark to respond in design terms with the stadium. This is an appropriate response to the context of the stadium and acknowledges the completely different urban character to the High Road in front of the stadium compared to the frontage in the Conservation Area. The two shorter sections of High Road frontage at the northern end of the site extend the playground of the school in the Canon Rubber development site, and a small infill where a new east-west street would cross the timber yard site. This and the two existing alleyways off the High Road, Percival Court and Brunswick Square, provide new east-west streets across the northern half of the development, connecting the new housing, workspace and park to the High Road.

Height, including Tall Buildings

9. The heights proposed follow the strategy of the Masterplan Framework, with lower heights compatible with the existing buildings where they are close to the retained buildings of the High Road and White Hart Lane, rising up to tall buildings along the railway edge. However the overall heights are increased, as housing targets and expectations of density have increased, active travel and public transport improvements have been delivered, particularly the new White Hart Lane Station and Cycle Superhighway 1, and other tall buildings in the vicinity have been approved, such as the six tall buildings to the south of the new stadium and Spurs other developments at the “Goods Yard” and “Depot” sites within this site, the designs of which, including their heights are adopted wholesale for the tall buildings proposed north of White Hart Lane.

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	10. The six main proposed tall buildings will form a row, with the existing River Apartments tower just to the north forming a seventh. The plan of each tower is strongly aligned north-south, around 40m wide (north-south), but under 20m deep (east-west), and the illustrative scheme suggests and design code requires they would be offset or chamfered in plan to accentuate their slenderness from the north and south, whilst the gaps between each, including to Rivers Apartments, is each around 30m. This means they should avoid "coalescence"; the effect of views of the towers merging together as they overlap, except in a narrow cone of views from the south-south-west and north-north-east, directions where there happen to be relatively few sensitive viewing points. The main views will be from the High Road to the south and north, Northumberland Park to the east, and from White Hart Lane and Tottenham Cemetery to the west, in all cases from where they will be clearly separated 11. Tall buildings would be embedded within podia and shoulder blocks of their constituent plots and into the street pattern, tying them into the wider grain and mitigating their scale, with the remainder of the plots formed by mansion block scaled blocks of four to ten storeys, yet with gaps providing glimpses and sun and daylight access into podium gardens. 12. Considering each criterion from Haringey's tall building policy is set in SP11 of our Strategic Polices DPD (adopted 2013 (with alterations 2017) and DM6 of our Development Management DPD (adopted 2017), skipping the 3rd & 4th bullets from the Strategic Policies, that reference the other document and the document used in preparing DM6: • The site is within the areas of both the adopted Tottenham AAP and the adopted Masterplan Framework. Both support the principle of tall buildings in this location. The adopted Masterplan Framework established in 2014 a principle that it would be acceptable to have a row of five tall and taller buildings alongside the edge of the railway in the High Road West area of North Tottenham, with the height of those towers dropping away to prevailing existing heights two – four storeys) at White Hart Lane and rising in height north and south. The Masterplan Framework suggested the row of towers north of White Hart Lane should rise to a highest tower at the northern end of the redevelopment area the then Canon Rubber Factory site. As it happened, that site was built out first, being completed in 2015, with its highest block, River Apartments, at 22 storeys. Since then, housing targets, density expectations and public transport accessibility have improved, and it is therefore reasonable for the number and heights to increase; • The council prepared a borough-wide Urban Characterisation Study in 2016, which supported tall buildings in this location, right beside the railway edge, well away from the High Road with its sensitive heritage, dropping in height closer to White Hart Lane. The Characterisation Study recognises that the railway forms a significant barrier and buffer between the two sides, with the west side a much quieter, and therefore lower rise neighbourhood than the east, as well as the railway corridor being at its widest beside this site, giving a much greater distance of 30-70m, with the broad, wooded embankments providing further buffering between the two areas; • High quality design especially of public realm is promised in the Design Code and Illustrative Scheme, but will be considered in detail at Reserved Matters phase. Heritage assets and their settings are covered by the Conservation Officer's comments;	

Stakeholder	Comment	Response
	• They will be capable of being considered "Landmarks" by being wayfinders or markers within the masterplan, marking the station and closing vistas of the east-west streets, the main north-south street, marking the new development with its new park from the south, west and east, and marking White Hart Lane station from the north; • They should also be capable of being considered "Landmarks" by being elegant, well proportioned and visually interesting when viewed from any direction. Aspects of the Design Code on tall buildings also provide assurances that they must be high quality designs, regular form, slender, grounded, with a clear base, middle and top with double height entrances and pronounced features to mark their tops but this will be subject to Reserved Matters application(s); • Consideration of impact on ecology and microclimate encompasses daylight, sunlight and wind, examined in detail below. Impact on ecology could also include impact on the flight of birds and other flying creatures, but this is only likely to be relevant adjacent to open countryside, a large open space or open waterway • The proposed tall buildings will be in *some* proximity to the built River Apartments, but this is by design to produce an intended effect of a row of tall buildings. They will be sufficiently far apart though, at around 30m from each other, and are slender in width east-west, to avoid detrimental effects of proximity and in any case are a line of aligned, north-south proportioned towers; there would be no canyon effect as their short sides would be the ones facing each other; 13. It should be noted that all buildings north of White Hart Lane, to plots J, L & M, are designed currently to be identical to the extant planning permissions for those sites. Nevertheless, *all* the tall buildings in the whole site, in common with all the outline part of the outline part of the development[1], will require Reserved Matters Approval, which will include consideration by the Council's Quality Review Panel as well as the Planning Committee. **<u>Design Code - Form, Elevational Composition and Materiality</u>** 14. The outline part of the site is not detailed with proposed floor plans and elevations, as is to be expected. These will be part of the Reserved Matters applications and will be considered separately by the Quality Review Panel and Committee when the time comes. However, the applicants have prepared a detailed Design Code to control all aspects of the proposals more detailed than street and block pattern and maximum height. This is accompanied by the Illustrative Scheme, which acts as an illustration of one way the development could be detailed, in accordance with the Parameter Plans and Design Codes. 15. The Design Code comprises site-wide coding and plot by plot coding, as well as coding for landscaping. Rules within the design code are all described as "must" where following that rule is mandatory, or "should" where there	

[1] Parts of the detailed planning permissions obtained for The Goods Yard, 867-879 High Road and The Printworks, are detailed planning permissions; namely Plots H1 & 2, K1 & N2 & 4, are detailed planning permission and could be built without further Reserved Matters approval, but none of these contain tall buildings; indeed, they are all characterised by being lower rised. As appropriate to their immediate heritage context close to the rear of the High Road or White Hart Lane.

Stakeholder	Comment	Response
	is *some* flexibility, but a strong expectation; unlike most design codes, there are no “may” codes, which strengthens the certainty that the code provides. 16. Site wide codes include important guarantees of quality like active frontages, defining “Primary Frontages” to where blocks face main streets and spaces, including the High Road, White Hart Lane, Moselle Square, Peacock Park and the key streets connecting them together; these should have shop frontages or primary residential entrances, front doors and habitable room windows, should not have refuse stores and must not have plant room doors or car park entrances. Further codes define high quality design approaches to all the required relationships between buildings and streets, including for instance, detailed coding to ensure refuse storage is convenient yet discreet. 17. A series of Architectural and Landscape Codes apply to different character areas of the site, including “Civic” around Moselle Square, “Parkside” around Peacock Park and “Heritage” along the High Road and White Hart Lane and immediately adjacent to significant heritage assets such as The Grange; for these the broad, site-wide materials codes get refined into more specifically appropriate palettes, with masonry, predominantly brick, being the main required building material finish. These codes also define whether balconies should be recessed (such as to the square) or projecting (such as to the park) and that balcony balustrades need to provide privacy and screening to residents’ clutter. 18. Detailed codes deal with each plot, so I will comment on each one in turn. Plot A is not included, as that is the detailed part of the scheme. Plots H, J, L, M & N are essentially the same as the permitted schemes for The Goods Yard and The Depot, which I will cover briefly together. **<u>Plot B</u>** • This is probably the trickiest plot in design terms, with a significant height and quantum of development on a small plot. It is less constrained by development around it, but has the tallest building in the development, on Plot D, immediately to its north across the relatively narrow Whitehall Street to its north and the lower rise Plot C to its east, along with the railway to its west and existing buildings outside of the site to the south, but the parameter plans and design code permit and the illustrative scheme suggest a modest odium courtyard enclosed by one tall block, mansion blocks and a small gap to its south east. • In and following recent meetings the applicants have successfully shown it could be reconfigured to open up the podium more to the south and even remove completely the southern side, creating a ground level landscaped space, which would provide better day and sunlight and outlook to the communal amenity space and lower floor flats, but could overshadow Plot D, reduce enclosure and animation from front doors and passive surveillance to the streets to the south, which are currently rather lacking in enclosure and animation, and be contrary to the Design Code. • It is worth pointing out that this block is probably going to be all market sale housing, and that its upper floors will get some of the best light and views. Provided extra effort is taken to ensure the lower mansion block “shoulders” are kept as low as possible, as many as possible are dual aspect and have as generous windows as possible, it should be possible to achieve acceptable living accommodation.	

Stakeholder	Comment	Response
	• Whilst the buildings should be as close to the railway as possible, to maximise the podium space and minimise what is likely to be an ugly, unused, service space at lower levels along the railway edge, it will be important to ensure that any residential units are raised above the level of passing trains before they look out onto the tracks. This would seem to suggest the "service" spaces; bins, bukes, plant etc, might be better stacked up on the lower floors of the tower rather than spread out under a podium. **Plot C** • Further clarification has confirmed that the three north-south blocks of Plot C, and the eastern-most side of Plot B will each be over 20m apart, which should ensure good privacy, day and sunlight. As the east-west winds of this block will be lower rise 4-6 storeys with a landscaped amenity roof garden acting in concert with the landscaped western podium garden and trees in the eastern yard space, they should have a green outlook complimenting the three retained trees on their Brereton Road (south) side, as well as creating a good variety of amenity spaces including childrens playspace. • Provided the Design Code is followed scrupulously, this plot should be capable of providing excellent residential quality suitable of a variety of residents including families and affordable housing tenants, along with business uses in the High Road frontage and yard space, and strong retail / food & beverage uses unto the square & east-west route. **Plot D** • This is the "landmark" plot of the whole southern half of the development, with the tallest tower sitting beside and marking the White Hart Lane Station end of the route from the stadium and acting as a marker for the station and Moselle Square, particularly in longer views from the west. For this reason, this tower is proposed to have a unique "Feature Building" architectural approach. It *should* be the tallest building in the development, and it could be a good idea to also procure its detailed design via an architectural competition, as is proposed for Plot E. • Nevertheless, the same comments made for the lower floors of the tall building in Plot B, against the railway edge, apply, with the danger of dead space against the railway edge being particularly relevant since this is proposed to house an energy centre. However the 2nd floor podium is sufficiently open, particularly to the south, but also with an attractive slot providing a glimpse / lookout to the station frontage to the north, to promise good quality private amenity space, including children's play space, and day and sunlight. **Plot E** • This is the other "landmark", a low-rise landmark that fills the gap between the Moselle Square and the High Road without hiding the view through, over and past it, from the station to the stadium and vice versa. It is also proposed to have public functions within and publicly accessible landscaping stepping up from the square over its roof, providing a vantage point view. • Nevertheless, this amounts to a particularly tricky design conundrum; a single-use singular building, with active frontage on all sides and no particular back, that must address the square yet hold the High Road	

Stakeholder	Comment	Response
	frontage as part of the continuous historic high road, repairing the gap potentially opened up by loosing the existing "not bad – if unexceptional" terrace on this site, a gap already created by the stadium opposite, a monumental landmark building, against which, despite being smaller, this needs to architecturally compete! Hence it is evident that the proposed open architectural competition is necessary and vital to secure the exceptional design quality such a significant and tricky brief requires. • Securing a reputable competition is essential, and the competition should be organised and administered by a reputable independent expert company or organisation such as RIBA Competitions (link to website) or Malcolm Reading Consultants (also a link). The correct balance between securing national and international interest in the competition with ensuring participants are grounded and connected to the local community, along with ensuring appropriate resourcing and timescale is provided, should be decided on the advice of the specialist consultants, and in accordance with recommendations in the RIBA Competitions Guidance for Clients. Buy in from the local community should also be secured by involvement in the brief writing, but it would be important to ensure that the judging be primarily by independent, expert design professionals. Timing could also be tricky given the need to presumably provide Plot E, completed, before the existing library on the neighbouring Plot C. But above all, it is essential for the exceptional quality of design required here, to secure and guarantee a competition, with integrity. **Plot F** • This is a large plot, that is expected to house one of the taller buildings in the development, in its north-western side or corner, along with another semi-tall building addressing the square. However, the proposals are generally pretty sound and logical from a design point of view, except in the one crucial aspect of the precise location of the tallest building. The block facing the square, with its civic character and two floors of active town centre-retail use promises to animate this most important side of the square, and the generous two storey high podium, with gaps providing glimpses in and out, its lower shoulder to the south-west permitting day and sunlight in, promises to support excellent residential accommodation for a range of residents. • The tall building is, however, something of a concern, for its impact directly onto White Hart Lane, as proposed in the illustrative scheme, right on the north-western corner of this plot. The scale difference of such a tall block with no mitigating step in scale to the low-rise buildings, many of heritage significance, and picturesque space of White Hart Lane, curving gently and on this south side tree-lined, seems very harsh. In recent discussions, the applicants have shown us variations within the parameter plans and design code that would push the tower slightly south, closer to the station, with its civic function and wider forecourt a compatible neighbour to tall buildings, and with a moderating 10 or so storey shoulder to White Hart Lane, which would be preferable in design terms. **Plot G** • This modest plot has nevertheless proved problematic, but that is partly because greater detail has gone into this, with the applicants having started its pre-application discussion son the reserved matters, albeit that these are far from compete. The illustrative scheme shows a symmetrical, four-square, six storey building. It	

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	is correct that it should close the vista of the street proposed to be heading north opposite this building, but it must equally turn the corner within its own plot, to its west, from White Hart Lane into William Street, which will lead through to Moselle Square, whilst it also needs to step down towards the 2 storey height of the neighbouring Listed Georgian building to its east. • The design code correctly states it must be no more than 3 storeys adjacent to the Listed Building, which would seem to contradict the illustrative scheme and parameter plans. In recent discussions the applicants have shown us what would be a far more preferable model for this site's development, as a building that steps up from 3 to 6 and 7; this would respond better to the Listed context and to the street corner, whilst it could still acknowledge the vista to its north in its entrance location. • The stepping façade could also continue as 9 and 10 storey steps in Plot F as modified as discussed above, which would provide much greater coherence to the whole south-side-of White Hart Lane frontage, complementary to the Conservation Area and Listed Buildings opposite and with a sense of movement along this major street, progressively, gently rising to the key turning to the station at its western end. **North of White Hart Lane Plots H & I)** • These are really three plots, rather than two. Blocks H 1 and 2 form a plot with the retained Station Masters House that essentially adopts wholesale the approved scheme for The Goods Yard, which is accepted. • H3 and I1 form a plot with the retained The Grange Listed Building. The design code is strict for these, but they must be very respectful of The Grange, in height, elevational treatment, proportions of fenestration and materials. • Blocks I2 and 3 form a plot with the retained no. 6a White hart Lane, a very modest 2 storey house, and with The Chapel, both or heritage significance. The entire block is completed by further buildings on White Hart Lane up to the corner of the High Road, and along the High Road, all outside the boundary of this site, as far as Percival Court, a narrow alleyway that forms its northern edge, with its western edge being that important new street north from White Hart Lane to Peacock Park. As a Back-of-High Road yard space, this is intended to house employment uses in the yard space, perhaps with residential above but as the proposed height of thee is never more than 4 storeys and they will have to step down to all the retained buildings there is not likely to be much accommodation in this plot. • Nevertheless, I2/3/etc is worryingly ambiguous in its front and back relationships; it will be necessary to achieve active frontage to the new street to the west as well as to Percival Court to the north, especially as the chapel and its attached Former Pastor's House line up with both those streets but appear to not have any active frontage to those sides. **Plots to the North** • Most of the rest of the plots to the north have planning permission over a large part of them, from the "Goods Yard" "Printworks" & 867-879 High Road (aka "The Depot") permissions, which have been adopted whole, and leave nothing to be said. They should, importantly contribute significantly to the provision of the park,	

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	and given that mot of this application site north of White Hart Lane is in a designated area of Open Space Deficiency, it is important that it is delivered early. • Two exceptions remain. One comprises J2, L2 and M3 and form the western side of Peacock Park. These are simple, straightforward, residential mansion blocks facing the park and are unproblematic in design. The other is K3, which includes a new street through the existing timberyard site from the High Road to the park, and the blocks either side. This street is considered essential as part of the masterplan and site allocation objective of creating east-west streets, and would be, in this approximate location, roughly evenly spaced between Brunswick Square and the continuation of Brantwood Road, with Percival Court and White Hart Lane similarly spaced. • I am also convinced that this street need not be particularly wide, and should have a great deal in common with Percival Court and Brunswick Square, as streets with very narrow, pedestrian only (& possibly cycle) constricted throats onto the High Road and an alleyway character that when the two existing examples have been cleaned up, resurfaced and enlivened with a couple of attractive new buildings, could be streets of considerable charm and appeal, complimenting and strengthening the Conservation Area. All three are noted as being intended for pedestrian priority, not for motor vehicles generally except for very occasional servicing • However, the applicants' illustrative scheme is here somewhat vague, albeit that the Design Code is definitive. This may reflect that there is potential for considerable adjustment as more is discovered about the site before a Reserved Matters application. The Design Code seems to be as clear and definitive as possible to preserved design quality for this site. **Residential Quality (Aspect, Daylight, Sunlight and Wind Microclimate)** 19. Residential quality will be mostly decided when Reserved Matters applications are made for each plot. It is not possible to make any judgements on flat or room sizes or on private amenity space at this stage. There is indicative indication in the Design & Access Statement (p82) and Illustrative Scheme drawings that the number of flats per floor per core should not ever need to exceed eight, and would normally be well below that, which is welcomed. 20. The same drawings show how the applicants have been able to demonstrate that layouts could be provided that minimise single aspect homes, avoiding completely single aspect north facing homes, very few single aspect south facing homes, and that blocks can be positioned sufficient distances apart or off-set from each other that residents will benefit from privacy from neighbours. 21. The applicants provided Daylight and Sunlight Reports on levels within their development and the effect of their proposals on relevant neighbouring buildings, prepared in accordance with council policy following the methods explained in the Building Research Establishment's publication "Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice" (2nd Edition, Littlefair, 2011), known as "The BRE Guide". 22. In the case of higher density developments, it should be noted that the BRE Guide itself states that it is written with low density, suburban patterns of development in mind and should not be slavishly applied to more urban locations; as in London, the Mayor of London's Housing SPG acknowledges. In particular, the 27% Vertical Sky	

Stakeholder	Comment	Response
	Component (VSC) recommended guideline is based on a low density suburban housing model and in an urban environment it is recognised that VSC values in excess of 20% are considered as reasonably good, and that VSC values in the mid-teens are deemed acceptable. Paragraph 2.3.29 of the GLA Housing SPD supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city. Therefore, full or near full compliance with the BRE Guide is not to be expected. 23. Their assessment finds the proposed outline scheme can achieve good levels of daylight and sunlight to most floors, but that it will be more difficult to achieve in many of the lower floors of the outline proposals. For instance, 87% of the facades on Plot B, 81% on Plot C, 83% on Plot D and 93% on Plot F would receive 15% VSC or better. Approximately 67% of each plot will meet or exceed BRE Guide recommended sunlight. Nevertheless, these are only assessments of the facades of proposed blocks, not actual window positions; as part of detailed designs, by making windows larger, varying heights and block profiles, changing flat layouts etc.. 24. For open spaces, their assessment finds that 54% of Moselle Square and all of Peacock Park would receive at least 2 hours of sunlight on a sunny equinox day (50% is the BRE Guide recommendation). All the podium and roof garden spaces pass except that on Plot D, but the courtyard spaces to the approved Goods Yard scheme do not. Their consultants note that it should be possible to design the amenity areas so that features that have higher dependency on sunlight such as play space and seating are positioned to receive sunlight 25. The assessment on neighbours finds a range of effects, with most existing residential neighbours not being adversely affected or only to a minor degree, but some close neighbours being significantly affected. The most dramatically affected are a group of homes to the rear of 841 High Road, that were converted from business units without planning permission, to subsequently gain a certificate of lawful development on time grounds. It is also worth noting that, at present, most of the neighbours benefit from the site being unusually under developed, with low rise warehouse units and extensive surface car parking. 26. To assess the impact of the proposals on wind microclimate, the applicants carried out wind tunnel testing of a physical model and measured the findings against long term wind statistics applicable to the site, in accordance with the industry standard “Lawson” criteria. Their assessment finds that the proposed towers will cause some downdrafts and tunnelling of wind in some street spaces along the western side of the site. Following some mitigations and design modifications, the locations of potentially uncomfortable wind conditions were found to be reduced to just a few places where sitting would be uncomfortable but strolling fine. Nevertheless, the applicants’ stated intention is that further mitigation as part of detailed landscape proposals should iron out any remaining concern. **Detailed Scheme** 27. The detailed scheme comprises just two blocks, in Plot A, which is to the west of the railway, on the site of two former community buildings. They are connected to the rest of High Road West via two railway bridges, on Whitehall Street and Orchard Place (which connects to Brereton Road), north and south respectively of Plot B, but the proposed blocks would be closer to Plot D. The immediate context to the west is existing two and three	

Stakeholder	Comment	Response
	storey council housing in Tenterden Road, Headcorn Road and Penshurst Road, a series of quiet culs-de-sac, with a square green space also immediately adjacent. 28. The proposals are of five and six storeys, in brick in an understated but elegant architecture with regular pattern of windows of a vertical proportion, interspersed with columns of balconies. To the eastern of the two blocks, there will be two storey maisonettes on the ground and first floor, with their own front doors and private back gardens. The end unit would be entered off the south facing flank wall onto the existing Whitehall Street, the remainder onto the new pedestrianised and lushly landscaped Whitehall Mews, between this block, the other block and the flank and of the existing housing. Two communal entrances to the flats above would also face this space, whilst at the northern end the terrace is closed with a secure cycle store. 29. The western of the two blocks is on the opposite side of Whitehall Mews, shifted south, and L-shaped in plan, with its entrance facing down Whitehall Street. It contains flats on each floor. Both blocks' communal entrances are celebrated with pigmented concrete "frame" encompassing entrance door, glazing to the entrance hall and solid, painted refuse / cycle store doors. The entrance frame to the western block turns the corner providing more passive surveillance to Whitehall Mews. Dark glazed bricks separate entrance door / windows from utility doors, and a darker red brick is used to the base of the eastern block, around doors and to end flank elevations to the softer pink primary brick. Balconies are thoughtfully detailed in brick, concrete and metal, referencing the traditional pot designs produced in this area. 30. All flats are dual aspect except for 1-bedroom flats, which face either east or west; the majority of flats are two or three beds, with three and four bed maisonettes. The applicants sun and daylight consultants prepared a full assessment of the detailed development, finding that 91% of proposed rooms, 95% of proposed living rooms, would receive at least the BRE recommended daylight levels. Given the expectations in denser urban developments mentioned above, this is considered an excellent outcome. Sunlight levels are not so successful, 57% receiving recommended annual levels but 95% receiving recommended winter levels. The applicants' consultants suggest these results could be due to the orientation being east-west, but these results can still be considered good in a dense urban setting. The effect of the proposals on neighbours is affected by many of those neighbours having windows that are already significantly overshadowed by balconies, so that their existing day and sunlight levels are poor, and following the development they would be worse. Presumably residents of those homes have learnt not to have a great expectation of daylight form already overshadowed windows. Generally, windows that are not overshadowed do not suffer a significant, or in many cases any noticeable loss of day or sunlight. 31. These two blocks are modest but elegantly designed, and form an appropriate transition between the high-density, high-rise urban density and intensity of the rest of High Road West (& indeed other developments beyond, particularly the Spurs Stadium) and the modest, sleepy character and lower rise, scattered layout existing housing to the west of the railway. Details are thoughtful and materials robust, durable, and attractive. The detailed scheme will only give a hint as to what the rest of the scheme, in outline, could be, but if it is a marker for what is to come, it is a promising marker.	

Stakeholder	Comment	Response
Drainage	Thank you for consulting us on the above planning application reference number HGY / 2021 / 3175, which is a Hybrid Planning application seeking permission for : 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. Having reviewed the applicant's submitted Masterplan Flood Risk Assessment document parts 1 to 9, prepared for Lendlease (High Road West) Limited by Robert Bird Group dated October 2021, please see below our comments : 1) For the Outline component of the application: We would like to propose a couple of conditions relates to the Surface water Drainage and it's management and maintenance, which will need to be attached as a part of any consent on this planning application. Please see below some wording for Conditions. Surface Water Drainage condition: No development shall take place until a detailed Surface Water Drainage scheme for site including overland flow path and final detailed design drainage drawings has been submitted and approved in writing by the Local Planning Authority. The development shall not be occupied until the Sustainable Drainage Scheme for the site has been completed in accordance with the approved details and thereafter retained. Reason: To endure that the principles of Sustainable Drainage are incorporated into this proposal and maintained thereafter. Management and Maintenance condition: Prior to occupation of any blocks hereby approved, a detailed management maintenance plan for the lifetime of the development, which shall include arrangements for adoption by an appropriate public body or statutory undertaker, management by Residents management company or other arrangements to secure the operation of the drainage 2 scheme throughout the lifetime of the development. The Management Maintenance Schedule shall be constructed in accordance with the approved details and thereafter retained. REASON: To prevent increased risk of flooding to improve water quality and amenity to ensure future maintenance of the surface water drainage system.	Conditions are recommended to secure the final drainage and maintenance arrangements.

Stakeholder	Comment	Response
	2) For the detailed component comprising Plot A With regards to the information as submitted for Plot A specifically, if the scheme is to built as per the submitted FRA, calculations, drawings, management and maintenance plan then we are content with the same and we have no further comments to make on the application for Plot A.	
Education	I don't have any particular comments from a place planning perspective at this stage. We have 5 primary schools in close proximity to the Love Lane estate with large surpluses and our annual place planning projections from the GLA take into account future housing trajectories.	Officers are satisfied that the proposal would not have an adverse impact on education provision.
Ecology	No comment received	
Planning Policy	Location: 867-879 High Road N17 8EY Proposal: Hybrid planning application (part Full/Part Outline) for the demolition of existing buildings & structures and redevelopment of the site for a residential led mixed use scheme with up to 330 residential units (class C3), retail/cafe use (Use Class A1/A3), area of new public open space, landscaping and other associated works. Full details/permission is sought in respect of Block D, 867 and 869 High Road (Grade II listed) and proposed Block G to its rear. Outline permission is sought for the remainder of the site, with details of ""scale"", ""layout"", ""appearance"" and ""landscaping"" reserved in relation to proposed Blocks A, B and C and details of ""appearance"" and ""landscaping"" only reserved in relation to Block E. Key designations • Tottenham Area Action Plan • Northumberland Park Growth Area • High Road West Site Allocation (Reference: NT5) • North Tottenham, Conservation Area (part) • Archaeological Priority Area (part) • Listed Buildings • Tall Building Growth Area • Ecological Corridor (part) Site and Proposal The site is located at 867-879 High Road. The proposal is for the redevelopment of the site for a residential led mixed use development scheme with up to 330 residential units, retail/café, area of public open space, and other associated works. Detailed permission is sought for Blocks D and G. change of use at 867 and 869 High Road (Block F), and outline permission is sought for remainder.	Officers are satisfied that the proposal delivers on the vision and aspiration and key principles, when read as a whole. The limited departures are considered to be justified and outweighed by the significant public benefits that the scheme delivers including but not limited to new housing (including affordable housing, substantial,

Stakeholder	Comment	Response
	Principle of development The site is located within the Lea Valley Opportunity Area and North Tottenham Growth Area. Policy SP1 of the Local Plan Strategic Policies document sets out that the Council will promote development within the North Tottenham Growth Area. Haringey's Growth Areas are areas with the greatest capacity for growth and it is expected that the majority of homes, jobs and infrastructure will be delivered in these areas over the plan period. The Tottenham Area Action Plan (AAP) gives effect to the Council's spatial strategy for Tottenham by identifying and allocating development sites. The site falls within the High Road West site allocation (reference NT5). The allocation covers the High Road West regeneration area of which 867-879 High Road is just a relatively small part. The allocation is expected to deliver a new residential neighbourhood and a new leisure destination for London comprising 1,200 new residential units (net). The Council adopted the High Road West Masterplan Framework in December 2014. In advance of the Tottenham AAP being finalised, this set out key principles for the redevelopment and regeneration of High Road West. 867-879 High Road is located within the northern part of High Road West which is identified for a new residential neighbourhood (Peacock Gardens) set around a large new community park. The proposal seeks to deliver a residential led mixed use development scheme with up to 330 residential units and small retail/café unit. It will involve the loss of circa 5000sqm retail floorspace, however the existing retail use is within an out of centre location and does not have specific policy protection. The residential led mixed use development of the site generally accords with the Local Plan Strategic Policies document, Tottenham AAP and High Road West Masterplan and the principle of the proposal is therefore considered acceptable. Masterplanning Policy AAP1 of the Tottenham Area Action Plan 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, a masterplan will be required to accompany development proposals which form part of a Site Allocation. The Council adopted a comprehensive Masterplan Framework for the High Road West in 2014. It is not necessary therefore for the application to be accompanied by a masterplan, instead the application should accord with the principles within the Council's approved masterplan. The Tottenham High Road Masterplan framework envisages the creation of a new residential neighbourhood in the northern part of the High Road West area. The land uses proposed at the site (867-879 High Road) accord with the masterplan framework and in general terms will support the creation of such a neighbourhood. Detailed consideration will need to be given to the layout of development and vehicular, cycle and pedestrian routes to ensure that the regeneration opportunity is optimised and that the site integrates well with other sites which have already come forward (to the north) or are expected to come forward in the remainder of the plan period (to the south).	public realm improvements, new access routes, new civic square, new public park, new employment and training opportunities and new community infrastructure.

Stakeholder	Comment	Response
	Quantum of development Policy SP1 of the Local Plan Strategic Policies document states that the Council expects development in Growth Areas to maximise site opportunities. The High Road West site allocation does not specify how many dwellings should be delivered at 867-879 High Road rather the site is expected to contribute to the overall target of 1,200 net residential units within the wider allocation. Policy SP2 of the Local Plan Strategic Policies document sets out that high quality new residential development in Haringey will be provided by ensuring that new development, amongst other things, meets the density levels set out in the Density Matrix of the London Plan. In December 2019 the Mayor published his Intend to Publish version of the new London Plan. This has been subject to examination and includes changes in response to the Inspectors' recommendations. It moves away from the use of a density matrix to a more holistic approach to making the best use of land and achieving sustainable densities. Regard should be had to policy D3 of the Intend to Publish London Plan when assessing the quantum of proposed development on the site. Policy D3 seeks to optimise site capacity through a design-led approach. This approach is consistent with policy DM11 of the Council's Development Management DPD which expects optimum housing potential of a site to be determined through a rigorous design-led approach. Mix of housing Policy DM11 of the Development Management DPD requires that proposals for new residential development should provide a mix of housing. The application documentation indicates that only 14% of homes would be 3+ bed units. Consideration should be given as to whether it would be appropriate for the scheme to deliver more family sized housing as the proposed amount is low. Affordable Housing The proposal provides 25% affordable housing by habitable room. An affordable housing viability appraisal has been provided to justify this level of provision which is short of the borough wide affordable housing target of 40% set out in Policy SP2 of the Local Plan Strategic Policies document. The viability appraisal should be scrutinised to ensure that the level proposed is the maximum reasonable amount of affordable housing provision. The Council's Housing team should be consulted in relation to the proposed tenure mix. Transport & Access We note that detailed comments have been provided by the Transport team in connection with the application. It is important that the access and movement proposals support comprehensive development across the High Road West allocation. Parameter Plan 05 addresses potential future accesses to the site from the south. It should be demonstrated that these are deliverable and will facilitate the connections envisaged in the High Road West Masterplan Framework.	

Stakeholder	Comment	Response
	Tall building It is noted that a tall building is proposed within the site. Only outline planning permission is sought for the tall building as part of this application. North Tottenham has been identified as being potentially suitable for the delivery of tall buildings as set out on Figure 2.2 of the Development Management DPD. Regard should be had to policy AAP6 of the Tottenham Area Action Plan and policies DM1 and DM6 of the Development Management DPD when deciding if the proposed tall building is appropriate in this location. Heritage The south eastern corner of the site falls within the North Tottenham Conservation Area. The part of the site falling within the Conservation Area contains a Grade II Listed Building (867-869 High Road). The proposal retains the Listed Building and seeks to convert it to residential use. The retention of the Listed Building is supported. Policy AAP8 of the Tottenham Area Action Plan sets out that the Council will encourage heritage-led regeneration and development on Tottenham High Road. Policy DM9 sets out development that conserves and enhance the significance of a heritage asset and its setting will be supported. The Council's Conservation Team should be consulted to ensure that the proposals will not have an unsatisfactory impact on the historic environment.	
Pollution Team	Thanks for contacting the Carbon Management Team (Pollution) regarding the above hybrid planning application for outline component comprising demolition of existing buildings and creation of new mixed- use development including residential (Use Class C3), commercial, business & service (Use Class E), leisure (Use Class E), community uses (Use Class F1/F2), and Sui Generis uses together with creation of new public square, park & associated access, parking, and public realm works with matters of layout, scale, appearance, landscaping, and access within the site reserved for subsequent approval; and Detailedcomponent comprising Plot A including demolition of existing buildings and creation of new residential floorspace (Use Class C3) together with landscaping, parking, and other associated works and I will like to comment as follows. Having considered all the relevant supportive information especially the Construction Environmental Management Plan dated October 2021, Energy & Sustainability Statement dated October 2021 taken note of section 5 (Silverside Energy Statement), Geotechnical and Geo-Environmental Desk Study with reference4200 – RBG – ZZ – RP – GE – 00001 Revision P04 prepared by RBG Ltd dated 8th October 2021 taken noteof Table 6.3 (Preliminary Conceptual Site Model (CSM)), sections 4 (Ground Conditions), 5 (Preliminary Contaminations Assessment) and 7 (Recommendations), Geotechnical and Geo-Environmental Desk StudyReport with reference 4202 – RBG – ZZ – ZZ – RP – GE – 001 Revision P03 also prepared by RBG Ltd dated 20th October 2021 taken note of Tables 13 & 14 (Preliminary Conceptual Site Model) for North and South Zone respectively, sections 7 (Ground Conditions & Environmental Setting), 8 (Preliminary Contamination Assessment), 10 (Hazard Register) and 11 (Conclusions) as well as Environmental StatementVol 4 CH07 Air Quality which we consider insufficient in addressing the details AQ concern as advised in our email dated 18th June, 2021 @ 1921hr, **please be advise that we have no objection to the proposed development**	Conditions are proposed to secure further contaminated land and air quality assessment and associated mitigation, construction and environmental management plans and CHP details.

Stakeholder	Comment	Response
	in respect to air quality and land contamination but the following planning conditions and informative are recommend should planning permission be granted. **1. <u>Land Contamination</u>** Before development commences other than for investigative work: **a.** Using the information already submitted in the Geotechnical and Geo-Environmental Desk Study reports above, chemical analyses on samples of the near surface soil in order to determine whether any contaminants are present and to provide an assessment of classification for waste disposal purposes shall be conducted. The site investigation must becomprehensive enough to enable; a risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing any additional remediation requirements where necessary. **b.** The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carriedout on site. **c.** Where remediation of contamination on the site is required, completion of the remediationdetailed in the method statement shall be carried out and; **d.** A report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied. **<u>Reason:</u>** To ensure the development can be implemented and occupied with adequate regard forenvironmental and public safety. **2. <u>Unexpected Contamination</u>** If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented asapproved. **<u>Reasons:</u>** To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the developmentsite in line with paragraph 109 of the National Planning Policy Framework. **3. <u>NRMM</u>** **a.** No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at http://nrmm.london/. Proof of registration must be	

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	submitted to the Local Planning Authority prior tothe commencement of any works on site. **b.** An inventory of all NRMM must be kept on site during the course of the demolitions, site preparationand construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required untildevelopment completion. **Reason:** To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMMLEZ **4. Demolition/Construction Environmental Management Plans** **a.** Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planningauthority whilst **b.** Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority. The following applies to both Parts a and b above: a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP). b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include: i. A construction method statement which identifies the stages and details how works will be undertaken; ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limitedto 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays; iii. Details of plant and machinery to be used during demolition/construction works; iv. Details of an Unexploded Ordnance Survey; v. Details of the waste management strategy; vi. Details of community engagement arrangements; vii. Details of any acoustic hoarding; viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance); ix. Details of external lighting; and, x. Details of any other standard environmental management and control measures to be implemented. c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July2017) and shall provide details on: i. Monitoring and joint working arrangements, where appropriate; ii. Site access and car parking arrangements;	

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	iii. Delivery booking systems; iv. Agreed routes to/from the Plot; v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the Plot during the demolition/construction phase; and vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation offacilities such as concrete batching. d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control(2014) and shall include: i. Mitigation measures to manage and minimise demolition/construction dust emissions during works; ii. Details confirming the Plot has been registered at http://nrmm.london; iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in theevent of Local Authority Inspection; iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kepton site, which includes proof of emission limits for equipment for inspection); v. A Dust Risk Assessment for the works; and vi. Lorry Parking, in joint arrangement where appropriate. **The development shall be carried out in accordance with the approved details. Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out.** **Reason:** To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic,protect air quality and the amenity of the locality." **5. Air Quality Assessment** In other to minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) where development islikely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people), • An Air Quality Neutral Assessment, taking into account emissions from the installation of temporaryand permanent boilers, transport sources and all other sources of emissions must be undertaken and submitted for approval. • Otherwise, the applicant will need to provide us a current addendum AQ assessment of the proposed development taken into consideration all emission sources for the purposes of reaching aconclusion on its significance effects on local air quality. **Reason:** To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design andConstruction.	

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	6. <u>Combined Heat and Power (CHP) Facility</u> Prior to the commencement of the development, details of the Combined Heat and Power (CHP) facility ofthe energy centre and associated infrastructure shall be submitted in writing to and for approval by the Local Planning Authority. The details shall include: a) location of the energy centre; b) specification of equipment; c) flue arrangement; d) operation/management strategy; and e) the method of how the facility and infrastructure shall be designed to allow for the future connectionto any neighbouring heating network (including the proposed connectivity location, punch points through structure and route of the link) f) details of CHP engine efficiency The Combined Heat and Power facility and infrastructure shall be constructed in accordance with the details approved, installed and operational prior to the first occupation of the development and shall bemaintained as such thereafter. **<u>Reason;</u>** To ensure the facility and associated infrastructure are provided and so that it is designed in amanner which allows for the future connection to a district system. **1. <u>Combustion and Energy Plant</u>** Prior to installation, details of the gas boilers to be provided for space heating and domestic hot watershould be forwarded to the Local Planning Authority. The boilers to be provided for space heating anddomestic hot water shall have dry NOx emissions not exceeding 40 mg/kWh (0%). **<u>Reason</u>**: As required by The London Plan Policy 7.14. **<u>Informative</u>**: 1. Prior to demolition or any construction work of the existing buildings, an asbestos survey should becarried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.	
Regeneration	1. INTRODUCTION 1.1 The delivery of the High Road West scheme provides the Council with the opportunity to tackle the entrenched social and economic barriers that residents face in North Tottenham and deliver on the benefits the community have said they want, such as good quality affordable homes, jobs and training and new and improved community	Regeneration benefits are noted.

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	and leisure facilities. Delivery of the scheme would represent a significant step forward in progressing the Council's and the community's ambition to ensure that north Tottenham is a fairer, healthier place where all our residents can thrive. An increase in council owned social rent homes alongside a suite of other benefits that would be delivered as a result of approving this planning application would ensure that our residents and businesses are given the support and capacity to grow. 1.2 The scheme represents a substantial and far-reaching investment, which includes delivery of the following benefits:- • Over 2,500 high-quality, sustainable homes, including 500 council owned social rent homes and 40% affordable housing. • £10m of funding for social and economic support for both businesses and residents, ensuring the local community benefit from the Scheme • A cutting edge new Library and Learning Centre and a refurbished Grange Community Hub which will provide improved community facilities early in the Scheme. • Around 143,000sqft of green spaces for the community including a large new community park with an outdoor gym, children's play area and Grange Gardens: a safe, central green space for local people. • A welcoming new civic square which will be an important focus of local events and activities, bringing the community together, promoting cultural activities and enhancing activity and safety at night. • Over 130,000sqft of commercial, retail and leisure space throughout the Scheme providing a wide range of leisure, employment space, shops, cafes and restaurants around a new civic square. • £500k of investment in the town centre and a £500k fund for events and activities, as well as meanwhile uses which will revitalise the local centre during construction and afterwards. • Over 3,300 construction jobs and more than 500 end-user jobs once the development is complete. 2. BACKGROUND AND ENHANCEMENT OF THE SCHEME TO RESPOND TO LOCAL NEEDS 2.1 The Council's Borough Plan Priority 1 "Housing", is for a "safe, stable and affordable home for everyone, whatever their circumstances" and states that an increasing supply of council housing is one of the most important things the council can do, "because for many people, a council home offers the only real chance of putting roots in Haringey in a stable, good-quality home". 2.2 North Tottenham is home to a large proportion of families with children; making up 51% of households in the area, compared to 35% borough wide; and with 32.0% of children living in poverty, more than 50% higher than the London average. But there is a deficit of family housing, with fewer than 14% of council owned properties	

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	in Haringey providing three or more bedrooms. Overcrowding is particularly acute in Tottenham, with the Children's Commissioner and Public Health England both highlighting the negative impacts this has on physical and mental health, particularly for children and young people, an issue that has been exacerbated during the Covid crisis. 2.3 The Council has established its own council house building programme to support its Priority 1 Objective. This programme seeks to secure council owned housing by a range of methods including; acquiring homes, acquiring stalled sites and building council housing. The High Road West Scheme represents an important contribution to the Council priority by delivering 500 social rent homes for acquisition by the Council. 2.4 The High Road West masterplan framework was agreed by the Council's Cabinet in 2014, following three years of engagement and consultation with the local community. In 2018 the Council sought a review of the High Road West Scheme, with the view to seeking to deliver more social housing through the Scheme and delivering a higher overall percentage of affordable homes. The outcome of this review included an uplift to 500 council owned social rent homes as well as a higher percentage of affordable homes (40% from 30%), and a range of other community benefits as referred to above, supported by a total funding package agreed with the GLA of £91,512,000 comprising of £70,312,000 of Affordable Housing Grant and £21,200,000 of Mayor's Land Funding. 2.5 The delivery of 500 new council owned social rented homes through the Scheme, offers a chance to increase the number of council owned social rented homes in the area and ensure the mix of the new homes reflects the needs of residents who will be moving into them. Eligible residents on the Love Lane Estate, including those currently living in both secure and temporary accommodation, will be offered a council home which meets their needs. The remaining 250+ social rented homes will be available to the most in-need households on the Housing Register beyond those living on the estate, as part of the council's commitment to deliver a new generation of council homes for local people. For many residents, the offer of a secure council tenancy in a home has been long awaited and will offer them much needed stability, that will help them to take better advantage of their opportunities in their careers, family and community activities. 2.6 The homes will be delivered as part of a healthy and sustainable neighbourhood which recognises the need for these to be part of a mix of employment, community and leisure activities, responding to the identified needs of the local community regarding issues such as health, financial security, community cohesion and personal safety and in particular, a step change improvement in the quality of homes for local residents. Alongside a £500k package to support for existing local businesses and funding to support new local business start-ups, a variety of commercial uses and employment activities will be delivered including retail, business and leisure space, which will help to support the town centre and support good business growth in the area. A range of types and levels of employment will be created which will include requirements for targets to be met in relation to employment of local people and people who might otherwise be overlooked seeking employment opportunities. This will be complemented by a focussed training programme, funded as part of the £10m socio-economic programme, that will help local people to access higher paid jobs in the local and wider London area and develop	

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	a sustainable career path, supporting existing successful programmes in the area and optimising the new opportunities provided, such as through the new Library and Learning Centre and community hub at the Grange. 2.7 High Road West will support the North Tottenham Improvement Plan's people-focused, cross sector, "Locality" based approach to improving areas and services by putting the quality of life for local people at the heart of decision making. Locality, or placed based services, are being introduced or piloted across North Tottenham, demonstrating a strong existing infrastructure to address the pressing challenges in the area. The North Tottenham Localities based work in summary includes: a) Connected Communities – a locality-based approach to early intervention and prevention. b) Place based care – delivery of holistic care in the community c) NHS Estates review – supporting a shift of services into the community d) Area based workers such as Local Area Coordinators (LACs), Employment Navigators, Haringey Gold community Safety Champions e) Building voluntary and community sector capacity to work directly with the public sector and to deliver sustainable change. 3. WORKING WITH LOCAL PEOPLE 3.1 Consultation and engagement with local residents and businesses has been an important part of shaping the High Road West scheme. The resident ballot that took place last year is an important milestone within a long-running timeline of working with Love Lane residents on the High Road West scheme. 3.2 The resident ballot in 2021 was based on a series of commitments that were set out in a 'Landlord Offer' that encapsulates previous feedback and commitments. This includes the consultation on the Resident Guides (agreed by Cabinet in 2014), Local Lettings Policy, Leaseholder Offer, and engagement on the proposed commitments to non-secure tenants. Discussion with residents on the masterplan and new homes has included the development of the Masterplan Framework (agreed in 2014), the creation of a Resident Design Guide (2015/16) and engagement across 2018. In spring 2021, residents gave feedback on a Masterplan and New Homes engagement booklet, and a series of themed interactive workshops took place. This feedback has shaped the vision and design principles presented in the Offer. The outcome of the ballot was a majority of 56% of eligible residents voting yes in favour of the plans to redevelop the Love Lane Estate as part of the High Road West scheme based on a turnout of 69% of eligible residents. 3.3 The council is committed to creating a good economy in the north Tottenham area, supporting local wealth building that benefits the local community. In achieving this, it is committed to working with existing businesses, with the aim to help them grow and be successful, so that the existing jobs in the area will be protected. Through	

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	engagement with businesses, the council committed to a Business Charter which seeks to reinforce the economic sustainability of individual businesses as well as enhance the local centre overall. In recent years, engagement has included business breakfast events and workshops alongside written updates and one-to-one meetings with business owners.
	
	3.4 In 2018/19, the council worked with consultants Retail Revival to fund training and business development advice, as well as access to a small grants pot, addressing vacant premises through, for instance, use of meanwhile activities from the local area and beyond. Recent initiatives have included a 'Get Online for Business' programme, and an upcoming programme will focus on support for SMEs and start-ups. A dedicated engagement officer has worked with North Tottenham businesses to help them get involved. As the scheme progresses, socio-economic investment for businesses and the local centre will come forward to enhance this existing provision.
	
	3.5 The council places a high priority in job creation through the High Road West scheme, with the need for employment opportunities being particularly high at the current time in the wake of the Covid crisis. Northumberland Park has the highest number of people claiming Universal Credit, Jobseekers Allowance and other job-related benefit allowances in Haringey and the highest level of people not in employment, education or training.
	• As a result the scheme will provide a range of opportunities including:
	  ○ the jobs brokerage and employment support programme;
	  ○ the STEM programme working with local schools;
	  ○ the business support programme that has already supported 19 local shops and will support many more over the life of the project;
	  ○ the business development spaces at the Library and Learning Centre, supporting hundreds of local people into work;
	  ○ the youth apprenticeship programme; and,
	  ○ the community digital hub that is supported by HALS to provide 1:1 support to residents is so important.
	• This will enable local people to take advantage of jobs and develop businesses across the region that they might previously not have had the opportunity to access.
	• This is in addition to the 130,000ft2 of new commercial, retail and leisure space that will provide over 500 jobs across a range of sectors and skills levels and with commitments to deliver jobs for local people, and sections of the community such as people who have been long term unemployed, women and people with disabilities.
	• There will also be 3,000 plus construction jobs arising from the scheme and the council is determined to ensure that people on the estate and living locally in North Tottenham are given opportunities to training and employment so that they can be at the heart of building their new neighbourhood.	

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	• The economic growth in the area as a result of the investment provided by the scheme, is likely to support the local economy helping to sustain local businesses and employment. • A series of funds from the scheme includes £500k for supporting businesses in their moves, whether this is as part of the scheme or elsewhere, and a further £500k for business support for businesses in the area, aimed at promoting the town centre and commercial areas. 3.6 The council is working to support businesses that need to be relocated by working to understand the individual aspirations of each business affected by the Scheme and aiming to relocate them where possible within the scheme, or as nearby as possible. The aim is to deliver the best available outcomes for them, both in relation to the availability and suitability of new employment spaces in the masterplan, and for their future options based on their individual aspirations, needs and circumstances. 3.7 The masterplan proposal delivers a significant proportion of commercial space which would be suitable for many existing businesses on the Peacock Industrial Estate and elsewhere in and around the site, if they wished to relocate there. The phasing plan has also been designed to provide opportunities for businesses to move once, from their current location to a new location. 3.8 The masterplan has been designed to offer modern accommodation suitable for a range of retailers, commercial and light industrial occupiers and will include the minimum delivery of 4,686sqm of either B2, B8 or Class E(g i, ii and iii) with suitable flexibility to accommodate a proportion of existing businesses. It is the Council's aspiration that, through the scheme, many businesses will be able to relocate into new high-quality spaces within the masterplan. We will be seeking to work with business owners to develop the optimal designs for these new spaces and other parts of the masterplan. 4. MASTERPLAN AND DESIGN 4.1 High Road West has focussed on delivering a strong approach to 'place-shaping' throughout, from initial masterplanning, developed around the 'High Road West Placemaking and Design Guidance' and onwards with the emerging Design Code document. 4.2 The aim throughout has been for high quality places that promote mixed and inclusive neighbourhoods supporting an attractive town centre with jobs and services for its communities; places that help meet people's wider needs and aspirations: for economic security; for health and well–being; for arts and culture; for safety and security; and for links to family and community. High Road West will have attractive, economically competitive, liveable, resilient places offering residents, workers and visitors enhanced opportunities and quality of life. 4.3 Clear design principles ensure high quality, liveable places and spaces throughout the scheme, optimising the opportunities for creating healthy streets and child-friendly activities, as well as promoting internal spaces which respond to the needs of people to play, study, socialise and commune and promoting sustainable living and	

Stakeholder	Comment	Response
	travel throughout. Driven by a strong design code approach, the scheme will be designed to ensure that people living, working and visiting the area will experience an attractive, safe and comfortable environment, with positive relationships between the scale and design of buildings and external areas and an attention to detail that is functional, sustainable and designed to celebrate the local character, culture and people. 4.4 High Road West uses best practice in creating healthy places, recognising the interconnectivity between factors such as accessibility, recreation, food, community facilities, building design and economic prospects and promoting a proactive approach based on the determinants of people's health. This is a critical issue with levels of obesity and diabetes, mental health and rates of stroke, cardiovascular disease and cancer being highest in north Tottenham compared to the rest of the borough and most parts of London, affecting the longevity and quality of people's lives and putting a strain on limited public resources. 4.5 The High Road West scheme will create the jobs which provide the opportunity for healthier lifestyles, the spaces for growing, selling and eating healthy food, the access to training and education, homes that provide space for social interaction, study and adequate peaceful sleep, opportunities for sports, recreation and active living and the public facilities that can provide or signpost health and social prescribing opportunities. It is aimed that streets across the scheme will have play activities and that access will be safe, attractive and inclusive for all people. The new homes will provide more options for healthy living that don't involve the damp, mould and cold that affects many Londoners' lives. Spaces across the scheme will provide numerous opportunities to socialise, celebrate local culture and diversity and create a more cohesive and strong community.	
Transportation	Environmental Statement Clarification is sought on the definition of 'interim scenario'. At Paragraph 15.2.7, it is stated that it will be assessed in two future year scenarios (peak demolition and construction phase, and complete and occupied phase), however elsewhere in the document (Paragraph 15.1.5), it is stated that the interim scenario is the scenario whereby only the southern site is developed. What is the scenario whereby both southern and northern sites are developed, and has it not been used as a basis for the environmental impact assessment? Chapter 15. Transport & Access The receptor sensitivities are all set at a 'medium' level, which lacks subtlety: • Pedestrians (including wheelchair users, people with pushchairs and people with mobility impairments) and cyclists are vulnerable road users and their sensitivity should be high. Any changes to conditions are likely to have a greater impact on them due to the time and effort required to travel on foot or by cycle. • Drivers are not the only road users that should be included. As a more general and inclusive term, this category should be renamed 'Motorised vehicle users' (including private car, taxi, bus drivers, delivery and servicing vehicle drivers, construction vehicle drivers and any vehicle passengers but excluding bus passengers). All motorised vehicle users experience delays as a result of changes in traffic flows and changes in routes which may affect only a proportion of their journeys. As such, their sensitivity should remain medium, as already suggested. • Bus passengers' sensitivity should be medium as they are sensitive to changes in traffic flows and routes which may affect only a proportion of their journeys.	Officers are satisfied that subject to conditions, the proposal would not have a severe impact on the transport network.

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	• Rail users' sensitivity should be medium due to localised changes in passenger flows which may affect only a proportion of their journeys. In Table 15.2, it is stated that, for amenity, fear and intimidation, the affected receptors include pedestrians, cyclists, bus and rail passengers. However, amenity, fear and intimidation do not normally apply to bus and rail passengers as they are already onboard services, only to pedestrians (including before and after using public transport services) and cyclists. The list of impacts for assessment is fine and in line with the guidance, however as I indicated in early feedback (informal scoping opinion request and formal scoping opinion request – HGY/2021/2960) it would be welcome to assess an additional impact, which is road user on-street parking. As you know, parking is critical in this scheme and the impact of it deserves to be assessed, especially as the on-street parking stock would be significantly altered and a substantial number of on-street parking activity (whether on public or private roads) would be generated. The parking stress surveys carried out as part of the Transport Assessment would be a good starting point to establish a baseline, on which the assessment of the parking impact could be built for future year scenarios. In light of the revised receptor sensitivities, and the effect scale matrix for the evaluation of significance, all likely significant effects, residual effects and residual cumulative effects should be reviewed to reassess the different impact groups of the proposed development. The review should also take account of the revised multi-modal trip generation assessment in the Transport Assessment (proposed and net alike). For each impact (severance, delay etc), and in particular if the assessment of the magnitude of impact is qualitative as opposed to quantitative, it is important for the proposed magnitude of impact to be clearly stated, in line with Tables 15.4 and 15.5 of Chapter 15 of the October 2021 ES. Below is a quick suggested re-appraisal of the likely significant effects with comments and questions for review:	

Stakeholder	Comment	Response

Impact and Receptor	Likely Significant Effect (Steer)	Likely Significant Effect (LB Haringey)
Demolition and Construction		
Severance: Pedestrians and Cyclists	Temporary, medium-term, local, adverse, and of minor significance	Very low magnitude of impact x high sensitivity = minor effect
Driver Delay: Drivers	Temporary, medium-term, local, adverse, and of minor significance	Medium magnitude x medium sensitivity = moderate effect – **not minor**
Public Transport Delay: Bus Passengers	Temporary, medium-term, local, adverse, and of minor significance	*Low or medium magnitude x medium sensitivity – minor or moderate effect?* *How many workers would commute to and from the site at peak? We need some data here to explain the magnitude of impact.*
Public Transport Delay: Rail Passengers	Negligible	*Why has the impact on rail not been assessed? Is it assumed that construction workers and visitors would not travel to and from the site by London Overground? If so, why?*

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Pedestrian and Cyclist Delay: Pedestrians and Cyclists	Temporary, medium-term, local, adverse, and of minor significance	Medium magnitude x high sensitivity = major effect – **not minor**
Amenity, Fear and Intimidation: Pedestrians and Cyclists	Temporary, direct, medium-term, local, adverse, and of minor significance	Low magnitude x high sensitivity = minor effect
Complete and Operational Development		
Severance: Pedestrians and Cyclists	Permanent, direct, long-term, local effect of minor beneficial significance	Very low magnitude x high sensitivity = minor effect – **not negligible** *Residual effects:* *With permeability improved throughout the site, would that equate to an overall negligible effect?* *This should also be updated to reflect the outcome of the discussions had with THFC/Spurs around crowd management and mitigation measures.*
Driver Delay: Drivers	Negligible	Very low magnitude x medium sensitivity = negligible effect
Public Transport Delay: Bus Passengers	Permanent, direct, long-term, local effect of minor adverse significance.	**Low magnitude?** x medium sensitivity = minor effect *I think we need a little more than professional judgement here. To justify the low magnitude of impact, we need a matrix with percentages of change per bus service to assess the magnitude of impact. The capacity of typical buses per line should be stated and an overall view can then be taken on the percentage of change throughout all affected bus services.*
Public Transport Delay: Rail Passengers	Permanent, direct, long-term, local effect of minor adverse significance.	Low magnitude x medium sensitivity = minor effect
Pedestrian and Cyclist Delay: Pedestrians and Cyclists	Permanent, direct, long-term, local effect of minor beneficial significance	Very low magnitude x high sensitivity = minor effect
Amenity, Fear and Intimidation: Pedestrians and Cyclists	Permanent, direct, long-term, local effect of minor beneficial significance.	Low magnitude x high sensitivity = minor effect
Accidents and Safety: Pedestrians and Cyclists	Permanent, direct, long-term, local effect of minor beneficial significance	Low magnitude x high sensitivity = minor effect

ES Non-Technical Summary including Addendum

Stakeholder	Comment	Response
	The non-technical summary is fine, subject to any numerical revisions in light of the requested changes to the trip generation assessments (proposed and net), as well as revisions with respect to the predicted likely significant effects (see comments on the ES chapter above). No comment Design Code Pedestrian routes – The absolute minimum pedestrian footpath width must be 1.8m, not 1.5m. Otherwise, the minimum of 2m should be met. Cycle routes – Across the site, high-quality segregated facilities should be provided to separate cyclists from both pedestrian and vehicular traffic, over and above minimum requirements. Parameter Plans No comment. Outline Residential Travel Plan The baseline surveys would be undertaken within 6 months of first occupation of the first phase or 75% residential occupation, with further surveys undertaken as each subsequent phase is complete and occupied. It should be made clear throughout the document that the trigger for the baseline travel surveys would be within 6 months of first occupation or once 75% occupation has been reached, whichever occurs first. The forecast residential modal splits in Table 3.1 must be revised in line with the comments made on the Transport Assessment, notably in terms of car driver and passenger mode shares. Likewise, the targets set in Table 4.1 will have to be revised for the same reasons. Although a reduction in the car driver and passenger mode shares is desirable over time, and in particular over the monitoring period, the decrease may only be in the region of a few percentage points. References to car parking must reflect that all Council housing residents will be able to access a car parking space if they need one (not just decanted residents). Family parking should also be mentioned in the measures and action plan accordingly. The Residential Travel Plan would be secured by Section 106 planning obligation. We would seek preoccupation interim documents then post-occupation full documents after the completion of the baseline travel surveys, to be repeated for each phase as the phased delivery of the proposed development progressed. For the present hybrid application, interim and operational documents would be sought for Plot A but the mechanism for future phases to be delivered with Reserved Matters would also be secured in the Section 106 agreement. Outline Framework (Commercial) Travel Plan Individual tenants would have to produce their own individual Travel Plans or Travel Plan Statements by using the Framework Travel Plan as a basis, if they are above the minimum threshold for producing a document as per the TfL	

Stakeholder	Comment	Response
	guidance. They would also be required to have their own Travel Plan Coordinators answering to the site-wide, overarching Travel Plan Co-ordinator. The baseline travel survey would be undertaken within six months of first occupation of each phase of development, at the same time as the baseline delivery and servicing surveys. The forecast commercial modal split in Table 3.1, derived from the Transport Assessment (Table 5.25), shows an assumed 50-50 split between London Overground and bus services. My earlier comments on the Transport Assessment did not pick this up, therefore I would like to understand why this assumption has been made as it seems highly arbitrary. Owing to the high volume of commercial trips forecast to be made by public transport during the peak hours (in excess of 500 two-way movements), a significant number of trips could potentially be directed to the wrong public transport mode and the impact assessment undertaken in the Transport Assessment skewed as a result. The Framework Travel Plan and associated documents would be secured by Section 106 planning obligation. We would seek pre-occupation interim documents then post-occupation full documents (including an updated operational Framework Travel Plan and individual Travel Plans/Travel Plan Statements) after the completion of the baseline travel surveys, to be repeated for each phase as the phased delivery of the proposed development progressed. For the present hybrid application, the mechanism for future phases to be delivered with Reserved Matters would also be secured in the Section 106 agreement. Outline Delivery and Servicing Plan The delivery and servicing trip generation figures presented in Table 3.1 are derived from Table 5.28 in the TA, and therefore may have to be revised depending on the outcome of the comparison with TRICS which has been requested to ascertain the robustness of the proposed trip rates proposed by Steer. The resulting loading bay requirements (based on the maximum parameters) should also be derived from the delivery and servicing peak hour and be stated in the Outline Delivery and Servicing Plan (DSP). For the present hybrid application, both an interim DSP and a Detailed DSP would be sought for the masterplan (including Plot A) to be produced respectively before occupation and post occupation (after the baseline delivery and servicing surveys undertaken within 6 months of first occupation). The mechanism for the DSP as part of future phases to be delivered with Reserved Matters applications would also be secured by planning condition. The surveys would be carried out at the same time as the baseline travel surveys. Outline Construction Environmental Management Plan Revised Demolition and Construction Environmental Management Plan (DEMP/CEMP) would be submitted for each future RMA.	

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	A Detailed Construction Logistics Plan (CLP) would be secured by planning condition for Plot A. Future RMAs would include Outline CLPs as part of revised CEMPs/DEMPs, and Detailed CLPs would subsequently be secured by planning condition associated with each RMA/phase of development. Cycle storage would be provided on site for site operatives, with numbers to be reviewed against demand on a monthly basis. This is welcome. It is understood that, at peak, 300 Lendlease and extended supply chain management staff to be present on site full time alongside circa 1,400 site operatives. The maximum number of on-site personnel would therefore be around 1,700 people on two occasions, in 2026 and 2028. The peak HGV traffic per month is expected to be attained in mid-2026 and late 2028 with 7,100 vehicle movements consisting of 4,300 HGV and 2,800 LGV movements. The peak year is expected to be 2028 with 14,780 movements. The Transport Assessment indicated that the impact of construction at peak would lead to fewer vehicles than the existing vehicle trip generation. Due to the proximity of the site with a number of schools, every effort should be made to schedule deliveries and collections where construction traffic is to pass by schools outside school opening and times (namely 08:00-09:00 and 15:00-16:00). Generally, construction deliveries and collections should also be scheduled outside the local network peak hours. Please ensure this is reflected in future documents. Section 106 Heads of Terms - Car-free/capped development – both residential and commercial, including £5,000 towards the amendment of the local Traffic Management Order, excluding Council housing residents - Car club: o Car club provision (10No. on-site spaces) o Establishment or operation of a car club scheme o Contributions from developer to residents - two years' free membership for all residents and £50 (fifty pounds in credit) per year 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 – CPZ contributions to the ongoing review and expansion of existing Controlled Parking Zones – under review. - S.278 highway works agreement (scope and extent of works to be defined after obtaining a detailed Section 278 drawing for costing purposes) - Commercial Travel Plan (including Interim and Full documents, monitoring reports and a £3,000 monitoring contribution) including: o Appointment of a Travel Plan Coordinator (to also be responsible for monitoring Delivery Servicing Plan) o Provision of welcome induction packs containing public transport and cycling/walking information, map and timetables to every new tenant/organisation	

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	o Cyclist facilities (lockers, changing rooms, showers, drying rooms for the non-residential uses) - Residential Travel Plan (including Interim and Full documents, monitoring reports and a £3,000 monitoring contribution) including: o Appointment of a Travel Plan Coordinator (to also be responsible for monitoring Delivery Servicing Plan) o Provision of welcome induction packs containing public transport and cycling/walking information, map and timetables to every new household - Future Connectivity and Access Plan - Enfield Traffic Management Order contribution - £20,000 (indicatively, based on past applications) - Walking and cycling/transport infrastructure contributions – under review - Public highway condition (before/after works) - Cycle parking and access details - Detailed Construction Logistics Plan - Demolition/Construction Environmental Management Plans - Delivery and Servicing Plan - Car Parking Design and Management Plan (including the provision of electric vehicle charging points – both active and passive, space allocation strategy, wheelchair-accessible car parking) - Combined Stage 1/2 Road Safety Audits along all shared surface lanes within the masterplan and for all new access points on White Hart Lane, the A1010 High Road, Brereton Road and Whitehall Street - Basement Vehicular Access Control Arrangements (RMA stage) - Highway stopping-up, diversion and adoption (if relevant) details Transport Assessment (including Car Parking Management Plan) and Design and Access Statement Baseline Conditions It is noted that 64% of the site falls within PTAL 4, 25% PTAL 5 and 11% PTAL 3. A parking stress survey was requested as per the Lambeth methodology and undertaken in May 2021. It highlighted significant spare capacity within the local Controlled Parking Zone (CPZ) that is operating at 60% capacity. It also found that there was limited capacity within the private car parks and on private roads, including those managed by Homes for Haringey (Tenterden Road and Headcorn Road). Overall, 71% of all spaces in the study area were utilised. Additionally, LBH Regeneration undertook a telephone survey of current Homes for Haringey residents and found that 43% of respondents (out of a sample of 87) said they owned a vehicle. ATZ Assessment The ATZ assessment was reviewed in detail. The lists of personal injury accidents for each route do not say whether any of the accidents were attributable to reasons other than human error. However, no physical interventions which could reduce the frequency and severity of such accidents are recommended in this section, but a number of suggestions have been made, namely: - Review and removal of footway parking where relevant to facilitate pedestrian flows along footways; - Inclusion of cycle lanes to encourage cycling as a safe mode of transport; - Addition of benches for pedestrians to stop and rest;	

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	- Improvements to pedestrian crossings with tactile paving, or creation of formal zebra crossings; and - Improvements to footway and crossing surfacing. Is the increase in trips as a result of the proposed development (and local committed schemes) likely to result in additional accidents on the network and, if so, are the measures outlined above sufficient? If mitigation is necessary then we need to know. Can the exact locations of the proposed improvements set out above be identified accurately on a map? Development Proposals Quantum of Development The floorspace and accommodation schedule of the outline element of the proposed development reflects suitable flexibility for a range of land uses, ranging between minimum and maximum parameters. The latter are as follows: - 280,000sqm C3 - 8,000sqm B2/B8 - 22,000sqm E - 6,000sqm F - 8,300sqm Sui Generis - 5,000sqm as on-plot residential parking Maximum total: 339,300sqm A maximum total of 2,977 residential units are proposed (297 existing properties, hence a proposed uplift of 2,680 units including +747 affordable units). The detailed element of the proposed development, Plot A, comprises 60 dwellings, of which 29 units are proposed to be family dwellings (3+bed units). Cycle Access and Parking (Plot A) Cycle parking and access details for Plot A would be secured by planning condition. Cycle Access and Parking (Masterplan) The masterplan proposes a dedicated cycle route running through the masterplan site in a north-south direction, which avoids the High Road. A connection with the extension to Cycleway 1 is allowed for to the west of the site. Within the site it is understood that the intention is for cycling to be accommodated on carriageway along one-way and two-way	

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	vehicle routes as well as through public realm areas. Delineation would be provided along one-way routes and across the public realm, but not along two-way routes. No segregation is proposed. Further justification is required in relation to the creation of a one-way system on Love Lane, Moselle Street and William Street. Where one-way systems are provided, dedicated cycle contraflow facilities are required. Cycle parking is proposed to be provided in line with the London Plan (2021) minimum standards, with 5% of the total provision to cater for larger cycles with adequately enlarged spaces. In addition to this, we would expect to see a proportion of cycle parking delivered in the form of Sheffield stands for regular cycles. This proportion should be comprised between 5% and 20% and would be discussed as part of any future Reserved Matters applications. Cyclist facilities such as lockers, changing rooms, showers, drying rooms etc for non-residential will be required and must be secured via the Travel Plan as part of the S.106 agreement. Car Parking (Plot A) No general car parking is proposed on Plot A due to spatial constraints. Based on the telephone surveys of existing residents, it is estimated that the 60 units would generate parking demand for 26 vehicles. The proposal is to accommodate that demand on street in the local area in the interim, where sufficient spare capacity has been identified by the parking stress survey. It is assumed that an all on-street parking solution would be a short-term solution until more plots got delivered and some parking for Council housing residents relocated off street/off the CPZ. Any parking occurring on street would require CPZ permits to be arranged by Homes for Haringey on behalf of Plot A residents. Car Parking (Masterplan) and Car Park Management Plan a. General The proposals are for a combination of on-street spaces on public (CPZ) roads, private roads and off street car parks (on plot). Existing accessible and doctors' bays as well as taxi ranks would be retained, which is welcome. It is indicated that the minimum 3% wheelchair-accessible provision would be 3 delivered from the outset for each plot in the future, and the plan in Appendix F shows the indicative (safeguarded) footprints of delivering the full 10% wheelchair-accessible parking provision. Wheelchairaccessible parking for non-residential uses would also be provided, in line with the London Plan standards. b. Council Housing The telephone survey undertaken in May 2021 established a baseline to determine the likely maximum demand generated by future residents housed by Homes for Haringey. As all 500 Council housing units would be provided south of White Hart Lane, it is important that all plots delivered within that area as part of any future Reserved Matters applications make adequate allowance for parking. Based on the existing parking demand generated by current Council housing residents, if all Council housing residents were offered the right to park, up to 500 x 43% = 215	

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	spaces would be required to meet the likely demand, which would have to be met mostly south of White Hart Lane, in close proximity of the proposed Council homes. Presently it is difficult to understand how much on-street parking there is proposed to be on site (with the exception of the 10% wheelchair-accessible parking provision) and what the total capacity would be, over and above accessible parking. Due to the potentially high number of spaces to be provided for Council housing residents, the provision of the 10% accessible parking from the outset on the southern plots is highly encouraged to create and maximise the amount of off-street parking, of which a proportion not taken up by future resident wheelchair users could be reallocated to Council housing residents through a dynamic Car Park Management Plan to be conditioned. c. Family Dwellings (3+ bed units) Likewise, it is noted that the whole masterplan would include approximately 16% of family dwellings (based on the illustrative masterplan). Any surplus non-CPZ parking not taken up by wheelchair users living on site should be offered to residents of family dwellings (in the order of priority, Council housing tenants would come in first, then residents of non-Council family-sized units). The priority order and mechanism for reallocation of accessible spaces on temporary leases should be discussed in more detail in the Car Parking Management Plan to be secured by planning condition. North of White Hart Lane where residential units would not be managed by Homes for Haringey and where the primary function of car parking would be for wheelchair users residing on site, it is essential to safeguard the necessary land/footprint to deliver all additional spaces (maximum 10% provision in line with the London Plan) from the off. In addition, we strongly advise that the proposed basement car park be also designed at full capacity (delivering sufficient spaces to meet the 10% accessible parking provision target) to provide such reallocation flexibility in favour of family dwellings. d. Conclusion The illustrative scheme shows that the minimum 3% parking provision delivered from the outset would provide a total of 89 spaces. If future Council housing residents follow the same vehicle ownership patterns as existing ones on the Love Lane estate, and all are granted a right to park, then up to 215 spaces would be required to meet that demand (of which a small proportion would overlap with the accessible provision). Additionally, we strongly recommend the applicant provide the further 7% parking from the outset throughout the whole masterplan site to cater for Council housing residents' off-street parking demand and any demand likely to arise from occupiers of family-sized dwellings. Planning committee members are very keen to see some parking made available to larger residential units. Relying on any potential unused non-CPZ accessible parking is the right way of boosting parking available on site without overproviding on-site parking and adding unnecessary pressure on CPZ parking. That would therefore bring the total parking provision somewhere in the region of 512 spaces (or slightly fewer due to a number of wheelchair users being Council housing and family-dwelling residents). That would equate to an overall car parking ratio of 0.17 spaces per unit across the whole masterplan site. Whilst this is not an indication of an	

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	absolute target to aim for, this is broadly in line with what was agreed for the Goods Yard and the Depot application (HGY/2021/1771) which provided an overall car parking ratio of 0.16 spaces per unit with parking provided at basement level. Overall, WebCAT indicates that the site mostly lies in areas of PTAL 4, with pockets of PTAL 5 and with the northwestern corner having a slightly lower PTAL (3). The site is also located in the Tottenham North CPZ. In accordance with Policy DM32: Parking of the Development Management DPD, the proposed development would qualify for a car-free status (the part of the site with lower connectivity is immediately adjacent to areas of PTAL 4; London Plan paragraph 10.6.4 also states that "the starting point for discussions should be the highest existing or planned PTAL at the site"). The Council would not issue any occupiers with on-street resident/business parking permits due to its car-free nature, with the exception of Council housing residents relying at least in part on CPZ parking. The Council would use legal agreements to require the landowners to advise all occupiers of the car-free status of the proposed development. Car club A car club viability report has been provided which highlights that Zipcar recommends a total of 10 car club spaces. Car club membership contributions for all residents would be secured via a Section 106 planning obligation. Non-Residential Trip Generation As far as the non-residential trip generation assessment is concerned, the use of Goods Yard Transport Assessment office trip rates and adjusted journey-to-work modal split is accepted. Highway Impact Completed Development In addition to my earlier queries, will network modelling be required after the proposed and net trip generation assessments have been revised? Public Transport Impact In TfL's response following the TfL pre-application meeting in June 2021, it was noted that "Cumulative impacts on the bus network will be considered by TfL and will not be set out in the TA." Whilst we appreciate TfL's request, we will still require sight of that cumulative impact assessment as part of the review of the planning application.	
Waste	The document provides some detail on how waste is to be contained and managed within Plot A and the 3 cores (A1, A2 and A3) that make this up. This has therefore been the focus of this review. There is reference to more detail following in reserve matters applications on how waste will be managed across the other blocks that form part of the	Conditions are proposed to secure appropriate

Stakeholder	Comment	Response
	wider development. An outline of bin numbers required for each block has been set out in Appendix B. These appear to have been calculated in line with LBH guidance and are therefore adequate. Communal bin collections from this development will be weekly. The bin calculations for Plot A presented in table 5, section 4.1. Are in line with LBH requirements. For Plot A1 there is reference to a 360l bin for food waste. We would now prefer that space is made for 140l bins (1 bin per 10 units). Therefore 3 x 140l bins would be needed here. The indicative communal bin store locations on the appended drawings (Appendix A) appear to acknowledge the 10m drag distance for bin collections specified in the SPD and referenced under 2.1.7 in the OWMS. The wheeled bin pulls from the duplex units appear to be acceptable. The swept path analysis provided will need to show more clearly that efforts have been made to limit reversing of RCV vehicles/factoring in space for vehicles to turn around. Commercial waste management sits outside of this strategy. Sizing/number of bins will very much depend on the type of businesses that occupy the space in operation, the waste/recycling they generate and the contracts they put in place for the collection of this. Commercial waste collection companies can provide up to twice daily collections 7 days per week. I would however advise against sizing the bins store based on minimum size and maximum collections. The store should be sufficient to store waste for one week. I hope these comments are helpful. We will be happy to review further drawings and documents in relation to operational waste management from this development as these are developed and shared.	waste storage and collection arrangements.
External		
Affinity Water	No comment received	
Arriva London	No comment received	
National Planning Case Unit	I confirm that we have no comments to make on the environmental statement.	
Clinical Commissioning Group	Thank you for the opportunity to comment on this planning application. This is a significant development of up to 2,929 new homes on a strategic site of 8.5 ha in north Tottenham. It is allocated as Site NT5 in the Tottenham Area Action Plan (2017). The development will have a significant impact on healthcare infrastructure and the High Road West Masterplan Framework (2014) acknowledges that additional healthcare provision is needed in the area, particularly primary care services. The site is located in Northumberland Park ward which is one of the most deprived wards in England. Therefore, access to healthcare and wider health inequalities are a key issue. The site is a multiple ownership, with the Council as main landowner of land to the south of White Hart Lane, including the Love Lane Estate. This includes sites owned by Tottenham Hotspur Football Club north of White Hart Lane. The CCG has responded to current applications for 867 new homes and commercial space on the Depot and Goods Yard site (HGY/2021/1771) and an application for 72 new homes, a cinema and supporting commercial uses on the Printworks site (HGY/2021/2283).	A planning obligation is proposed to ensure that the proposal does not generate a deficit in local healthcare provision.

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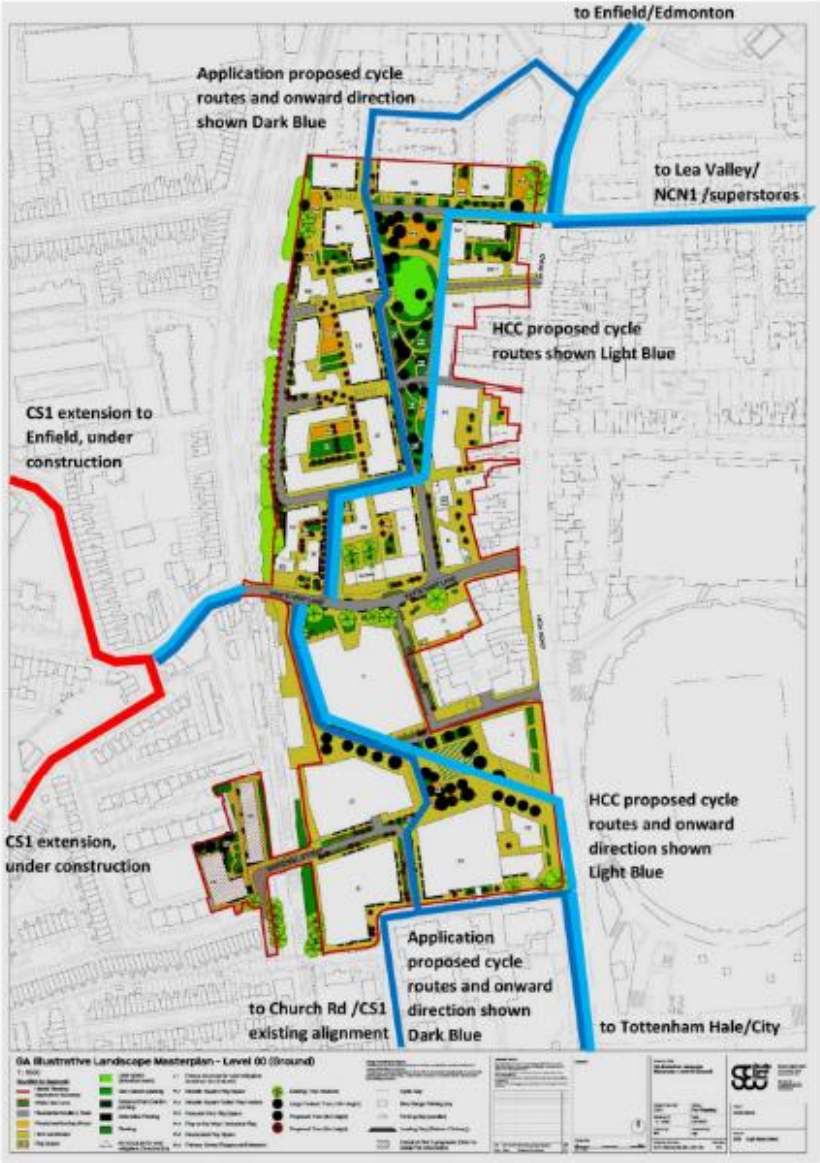
	To the north of the site, in Enfield, is the Joyce and Snells Estate, where the London Borough of Enfield is looking to bring forward an estate renewal scheme comprising approximately 1,992 homes and associated social infrastructure and open space. This together with High Road West will have a cumulative impact on healthcare services in the area. We note that Table 1 of the Planning Statement sets out the minimum and maximum total floorspace cap by land use. It includes Use Class E (e): Medical or healthcare with a floorspace range of between 0 sqm to 1,000 sqm (GEA). Paragraph 3.20 implies that the healthcare floorspace could be provided in, or across a number Development Zones (Plots). The application site includes Tottenham Health Centre at 759 High Road which would be demolished as part of the plans for Plot E and the creation of Moselle Square. Policy DM49 (A) of the Development Management DPD (July 2017) states that the Council will seek to protect existing social and community facilities unless a replacement facility is provided which meets the needs of the community. Paragraph 7.44 of the planning statement states that “sufficient flexibility has been incorporated within the maximum land use parameters to allow a future healthcare use to be delivered on-site” to replace the existing facility.	
Enfield LB	No comment received	
Environment Agency	We understand that it is deemed not feasible to de-culvert the Moselle Brook as part of this application which you are in agreement with because of the constraints and place making requirements associated mainly with the stadium and access. We can accept this justification. With this in mind, we believe that planning conditions could be invoked to ensure that the culvert is protected and fit for purpose for the lifetime of the development. We have discussed wording of these conditions with the applicant and if agreeable these planning conditions would enable us to remove our objection. Before confirming this position I need to discuss the planning conditions with my flood risk colleagues. I will have this discussion early next week and submit a more formal response on the matter by Tuesday.	Suitalbly worded planning conditions are proposed to ensure that the proposal does not adversely impact on the existing culverted river.
Haringey Cycling Campaign	HCC were consulted in 2018 and again in 2021 on the plans for this development. We emphasised the need for cycle routes serving identified destinations, routed directly and clearly defined for legibility and to avoid pedestrian conflict. We also commented in 2021 that the main public open space should be more generous. The scheme now submitted proposes virtually invisible cycle routes that wander aimlessly to the North of the site and in a slightly less aimless fashion to the South. The Mayor's London Plan Guidance has statutory weight in planning decisions and makes it clear that development plans should “protect and improving existing cycle routes and create new strategic routes and local links”, as the extract below. Additionally the statutory guidance in LTN1/20 makes it clear that cycle routes should be direct and easy to follow, as the core design principles (below left) and makes clear, wherever there are high pedestrian numbers, cycles must be physically separated from pedestrians, as the summary principles, below right.	Planning conditions are proposed to secure the detailed landscaping details, cycle parking arrangements and road safety audits of areas where there is a potential

Stakeholder	Comment	Response
	The development is planned to have 2,869 new homes and at least 7,225sqm of commercial, office, retail and community uses and there will be considerable pedestrian traffic, generated both by the development and in the surrounding areas. The development is not a small housing estate where limited shared use might be acceptable. Development Plans should identify and make provision for current and future needs for cycling, including protecting and improving existing cycle routes and creating new strategic routes and local links. They should identify locations for cycling facilities such as cycle parking hubs, additional cycle land requirements and, where applicable, areas of potential expansion of the Cycle Hire network..... Development Plans should identify strategic cycle routes based on the corridors in TfL's Strategic Cycling Analysis (SCA), set out preferred route alignments as far as possible and include safeguarding as necessary..... Development Plans should identify and make provision for local cycle links that connect to and complement the strategic cycle network..." https://www.london.gov.uk/sites/default/files/sustainable_transport_walking_and_cycling_london_plan_guidance_0.pdf LTN1/20 Core Design Principles Fig 1.1 LTN1/20 Summary Principles 1.6.1 (2) The Site Plan below shows the circuitous cycle routes proposed by the applicants, together with routes proposed by HCC, which we suggest would be better used and could give compliance with LTN1/20.	conflict between highway users.

Stakeholder	Comment	Response
		

Stakeholder	Comment	Response
	The Design and Access Statement includes details of path surfacing that make no allowance for safe cycle use and do not comply with LTN1/20. Cycle users are given no indication of where they are meant to cycle and pedestrians will have no idea of where to expect cycles. In fact the proposed cycle routes will be virtually invisible. Part of cycle route, N from White Hart Lane Cycle route, Peacock Park Although not directly a cycling matter, we would point out the main public space, Peacock Park has shrunk in size since the competition winning design of 2018. We suggest the wedge shaped park, narrowing to a point and hemmed in by tall buildings on all sides, will feel uncomfortable and should be redesigned to give a more relaxed and generous space. Competition sketch Present proposal I would be grateful if you could register Haringey Cycling Campaign's objection to the proposals and in particular our objection to the cycle routes, which will not comply with current standards and good practice. Legible, safe and direct cycle routes are essential, which will serve increasing cycle use by residents and the wider community, improve health and mobility and help in the fight against climate change.	

Stakeholder	Comment	Response
Historic England	Thank you for your letter of 3 February 2022 regarding further information on the above application for planning permission. On the basis of this information, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation advisers, as relevant. It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request. This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority. The full GLAAS consultation criteria are on our webpage at the following link: https://www.historicengland.org.uk/services-skills/our-planning-services/greaterlondon-archaeology-advisory-service/our-advice/	Specialist Heritage advisers have been consulted on the proposal.
London and Middlesex Archaeological Society	The London and Middlesex Archaeological Society (LAMAS) promotes London's archaeology, local history, and historic buildings. The LAMAS Historic Buildings and Conservation Committee reviews planning applications relating to important historic buildings and seeks to ensure a sustainable future for vital aspects of London's built heritage. The Committee reviewed and discussed the application documents at and subsequent to its meeting on 22nd November and wishes to make the following comments. The Committee is concerned by the scale of the loss of locally listed buildings that would result from the proposed development, namely Nos. 743–759 High Road and the electricity substation building adjoining Coombes Croft Library. These losses are much greater than it would normally consider acceptable. On this occasion, however, it acknowledges that Haringey has in effect already set the direction of travel by proposing in its own Conservation Area Appraisal and Management Plan (paragraphs 2.8.5 to 2.8.8) the de-designation of subarea C of the North Tottenham Conservation Area in which the buildings stand, facilitating their removal and likewise of those around them to improve passage between the Tottenham Hotspur Stadium and White Hart Lane Station. This strategy on the part of Haringey of diminution and division of the Conservation Area is arguably more objectionable than the proposed destruction of locally listed heritage assets. The submitted plans envisage the demolition and replacement of the buildings, with no option given for their retention or relocation. This feels unimaginative and underappreciative of the present and potentially the future contributions they can make to the local built environment. The retention of designated heritage assets such as the Grade II listed Warmington House (744 High Road) across the High Road in the redevelopment of White Hart Lane stadium and its surroundings exemplifies how historic buildings can be retained and successfully repurposed in the context of local new development. The late 19th- or early 20th-century substation building, noted in the Conservation Area Appraisal to be of "vaguely gothic style" (paragraph 1.5.28), is of a very modest size that would facilitate its re-erection as an element of the new development; in one corner of the envisaged 'Moselle Square', for example. In the event it is decided there is no advantage to be gained by the retention of the affected locally listed heritage assets in some form, the Committee asks that historic building recording to at least Historic England Level 2 (and	A planning condition is proposed to secure historic building recording.

Stakeholder	Comment	Response
	preferably Level 3) be imposed as a condition of any planning consent granted. This recording exercise might also seek to capture the recent social histories of the buildings and areas that will be affected by redevelopment, especially given the application documents give an uncertain impression as to whether the present, wonderfully diverse array of businesses and activities accommodated by the locally listed buildings will not all find new homes in the High Road West development.	
London Overground Infrastructure Management	Thank you for your consultation. Rail for London (RfL) has no objection in principle to the above refenced planning application subject to a number of potential constraints on the development of the site situated close to RfL Infrastructure. Therefore, it will need to be demonstrated to the satisfaction of RfL that: • the development will not have any detrimental effect on RfL Infrastructure & Operations in the short or long term • the design must be such that the loading imposed on RfL Assets is not increased or removed • we offer no right of support to the development or land RfL requests that the grant of planning permission be subject to conditions to secure the following: The development hereby permitted shall not be commenced until detailed design, method statements & risk assessments for each stage of the development covering demolition, substructure and superstructure and all temporary works have been submitted to and approved in writing by the local planning authority (in consultation with RfL) which: • provide details on all structures • provide details on the use of plant • accommodate the location of the existing RfL Assets / Infrastructure • accommodate RfL Operational and Maintenance requirements • accommodate ground movement arising from the construction thereof • mitigate the effects of noise, vibration & distractions arising from the adjoining operations to the RfL Infrastructure & Operations In addition, • RfL requires that the applicant enters into an Asset protection Agreement with RfL to ensure that the development is carried out safely and in accordance with RfL's requirements. • No maintenance regime for the proposed development elevations facing the railway should be permitted which compromises the safe, efficient and economic operation of the railway. • For all new developments adjacent to operational lines RfL accepts no liability in respect of noise and vibration. Developers should undertake their own investigations to establish any level of noise and vibration likely to originate from the operation of the railway, and design their mitigation measures accordingly. • Any additional fencing required on the railway boundary, for example for screening purposes, must be independent of RfL's fencing and allow room for maintenance of both fences. • All drainage needs to be directed away from the railway and into local authority sewers, and it should be installed a minimum distance of two metres from the railway boundary. The use of soakaways is not favoured by RfL and therefore is unacceptable as they could have a detrimental effect on RfL land. The drainage system should be designed to take this into account.	Planning conditions and informative are proposed to ensure that the proposal does not have an adverse impact on existing rail infrastructure.

Stakeholder	Comment	Response
	• RfL would be opposed to balconies and fully openable windows on the elevations facing the railway (applicable to those in close proximity of the railway). The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied. Reason: To ensure that the development does not impact on existing or proposed Rail for London transport infrastructure & operations, in accordance with London Plan 2015 Table 6.1, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012. This response is made as Rail for London Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering, operational and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.	
London Fire Brigade	I've had a look at the documents provided and the fire fighting access highlighted within the documents would appear to meet our requirements subject to meeting them	Detailed fire safety statements will be secured by planning condition.
Natural England	Following discussion and receipt of further information related to the proposal, Natural England is satisfied that the specific issues we have raised in previous correspondence relating to this development have been resolved. We therefore consider that the identified impacts on Epping Forest Special Area of Conservation (SAC) and underpinning Site of Special Scientific Interest (SSSI) can be appropriately mitigated with measures secured via planning conditions or obligations as advised and withdraw our objection. Natural England recommends that the Appropriate Assessment for this proposal is updated with regards to the final agreements between us and the Council on appropriate avoidance and mitigation measures for Epping Forest SAC, if it has not been already. We consider the following to provide appropriate avoidance and mitigation measures: • Appropriate mitigation measures secured through a financial SANGs contribution, for improvements to Bruce Castle Park, as outlined in the draft AA shared with NE on the 4th of March, and to be fully determined by London Borough of Haringey in line with NE interim guidance to improve the accessibility and biodiversity of the park. We recommend that conditions or legal obligations are attached to any subsequent permissions to secure the above measures.	A planning obligation is proposed to secure SANG's mitigation.

Stakeholder	Comment	Response
	In principle we would agree to this contribution to improve a local greenspace. However, as mitigation is now being provided the Habitats Regulations Assessment produced for the development will need to go to Appropriate Assessment (in line with the decision made at the People Over Wind ECJ). For this reason, and in order for the HRA to be secure from challenge, we would need to see a bit more detail in terms of the improvements that would be made to Bruce Castle Park, and how these would in turn lead to the site being a more accessible and desirable park to visit for the residents of the new development. It may be that Haringey Council are best placed to provide these details, rather than the developer of the High Road West site, but we feel that they would need to be included in the AA section of the HRA in order to ensure the security of the mitigation, and for us to be able to agree with the conclusion of no likely significant effect from the development on Epping Forest SAC.	
Network Rail	Thank you for consulting with Network Rail regarding the following application. Network Rail strongly recommends the developer complies with the following comments and requirements to maintain the safe operation of the railway and protect Network Rail's infrastructure. **Network Rail strongly recommends the developer contacts the Asset Protection Teamon AngliaASPROLandClearances@networkrail.co.uk prior to any works commencing onsite, and also to agree an Asset Protection Agreement with us to enable approval ofdetailed works. More information can also be obtained from our website https://www.networkrail.co.uk/running-the-railway/looking-after-the-railway/asset- protection-and-optimisation/** ***Section A*** identifies the main issues specifically derived from the application HGY/2021/3175 and ***Section B*** are generic comments from our Asset Protection (ASPRO)team which aim to ensure high standards of Network Rail's operation. **Section A:** 1. Given the proximity of the proposal to our White Hart Lane Station, I have thefollowing comments: 2. Access to and from the Station is to be maintained at all times for NR and the TOC. 3. Any impact to NR infrastructure and the Station is to be coordinated with ASPROand presumably a APA/BAPA to be put in place. 4. Any access required to the Station for the purposes of surveys, etc are to be coordinated with	Planning conditions and informatives are proposed to ensure that the development does not adversely impact existing rail infrastructure.

Stakeholder	Comment	Response
	the TOC. 5. Lighting to the Station should not be impacted, if it is this should be worked throughwith NR and the TOC. 6. As should construction noise, should not impact the operation of the Station. 7. If there are impacts to Station assets and or any services which shall pass throughthe Station lease area, this may be subject to regulatory consents such as Station Change, Minor Modifications and G6 consultations (in the case of wayleaves or easements which may be required) **Section B – ASPRO Comments:** **Item 1. Issues** - Proximity of the proposed development to the Network Rail boundary andoperational equipment. **Reasons/Mitigations:** The developer/ designer must ensure that they allow sufficient space from the Network Railboundary fence so as not to import risk to the operation of the railway or impose risk to theoccupants of the building or maintenance staff. A minimum of 2.5m should be allowedbetween the Network Rail boundary fence and any superstructure. A minimum of 3m mustbe allowed to any Network Rail electrification equipment. The developer must ensure any future maintenance intervention does not import risk tothe operational railway. The applicant must ensure that the construction and subsequent maintenance of their development can be carried out without adversely affecting the safety of operational railway. **Item 2. Issues** - Demolition activities resulting in collapse onto the railway. **Reasons/Mitigations:** The applicant shall provide all demolition and construction methodologies to Network Railfor acceptance prior to commencing the works relating to all works that may import riskonto the operational railway, potentially cause disruption to railway services or present riskto the infrastructure. A suitable designed hoarding must be erected near the boundarywhich will afford protection to the railway and railway assets. **Item 3. Issues** - Potential impact on the adjacent railway infrastructure from the construction activities. **Reasons/Mitigations:** The applicant shall provide all demolition and construction methodologies to Network Railfor acceptance prior to commencing the works relating to all works that may import riskonto the operational railway, potentially cause disruption to railway services or present riskto the infrastructure.	

Stakeholder	Comment	Response
	Item 4. Issues - Invasive plants near the railway. **Reasons/Mitigations:** The developer must determine the locations and extents of any invasive plant species (forexample: Japanese Knotweed) which must be treated in accordance with the current codesof practice and regulations where it exists on site. **Item 5. Issues** - Piling/ deep excavation causing movement/ settlements to the railwayinfrastructure adversely affecting the track geometry or stability of operational infrastructure. **Reasons/Mitigations:** The developer must ensure that any piling or deep excavations adjacent to the railway donot have an impact on operational railway assets. An impact assessment must be conducted using information specific to the site and track and structure monitoring must be instigated in accordance with Network Rail standard NR/L2/CIV/177 where Piling/ deepexcavation is proposed within the track support zone. **Item 6. Issues** - Potential buried services crossing under the railway tracks. Some of the services may be owned by Network Rail or Statutory Utilities that may have entered into acontract with Network Rail. **Reasons/Mitigations:** The developer is responsible for a detailed services survey to locate the position, type of services, including buried services, in the vicinity of railway and development site. Any utilityservices identified shall be brought to the attention of Senior Asset Protection Engineer (SAPE) in Network Rail if they belong to railway assets. The SAPE will ascertain and specify what measures, including possible re-location and cost, along with any other asset protection measures shall be implemented by the developer. **Item 7. Issues** - Collapse of plant or cranes near or over the Network Rail boundary. **Reasons/Mitigations:** The operation cranes should comply with CPA Good Practice Guide 'Requirements for Mobile Cranes Alongside Railways Controlled by Network Rail' or the CPA Good PracticeGuide 'Requirements for Tower Cranes Alongside Railways Controlled by Network Rail'. Use of piling rigs should comply with Network Rail standard 'NR/L3/INI/CP0063 - Piling adjacent to the running line'. Note that where the compound collapse radius of a crane is within 3m of the Network Railboundary or asset, consultation with Network Rail must take place and a possession and isolation of the railway may be required. **Item 8. Issues** - Collapse of temporary works near or over the Network Rail boundary or infrastructure. **Reasons/Mitigations:**	

Stakeholder	Comment	Response
	Any temporary structures which may have the potential to collapse within 3m metres ofthe Network Rail boundary or asset will require review by Network Rail asset protection. No temporary structure may be positioned within 3m of live railway electrification equipment without further consultation with Network Rail. This development must consider the constraints for construction in close proximity to an operation station. Adequate space must be specified for temporary works which do not require platform closure. **Item 9. Issues** - Trespasses and unauthorised access onto Network Rail land. **Reasons/Mitigations:** Where required, the developer should provide (at their own expense) and thereafter maintain a fence erected on the developers side of the existing boundary fence, to a suitable minimum height and containment in accordance with Network Rail standards . Adequate space must be provided for maintenance of both the existing Network Railboundary measures and the developers own fence. **Item 10. Issues** - Glare from light source or reflective surfaces – impact on train driver visionand visibility of signals. **Reasons/Mitigations:** Any lighting which may originate from the development (including vehicle lights) must not interfere with the sighting of signaling apparatus and/or train drivers' vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signaling arrangements on the railway. The developers should obtain Network Rail's Asset Protection Engineer's approval of lighting proposals. Where glazing or reflective cladding is proposed a glare assessment must be completed to determine the impact on the railway. **Item 11. Issues** - Road Vehicle Incursion. **Reasons/Mitigations:** Where there is any risk of road vehicle incursion onto the railway the risk must be mitigatedwith an effective road vehicle incursion barrier or structure designed for vehicular impact to prevent vehicles accidentally driving or rolling onto the railway or boundary fence. **Item 12. Issues** - Interface with Network Rail Structures which support the railway. **Reasons/Mitigations:** Further consultation with Network Rail is required to capture a complete set of asset ownerrequirements in a comprehensive requirements document. The design proposal presentedhere must satisfactorily address fundamental safety and operational requirements. Assetsidentified but not limited to;	

Stakeholder	Comment	Response
	HDT 7.0066 B/U 1947 Orchard Place - Owner NR HDT 7.0154 B/U 1948 Whitehall Street - Owner NR HDT 7.0176 B/S 1948A White Hart Lane Station Platform and Retaining Arches Down SideArches 1 - 22 — Owner O/P HDT 7.0330 B/U 1949 WHITE HART LANE STATION SUBWAY - Owner NRHDT 7.0352 B/U 1950 WHITE HART LANE - Owner NR **Item 13. Issues** - Effects of electrical plant or transformers on Network Rail signals orcommunications systems due to electromagnetic compatibility. The impact on the occupants of the development located within close proximity to a high voltage overhead electrification lines. **Reasons/Mitigations:** The developer will be required to undertake an Electromagnetic Interference (EMC) risk assessment to determine the potential impact the project may have on Network Rail assets. Any projects that will be within 20m or any transmitter within 100m of the operational railway will require an electromagnetic compatibility assessment, carried out in accordance with Network Rail standards 'NR/L1/RSE/30040 & 'NR/L1/RSE/30041' andNR/L2/TEL/30066' **Item 14. Issues** - Environmental pollution (Dust, noise etc.) on operational railway. **Reasons/Mitigations:** Contractors are expected to use the 'best practical means' for controlling pollution andenvironmental nuisance complying all current standards and regulations. The design and construction methodologies should consider mitigation measures to minimise the generation of airborne dust, noise and vibration in regard to the operational railway.	
Secretary of State	I confirm that we have no comments to make on the environmental statement.	
Sport England	The Proposal and Assessment against Sport England's Objectives and the NPPF Community Sports Facility Provision Although not clear, it appears that the number of proposed units quoted in the description of development differs from that mentioned in the Design & Access Statement, schedules etc. seen by Sport England.	Officers are satisfied that there is adequate sports provision in reasonable

Stakeholder	Comment	Response
	Sport England's comments, therefore, are based on the total number proposed residential units stated in the description of development it was consulted on. The planning application proposes 2,929 residential units the occupiers of which will generate demand for sporting provision. The existing provision within the area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as the Council's Playing Pitch Strategy, Built Facility Strategy or another relevant robust and upto-date needs assessment. Although there is floorspace proposed for uses failing within Use Class E (d) it is not clear what sport facilities would be provided, whether the facilities would meet existing or future local need and whether the space provided would be sufficient for the sport(s) it intends to accommodate. As a result, it would be unknown if any sport facilities provided would be sufficient to meet the sporting demands arising from the development. Changes to CIL Regulations in 2019 has resulted in the Council having the opportunity to seek contributions through CIL or via a S. 106 Agreement however it is not clear how, or if, the Council intends to mitigate the impact of the increase of sporting demand on local sport facilities. If provision for sports facilities is to be made by the CIL charge, it is acknowledged that there is no requirement to identify where those CIL monies will be directed as part of the determination of any application. That said, Sport England would encourage the Council to consider the sporting needs arising from the development as well as the needs identified in its Playing Pitch Strategy and/or any other robust borough wide sport facility strategy and direct those funds to deliver new and improved facilities for sport based on the priorities identified in those documents. In the event that the Council decides to seek provision for sports facility provision through a S. 106 agreement rather than the CIL charge then Sport England would be happy to provide further advice. To assist the Council, an estimate of the demand generated for outdoor sports provision can be provided by Sport England's Playing Pitch Calculator strategic planning tool. Team data from the Council's Playing Pitch Strategy can be applied to the Playing Pitch Calculator which can then assess the demand generated in pitch equivalents (and the associated costs of delivery) by the population generated in a new residential development. It can also calculate changing room demand to support the use of this pitch demand. In relation to built sport facilities, Sport England's established Sports Facilities Calculator (SFC) can help to provide an indication of the likely demand that will be generated by a development for certain sports facility types. The SFC indicates that a population of 7,030 (calculated by multiplying the number of residential units by the average occupation rate of 2.4) in the London Borough of Haringey would generate a demand for 0.53 sports halls (£1,732,292), 0.37 swimming pools (£1,847,279), 0.23 artificial grass pitches	proximity to the application site and that the proposed development will make a proportionate contribution to informal sports provision.

Stakeholder	Comment	Response
	(£305,569 if 3G or £277,930 if sand) and 0.07 rinks of an indoor bowls centres (£33,173). Consideration should be given by the Council to using the figures from the Sports Facility Calculator for informing the level of any financial contribution if indoor sports provision was to be made through a S.106 agreement. Active Design Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via the following link: https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/activedesign	
Transport for London	Thank you for consulting TfL. As previously indicated, the development site is located directly adjacent to White Hart Lane Station and immediately to the west of the A1010 High Road, which forms part of the Strategic Road Network (SRN). While the Local Planning Authority is the Highway Authority for this road, TfL is the Traffic Authority and has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN. After reviewing the updated case documents, TfL make the following comments. These are additional to any responses you may have previously received from my colleagues in infrastructure or asset protection and from TfL as a party with a property interest. Please also note that these comments should be read in conjunction with TfL's detailed comments made on 10th February 2022. Considering that the applicant has already responded to TfL's detailed comments, it should be further noted that I will send a follow-up email setting out any specific aspects of our response in due course. • For TfL is very important to keep track of the cumulative impact of development on the local and wider transport network. The applicant's commitment to ensure appropriate information about cumulative development in the area is included, specifically development in the wider context of the HRW masterplan area, is welcomed. • The accompanying 'Chapter 15, Transport & Access ES' addendum report suggests that there will be no change to the methods used in the proposed assessment. As set out by the addendum report, TfL acknowledges this chapter has been informed by the original ES and corresponding Transport Assessment, as well as the Outline Delivery and Servicing Plan; Residential Travel Plan; Framework Travel Plan; and Outline Construction Environmental Management Plan. Existing requirements relating to the preparation of all these documents are to remain unchanged.	Planning conditions and obligations are proposed to ensure that the proposal does not have an adverse impact on transport infrastructure.

Stakeholder	Comment	Response
	Public transport service frequencies should be consistent with those agreed through pre-application communications with TfL, including the TfL Strategic Modelling team. This includes London Overground (LO) train and bus service frequencies. The applicant must ensure this assessment and analysis reflect representative/agreed public transport conditions. The London Plan Policy T5, sets out cycle parking standards to help remove barriers to cycling and create a healthy environment in which people choose to cycle. Considering the detailed element of the scheme and submitted plans for Plot A, TfL has concerns about the cycle parking, specifically building A1 and the lack of provision of spaces for larger cycles for long-stay cyclists. Given that the schedule of accommodation sets out that all wheelchair accessible homes will be contained within building A1, TfL encourage the applicant to review the cycle parking and incorporate adequate provision within building A1 to cater specifically for non-standard bicycles. This should consider riders of certain type of bicycles, including people who use handcycles, tricycles, tandems and models adapted to suit the rider's specific needs, as well as cargo cycles. Further consideration should also be given to short-stay cycle parking provision for buildings A2 and A3, as spaces for visitors located in the landscape, adjacent to building A1's entrance are too remote from other user destinations, particularly building A3's entrance. All cycle parking is required to be designed and laid out in accordance with the London Cycling Design Standards (LCDS). Subject to the above comments and issues raised being addressed satisfactorily, the updated case documents appear acceptable from a Spatial Planning perspective. Therefore, TfL have no further comments on this application. I write to provide detailed strategic transport comments on this application reference HGY/2021/3175. These provide more detail on the matters raised in the GLA Stage 1 Planning Report GLA/2021/1215/S1/01 dated 7th February 2022. Please note that these are additional also to any response you may have received from my colleagues in infrastructure or asset protection and from TfL as a party with a property interest. This response relates to a hybrid planning application for the '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 60 residential units (Use Class C3) together with landscaping, parking and other associated works'. Please note that the following comments represent the view of TfL and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. In addition, these comments do not necessarily represent the views of the GLA. **Site Description and Context**	

Stakeholder	Comment	Response
	The site comprises three portions of multiple land ownership, situated on both sides of the Lea Valley railway line. The two larger portions (Outline element), which are separated by White Hart Lane, are bounded by the railway viaduct to the west, the A1010 High Road to the east (beyond which lies Tottenham Hotspur Football Club Stadium), Brereton Road to the south and Brook House Primary School to the north. A smaller portion (Detailed element) to the west of the railway tracks is also included, comprising Whitehall Lodge and the Whitehall and Tenterden Community Centre. The nearest points of vehicular access to the TLRN from the site are the A10 Bruce Grove / A1010 High Road junction and the A406 North Circular Road / A1010 Fore Street junction, located approximately 1km to the south and north respectively. The A1010 High Road, which forms part of the Strategic Road Network (SRN), is located directly adjacent to the site. White Hart Lane station (London Overground and Greater Anglia services) is located adjacent to the site, approximately 200m distance from the Whitehall Mews scheme. Northumberland Park station (National Rail services) and Seven Sisters station (London Underground Victoria Line and London Overground) are located approximately 1km to the east and 3km south of the site respectively. Bus routes in vicinity of the site include five daytime bus routes with bus stops along the A1010 High Road, White Hart Lane and Northumberland Park. The site has varying PTALs with values ranging between 3 on the north and the southwestern edges of the site and 5 on the interior of the site near White Hart Lane. Cycleway 1 (From Tottenham to Liverpool Street) is located approximately 400m south of the development site. This application comprises a detailed element (also known as 'Plot A') which represents the first phase of development of the comprehensive regeneration of High Road West and consists of 60 residential dwellings, comprising entirely of decanted residents; together with landscaping, parking and other associated works and for which no matters are reserved; and an outline element for which all matters except access into the High Road West site (also known as 'The Site') are reserved. This development proposal is part of a comprehensive regeneration of High Road West that will deliver up to 2,929 residential dwellings and 36,000 sqm of non-residential floorspace, including new retail, office, leisure and community uses. **Access and Delivery and Servicing Arrangements** Access by all modes will be accommodated via Tenterden Road, Church Road, White Hart Lane and the A1010 High Road. This includes vehicular access routes through a series of one-way restricted (residents only) and unrestricted access andservicing streets, as well as residential streets. The proposals for the outline element also include a new north-south cycleway through the development site on the eastern side of the railway line and key pedestrian routes, namely, Moselle Walk, which connects Brereton Road to the new Moselle Square, leading into the Tottenham Hotspur Football Club (THFC) stadium; and a major pedestrian route running through the centre of the northern site, which then would also connect through to the southern site via William Street, Moselle Square and Coombes Lane.	

Stakeholder	Comment	Response
	Pedestrian access to the detailed element is taken from Whitehall Street, Headcorn Road and Tenterden Road. The primary access route to the residential blocks of the detailed element will be accommodated through Whitehall Mews, which is to be pedestrianised. Whilst proposals for the internal street network are subject to detailed approval, the applicant is encouraged to identify any improvements, no matter how small, in order to make a possible contribution to the delivery of Healthy Streets and Vision Zero policies, specifically the route under the bridge along Whitehall Street to support the detailed element. Development proposals should enhance permeability and connectivity between the residential dwellings to the west of the railway tracks and non-residential components and provide for safe and secure movement, particularly for people walking and cycling. Improvements could consider possible techniques to rebalance priorities and increase active travel awareness along this route, including well designed lighting, opportunities for soft landscaping, potential surface treatment and wayfinding. The majority of the development will be serviced through a series of public two-way and one-way streets within the proposed internal network. However, a number of designated shared surface lanes are proposed, allowing restricted access to servicing routes to accommodate service, emergency and larger vehicles along routes otherwise only open to pedestrians and cyclists. Stage 1 Road Safety Audit (RSA) along all shared surface lanes should be completed prior to determination. TfL welcomes the applicant's approach to safeguard potential future links along the northern edge of the outline element and the neighbouring Cannon Road. **Healthy Streets, Vision Zero, Walking and Cycling** The development proposals will see an increase in pedestrian and cycle trips to/from the site and the local area, as well as public transport trips. The Active Travel Zone (ATZ) section appropriately includes a casualty analysis of clusters of KSIs along key routes and destinations and potential improvements. However, there is limited detail on how the new major pedestrian route, which will predominantly be pedestrian focused throughout the day following a key desire line between White Hart Lane station and the stadium, will impact on the bus stop (T) on High Road, including its current location, bus stop environment and passenger waiting area. Whilst the TA provides some useful detail in relation to Moselle Square spatial requirements in the context of crowd flow and major event operations, which is welcomed, full consideration of the implications specifically for users of the bus stop under all anticipated operating conditions along the new pedestrian route should be incorporated. This should include matchdays and non-football events, as well as operations of this route under normal conditions. Whilst the internal street network and how different components of this network will tie up into the surrounding streets are subject to a future Reserved Matters Application (RMA), clarification is required in relation to how this major pedestrian route achieves a seamless interface, particularly with the A1010 High Road. In addition, full consideration should be given to walking and cycle connectivity between areas to the north and the south of White Hart Lane, including White Hart Lane Station. Consistent with TfL's pre-application advice, Healthy Streets Check for Designers (HSCD) needs to be completed for both the base and future situation for routes being wholly or mainly delivered as	

Stakeholder	Comment	Response
	part of the RMA. The applicant is recommended to complete Road Safety Audits (RSA) whenever there is clear potential for conflict between vehicles and vulnerable road users. In line with policies T2 Healthy Streets and T3 Transport Capacity, Connectivity and Safeguarding of the London Plan, development proposals should connect to local/wider walking and cycling networks, and enable and deliver improvements to provide safe, inclusive and convenient connections for people. This includes ensuring the bus network can operate efficiently to, from and within the development, giving priority to buses, all passengers and supporting infrastructure as needed. Subject to a future RMA, wayfinding, possibly Legible London, is to be provided. The principle of providing wayfinding and adopting layouts that prioritise pedestrian and cycle movements, including new walking and cycling routes is welcomed. However, the proposals should provide sufficient on-site space for safe, convenient, direct and accessible access/routes for pedestrians and cyclists, particularly when considering one-way streets and related traffic arrangements from a cyclist perspective. As part of the RMA, the applicant is recommended to review proposed primary and secondary pedestrian routes together with the north-south cycle route arrangement to ensure the proposals promote simple and more convenient means of accessing public transport networks and create a safer and more direct environment that is easier to navigate and move around by walking and cycling at all times, especially by disabled people. **Car Parking** Whilst there is no car parking provision within the detailed element boundary, a permit allocation scheme will operate for residents to park within the Tottenham North Controlled Parking Zone (CPZ), as the detailed element consists solely of decanted residents. However, this proposal excludes parking bays along Headcorn Road and Tenterden Road, where residents will not be permitted to park. Development proposals restrict new residents to accessible spaces only. Two on-street disabled persons' car parking spaces (three per cent) will be provided along Whitehall Street, immediately to the south-east of the proposed buildings. Additional disabled persons' car parking spaces, equivalent to seven per cent of the dwellings could be provided should the initial provision be insufficient. A point of concern is raised over the distance additional spaces are from residential dwellings. However, this is due to the highway constraints in this location so is largely acceptable, subject to the provision of a safe, convenient, direct and accessible access route. Disabled persons parking bays should be positioned to minimise the travel distance from the vehicle to the main entrance of buildings. In addition, there are concerns over the access route under the bridge and safety, specifically for disabled users. The applicant should ensure that on street parking, particularly along Whitehall Street, is not dominant in the street scene nor disrupt desire lines. Clarification on the proposed pedestrian amenity/mitigation is required. Based on the outcome of a telephone survey of existing residents, the estimated ratio of vehicle ownership within the site equates to approximately 0.43 spaces per residential unit. Therefore, forecast demand for the detailed element is	

Stakeholder	Comment	Response
	estimated to be at around 26 car parking spaces. Subject to a future RMA, the development proposals will provide car club provision of up to ten spaces, which should be secured by legal agreement. In line with the Mayor's Transport Strategy (MTS) and the London Plan, clarification is necessary to demonstrate how the overall car parking provision/supply is being capped, as a result of the creation of car club spaces, allowing the local area to reduce its future dominance on private cars. Electric vehicle charging provision will be afforded in excess of the London Plan requirement that dictates 20% active provision and the remaining spaces fitted with passive provision. This proposal, which is welcomed in line with London Plan policy T6.1, must be applied and secured by condition. It should be noted that physical infrastructure should not negatively affect pedestrian amenity in line with policy T6 Car Parking of the London Plan. This is particularly important, given the need to re-provide car parking spaces through a combination of on street spaces on public and private roads, and within plots; and a noticeable increase in pedestrian trips to/from the site and the local area, as well as the proximity to the stadium. Therefore, clarification is necessary to demonstrate where on-street charging points will be located and how the proposals will achieve the safe and efficient use of the pedestrian amenity. As per TfL's pre-application advice, any replacement car parking needs to be provided for the occupancy of the returning resident only and be secured by legal agreement along with the requirement to produce a Car Parking Management Plan (CPMP), which will detail how the spaces will be monitored, managed and enforced. After that, a permit-free obligation should be secured to prevent any new occupier access to the on-street car parking provision within the CPZ, other than the disabled spaces as agreed. For the outline element, car parking is proposed via mix of on-street perpendicular and parallel arrangement, ground floor podium structures, parking courts and basements. Whilst TfL supports the principle that the parking strategy will minimise the impact of on street parking through the provision of spaces that are limited to small groups of vehicles to allow planting and street trees between groups, the applicant is recommended to design out the requirement for turning and reversing manoeuvres of motorised vehicles, specifically linked to perpendicular car parking spaces. Further work is required to address TfL's concerns. **Cycle Parking** As part of the detailed element a total of 119 long-stay and 4 short-stay cycle parking spaces is proposed to be situated within residential block podiums in formal cycle stores and the public realm respectively. Whilst this number accords with the London Plan minimum cycle parking standards, further details on the cycle parking provision is required, which could be secured by condition. This includes the total number and the exact location of cycle parking provision for all uses (i.e. scaled drawings). This provision needs to consider a variety of stands suitable for all users and all types of cycles. All cycle parking must be in accordance with the London Cycling Design Standards (LCDS), including at least 20% Sheffield stands and a further 5% wider spaces for non-standard bicycles. **Trip Generation and Highway and Public Transport Impact Assessment**	

Stakeholder	Comment	Response
	Whilst TfL welcomes the assessment is largely consistent with pre-application advice, a detailed justification for the selection of residential sites from TRICS is missing from the TA. TfL has concerns about the assumptions and proposed bus trip generation figures. Clarification of the trip generation (Chapter 5) and public transport (Chapter 7) sections is required, as set out in the detailed response. Further work is required to address TfL concerns. Whilst not agreeing entirely with the proposed selection of residential sites to help inform the assessment of the trip generation for the proposed development, which exclusively mirrors a previous application within the Goods Yard site, specifically PTALs and survey years, person trip rates identified from the TRICS database appear to be within a reasonable range. Clarification is required on the trip generation section, as the total number of residential dwellings used for this assessment appears to vary between paragraphs 5.1.1.2 (i.e. 2,977 residential units, which are noted to be in excess of the proposed maximum of 2,929 units to be delivered and the 2,612 residences as part of the illustrative scheme information and set out in Table 4.3,) and 5.1.2.3 (i.e. 2,680 residential units that are used to estimate total person trip generation figures). The application needs to state parameters and assumptions clearly. This includes the precise number of additional residential dwellings assumed for the transport assessment, taking into account new housing, replacement, preservation or a combination. Clarification is also required on the proposed bus trip generation figures, as a number of bus frequencies in Table 2.2 are incorrect. Therefore, the applicant is required to provide updated bus trip generation figures with re-allocated trips based on the following considerations. Whilst route W3 runs at 10 bph, during peak hours route 149 runs at 9 bph, route 259 runs at 6 bph, route 279 runs at 11 bph and route 349 runs at 6 bph. For reference, route 318 runs at 5 bph. Table 7.21 provides bus trip generation figures by bus route and direction. However, a number of the routes in Table 7.21 are not within a reasonable distance of the development. New trip numbers would therefore be negligible and should be excluded as follows: • Routes 123 and 243: The nearest bus stops are located on Bruce Grove at a walking distance of approximately 930m from the site boundary – with a greater distance for much of the development site. High frequency same-stop interchange is available between routes 123 and 243 – and routes 149, 259, 279 and 349. As such, it is expected that the trips forecast for the 123 and 243 would be made on the latter four routes. • Routes 341 and 476: The nearest bus stops are located on Tottenham High Road south of Lansdowne Road at a walking distance of approximately 630m from the site boundary – with a greater distance for much of the development site. High frequency same-stop interchange is available between routes 341 and 476 – and routes 149, 259, 279 and 349. As such, it is expected that the trips forecast for the 341 and 476 would be made on the latter four routes. • Routes 444 and 491: The nearest bus stop is located on Bridport Road at a walking distance of up to approximately 850m from the site boundary – with a greater distance for much of the development site. It is reasonable for these trips to be discounted and reallocated to the closer bus network.	

Stakeholder	Comment	Response
	In terms of LO service frequencies, clarification is also required on the frequency applied during the AM peak hour (7 tph in total, as set out in Table 2.3), as this frequency is not representative and in fact it is only achieved between 06:44 and 07:38 (Timed at White Hart Lane), which is before the time at which the peak hour flow is observed on this route. This point of concern is particularly important, as a service frequency reflecting the standard peak service pattern needs to be assumed for the AM peak hour capacity assessment - i.e. 6 tph, equivalent to 4 and 2 tph to Enfield Town and Cheshunt respectively. Notwithstanding the outcome of the applicant's clarifications, TfL recognises that a more robust uplift in residential trips generated by this development, based on the most relevant and latest multi-modal data available, is unlikely to make a noticeable difference on the net impact of development proposals and to have a significant impact on the strategic road network. Given the effect of a recent congestion relief project completed at White Hart Lane station and TfL's own analysis, based on planning permissions sought since Summer 2020, it is confirmed that the proposals will not require mitigation on the LO network. However, the applicant is required to provide updated bus trip generation figures. Subject to the outcome of any additional assessment, TfL may seek mitigation towards enhancing bus priority measures and/or fund infrastructure upgrades. **TfL Technical Approval and Infrastructure Protection** Given the proximity of the site to Rail for London (RfL) infrastructure and operations, the applicant needs to consider the importance of identifying the risks associated with working on/near the railway and ways of mitigating those risks. This includes our design preference to avoid balconies or fully opening windows facing the railway and the associated risk of items falling or being thrown onto the railway; proposed maintenance arrangements for the future development (i.e. window/façade cleaning proposals requiring inherently risky access techniques such as abseiling); drainage (i.e. water management should operate away from the railway); any additional fencing required on the railway boundary, which must be independent of RfL's fencing and allow room for maintenance of both fences; use of scaffolding and the requirement to submit a Crane/Lifting Management Plan for approval by the Council in consultation with RfL. This requirement that is normally dealt with by Network Rail should be secured by condition. Whilst TfL have no objection in principle to the proposed development in relation to the site's adjacency to the railway lines, the future planning consent should include appropriate infrastructure and operational protection measures. TfL requires that the applicant enters into an Asset protection Agreement with RfL. **Travel Plan** The submitted outline residential Travel Plan (TP) and Framework Travel Plan (FTP) for the non-residential uses are generally acceptable. The focus on active travel is welcomed. The final TP and FTP and all agreed measures should be secured, enforced, monitored and reviewed through the Section 106 agreement, in accordance with Policy T4 Assessing and mitigating transport impacts of the London Plan. **Delivery and Servicing and Construction Logistics**	

Stakeholder	Comment	Response
	The outline Delivery and Servicing Plan (DSP) and outline Construction Environmental Management Plan (CEMP) along with the Operational Waste Management Strategy are welcomed and the contents of these documents are found to be broadly acceptable. Due to the phased nature of this development proposal (within a multiple land ownership site) with this detailed element being the first phase of a long-term and comprehensive regeneration of High Road West to be delivered by the applicant, this application will require the adoption of a coherent wayfinding strategy to enable people to access and find the stadium and other key local attractor destinations. The RMA should make clear how the development and construction operations will be managed alongside the continuation of the operations of the stadium and other key local attractors. The full DSP and CEMP, which needs to include infrastructure protection measures in respect of the adjacent railway lines, should be produced in accordance with TfL guidance and secured by condition. This is particularly important, as High Road is a key bus corridor and safe site access during construction should fully consider the impact on the surrounding community, including the stadium and St. Francis de Sales Catholic Infant and Junior School. 04.02.2022 Thank you for consulting TfL. As previously indicated, the development site is located directly adjacent to White Hart Lane Station and immediately to the west of the A1010 High Road, which forms part of the Strategic Road Network (SRN). While the Local Planning Authority is the Highway Authority for this road, TfL is the Traffic Authority and has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN. After reviewing the updated case documents, TfL make the following comments. These are additional to any responses you may have previously received from my colleagues in infrastructure or asset protection and from TfL as a party with a property interest. Please also note that these comments should be read in conjunction with TfL's detailed comments made on 10th February 2022. Considering that the applicant has already responded to TfL's detailed comments, it should be further noted that I will send a follow-up email setting out any specific aspects of our response in due course. • For TfL is very important to keep track of the cumulative impact of development on the local and wider transport network. The applicant's commitment to ensure appropriate information about cumulative development in the area is included, specifically development in the wider context of the HRW masterplan area, is welcomed. • The accompanying 'Chapter 15, Transport & Access ES' addendum report suggests that there will be no change to the methods used in the proposed assessment. As set out by the addendum report, TfL acknowledges this chapter has been informed by the original ES and corresponding Transport Assessment, as well as the Outline Delivery and Servicing Plan; Residential Travel Plan; Framework Travel Plan; and Outline Construction Environmental Management Plan. Existing requirements relating to the preparation of all these documents are to remain unchanged.	

Stakeholder	Comment	Response
	• Public transport service frequencies should be consistent with those agreed through pre-application communications with TfL, including the TfL Strategic Modelling team. This includes London Overground (LO) train and bus service frequencies. The applicant must ensure this assessment and analysis reflect representative/agreed public transport conditions. • The London Plan Policy T5, sets out cycle parking standards to help remove barriers to cycling and create a healthy environment in which people choose to cycle. Considering the detailed element of the scheme and submitted plans for Plot A, TfL has concerns about the cycle parking, specifically building A1 and the lack of provision of spaces for larger cycles for long-stay cyclists. Given that the schedule of accommodation sets out that all wheelchair accessible homes will be contained within building A1, TfL encourage the applicant to review the cycle parking and incorporate adequate provision within building A1 to cater specifically for non-standard bicycles. This should consider riders of certain type of bicycles, including people who use handcycles, tricycles, tandems and models adapted to suit the rider's specific needs, as well as cargo cycles. Further consideration should also be given to short-stay cycle parking provision for buildings A2 and A3, as spaces for visitors located in the landscape, adjacent to building A1's entrance are too remote from other user destinations, particularly building A3's entrance. All cycle parking is required to be designed and laid out in accordance with the London Cycling Design Standards (LCDS). **Subject to the above comments and issues raised being addressed satisfactorily, the updated case documents appear acceptable from a Spatial Planning perspective. Therefore, TfL have no further comments on this application.**	
Themes Water	Waste Comments Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. The application indicates that SURFACE WATER (North of White Hart Lane) will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority. Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position. There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.	Planning conditions and informatives are proposed to ensure that the proposal does not have an adverse impact on water infrastructure.

Stakeholder	Comment	Response
	https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes. Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses. As per Building regulations part H paragraph 2.21, Drainage serving kitchens in commercial hot food premises should be fitted with a grease separator complying with BS EN 1825-:2004 and designed in accordance with BS EN 1825-2:2002 or other effective means of grease removal. Thames Water further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses. Please refer to our website for further information: www.thameswater.co.uk/help Water Comments There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes	
Metropolitan Police Service Design Out Crime Officer	***Detailed Element*** ***Section 1 - Introduction:*** Thank you for allowing us to comment on the above planning proposal, please note that due to the nature of a Hyl Application and the breadth of information required, this response will be in 2 parts. This response will focus on the deta element of Block A within the application under police reference NE4188. Part one (1) was dealt under police refere NE6136. With reference to the above application we have had an opportunity to examine the details submitted and would like to o the following comments, observations and recommendations. These are based on relevant information to this site (Plea see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer. It is in our professional opinion that crime prevention and community safety are material considerations because of the mi use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer developm	Planning conditions are proposed to ensure that the proposal meets secure by design accreditation.

Stakeholder	Comment	Response
	in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have relation to Crime Prevention (Appendices 1). We have met with the project Architects to discuss Crime Prevention and Secured by Design (SBD) for Block A and ha discussed our concerns around the design and layout of Block A. The Architects have made mention in the Design a Access Statement with reference to design out crime or crime prevention and have stated that they will be working in cl collaboration with DOCOs to ensure that the development is designed to reduce crime at detailed design stage. At this po it can be difficult to design out fully any issues identified. At best crime can only be mitigated against, as it does not f reduce the opportunity of offences. Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions a an informative. The comments made can be easily be mitigated early if the Architects ensure the ongoing dialogue with department continues throughout the design and build process. This can be achieved by the below Secured by Des conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD applicat forms at the earliest opportunity. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to. ***<u>Section 2 - Secured by Design Conditions and Informative:</u>*** In light of the information provided, we request the following Conditions and Informative: **<u>Conditions:</u>** A. Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve **'Secured by Design' Accreditation**. Accreditation must be achievable according to current and relevant **Secured by Design** guide lines at the time of above grade works of each building or phase of said development. The development shall only be carried out in accordance with the approved details. B. Prior to the first occupation of each building or part of a building or its use, **'Secured by Design'** certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained. C. **<u>Informative:</u>**	

Stakeholder	Comment	Response
	The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) achieve accreditation. The services of MPS DOCOs are available **free of charge** and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813. ***<u>Section 3 - Conclusion:</u>*** We would ask that our department's interest in this planning application is noted and that we are advised of the final **Decis Notice**, with attention drawn to any changes within the development and subsequent Condition that has been implemen with crime prevention, security and community safety in mind. Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices plea do not hesitate to contact us at the above office. **<u>Outline Element</u>** ***<u>Section 1 - Introduction:</u>*** Thank you for allowing us to comment on the above planning proposal, please note that due to the nature of a Hyb Application and the breadth of information required, this response will be in 2 parts. This response will focus on the Out element of the application in Part (One) 1 and the detailed response for Plot A will follow in Part (Two) 2 under NE 41 reference. With reference to the above application we have had an opportunity to examine the details submitted and would like to o the following comments, observations and recommendations. These are based on relevant information to this site (Plea see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer. It is in our professional opinion that crime prevention and community safety are material considerations because of the mi use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer developm in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have relation to Crime Prevention (Appendices 1). We have met with the project Architects to discuss Crime Prevention and Secured by Design (SBD) for the overall masterp and have discussed concerns around counter terrorism & crowd control. The Architects have made mention in the Des and Access Statement with reference to design out crime or crime prevention and have stated that they will be working close collaboration with DOCOs and CTSAs to ensure that the developed is designed to reduce crime at detailed des stage. At this point it can be difficult to design out fully any issues identified. At best crime can only be mitigated agai as it does not fully reduce the opportunity of offences.	

Stakeholder	Comment	Response
	Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions a an informative. The comments made can be easily be mitigated early if the Architects ensure the ongoing dialogue with department continues throughout the design and build process. This can be achieved by the below Secured by Des conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD applicat forms at the earliest opportunity. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to. ***<u>Section 2 - Secured by Design Conditions and Informative:</u>*** In light of the information provided, we request the following Conditions and Informative: **<u>Conditions:</u>** D. Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve **'Secured by Design' Accreditation**. Accreditation must be achievable according to current and relevant **Secured by Design** guide lines at the time of above grade works of each building or phase of said development. The development shall only be carried out in accordance with the approved details. E. Prior to the first occupation of each building or part of a building or its use, **'Secured by Design'** certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained. F. Commercial aspects of the development must achieve the relevant **Secured by Design Accreditation** at the final fitting stage, prior to residential occupation of such building in accordance with condition B (Secured by Design) and commencement of business. Details shall be submitted to and approved, in writing, by the Local Planning Authority G. Measures to mitigate against counter terrorism activities plus crowd control during events must be implemented according to Metropolitan Police Guidelines and advice during the lifetime of the development and upon final development completion. (Note - this information will not be shared in the public domain once provided). **<u>Informative:</u>**	

Stakeholder	Comment	Response
	The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) achieve accreditation. The services of MPS DOCOs are available **free of charge** and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813. ***<u>Section 3 - Conclusion:</u>*** We would ask that our department's interest in this planning application is noted and that we are advised of the final **Decis Notice**, with attention drawn to any changes within the development and subsequent Condition that has been implemen with crime prevention, security and community safety in mind. Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices ple do not hesitate to contact us at the above office. Yours sincerely, **Lee Warwick 463TP** Designing Out Crime Officer Metropolitan Police Service This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does n constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the are All other applicable health, safety and fire regulations should be adhered to **Appendix 1: Concerns and Comments** In summary we have overall site specific comments in relation to the following items. This list is not exhaustive and ac initial observations on the masterplan based on the available plans from the architect and local authority planning portal Site specific advice may change depending on further information provided or site limitations as the project develops: In summary we have site specific comments and concerns in relation to the following items. This list is not exhaustive and acts as initial observations from the Plans. Site specific advice may change depending on further information or site limitations as the project develops:	

Stakeholder	Comment	Response
	General **CTSA measures –** Evidence supporting the implementation of CT measures should be further discussed with the CTSAs as the development progresses. This can be ensured via an appropriately worded CT condition in conjunction with the CTSA. Anything installed must meet the security needs for the site and adaptable for future events and or concerns. **Crowd control measures –** Physical measures to assist control of large crowds should be implemented during the building phase and for the completion of the development. **Lighting** – It is unclear exactly what levels of illumination is provided for the external aspects at this time. A lux plan should be provided to encourage overall uniformity of lighting and reduce the likelihood of hiding places or dark spots and make public walkways as visually open and safe as possible. This should be to the latest BS 5489 standard and the design engineer should have a competency to level 3 and 4 of the Institution of Lighting Professionals (ILP) Scheme shown. Dusk till dawn photoelectric cells with ambient white lighting via directional down-lighting columns is advised for best lighting practice. Bollard lighting as a primary light source is not supported as it does not provide suitable illumination and creates an “up lighting effect” making it difficult to recognise facial features and thus increase the fear of crime. **CCTV** – Data logging and CCTV will be paramount for the site to assist management when dealing with any issues during events and the day to day running of development. A CCTV strategy for the site should be reviewed at the earliest opportunity to not only protect the different buildings within the design, but the main walkways/pathways that run through the design**.** This should be installed to BS EN 50132-7:2012+A1:2013 standard, co-ordinated with the planned lighting system, contained within vandal resistant housing, to record images of evidential quality (including at night time) that are stored for a minimum of 30 days on a locked and secure hard drive or a remote cloud system. Appropriate signage should also be included highlighting its use. **Cycle Storage –** We recommend that there should be 3 points of locking for the bikes and signage for residents advisin lock their bikes appropriately. The bike store should not be advertised from the outside to further deter opportunistic cri and access should only be provided to those who register with the Managing Agency. Bike stands should have three points of locking and signage put up advising people to lock them securely. External signage should not advertise the usage of this space to try and reduce opportunistic theft. External cycle racks should be positioned to avoid usage as seating or located. **Vehicle Routes** – It is important to ensure that routes into and around the site not only meet SBD/CT requirements, but that the Police Traffic Management Unit (TMU) have reviewed the measures and are satisfied. **Doors and windows -** SBD Approved Doors and windows (as recommended by the DOCO) are advised to ensure this and will need to be reviewed across the site once a final design has been agreed by the Local Authority. This will	

Stakeholder	Comment	Response
	also need to be reviewed against any Heritage requirements for the site which could impact on certified products being installed. **Pathways/Walkways –** As the concept of the design is to provide safe spaces for people to walk and cycle at all times, it will be important to ensure all pathways allow good visibility, are wide, are a straight as possible, are well lit and are covered by adequate CCTV. **Climbing Aids –** Whilst climbing aids on the whole are not within the design, every effort should be made to ensure that the design does not inadvertently create opportunities to climb up to roof, balcony or amenity spaces. Review of the distances and materials should be taken into account across the site and designed in such a way that it cannot become a climbing aid. **Access Control Strategy –** The reduction in routes into any building and floor by floor access control to the different uses (including upper level garden spaces) is supported. As the project develops further, further discussions into ensuring that this is appropriate for the site (considering its complex and multi-use functions) will be important to avoid permeability issues. Ongoing discussions are recommended in case of any changes to the floor layouts and functions that may affect original advice **Residential and Commercial** **Outline Application –** The design concepts show basic plans for the layouts of the buildings, but are likely to go through alterations to layouts as their design progresses. **Whilst the general layouts appear on the whole suitable, the below comments are to aid the design teams to fine tune their proposals in line with SBD Guidance.** **Compartmentation –** The design currently allows access for a high volume of residents into multiple cores within multiple Blocks and the necessity of compartmentation and level by level access control will be extremely important considering the aspects of giving legitimacy for people to have immediate access. A robust access control system should be put in place to reduce excessive permeability through the design and to aid compartmentation this may include the use of access controlled lifts to control the movement of both residents and their visitors. It is recommended that data logged access control is installed at the earliest opportunity within the build to limit access of non-residents and those who have limited access rights. It is recommended that all lifts/doors leading out of the staircases onto the upper residential floors have data logged access control to help the Management Agency monitor usage of the different spaces and in turn help them to identify misusers in particular areas. This should work in tandem with CCTV to make it easier for the Managing Agency to deal with offences and via the tenancy agreements. This would be a requirement for the scheme to achieve SBD accreditation. **Defensible Space** – Across the design there is a proposal for ground level properties to activate the street frontage which is supported. However to protect these properties (as they are more vulnerable to crime and ASB), it is important to ensure that they are provided with low-level defensible zones around the property.	

Stakeholder	Comment	Response
	Bin Storage – Bin storage is likely to be core specific and in close proximity to the building entrances for each of Waste Collection which is supported. It is strongly recommended that access to the bins are externally accessed by residents only and with the corridor removed to avoid creating a method of bypass into the residential aspects. In order to control these spaces as best as possible it is recommended that data logged SBD approved doorsets are used and are single sized large doors to eliminate the weaknesses of passive leaf manual locking systems. If double doors are required, then the passive leaf needs to be locked in such a way that Maintenance only can open the door. To help the Management Agency monitor the spaces and to help prevent against potential drug dealing, rough sleeping and assaults, CCTV should ideally be implemented both within and outside the stores. **Commercial/Residential mixed use –** It is strongly recommended that commercial and residential aspects of a build are always kept separate wherever possible and that there is no excessive permeability through each space. **Adjoining Balconies –** Adjoining balconies leave the residents more vulnerable to crime and ASB. Where possible it is recommended that balconies are suitably separated to ensure that climbing between them is not possible. Where this cannot be designed out it is advised that the doors and windows are to an enhanced standard to mitigate the risk. **Postal Strategy –** In order to prevent against postal theft, it is recommended that post be delivered into an airlock created through the Compartmentation requirements. These areas should be covered by CCTV that shows the post boxes for evidential purposes. A strategy for bulky package delivery and where this will be stored securely should also be reviewed against the number of residents who potentially may use this feature daily. **Appendix 2: Planning Policy** **London Plan 2021** **Policy D11: Safety, Security and Resilience to Emergency** This policy links design out crime, counter terrorism prevention measures and acknowledges fire safety issues. **Section B** of policy D11 Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire Commissioner, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Policies and any site allocations, where locally justified, should be set out in Development Plans. **Section C** of policy D11 These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically inte	

Stakeholder	Comment	Response
	nto the development and the wider area. The policy considers not just crime, but also a wide range of hazards, such as fire, flood, extreme weather and terrorism. New buildings should therefore be **resilient** to all of these threats. **Paragraph 3.11.3** Measures to **design out crime**, including counter terrorism measures, should be integral to development proposal considered early in the design process, taking into account the principles contained in guidance such as the Secured by D Scheme published by the Police…. This will ensure development proposals provide adequate protection, do not compr good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate mea that are proportionate to the threat of the risk of an attack and the likely consequences of one. **aragraph 3.11.4** he Metropolitan Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to e ajor developments contain appropriate design solutions, which mitigate the potential level of risk whilst ensuring the qua aces is maximised. **aragraph 3.12.10** **re safety and security measures** should be considered in conjunction with one another, in particular to avoid potential co etween security measures and means of escape or access of the fire and rescue service. Early consultation between the L re Brigade and the Metropolitan Police Service can successfully resolve any such issues. **MM4 (Policy DM2) Part A(d)** "Have *regard to the principles set out in 'Secured by Design'"* **MM5: Para 2.14** - "Proposals will be assessed against the principles of secured by design'. The latest published uidance in this respect should be referred." **n Independent Sustainability report by AECOM on Tottenham area action plan states:** *"Crime is high in ottenham with many residents concerned about safety, gang activity and high crime rates. Issues are particularly ssociated with Northumberland Park and Tottenham Hale".* **2.3 of same report states:** • Crime rates are relatively high across the borough and crime is particularly prevalent in Northumberland Park. There is a need to design schemes in order to reduces levels of crime, fear of crime and anti-social behaviour. Since unemployment is strongly correlated with acquisitive crime, there may also be a link to wider economic development. • There are no references to crime in the **overarching policies**, although it is recognised that housing and economic polices aim to support a very significant level of regeneration in the area. This could indirectly lead to reduced crime / fear of crime in the medium term through creating more high quality environments and more	

Stakeholder	Comment	Response
	stable communities. **AAP 06** includes requirements on urban design and character and seeks to maximise opportunities to create legible neighbourhoods, which may assist in creating safe, modern and high quality places. • There are no references to crime in the **neighbourhood area sections;** however they do set out key objectives which include considerations for safe and accessible environments. Furthermore, as noted above, the scale of regeneration proposed should indirectly lead to reductions in crime and fear of crime. Crime is particularly high in Northumberland Park and Tottenham Hale, hence this issue might be explicitly addressed in these sections; however, it is recognised that the DM Policies DPD includes Borough wide requirements in this regard. Also, AAP 06 sets out the Council's commitment to preparing Design Code Supplementary Planning Documents (SPDs) for Tottenham's Growth Areas, where opportunities for secure by design principles can be investigated. • In **conclusion**, the plan is likely to result in positive effects on the crime baseline if there is large scale regeneration (including jobs growth) and robust implementation of safer streets and other measures to design out crime in Tottenham, including particularly in Northumberland Park where crime levels are highest. **Appendix 3 : Crime Figures** The crime figures provided below are publicly available on the Internet at http://www.met.police.uk/. The figures can at b considered as indicative as they do not include the wide variety of calls for police assistance which do not result in a report. Many of these calls involve incidents of anti-social behaviour and disorder both of which have a negative imp quality of life issues. Haringey is one of 32 London Boroughs policed by the Metropolitan Police Service. It currently has crime figures above av for the London Boroughs and suffers from high levels of crime and disorder to its residents and business communities. The following figures relate to recorded crime data from Police.uk for the below area:	

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	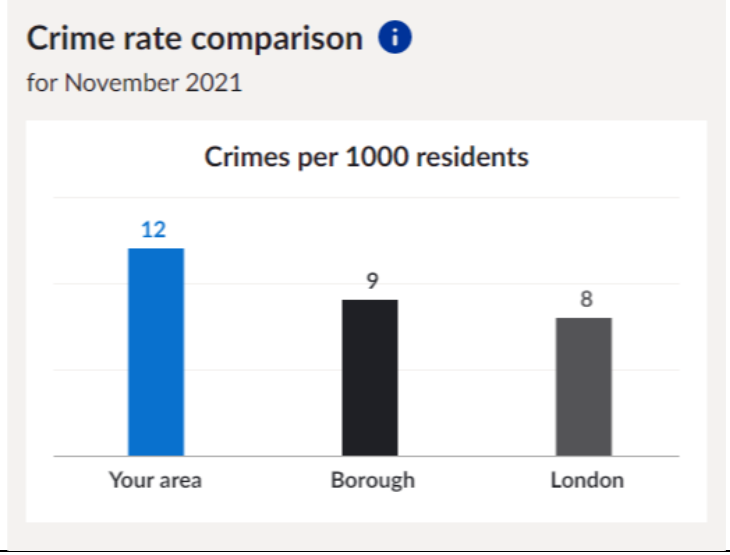	

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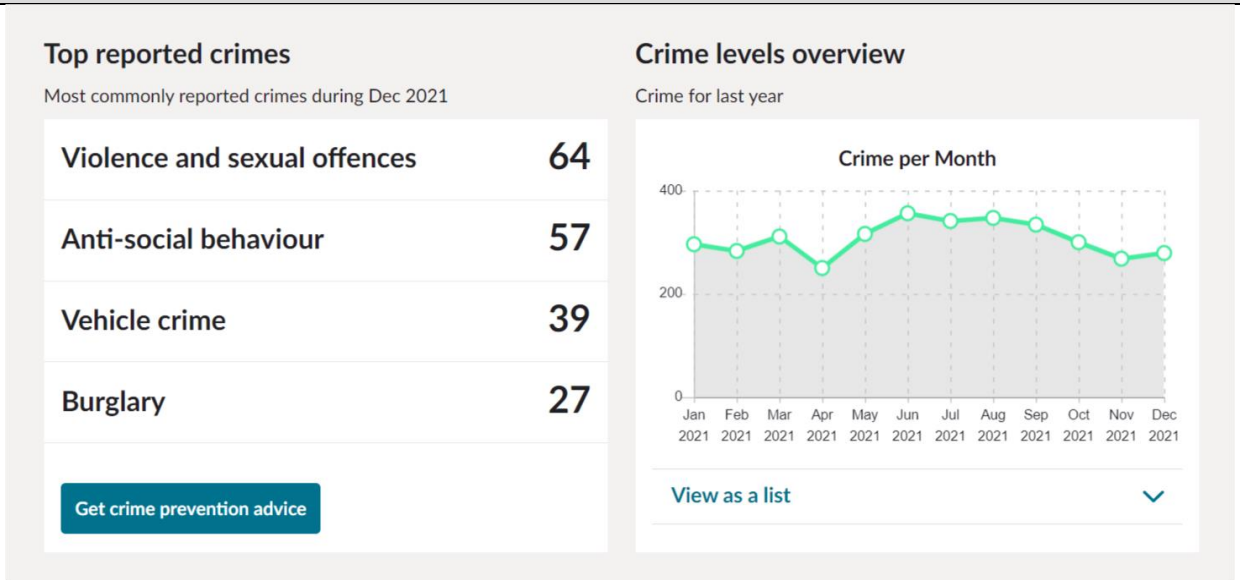
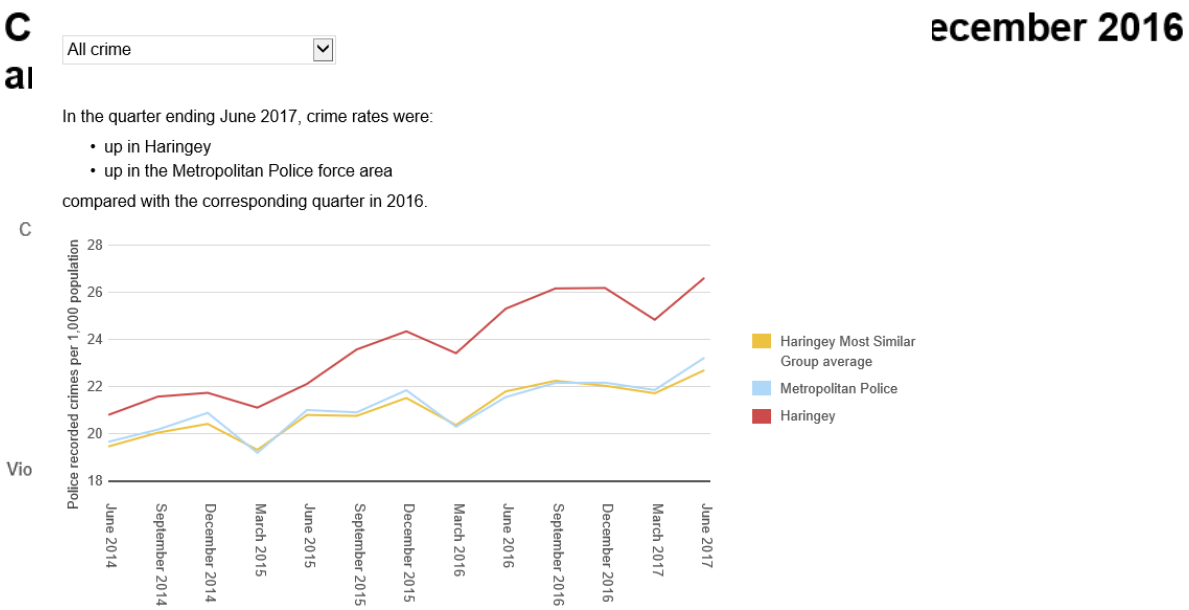
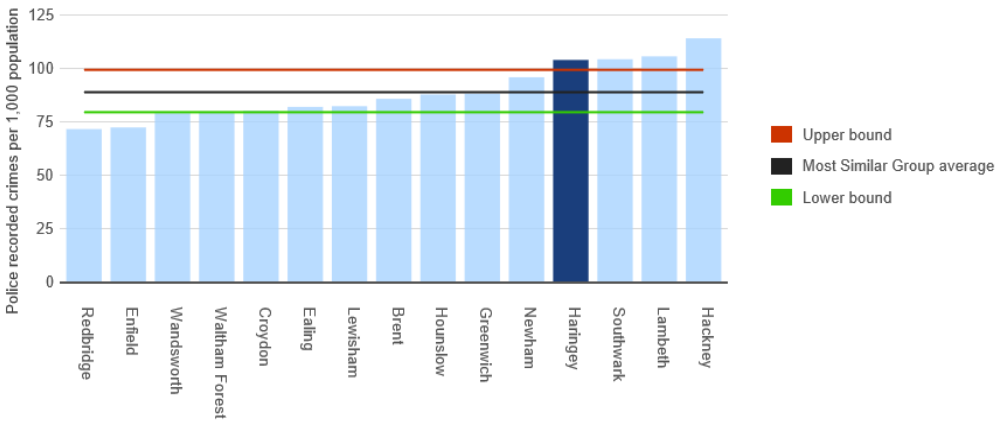
	 	

Stakeholder	Comment	Response
	Crime in Haringey compared with crime in other similar areas All crime In the year ending June 2017, the crime rate in Haringey was higher than the average crime rate across similar areas.  	
Waltham Forest LB	No comment received	
Greater London Authority	See Appendix 4	
Greater London Archaeological Advisory Service	*Re-consultation received 03/02/2022: addendum to ES; and documents & plans relating to Plot A* The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter. NPPF section 16 and the London Plan (2021 Policy HC1) make the conservation of archaeological interest a material planning consideration. NPPF paragraph 194 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest. The planning application lies in an area of archaeological interest.	Suitable planning conditions are proposed to ensure the proposal does not have an adverse impact archaeological assets.

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	The updated 2022 archaeology ES chapter better recognises the archaeological potential of the Roman road alignment through the site and the potential of the Moselle as well as the expected river crossing point, to preserve significant archaeological remains within the site boundaries. It does not go on to identify these assets as EIA receptors which is a strange decision, one which means that the presence of the heritage assets has still not effectively fed into mitigation and design decisions as the EIA process intends. The application continues to consider archaeological investigation to be a mitigation response. Archaeological investigation does not mitigate harm to receptors. It is a destructive process that has a negative impact on them. Further, the application proposes that archaeological work take place after demolition and remediation works on site, both of which have great scope to harm buried remains. Improved public understanding can be argued to be an offsetting of impact. The applicants have offered a modest suite of temporary outreach work during archaeological excavations but have not set out any ways that the archaeological heritage of the site might become an asset for the benefit of residents and victors through presentation and interpretation. It remains GLAAS' advice to you that a successful and policy-compliant scheme should take further account of identifying and sympathetically managing important archaeological heritage assets in order to harness them to create a characterful and maximally beneficial development that meets local and national policy objectives for both heritage and design. If the LPA chooses to grant the scheme in its current form, I recommend that the steps outlined above are carried out before detailed design matters are considered, in order to inform them. To this end, I recommend that the appended archaeological condition wordings be placed on any consent of the current application, should the LPA deem the material provided so far to be sufficient to base a decision on. I have looked at this proposal and at the Greater London Historic Environment Record. I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. NPPF paragraphs 190 and 197 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities. Without prejudice to our advice that the scheme should be determined and designed based on further archaeological assessment four (4) related conditions are listed below.	

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	These would create a staged process of archaeological investigation, historic buildings recording (where appropriate), detailed development design work and then asset enhancement and public benefit. Recommend amendments and updates to archaeology submission **No reserved matters shall be submitted, nor shall any demolition or development take place in any phase** until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing, in consultation with GLAAS. For land that is included within the WSI, no reserved matters application shall be submitted or demoliton or groundworks begun other than in accordance with the agreed WSI , and the programme and methodology of a **site evaluation** and the nomination of a competent person(s) or organisation to undertake the agreed works. If heritage assets of archaeological interest are identified by stage 1, then for those parts of the site which have archaeological interest, a stage 2 **excavation and mitigation** WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include: A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works B. Details of a programme for delivering archaeological outreach during the project. C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI. Informative: *Written schemes of investigation will need to be prepared and implemented by a suitably Qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London.* Condition 2 (Building recording) **No reserved matters shall be submitted, nor shall any demolition take place in any phase** until the applicant has secured the implementation of a programme of recording, research and historic analysis of the standing buildings in each phase, one which considers social history, building structure, architectural detail and archaeological evidence. This shall be undertaken in accordance with a written scheme of investigation for each phase, submitted by the applicant and approved by the local planning authority. *Informative: Locally listed buildings are present on the site. Accordingly, the planning authority wishes to secure the provision of historic building recording prior to development, in accordance with Historic England guidance.* Condition 3 (Foundation and below ground design): **No reserved matters shall be submitted nor shall any development in any phase shall take place,** other than archaeological work, within the proposed development site until the applicant has produced a detailed scheme	

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	showing the complete scope and arrangement of the **foundation design and other below ground works** in each phase, which has been submitted to and approved by the local planning authority for each phase. *Informative The development of this site is likely to damage heritage assets of archaeological interest. The applicant should therefore submit detailed foundation and other below ground designs for approval that demonstrate reduced harm to buried remains.* Condition 4 (Presentation): **No reserved matters shall be submitted for any phase** until a scheme of **permanent heritage interpretation, landscaping and display** at the site has been agreed, in accordance with a research, materials, design and long-term maintenance proposal and the results of the recommended historic and archaeological research and investigation. The proposal for the work is to be approved in advance in writing by the Local Planning Authority in consultation with GLAAS. The scheme shall be displayed in the public realm of the site and should be integrated uniformly with the site's other public realm, design and landscape proposals. *Informative: The LPA wishes that the rich history of the site and its surroundings be conveyed to the public. These include the heritage of Ermine Street Roman road, the Moselle, any river crossing by the Roman road, and any other significant remains encountered during fieldwork. The interpretation scheme should be researched, designed and implemented by a recognised historical or archaeological interpretation specialist with appropriate experience of the periods involved.* Thank you for your consultation received on 18 November 2021. The Greater London Archaeological Advisory Service (GLAAS) give advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter. NPPF Section 16 and the London Plan (2021 Policy HC1) make the conservation of archaeological interest a material planning consideration. NPPF section 194 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest. A field evaluation may also be necessary. I have looked at this proposal and at the Greater London Historic Environment Record but I need more information before I can advise you on the effects on archaeological interest and their implications for the planning decision. If you do not receive more archaeological information before you take a planning decision, I recommend that you include the applicant's failure to submit that as a reason for refusal. The submitted study has focused on post-mediaeval remains and had not unfortunately carried out the geoarchaeological modelling work recommended in the scoping response or consulted the Corcoran et al Lower Lea Valley Model towards establishing the potential for earlier periods. Questions about harm and significance are not well	

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	explored in the submission. It is regrettable that the DBA authors did not consult GLAAS for advice on relevant sources. Of greater concern, the EIA considers archaeological investigation to be a mitigation response, indeed the only mitigation response. Further, it proposes this work take place after demolition and remediation works on site, both of which have great scope to harm buried remains. Archaeological investigation does not mitigate harm to receptors. It is a destructive process that has a negative impact on them. Improved public understanding can be argued to be an offsetting of impact, but the applicants have not considered how they might create public understanding or other heritage benefits in their submission. No proposals are put forward to avoid harm through design or programming of development and no proposals are put forward for public heritage benefits that could offset harm and which would assist in creating a sense of place and celebration of local history and character in a final scheme. This was a key recommendation at scoping and has also not been acknowledged. The proposals do not comply with London Plan or Local Plan policies about heritage display and interpretation and are also not underpinned by thorough assessment. I recommend that the heritage submissions be updated and that the applicants liaise with GLAAS during this process. If the applicants are not able to do this, then I recommend that this advice forms part of a formal Reg 25 request. Because of this, I advise the applicant completes these studies to inform the application: Desk Based Assessment and ES Chapter revisions Desk-based assessment produces a report to inform planning decisions. It uses existing information to identify the likely effects of the development on the significance of heritage assets, including considering the potential for new discoveries and effects on the setting of nearby assets. An assessment may lead on to further evaluation and/or mitigation measures. The DBA and the relevant ES Chapter should be updated in line with the recommendations above. I will need to agree the work beforehand and it should be carried out by an archaeological practice appointed by the applicant. The report on the work must set out the significance of the site and the impact of the proposed development. I will read the report and then advise you on the planning application. NPPF paragraphs 199 - 202 place great weight on conserving designated heritage assets, including non-designated heritage assets with an archaeological interest equivalent to scheduled monuments. Non- designated heritage assets may also merit conservation depending upon their significance and the harm caused (NPPF paragraph 203). Conservation can mean design changes to preserve remains where they are.	

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	NPPF paragraphs 190 and 197 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Applicants should therefore expect to identify appropriate enhancement opportunities. If preservation is not achievable then if you grant planning consent, paragraph 205 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. You can find more information on archaeology and planning in Greater London on our website. This response only relates to archaeology. You should also consult Historic England's Development Management team on statutory matters.	