

## REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

### 1. APPLICATION DETAILS

**Reference No:** HGY/2021/3175

**Ward:** Northumberland Park

**Address:** High Road West N17

**Proposal:** Hybrid Planning application seeking permission for:

1) 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

2) Detailed component 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

Outline:

- Demolition of most buildings (with retention of some listed & locally listed heritage assets);
- New buildings at a range of heights including tall buildings;
- Up to 2,869 new homes in addition to Plot A (including affordable housing);
- At least 7,225sqm of commercial, office, retail, & community uses (incl. new library & learning centre);
- New public park (min 5,300sqm) & new public square (min 3,500sqm); &
- Other landscaped public realm and pedestrian & cycle routes

Detailed:

Plot A - Demolition of 100 Whitehall Street & Whitehall & Tenterden Community Centre and erection of new buildings of 5-6 storeys containing 60 new affordable homes & open space.

**Applicant:** Lendlease (High Road West) Limited

**Ownership:** Private and Council

**Case Officer Contact:** Philip Elliott

**Site Visit Date:** 04/02/2022

**Date received:** 08/11/2021 **Last amended date:** 01/02/2022

**Plans and Document:** See **Appendix 10** to this report.

- 1.1 The application has been referred to the Planning Sub-Committee for determination as the planning application is a major application, on Council owned land, that is also subject to a s106 legal agreement.
- 1.2 The planning application has been referred to the Mayor of London as it meets Categories 1A ,1B, 1C and 3A as set out in the Town and Country Planning (Mayor of London) Order 2008.

## **SUMMARY OF KEY REASONS FOR RECOMMENDATION**

- The proposal is a well-designed, comprehensive, residential-led mixed-use scheme providing up to 2,929 homes (including 60 affordable homes in the detailed element), at least 7,225 sqm (GIA) of commercial space, including a new library and learning centre, a new public park measuring at least 5,300 sqm and a new public square measuring at least 3,500 square metres alongside other landscaped public realm and pedestrian/cycle routes equating to at least 0.4 hectares.
- The development would make a significant contribution to the regeneration and place-making of Tottenham including improved connectivity to White Hart Lane Station, improved public realm, creation of new public open spaces, creation of training, up-skilling and employment opportunities, support local business and community wealth-building through increased footfall and associated spending and support the diversification of the local economy.
- The scheme would deliver up to 1,025 affordable homes, including up to 564 Social Rented Homes and 461 Shared Ownership Homes. The illustrative scheme would deliver a mix of dwelling sizes, including family sized homes and including 500 Social Rented homes and 416 Shared Ownership homes. The affordable housing provision represents a 35% provision of affordable housing by unit number and 40% provision by habitable room with a tenure split of 55% social rent and 45% intermediate. This is proposed to be increased to 40% by unit subject to grant funding and viability.
- The proposal would deliver between 7,225 sqm GEA and 36,300 sqm GEA of community and employment floorspace. The illustrative scheme would deliver 17,600 square metres of community and employment floorspace.
- The layout and design of the development optimises the potential of the site, provides acceptable levels of open space and respects the scale and character of the surrounding area and the amenity of neighbours.
- The proposal includes a set of parameter plans and a design code to guide future reserve matters applications which would be subject to further determination of a

range of detailed reserved matters from the planning authority and ensure high quality design.

- Whilst the proposal would conflict with some principles of the approved 2014 masterplan, it would deliver on its key principles and would make the most efficient use of the site.
- The 'less than substantial harm' to the wider setting and significance of a number of heritage assets would be outweighed by the significant public benefits that the proposed scheme would deliver.
- The development is estimated to deliver a minimum net increase of 240 Full Time Equivalent jobs once operational and a further 93 FTE associated supply chain jobs. The illustrative scheme is expected to deliver significant economic benefits including 1,214 construction jobs, 1,202 construction supply chain jobs, 453 net additional full time jobs from the proposed commercial and employment uses with 204 associated supply chain jobs and 163 supported jobs (from the 23.2 million annual increased household expenditure in the local area). The development is anticipated to generate up to £267.8 million of GVA to the economy every year during construction and £57.7 million of GVA to the economy per year once complete. £ 4.4 million in Council Tax revenues, £849,000 in Business Rates Revenue per annum, once complete. The development is anticipated to make approximately £10,000,000 in Community Infrastructure Levy contributions.

## 2 RECOMMENDATION

- 2.1 That the Committee resolve to GRANT planning permission and that the Head of Development Management or the Assistant Director Planning, Building Standards & Sustainability is authorised to issue the planning permission and impose conditions and informative notes subject to referral to the Mayor of London for his consideration at Stage 2 and signing of a section 106 Legal Agreement providing for the obligations set out in the Heads of Terms below and a section 278 Legal Agreement providing for the obligations set out in the Heads of Terms below.
- 2.2 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.2) above, planning permission is granted in accordance with the Planning Application subject to the attachment of the conditions.
- 2.3 That delegated authority be granted to the Head of Development Management or the Assistant Director to make any alterations, additions or deletions to the recommended heads of terms and/or recommended conditions as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice Chair) of the Sub-Committee.

**Conditions y** – (the full text of recommended conditions is contained in **Appendix 11** of this report to follow).

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

### **Workspace provision**

#### **1. Business Relocation and Affordable Workspace Strategy**

Strategy to assist with the relocation of existing business within the development to temporary or permanent locations within the development, or if that is not feasible, within the vicinity of the Site, to be submitted with each relevant Reserved Matters Application;

A proportion of Use Class E(g) floorspace provided within the masterplan will be provided as affordable workspace, suitable for a range of small businesses;

### **Affordable Housing**

#### **2. Affordable Housing:**

- 35% affordable housing by unit across the whole site
- 500 affordable (social rent) units
- 28 Shared Ownership and 46 Shared Equity units to be provided south of White Hart Lane
- Resident leaseholds of Love Lane Estate (subject to eligibility) shall be offered a shared equity unit:
  - Shared Equity Housing- provided 25% equity of value with no rental of remaining 75% (for existing leaseholders) option to staircase to 100% of value, flexibility in tenure provided in order for the Council to provide low cost rent or Intermediate housing
- Tenure mix – 45% Intermediate housing & 55% Low Cost Rent housing by habitable room.
- Compliance with quality standards
- Affordable housing plan showing the location of affordable housing on a plot, to be submitted prior to commencement of that plot. Affordable housing residents to have access to the combined external communal amenity and play space as Market housing (where Blocks have a mix of tenures).

#### **3. Affordability:**

- Intermediate homes which are Shared Ownership to be delivered in accordance with the new London Shared Ownership Model, with rents on the unsold equity up to 2.75%
- Approve plan for marketing for first lettings of Intermediate Housing homes to households living or working in the following priority (1) Haringey and (2) London (3) other:
  - with max. annual income of £40,000 (Index Linked) for 1 & 2-bed homes and £60,000 (index-linked) for 3-bed homes – for 6-months prior to and up to completion of each Phase. After 3 months of marketing the income caps will increase to £60, 000 for 1, 2, and 3 bed- units, and up to £90, 000 (index linked) or as updated in line with the GLA Annual Monitoring Report from time to time, by practical completion.
  - Provided that annual housing costs for each home do not exceed 28% of the above relevant annual gross (40% net income) income levels.

#### **4. Viability Review Mechanism:**

- Early Stage Review (if not implemented within 24-months).
- Break Review (if construction suspended for 30-months or more)
- Mid term review(s)
- Late Stage Review [ ]% of

#### **5. Marketing**

Local Marketing to Haringey Residents include a Tottenham-first approach

#### **Infrastructure Provision**

##### 6. Improvements to adjoining Public Realm and Open Spaces:

- Public realm and improvement works to be delivered on Moselle Place, part of Orchard Place, Brereton Road (north and south side)

#### **7. Social Infrastructure**

- Library and Learning Centre: Delivery of a new Library and Learning Centre in accordance with the parameters of development specification
- Healthcare Provision: To secure future healthcare provision on-site. New healthcare facility to be in operation prior to demolition of the existing Tottenham Health Centre.

#### **8. Open space**

- To pay a contribution of £50,000 towards improvements to Bruce Castle Park or a similar green space
- Public Park: Provision of a public park to be delivered to the north of White Hart Lane in accordance with the parameter plans;
- Public Square: Provision of a public square to be delivered to the south of White Hart Lane in accordance with the parameter plans;

### **Open Space Management and public art**

**9. Meanwhile Use Strategy:** A strategy including provision for meanwhile uses across the Site

#### **10. Provision of public art**

£50,000 within Moselle Square and £50,000 within Peacock Park. Details and location of installation to be agreed with the Local Planning Authority

#### **11. Curation and management of the public realm to provide for temporary events**

#### **12. Publicly Accessible Open Space Access & Management Plan**

ensuring public access and future management & maintenance (in accordance with the Public London Charter) (October 2021).

- Plan to include:
  - stadium event day access and management and a crowd flow management plan
  - every day access and management

### **Transportation**

**13. Future Connectivity & Access Plan** – setting out how the development shall be constructed to allow for potential future pedestrian, cycling and vehicular access across the proposed development and adjoining land.

#### **14. Car-Capping:**

- Prohibiting residents (other than Blue Badge holders) from obtaining a permit to park in the CPZ (outline development only)
- Parking Management plan to manage the provision of on site parking to prioritise Blue Badge holders then (excluding Love Lane Estate residents and Blue Badge holders);
- £5,000 for revising the associated Traffic Management Order.

#### **15. Enfield CPZ Contribution**

Baseline car parking survey, monitoring and if monitoring shows overspill car parking to be a significant problem, a financial contribution of up to a

maximum of £20,000 across the whole of the Development towards consultation/implementation of a CPZ.

## **16. Commercial Travel Plan**

(including Interim and Full documents, monitoring reports and a £3,000 monitoring contribution) including:

- Appointment of a Travel Plan Coordinator (to also be responsible for monitoring Delivery Servicing Plan)
- Provision of welcome induction packs containing public transport and cycling/walking information, map and timetables to every new tenant/organisation
- Cyclist facilities (lockers, changing rooms, showers, drying rooms for the non-residential uses)

## **17. Residential Travel Plans:**

including Interim and Full documents, monitoring reports and a £3,000 monitoring contribution) including:

- Appointment of a Travel Plan Coordinator (to also be responsible for monitoring Delivery Servicing Plan)
- Provision of welcome induction packs containing public transport and cycling/walking information, map and timetables to every new household

## **18 Car Club:**

Establishment or operation of a Car Club Scheme.

Up to 10 x Car Club spaces across the development, to be provided on a phased basis (with actual number tbc following discussions with prospective operators).

2 years' free membership for each household and £50 per year credit for the first 2 years

## **19 Improvements to Percival Court: A commitment to resurface Percival Court;**

## **Employment & Training**

## **20 Local Employment & Training:**

- Employment & Skills Plan – including Construction Apprenticeships Support Contribution & Skills Contribution (to be calculated in accordance with the Planning Obligations SPD).
- Commitment to being part of the borough's Construction Programme
- End-user Phase Skills and Training, Local Enterprise arrangements, and Apprenticeships:
- Contribution to support End-user Skills and Training

## **21 Loss of Non-Designated Employment Floorspace:**

- Financial contribution to be paid where there is a net loss of employment floorspace in a given Plot, in accordance with the calculation and requirements of the SPD;

## **Carbon Management & Sustainability**

### **22 Future connection to District Energy Network:**

- Submission of Energy Plan for approval by LPA
- Ensure the scheme is designed to take heat supply from the proposed DEN (including submission of DEN Feasibility Study) ,
- Design of the DEN and approval of details at design, construction and commissioning stages (but no design elements will be required which did not form part of the planning application).
- Use reasonable endeavours to negotiate a supply and connection agreement with the proposed DEN within a 10-year window from the date of a permission subject to a DEN Feasibility Study.
- Collaborate with the LPA to deliver a future connection point from the site
- All DEN provisions will be subject always to any other agreed commercial terms between the Council and Developer

### **23 Carbon offsetting:**

Payment of an agreed carbon offset at £90 per tonne over 30 years (£2,700) where individual Plots do not fully meet net zero carbon on-site; (residential & non-residential);



### **Telecommunications**

#### **24 Ultrafast broadband infrastructure**

connections to be provided.

### **Construction**

#### **25 Construction Partnership:**

A partnership agreement with the London Borough of Haringey for Construction of the Development;

#### **26 Commitment to Considerate Constructors Scheme.**

### **Monitoring**

#### **27 Monitoring costs**

5% of the financial contribution total & £500 per non-financial contribution.

#### **28 Design**

- Architect Retention – Local Planning Authority agreement – All Plots
- Architectural competition to design building E

### **Implementation**

#### **29 Existing permissions:**

Supplemental S106 shall be entered into prior to approval of any Reserved Matters Applications on the THFC plots which confirms that the obligations in THFC's existing s106 agreements are carried forward to apply to the new HRW permission on those specific plots, unless otherwise agreed with LBH. LBH will agree not to grant RMAs for these sites until these agreements have been entered into. The s106 agreement will confirm that these sites will not be bound by the main obligations under the s106 agreement.

#### **30 Third Party Land**

In the event that any third party land within the redline is acquired by the Developer there will be an obligation for the Developer to enter into a supplemental deed to the section 106 confirming that such land is bound by the above obligations .

### **Highways**

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

Highway works to be carried out by Developer

Agreement(s) shall secure:

- 1) public realm improvements listed above
- 2) highway improvements works to:
  - a. Whitehall Street East;
  - b. Whitehall Street West;
  - c. Moselle Street;
  - d. Tottenham High Road Works;
  - e. Love Lane;
  - f. Brunswick Square;
  - g. William Street; and
  - h. construct of a new site access from Tottenham High Road

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### **APPENDICES:**

- Appendix 1: Images of the site and proposed scheme
- Appendix 2: Internal and External Consultee representations
- Appendix 3: Neighbour representations
- Appendix 4: Mayor of London Stage 1 Report (7 February 2022)
- Appendix 5: Planning Sub-Committee Minutes (25 October 2021)
- Appendix 6: Development Management Forum (13 October 2021)
- Appendix 7: Quality Review Panel Report (27<sup>th</sup> June 2018)
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- Appendix 12: Quality Review Panel Report (2<sup>nd</sup> March 2022)
- Appendix 12: Plans and Documents List
- Appendix 13: Planning Conditions

### 3. PROPOSED DEVELOPMENT AND SITE LOCATION DETAILS

#### Proposed Scheme

- 3.1 The is a 'hybrid' application (part full,part outline) where full planning permission is sought for Plot A for the demolition of 100 Whitehall Street and Whitehall and Tenterden Community Centre and the erection of two 5-6 storey buildings containing 60 affordable dwellings and associated open space.
- 3.2 Outline planning permission is sought, for the demolition of existing buildings and the creation of a mixed-use development comprising up to 2,869 residential dwellings (Use Class C3) and at least 7,225 sqm commercial, business & service (Use Class E), leisure (Use Class E), community uses (Use Class F1/F2), and Sui Generis uses together with creation of a new public square of at least 3,500 square metres, creation of a new public park of at least 5,300 sqm & associated access, parking, and public realm works. Matters of appearance, landscaping, layout and scale are reserved for subsequent approval (reserved matters) and detailed approval is sought for matters of access.

Table 1 below sets out the minimum and maximum floorspaces, for each use class, as set out in the development specification.

Total floorspace	Floorspace
Detailed Element	
Residential	6,788 sqm (GIA)
Outline Element	
Residential	235,000 – 280,000 sqm (GEA)
Use Class B2: Industrial	0 – 7,000 sqm (GEA)
Use Class B8: Industrial	0 – 1,000 sqm (GEA)
Commercial (Use Class E)	6,025 sqm – 22,000 sqm (GEA)
Use Class E (a): Retail other than hot food	4,000 – 7,800 sqm (GEA)
Use Class E (b): Sale of food and drink mainly for consumption on premise	
Use Class E (c): Commercial,	

professional (other than medical) or financial services	
Use Class E (d): Indoor sports, recreation or fitness	500 – 4,000 sqm (GEA)
Use Class E (e): Medical or healthcare	0 – 1000 sqm (GEA)
Use Class E (f): Creche, day nursery or centre	0 – 2,000 sqm (GEA)
Use Class E (g): offices for operational or administrative functions, R+D of Products or processes, industrial processes	1,525 – 7,200 sqm (GEA)
(Use Class F)	1,000 – 6,000 sqm (GEA)
Use Class F1 (d): Public Libraries or reading rooms	500 – 3,500 sqm (GEA)
Use Class F1 (e): Public halls or exhibition halls	
Use Class F2 (b): local community halls	500 – 2,500 sqm (GEA)
Sui Generis Use Class	200 – 8,300 sqm (GEA)
Energy Centre	200 – 1,800 sqm (GEA)
Public House	0 – 3000 sqm (GEA)
Sub Station	0 – 500 sqm (GEA)
Cinema	0 – 3,000 sqm (GEA)
Total	252,907 – 339,300 sqm (GEA)
A minimum floorspace of 4,686sqm GEA will be delivered either as B2, B8 or E(g i, ii or iii) consistent with the Minimum and Maximum floorspace areas for these uses	

## **The proposed illustrative layout**

- 3.3 The submission is accompanied by an illustrative layout which provides a potential way that the outline part of the site could be development within the submitted control documents (the parameters plans, design code and development specification). The illustrative scheme does not represent the maximum development for which planning permission will be granted, but illustrates how it could come forward within the parameters and design code proposed.
- 3.4 The southern part of the site centres on a new public square (Moselle Square) linking White Hart Lane Station to the West to the New Tottenham Hotspur Stadium to the east. East to West connections, across the railway line are provided by Whitehall Street and White Hart Lane. Coombes Lane, Love Lane and William Street provide north-south links from Brereton Road/ Orchard Place to White Hart Lane. The layout carries through a perimeter block arrangement.
- 3.5 The northern part of the site centres on the proposed Peacock Park. Pickford Lane, to the northern most fringe, runs adjacent to Peacock Park, linking High Road to Canon Road. The sidings and Grange Street run in close proximity to the railway, providing a circular link from White Hart Lane to Parkside West. The layout broadly forms a perimeter block layout.
- 3.6 The illustrative masterplan layout includes the existing depot and goods yard extant planning permissions HGY/2018/0187 and HGY/2019/2929 and the Printworks application (ref HGY/2021/2283) that has a resolution to grant planning permission, insofar as they are located within the application site, to enable the option of simultaneous delivery of each scheme. The recently refused Depot and Goods Yard application (ref HGY/2021/1771) has not been incorporated into the illustrative masterplan layout.
- 3.7 Overall, the indicative masterplan delivers 2,612 new homes (including 916 affordable dwellings), capacity for 3-10% accessible parking spaces, parking for returning Love Lane residents, 40% family sized units (2 bedroomed, 4 person plus dwellings), over 12,922 sqm of commercial floorspace (including a minimum of 4,686 square metres of new employment space and over 4,900 square metres of new retail floor space), over 2,977 sqm of community space is proposed along with a minimum of a 5,300 square

metre park (Peacock Park) and a minimum of 3,350 square metre civic square (Moselle Square) as part of an overall 42,100 sqm of publicly accessible open space (figure 1).

- 3.8 In respect to building scales, the proposed masterplan envisages building heights increasing from 2-3 storey level at High Road to up to 29 storeys adjacent to the railway line with scale decreasing towards White Hart Lane. The illustrative development density is 337 dwellings/ 945 habitable rooms per hectare and an average open space provision of 16.2 square metres per dwelling.
- 3.9 The illustrative scheme delivers 48 on-plot parking spaces, 10 on-street parking spaces and 31 basement car parking spaces, 4,792 long stay, 485 short stay and 134 on street cycle parking spaces. The vehicle parking is to be provided for returning Love Lane residents alongside disabled parking bays.

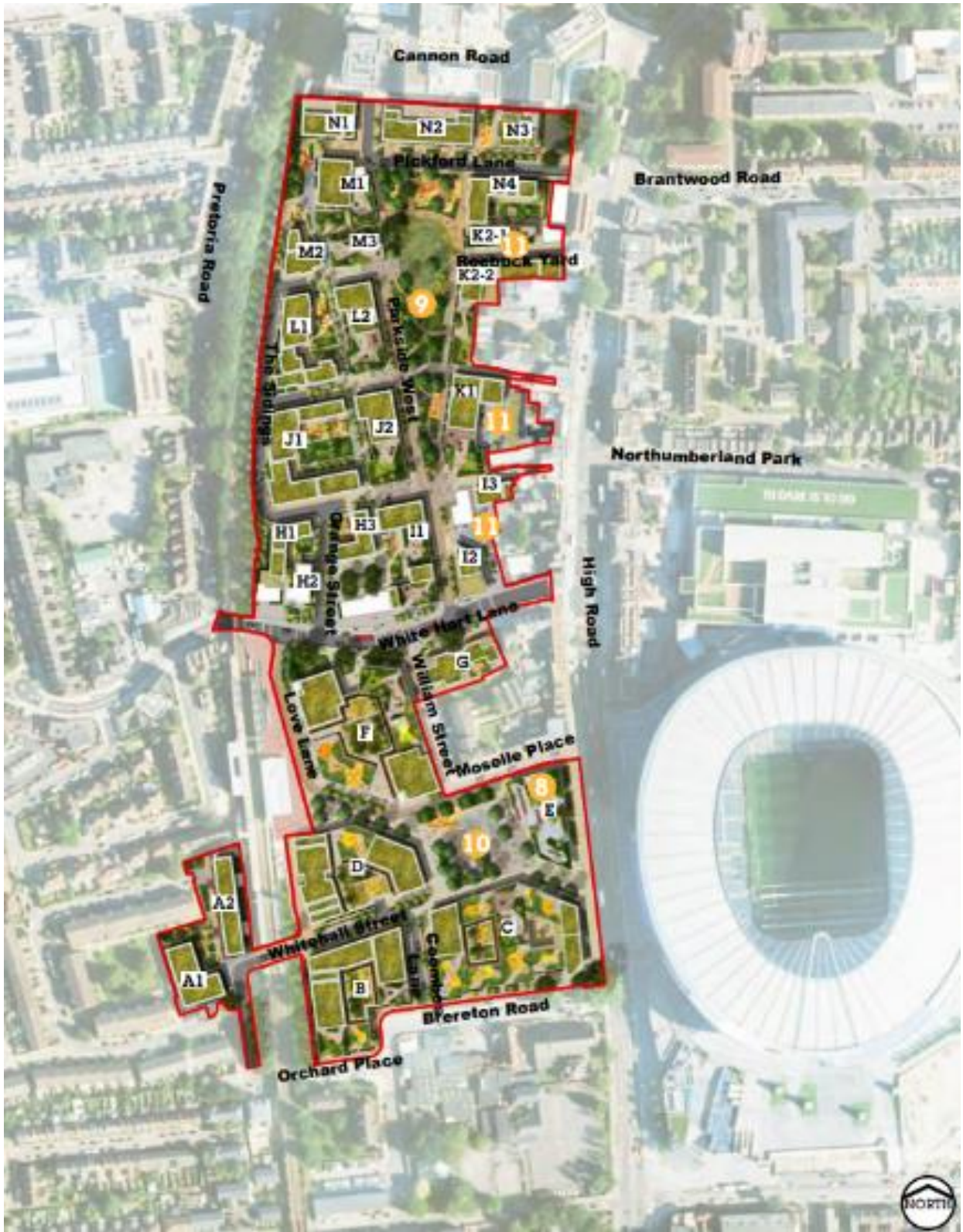


Figure 01: The proposed Illustrative Masterplan.



- 3.10 All existing vehicular, cycle and pedestrian access points are proposed to be retained and enhanced with increased permeability through the site on the north-south and east-west axis.
- 3.11 The illustrative masterplan layout concentrates commercial and community uses towards Moselle Square, White Hart Lane, High Road and Peacock Park, mostly as part of mixed use buildings, creating active frontages at street level. This includes blocks C, D, E, F, G, H1, H2, H3, I1, I2, I3, K1, K2-1, K2-2, M3 and N4. Residential uses are focused on the upper floors of mixed-use buildings and residential only blocks to the south, west and north/north west of the site. Residential only blocks include the detailed part of the permission (A1 and A2), B, J1, J2, L1, L2, M2, M1, N1, N2 and N3.
- 3.12 Based on the most up-to-date GLA Population Yield Calculator, the estimated future resident population once the proposed scheme is completed would be 6,410 people. The applicant expects the proposed scheme to be delivered over a ten-year construction period starting in 2022 as set out in the proposed illustrative phasing plan Figure 2 and Table 02 below. The expected on-site population would increase incrementally over this period.

Figure 2: Proposed illustrative phasing plan.



Key (Not for Approval)

- |   |  |  |  |
|---|--|--|--|
|  Hybrid Planning Application Boundary                                |  Phase 1 - Plots A, G and Low Lane (2022 - 2024)          |  Phase 4 - Plots M2, L1, L2, H1, H2, H3 (2022 - 2024)                               |  Phase 7 - Plots K1, J2 and remaining portion of Peacock Park (2025 - 2029) |
|  Existing buildings, associated structures and spaces to be retained |  Phase 2 - Plot D and F (2025 - 2026)                     |  Phase 5 - Plots M1, N1, N2, N3, N4 and upper portion of Peacock Park (2023 - 2026) |  Phase 8 - Plots I1, I2 and I3 (2027 - 2029)                                |
|   |  Phase 3 - Plots B, C, E and Howells Square (2026 - 2027) |  Phase 6 - Plot K2, N3, L2 and portion of Peacock Park (2026 - 2028)                |  |

Table 02: Proposed illustrative phasing Plan

	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032
Phase 1: Plots A, G and Love lane	■	■	■								
Phase 2: Plot D and F		■	■	■	■	■	■				
Phase 3: Plot B, C, E and Moselle Square			■	■	■	■	■	■	■	■	■
Phase 4: Plot M2, L1, L2, H1, H2, H3	■	■	■								
Phase 5: Plot M1, N1, N2, N3, N4 and upper Peacock Park		■	■	■	■						
Phase 6: Plot K2, M3, L2 and Peacock Park					■	■	■				
Phase 7: Plot K1, J2 and rest of Peacock Park					■	■	■	■			
Phase 8: Plot I1, I2 and I3						■	■	■			

- 3.13 The proposed development falls within the scope of Paragraph 10B “Urban Development Projects” to Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. As such, it represents ‘EIA development’ and is accompanied by an Environmental Statement (ES). Regulation 3 prohibits the Local Planning Authority (LPA) from granting planning permission without consideration of the ‘environmental information’ that comprises the ES, any further information and any representations made by consultation bodies or by any other person about the environmental effects of the proposed development. The scope of the ES reports on an assessment of the potential cumulative effects of the proposed development.

### **The Site and Surroundings**

- 3.14 The application site is a circa 8.57 - hectare ‘L’ shaped parcel of land, comprising the Goods Yard and the Depot to the north of White Hart Lane and the Love Lane Estate to the south of White Hart Lane. The detailed part of the site comprises Whitehall and Tenderden Community Centre and Whitehall Lodge (no. 100 Whitehall Street). The outline part of the application site includes the site areas for the existing Goods Yard and Depot Site extant consents (references HGY/2018/0187 and HGY/2019/2929).

#### *Detailed part of the site -Whitehall and Tenderden Community Centre and Whitehall Lodge*

- 3.15 Whitehall and Tenderden Community Centre is a single storey, metal clad, community building located on the western side of the railway line. The building has seven off-street parking spaces to the south and is accessible via Whitehall Street. Whitehall Lodge is a brick built, three storey flat block that currently provides temporary emergency accommodation. To the south of the building is a fenced in grass verge and there is low level planting and boundary treatments onto the shared Headcorn and Tenderden garden square (figure 3).



Figure 3. Outline part of the site

3.16 The outline part of the site is located between the railway to the west, High Road (A1010) to the east, Cannon Road to the north and Brereton Road/ Orchard Place to the south. The site is bisected east-west by Whitehall Street in the south and White Hart Lane in the centre. The eastern part of the site is located in North Tottenham Conservation Area. There are several listed and locally listed buildings within and in close proximity of the application site.

### *South of White Hart Lane*

- 3.17 The southern part of the site is predominantly occupied by the Love Lane Estate. The 1960's estate provides 297 homes across 3 Y shaped, 9-10 storey blocks and several other 4 storey blocks with associated open space and parking areas. The estate is bounded to the west by Love Lane, the rail station and the rail line, to the east by terraced buildings, in mixed commercial and residential use, that front High Road. The southern part of the site includes Coombes Croft Library together with several other commercial properties fronting High Road. The site also includes the locally listed former Whitehall Tavern Public House (No.759 High Road); No. 743-757 High Road (odd), and electricity substation (adjoining the library).

### *North of White Hart Lane*

- 3.18 The northern part of the site is characterised by industrial and commercial buildings located within the Peacock and Carbery Industrial Estates. A large, two storey B&M store and a block of 5 smaller retail units, with associated parking, occupies the northern-most part of the site. No. 859-863 High Road, a Grade II Listed building, is partially within the north-eastern part of the site. Peacock Industrial Estate is located in the centre of the northern part of the site and includes a range of buildings and uses including car servicing businesses, a wood spraying facility, electrical repair shop and small construction companies. The site accommodates, a large retail store, currently occupied by B&M Home Store, five small retail units and a surface level car park (figure 4). Part of the High Road frontage is located within the North Tottenham Conservation Area.
- 3.19 There are two large London plane trees on the eastern part of the site, near the High Road (one on the northern boundary and one close to No. 869) and two other large London plane trees in the High Road footway. There are a number of other smaller less noteworthy trees on the site and immediately to the west in the railway embankment.
- 3.20 To the east, there are existing homes to the rear of Nos. 841-843 High Road, the La Royale Banqueting Suite (which is located at 819-821 High Road (Grade II Listed) and extends into the Site) a church (International Ministries for the Living Word) and the former pastor's house on Chapel Place (locally listed).
- 3.21 The site falls from west to east towards High Road and towards White Hart Lane. Site levels vary between 11m Above Ordinance Datum at its lowest point in the south-eastern corner to 15.5 metres at its highest point, adjacent to the railway line to the north-west.



Figure 4: Aerial view of the application site in its context.

### *Heritage Assets*

3.22 Parts of the site are located within North Tottenham Conservation Area and there are several listed buildings immediately adjacent to the site including the Grade II listed no.7 White Hart Lane, no. 797 and 799 High Road, no.867 and 869 High Road and on the opposite side of High Road is the Grade II\* listed Dial House, Percy House and 808-810 High Road along with the Grade II listed nos. 792 – 794, nos. 798 – 802 and nos. 816 – 822 High Road. There are several other designated and non-designated heritage assets in proximity to the site (figure 5).

Figure 05: ES Appendix 11.1 (Heritage Assets Plan)

### *Accessibility*

3.23 The Public Transport Accessibility Level (PTAL) varies across the site. Ranging from 3 - 5. White Hart Lane Station is located immediately adjacent to the western boundary. There are several bus routes in the vicinity of the site that stop along High Road

(A1010), White Hart Lane and Northumberland Park. Cycleway 1 is located circa 400 metres to the south of the site.

- 3.24 The site is adjacent to part Cycle Superhighway 1, which runs from Old Street to the Stadium, well served by bus services (Routes 149, 259, 279, 349 and N279) on the High Road) and is adjacent to White Hart Lane Overground Station and the W3 bus route on White Hart Lane. It is within the Tottenham North Controlled Parking Zone (CPZ) and the Stadium Event Day CPZ.



## Existing Land Uses

3.25 Table 04 below sets out the existing uses on the site.

Use (Use Class)	Existing Floorspace (GIA)
B2: Industrial	9,818
B8: Industrial	864
<b>Total B Class Use</b>	<b>10,682</b>
C3: Residential	31,109
C2: Institutional Accommodation	879
<b>Total C Class Use</b>	<b>31,998</b>
E (a) Retail other than hot food	8,236
E (b) Sale of food and drink mainly for consumption on premise	3,759
E (e) Medical or healthcare	818
E (g) Offices	1,627
<b>Total E Class Use</b>	<b>14,400</b>
F1 (d) Public Library	455
F1 (f) Public places of worship	595
F2 (b) Local community halls	1,023
<b>Total F Class Use</b>	<b>2,073</b>
Sui Generis (Public House)	1,086
Sui Generis (Sub Station)	86
Sui Generis	1,172
<b>Total</b>	<b>60,355</b>

## Surroundings

3.26 Immediately to the north of the site is the Cannon Road housing scheme, which was built on the site of the former Cannon Rubber Factory in 2014/15. It comprises four residential buildings, which from west to east are: River Apartments (part 22/part 23-storeys – 86.2m AOD), Mallory Court (6-storeys) which backs on the application site, Ambrose Court (9-storeys) and Beachcroft Court (part 4/part 5-storeys), which includes the Brook House 2FE Primary School on the ground and first floors. Cannon Road itself splits in to two north-south cul-de-sacs. The eastern arm of Cannon Road includes a games/outdoor learning space that is connected with the school.

3.27 Further to the north, in the London Borough of Enfield, is the Langhedge Lane Industrial Estate and the Joyce and Snells Estate, where Enfield Council is intending to bring forward an estate renewal scheme comprising approx. 1,992 homes and associated social infrastructure and open space.

- 3.28 To the east is the High Road which comprises a range of three to four-storey buildings. Most of the buildings on the eastern side of High Road have a commercial element at ground floor level with housing/ ancillary uses on the upper floors. Beyond High Road, to the east, are the residential streets based around Brentwood Road and the Tottenham Hotspur Stadium and associated facilities.
- 3.29 To the west of the site is White Hart Lane Train Station and associated Overground Line. Beyond are predominantly residential terraced buildings on Pretoria Road, Penhurst Road and Tenterden Road along with various community and commercial uses off Creighton Road and White Hart Lane.
- 3.30 To the South of the site is the St Francis de Sales Church and Junior School with the residential buildings fronting Orchard Place, Whitehall Street and Tenterden Road.

### **Relevant Planning and Enforcement History**

#### *The site*

- 3.31 Goods Yard – Temporary planning permission (HGY/2015/3002) was granted in February 2016 for a period of three years for the Goods Yard to be used as a construction compound associated with the new stadium.
- 3.32 Goods Yard - Planning permission (HGY/2018/0187) was granted on appeal, against non-determination, in June 2019 for a residential-led mixed use redevelopment comprising up to 316 residential units, 1,450sqm of employment (B1 use), retail (A1 use), leisure (A3 and D2 uses) and community (D1 use) uses.
- 3.33 Depot – Planning permission (HGY/2019/2929) and Listed Building Consent (HGY/2019/2930) were granted in September 2020 for the conversion of Nos. 867-869 High Road and redevelopment of the rest of the site for a residential led mixed-use scheme with up to 330 residential units (class C3), 270sqm of retail/café use (Use Class A1/A3), area of new public open space, landscaping and other associated works.
- 3.34 Goods Yard - Planning permission (HGY/2020/3001) granted in March 2021 for ground works to facilitate the temporary use (18 months to September 2022) for car parking (approx. 415 spaces).
- 3.35 High Road West (the application site) (HGY/2021/2960) and EIA Scoping Opinion in relation to the proposals (superseded by the submission of the application)
- 3.36 Goods Yard and Depot – Hybrid planning application (HGY/2021/1771) was refused and currently subject to appeal for a residential-led mixed use redevelopment comprising of up to 869 residential units.

- 3.37 The Printworks (Nos. 819-829 High Road) – current planning (HGY/2021/2283) and Listed Building Consent (HGY/2021/2284) applications for the demolition of 829 High Road; change of use and redevelopment for a residential-led, mixed-use development comprising residential units (C3), flexible commercial, business and service uses (Class E) and a cinema (Sui Generis). The application has a Planning Sub Committee resolution to grant.
- 3.38 Goods Yard and Depot - Revised Hybrid planning application HGY/2022/0563 submitted 24/02/2022.

#### *The wider area*

- 3.38 807 High Road – Planning permission granted in September 2021 (HGY/2021/0441) for the demolition of the existing buildings and the erection of a replacement building up to four storeys to include residential (C3), retail (Class E, a) and flexible medical/health (Class E, e) and office (Class E, g, i) uses; hard and soft landscaping works including a residential podium; and associated works.
- 3.39 Northumberland Terrace – Planning permission (HGY/2020/1584) and Listed Building Consent (HGY/2020/1586) granted in April 2021 for the erection of a four-storey building with flexible A1/A2/A3/B1/D1/D2 uses and change of use and alterations and extensions to a number of existing buildings (Nos. 799 to 814 High Road).
- 3.40 White Hart Lane Station – Planning permission (Ref: HGY/2016/2573) granted in November 2016 for a new station entrance, ticket hall, station facilities and station forecourt (completed).
- 3.41 Northumberland Development Project – Planning permission (HGY/2015/3000) and Listed Building Consent (HGY/2015/3000) granted in April 2016 for demolition of existing buildings, works to Warmington House and comprehensive phased redevelopment for a 61,000 seat stadium, with hotel (180-bed plus 49 serviced apartments), Tottenham Experience (sui generis), sports centre (Class D2); community (Class D1) and/or offices (Class B1); 585 homes; and health centre (Class D1) – towers up to 36-storeys.
- 3.42 Former Cannon Road Rubber Factory – Planning permission (HGY/2012/2128) granted In February 2013 for 222 residential units, a 2-form entry primary school and three commercial units (including a 22-storey tower) and subsequent approval of details. The development was completed in 2015.
- 3.43 The illustrative masterplan and proposed parameters plans, that accompany the submission allow for the consented developments, within the application site area, to take place, independently of the remainder of the proposed High Road West development.

## **Consultation and Community Involvement**

- 3.44 The applicant's Statement of Community Involvement (SCI) sets out that the proposal has been supported by extensive community and key stakeholder consultation. This includes during the consultation stages of the High Road West Masterplan (2014). The 2013 consultation received 435 feedback forms (207 from Love Lane residents, 70 from Local Businesses and 158 from residents from the wider community and 10 organisational responses). The consultation identified option 3 as the preferred option. The 2014 consultation received 292 feedback forms including 130 from Love Lane Residents, 38 from Local Businesses, 104 from residents in the wider community and 35 anonymous comments. The consultation established the preference for key principles of the masterplan including, but not limited to, the demolition of the Love Lane Estate, all homes should have access to amenity space, the provision of a community hub, a new public square and a more accessible station.
- 3.45 Between March and May 2017, a six week, S105 consultation event including information pack provision, feedback form (electronic and postal), drop in sessions and home visits was held with Love Lane residents about future housing in the estate area. Further consultation regarding development in the area took place as part of the Tottenham Area Action Plan (AAP) and development of the applicants Masterplan.
- 3.46 The proposal is required to comply with the Mayor's Good Practice Guide to Estate Regeneration 2018 which requires full and transparent consultation and involvement.
- 3.47 The applicant's masterplan stage 0 consultation involved distribution of over 24,000 letters and flyers, 37 one-one and group meetings, 7 information drop in sessions, 9 pop up events, 1 drop in exhibition, 1 community fun day and 1 walk and talk event. Safety, security, youth/family orientated community facilities, parking transport and scale and massing of buildings were concerns amongst participants and new homes, employment and retail uses were welcomed. The feedback received then translated into the applicant's masterplan.
- 3.48 The stage 1 engagement involved the distribution of 13,078 masterplan packs, flyers and letters, 172 telephone calls with Love Lane residents, 4 virtual presentations, 3,000 feedback forms distributed and 2 live question and answer sessions between February and April 2021. Residents were positive about the open spaces but wanted to see more greenery and a reflection of local identity, concerns remained about safety and provision of facilities for families and children. Residents wanted choice on home design and clarity on open space access and moving arrangements.
- 3.49 Stage 2 engagement involved over 1,000 workshop invitations/ reminders being sent, 49 stakeholder emails being sent, 3 design workshops, 3 one-one meetings with stakeholders and 3,194 workshop flyers being distributed. Participants agreed with a shift to sustainable transport but felt parking should be distributed throughout, CCTV was seen as a must, management was seen as an important contributor to safety, event and

play spaces and community buildings were supported by residents. Residents were supportive of sensitively designed modern buildings. Residents were positive about employment and retail uses but did not extend positivity to drinking establishments.

- 3.50 Stage 3 engagement (August to September 2021) involved 3,500 masterplan packs and flyers being distributed, 564 emails sent to the mailing listed, 2 drop in sessions, 2 one-one meetings, 1 business drop in session and a community fun day. Feedback provided on the Whitehall Mews included concerns on amenity of surrounding residents, opportunities to improve the area were highlighted.
- 3.51 An independent ballot was run during August and September 2021. 203 votes were cast by the closing date of 6 September 2021, representing a 69.4% turnout for Love Lane residents 55.7% voted in favour of the proposal for the regeneration of the Love Lane Estate as part of the High Road West scheme.
- 3.52 The emerging proposals were considered by Haringey's Quality Review Panel (QRP) on the 27 June 2018, 30 January 2019, 28 April 2021, 23 June 2021, 17 September 2021 and the application scheme was considered by the Panel on 2<sup>nd</sup> March. The QRP Reports following these reviews are attached as **Appendices 7 - 11**.
- 3.53 Emerging proposals were presented at a Development Management (DM) Forum on 13 October 2021. A summary of responses from the Forum are attached as **Appendix 6**.
- 3.54 Throughout the planning application process the applicant has continued to engage with the local community including hosting business breakfast, hosting of public exhibitions, drop in sessions, the creation of a dedicated High Road West website, facilitation of site visits, publication of newsletters. The findings of these consultation exercises include an interest in development phasing, a desire for regular update sessions, desire to forge a relationship with the construction liaison officer, management of the site, sunlight/daylight impacts, fire safety, security, event management and construction management. The applicant envisages the delivery of a series of public information sessions, if planning permission was to be forthcoming
- 3.55 The application was also presented to Planning Sub Committee members at pre-application stage on the 25<sup>th</sup> of October 2021. The Committee sought clarification on affordable housing provision, the potential for the provision of a bridge over the railway and the density of the proposed development. The Committee welcomed the size of the social rent units and the provision of 3-4 bedroomed units.
- 3.56 The application seeks to address the issues raised at pre-application stage through the submission of a comprehensive suite of supporting documents that includes, but is not limited to, parameters plans, a design code, a development specification and an affordable housing statement.

## 4 CONSULTATION RESPONSE

4.1 The following were consulted regarding the applications:

### Internal Consultees

- LBH Building Control
- LBH Carbon Management
- LBH Conservation Officer
- LBH Design Officer
- LBH Drainage
- LBH Ecology
- LBH Education (School Places Planning)
- LBH Housing
- LBH NHS Haringey
- LBH Planning Policy
- LBH Pollution
- LBH Tottenham Regeneration
- LBH Transportation
- LBH Tree Officer
- LBH Waste Management

### External Consultees

- Affinity Water
- Arriva London
- Brook House Primary School (Head Teacher)
- Enfield (London Borough of)
- Environment Agency
- Georgian Group
- Greater London Authority
- Greater London Archaeology Advisory Service (GLAAS)
- Historic England
- London Overground
- London Fire Brigade
- Mayor's Office for Policing and Crime
- Metropolitan Police - Designing Out Crime Officer
- National Grid
- National Planning Case Unit (EIA Development)
- Natural England
- Network Rail
- Newlon Housing Association

- NHS Clinical Commissioning Group
- Residents Associations (Cannon Road RA, Headcorn, Tenterden, Beaufoy & Gretton RA, Northumberland Park RA, Love Lane Residents Association & Love Lane RA (TAG))
- Sport England
- Thames Water
- Tottenham Civic Society
- Tottenham CAAC
- Transport for London
- Tree Trust for Haringey
- UK Power Networks
- Waltham Forest (London Borough of)

4.2 An officer summary of the responses received is below. The full text of internal and external consultation responses is contained in **Appendix 2**.

Internal:

**Building Control** – The principles in the outline Basement Impact Assessment and Fire Safety Statement are correct. Detailed statements will be required at reserved matters stage.

**Carbon Management** – The proposal is considered to be acceptable subject to conditions requiring compliance with the energy statement for plot A, securing the implementation of the energy efficiency measures, securing registration on the GLA's energy monitoring platform, requiring the submission of an overheating assessment for plot A and requiring compliance with boiler specifications. Conditions are also recommended for the outline part of the site to include an energy strategy to be submitted at reserved matters stage, compliance with the approved energy strategy, the submission of an overheating assessment at reserved matters stage, the provision of details of living roofs/walls, the submission of a BREEAM design stage accreditation certificate, circular economy statements and post completion reports and whole life carbon assessment. It is also recommended that sustainability reviews, commitments to upload be seen data, deferred carbon offsetting and DEN connection is secured by legal agreement.

**Conservation Officer** – 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 schemes respect and positively respond to neighbouring heritage assets.

The tallest elements of the new development dominate to various degrees in the background of currently undeveloped, or modestly developed views towards the development site as experienced from various standpoints including Bruce Castle Park, from White Hart Lane, along the High Road, as well as from Northumberland Park and from the north entrance into 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** – The proposal has ambition to create a new neighbourhood of excellent design and living conditions, supporting a vibrant new town centre that contributes to positive change in North Tottenham. This includes new public realm, a park, civic square and landmark buildings. Satisfied that the proposal can be a vibrant town centre and a pleasant place to live.

**Planning Policy** – 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.

**Ecology Officer** – No comment received

**Lead Local Flood Authority** – Satisfied with the outline part of the scheme subject to conditions relating to surface water drainage and its management and maintenance, the Flood Risk Assessment, calculations, drawings, management and maintenance plan detailed part of the scheme are acceptable

**Pollution** – No objection, subject to conditions on Land Contamination, Unexpected Contamination, NRRM and Demolition/Construction Environmental Management Plans, Air Quality Assessment and details of the Combined Heat and Power Facility and gas boilers.

**School Places Planning** – We are satisfied that there is sufficient school capacity.

**Transportation** – No objection subject to further details and conditions.

**Tree Officer** – I mostly concur with the findings of the Arboricultural Impact Assessment. The provision of 236 new trees will mitigate the proposed loss at a 4:1 ratio. There are some inconsistencies between the landscape masterplan and the Arboricultural Impact



Assessment that will need to be addressed by condition. An Arboricultural methods statement, landscape plan/ specification will need to be conditioned.

**Waste Management** – The bin provision for plot A are in line with adopted guidance however there is a preference for 1 x 140 litre food waste bin per 10 units) (3 bins in place of the 360 litre bin proposed). The swept path analysis will need to more clearly show that refuse collection vehicle reversing and has been limited and suitable turning space is available. The indicative bin store locations for the outline part of the scheme are 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 stores should be designed to provide 1 week storage capacity despite the fact that commercial contractors can collect up to twice daily.

External:

**Enfield** (London Borough of) –No comment received.

**Environment Agency** – No objection subject to conditions.

**Greater London Archaeological Advisory Service** – No objection subject to conditions relating to written scheme of investigation, building recording, foundation design and a scheme of heritage interpretation, landscaping and display.

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

**Haringey Cycling Campaign** – The proposed cycle routes should be clearly marked and legible in the interest of vehicle, pedestrian and cyclist safety and in accordance with latest guidance. The open space should be more generous.

**London and Middlesex Archaeology Society** – There is concern about the scale and loss of locally listed buildings and that the losses are greater than normally acceptable but acknowledge that this is the direction of travel. Greater consideration could have been given to relocation/ retention of such buildings. In the event there is no advantage gained by retaining the assets they ask for HE level 2 (preferably 3) recording.

**London Fire Brigade** – The proposed fire fighting access arrangements appear to meet our requirements.

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

**National Planning Casework Unit** – No comments on the Environmental Statement.

**Natural England** –We are satisfied that the impacts on the Epping Forest Special Area of Conservation and underpinning Site of Special Scientific Interest can be appropriately mitigated with a SANGS financial contribution.

**Network Rail** – Comments in relation to works next to the railway (Demolition, Scaffolding/Plant & Materials, Access to and from the Station, Track Support Zone, Buried Services, Unauthorised Access, Overhead Line Equipment and Site Layout) and the Impact of Noise and Dust on Railway Operations.

**NHS Clinical Commissioning Group** – Tottenham Health Centre (759 High Road) is proposed to be demolished. The parameters plans include the provision of a 0 – 1000 square metres of floorspace in use class E(e). A replacement healthcare centre will need to be secured by legal agreement as well as a £3,073,120 financial contribution towards meeting the intensified healthcare demand resulting from the development. There should be a mechanism to monitor and evaluate the construction and operational impacts and mitigation measures.

**Rail for London** – No objection subject to a condition requiring detailed design, methods statements and risk assessments for each stage of development prior to the development commencing.

**Sport England** – The development should contribute towards meeting the demand for sports facilities generated by the development through on-site and/or improving off site capacity.

**Thames Water** – Waste - no network infrastructure capacity objections in relation to foul water and surface water. Request for conditions to safeguard water mains and other underground water assets and delivery of necessary essential water infrastructure to support the development.

**Transport for London** –The proposed parking strategy is considered to be acceptable. The applicant is encouraged to make improvements under the bridge along Whitehall Street. The safeguarding of a future links is welcome. Impacts of the proposed link from the station to the stadium will need to be designed to avoid adverse impacts on bus stop T. Wayfinding should be provided throughout the site. There are some aspects of the bus and trip generation figures that need clarifying/ amending. Notwithstanding this, 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. Detailed travel plans, CEMP's, waste management strategy, car club provision, electric charging points, returning residents parking, a parking management plan and cycle parking should be secured by planning condition and/or legal agreement.

**Waltham Forest** (London Borough of) - No comment received.

**Mayor of London** – The Mayor’s Stage 1 Report raises no objection subject to the following matters being addressed:

- Estate regeneration: The scheme would ensure the like for like replacement of existing affordable housing and the right to return for all social rent households. The approach to leaseholders and public consultation would comply with the Mayor’s key principles on estate regeneration. Therefore, the comprehensive redevelopment of the estate could be supported in this case, subject to the maximum viable level of affordable housing provision being secured.
- Land use principles: the comprehensive residential-led mixed use redevelopment of the site accords with the expectations set out in the Local Plan site allocation and is supported in strategic planning terms, subject to further discussion and clarification regarding the provision of employment and social infrastructure use and means of securing this.
- Housing and affordable housing: The applicant’s Financial Viability Assessment (FVA) is being scrutinised to ensure the scheme is providing the maximum viable level of affordable housing. Early, mid and late stage viability review mechanisms will be required. Affordability levels on intermediate housing should be secured.
- Urban design: The design and layout is strongly supported and is aligned with the High Road West Masterplan Framework. The density is supported, noting the design-led approach undertaken. The residential quality is acceptable.
- Tall buildings: The height and massing proposed can be supported in this plan led location and the scheme would overall comply with the qualitative criteria set out in London Plan Policy D9 in respect of visual, heritage, functional, environmental and cumulative impacts. The architectural and materials quality of tall buildings should be of an exemplary standard.
- Heritage impact: The harm to heritage assets would be less than substantial. This would be clearly and convincingly outweighed by the public benefits proposed by the application.
- Transport: Updated bus trip generation figures should be provided to enable officers to fully assess the impact on bus capacity and clarify whether any mitigation is required. Conditions should secure further details regarding car parking, cycle parking and Road Safety Audits.
- Climate change: The approach to energy, drainage and urban greening is generally acceptable, subject to conditions and obligations.

The full Stage 1 Report is attached as **Appendix 4**. These issues are addressed in the relevant section of the report.

## 5 LOCAL REPRESENTATIONS

5.1 On 18/11/2021, notification was sent to the following:

2,892 Letters to neighbouring properties  
13 site notices erected in the vicinity of the site

5.2 A further consultation was carried out following the submission of revised information on 03/02/2022 notification was sent to the following:

3,165 Letters to neighbouring properties  
10 site notices erected in the vicinity of the site

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

No of individual responses: 269  
Objecting: 259 (including Cannon Road Residents' Association and Love Lane Residents' Association and 17 individuals).  
Others: 6.

5.4 Further details of neighbour representations and the officer response are set out in **Appendix 3**.

5.5 The main issues raised in representations from adjoining occupiers on the scheme as originally submitted are summarised below.

Objections:

- The loss of local businesses
- The proposed development does not re-provide Use Class B2 space for the industrial business that will be lost
- The loss of existing affordable homes not being accounted for in the provision of affordable housing and a lack of affordable housing provided overall.
- Loss of parking for attending match days
- Adverse impact on congestion and traffic due to influx of residents
- There will be a greater strain on local services and transport due to the number of units proposed
- The development brings no benefits to the local community
- The development results in the loss of local jobs for local people

- The proposed blocks are too tall
- The loss of homes for local landlords and tenants
- Impact on neighbour amenity on match days
- Provides too many flats
- Loss of the GRACE fellowship
- The redevelopment limits the ability of existing residents to stay in the area

Support:

- Regeneration of the area
- Provision of modern housing
- Provision of community facilities

## **6 MATERIAL PLANNING CONSIDERATIONS**

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

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

### **6.2 Principle of the development**

#### *Policy Background*

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

#### *The Development Plan*

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

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

6.6 The Council is preparing a new Local Plan and consultation on a Regulation 18 New Local Plan First Steps document took place between 16 November 2020 and 1 February 2021. The First Steps document sets out the key issues to be addressed by the New Local Plan, asks open question about the issues and challenges facing the future planning of the borough and seeks views on options to address them. Owing to the early stage that the plan is at, very limited weight can be given to the emerging Local Plan.

#### *The London Plan*

6.7 The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over a 20–25 year period. The London Plan (2021) sets out several objectives for development in London, through numerous policies. The policies in the London Plan are accompanied by a suite of Supplementary Planning Guidance documents (SPGs).

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

6.8 The Upper Lee Valley Opportunity Area Planning Framework (OAPF) (2013) is supplementary guidance to the London Plan. A Development Infrastructure Study (DIFS) in relation to the OAPF was also prepared in 2015. The OAPF sets out the overarching framework for the area, which includes the application site.

6.9 The OAPF notes the redevelopment of the High Road West area is supported by a comprehensive masterplan. The OAPF sets out the ambitions for the High Road West area to become a thriving new destination for north London, with a sports, entertainment and leisure offer supported by enhanced retail, workspace and residential development.

#### *The Local Plan*

6.10 The Strategic Policies DPD sets out the long-term vision of how Haringey, and the places within it, should develop by 2026 and sets out the Council's spatial strategy for achieving that vision. The Site Allocations (DPD) and AAP supplement the delivery of the Borough's spatial strategy by allocating sufficient sites to accommodate development needs.

#### *Strategic Policies*

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

6.12 Policy SP1 requires that development in Growth Areas maximises site opportunities, provides appropriate links to, and benefits for, surrounding areas and communities, and provide the necessary infrastructure and be in accordance with the Council's other planning policies and objectives.

#### *Tottenham Area Action Plan*

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

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

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

6.15 The Policy NT5 (High Road West) site allocation covers approximately 11.69ha and calls for a master planned, comprehensive development creating a new residential neighbourhood (with an indicative development capacity including 1,200 dwellings, 4,353 sqm of commercial floorspace, 11,740 Town Centre Units and 1,200 square metres of floorspace in other uses) and a new leisure destination for London. The residential-led mixed-use development is expected to include a new high-quality public square and an expanded local shopping centre, as well as an uplift in the amount and quality of open space and improved community infrastructure.

6.16 The NT5 site allocation contains site requirements, development guidelines and sets out the steps for undertaking estate renewal. These are set out below.



## NT5 Site Requirements

*The site will be brought forward in a comprehensive manner to best optimise the regeneration opportunity.*

*Development should accord with the principles set out in the most up-to-date Council-approved masterplan.*

*Creation of a new residential neighbourhood through increased housing choice and supply, with a minimum 1,400 new homes of a mix of tenure, type and unit size (including the re-provision of existing social rented council homes, the offer of alternative accommodation for secure tenants, and assistance in remaining within the area for resident leaseholders from the Love Lane Estate).*

*Creation of a new public square, connecting an enhanced White Hart Lane Station, and Tottenham High Road, to complement the redeveloped football stadium.*

*New retail provision to enlarge the existing local centre, or create a new local centre, opposite to and incorporating appropriate town centre uses within the new stadium, including the new Moselle public square. This should complement not compete with Bruce Grove District Centre. Enhance the area as a destination through the creation of new leisure, sports and cultural uses that provide seven day a week activity.*

*Improve east-west pedestrian and cycling connectivity with places such as the Northumberland Park Estate and Lee Valley Regional Park.*

*The site lies within the North Tottenham Conservation Area and includes listed and locally listed buildings. Development should follow the principles under the 'Management of Heritage Assets' section of the APP.*

*Where feasible, viable uses should be sought for existing heritage assets, which may require sensitive adaptations and sympathetic development to facilitate.*

*Deliver new high-quality workspace.*

*Increase and enhance the quality and quantity of community facilities and social infrastructure, proportionate to the population growth in the area, including:*

*A new Learning Centre including library and community centre;*

*Provision of a range of leisure uses that support 7 day a week activity and visitation; and*

*Provision of a new and enhanced public open space, including a large new community park and high-quality public square along with a defined hierarchy of interconnected pedestrian routes.*

## NT5 Development Guidelines

*Produce a net increase in the amount and the quality of both public open space and private amenity space within the area.*

*To deliver transport improvements including a new, safe and attractive entrance to White Hart Lane Station and improved rail connectivity.*

*Re-provision of employment floorspace lost as a result of the redevelopment as new leisure, sports and cultural floorspace and as modern, flexible workspaces.*

*This could be achieved by workspaces with potential to connect to High Road retail properties, and/or through the creation of workspace behind the High Road and the railway arches.*

*This central portion of the site is in an area of flood risk, and a Flood Risk Assessment should accompany any planning application.*

*This site is identified as being in an area with potential for being part of a Decentralised Energy (DE) network. Development proposals should be designed for connection to a DE network, and seek to prioritise/secure connection to existing or planned future DE networks, in line with Policy DM22.*

*Create a legible network of east-west streets that connect into the surrounding area, existing lanes off the High Road, and open spaces.*

*Establish clear building frontages along the High Road and White Hart Lane to complement the existing character of the Local Centre.*

*Incorporate a range of residential typologies which could include courtyard blocks of varying heights and terraced housing.*

*In the part of the site facing the new stadium, development should respond to both the existing High Road Character and the greater heights and density of the new stadium. This needs to be carefully considered given the height differential between the existing historic High Road uses and future stadium development.*

*Larger commercial and leisure buildings should be located within close proximity to the new public square linking the station to the stadium.*

*Due to the size of the site and scale of development envisaged, particular consideration of the effect of the works on the nearby communities, including how phasing will be delivered. This is referenced in the High Road West Masterplan Framework (HRWMF).*

*Where development is likely to impact heritage assets, a detailed assessment of their significance and their contribution to the wider conservation area should be undertaken and new development should respond to it accordingly.*

*The Moselle runs in a culvert underneath the site and will require consultation with the Environmental Agency.*

6.17 The Tottenham Hotspur Football Club (THFC) Stadium is the first stage of regeneration of the wider area. The intention is for it to fully integrate with the comprehensive regeneration of High Road West and Northumberland Park. A priority is to ensure that on match and non-match days, the area is lively and attracts people to area. This includes, but is not limited to, urban realm improvements, new community facilities, leisure, retail and other commercial uses to build upon and cement the area's reputation as a premier leisure destination in North London.

*High Road West Master Plan Framework (HRWMF)*

6.18 Policy AAP1 (Regeneration and Master Planning) states that:

6.19 *"A. The Council expects all development proposals in the AAP area to come forward comprehensively to meet the wider objectives of the AAP. To ensure comprehensive and coordinated development is achieved, masterplans will be required to accompany*

*development proposals which form part of a Site Allocation included in this Plan. Applicants will be required to demonstrate how the proposal:*

*a Contributes to delivering the objectives of the Site, Neighbourhood Area, and wider AAP;*

*b Will integrate and complement successfully with existing and proposed neighbouring developments; and*

*c Optimizes development outcomes on the site*

*B. The Council will direct development to Growth Areas and Areas of Change, and will support planning applications which accord to the delivery of Neighbourhood Objectives, and site requirements. Planning applications for development within the Tottenham AAP area should promote the positive regeneration of Tottenham, in line with the principles of the Strategic Regeneration Framework.*

*C. The Council will take a proactive approach to working with landowners, the Mayor of London, existing site users, the local community and other interested parties to help deliver the changes needed in Tottenham to meet the shared vision for the regeneration of Tottenham.*

*D. Development proposals will be expected to provide a range of types and sizes of homes, create inclusive and mixed communities within neighbourhoods, create economic opportunities for local residents and businesses, improve and enhance the local environment, and reduce carbon emissions and adapt to climate change, in accordance with the other policies of this AAP and Haringey's Local Plan."*

6.20 The current approved High Road West Master Plan Framework (HRWMF) is that prepared by Arup in September 2014. The Framework sets the vision, details the context, opportunities and constraints for the master plan area, through engagement with the local. The framework also establishes key principles to guide development proposals in the masterplan area and illustrates what a development that responds to the vision, context and key principles could look like. The framework defers the provision of a detailed masterplan to the "eventual outline planning application for the site" but notes that it must adhere to the key principles set out in the Framework. Key principles include quantum of development, massing, heights of buildings and land uses.

6.21 The Vision "is to create a vibrant, attractive and sustainable neighbourhood and a new sports and leisure destination for North London."

6.22 The objectives of the framework are to:

- Create a safe, secure and attractive place to live
- Deliver a high quality public realm network
- Be a well connected place
- Be a prosperous hub for business
- Be a low carbon development
- Support cultural diversity
- Become a new leisure destination

6.23 The framework design concept centres on the creation of a sequence of places that increase density and activity whilst retaining local character and scale, linked by a new north-south route that forms the spine of the neighbourhood. The spine connects Moselle Square (a mixed use community and leisure destination with high density residential development centred on a new entrance to White Hart Lane), Peacock Gardens (a medium density residential neighbourhood around a new community park), White Hart Lane (retail and mixed use development that includes community facilities centred around improved public realm providing a unique setting to reactivate heritage buildings), Peacock Mews (new living and workspaces behind High Road and White Hart Lane) and The High Road (traditional high street with a range of shops and flats and new learning centre opposite the new THFC stadium) (figure 5).



Figure 5: 2014 masterplan illustrative character areas.

6.24 The plan includes the delivery of a new public square (Moselle Square) providing high quality amenity whilst creating a clear route for match day and non match day visitors to THFC. The masterplan also provides a framework for the delivery of a new linear public park (Peacock Park) providing a range of community and outdoor play space. The topology of the framework envisages buildings that reflect the scale of the buildings fronting High Road and White Hart Lane and increasing in height and scale on an east to west axis, with the tallest buildings being adjacent to the railway line.

6.25 The Masterplan framework considers 3 options proposed to deliver between 600 and 1,650 new homes and 600 new jobs.

6.26 The principles of the masterplan include:

6.27 Character and Urban Form

- Creating a legible network of east- west streets that connect to the surrounding area
- Create attractive north-south links behind the High Road
- Complement the scale of the proposed street layout with appropriate building heights
- Establish clear building frontages along White Hart Lane
- Incorporate a range of residential typologies including courtyard blocks and varying heights and terraced housing
- Develop a 'behind the High Road' workspaces typology
- Reflect the scale and impact of the new Tottenham Hotspur Football Club Stadium by locating larger commercial and leisure buildings opposite
- Demonstrate clear definition of fronts and backs of buildings, public spaces and active street frontages
- Establish a simple palette of high quality materials that includes the significant use of brick
- Enhance the heritage value contribution of High Road

6.28 Heritage

- Preserve and enhance the character of the Conservation Area as a whole
- Demonstrate how heritage significance of existing assets has been incorporated and reinforced
- Promote the adaptable reuse of heritage assets
- Demolition can be considered where benefits of change and sympathetic new development can enhance the overall viability of the development
- The impact of loss of heritage assets on the wider conservation and appearance of setting of retained assets should be demonstrated

## 6.29 Open Space

Provision of a new public square located south of White Hart Lane as a focus for new leisure and community buildings

A high quality pedestrian route connecting the new White Hart Lane Station entrance to the High Road

Provision of new high quality public realm around the new station and arches

Public realm enhancements to White Hart Lane to create a setting for heritage assets

New community park north of White Hart Lane which includes safe child play areas and sports uses

Integration of child play areas in shared private courtyards

Provision of allotments in roof top gardens and the community park

Clear network of streets

Strengthen pedestrian links to open spaces outside the masterplan

Enhance biodiversity and incorporate living roofs and walls

Promote health and well being through access to high quality open spaces

Create a legible network of streets

Transport and Movement

Preserve opportunities for connections to the west over the railway line

Integrate and improve accessibility to bus services

Locate more intensive land uses in close proximity to transport nodes

Integrate traffic calming measures

Improve and enhance access to White Hart Lane Station

Integrate the station into active public realm

Seek enhancements to public transport services

Integrate cycle lanes and parking that connect to wider routes

## 6.30 Land Use

Commercial leisure development between the new station and entrance to High Road

Retail uses reinforcing the role of High Road

Activation of the railway arches with workspace, retail and food and beverage uses

Creation of workspace behind the High Road with mews and courtyard type development

Location of a new community ideas store on the High Road and new Moselle Square

Residential development focused north of White Hart Lane

## 6.31 Homes

Provide a mix of housing sizes, types and tenures

Re-provide all social rented homes for all affected Council tenants  
Achieve appropriate residential densities corresponding to the guidelines set out by the Mayor in relation to public transport accessibility levels (currently up to 700 habitable rooms per hectare)  
Building new homes along traditional street patterns that sit within attractive public realm  
Create a consistent architectural expression  
Meet the London Housing Design Guide (LHDG) minimum space standards  
Following LHDG for privacy, dual aspect dwellings, noise, floor- ceiling heights, daylight and sunlight  
Implement LHDG on climate change mitigation  
All new homes should have access to high quality open space  
Implement secure by design principles

### 6.32 Parking

Provide residential parking within 100 metres of the front door of all residential properties  
Podium parking will be well lit, safe and secure with clear entry and exit points  
On street parking will be integrating into the streetscape as part of traffic calming  
Large areas of surface parking will not be acceptable  
A multi-storey car park is required to meet the demands of the commercial and leisure uses  
Plots with podium parking are concentrated predominantly along with western edge  
Improve local cycling infrastructure network in the area through the integration of safe cyclelanes and wayfinding

### 6.33 Community Benefits and Social Infrastructure

Provide appropriate levels of social infrastructure in the phased delivery of development  
Create a community hub with learning and enterprise functions  
Create community and leisure facilities for people of all ages  
Improve access to services, open space, play space, sports facilities, outdoor gyms and community spaces for events and activities that contribute to healthy lifestyles

### 6.34 Employment

Phased provision of improved workspaces around the Peacock Industrial Estate to allow appropriate businesses to expand and evolve  
A workspace typology that provides opportunities to link workspaces behind the High Road with retail units  
Located B1b and B1c uses under residential uses and move B2 uses into existing industrial employment areas  
Create a net increase in jobs and business opportunities in the area

Provide a range of retail and commercial units to encourage and create mix and wider retail offer

### 6.35 Massing

Tall buildings will only be considered in parts of the masterplan area where the existing character would not be affected by the scale, mass or bulk of the tall building

Taller buildings placed towards the railway line, away from High Road

Building massing falls towards White Hart Lane to create an appropriate heritage setting for the heritage assets

Taller buildings located to minimise overshadowing of adjacent development

Taller buildings used as part of way finding and movement strategy

Bulkier building massing located towards the new stadium

Key views of the stadium considered and maintained in the profile of buildings

### 6.36 Low Carbon Development

Integrate an efficient supply of heating and cooling to and within the High Road west site

Safeguard a connection from the energy centre to the emerging Lee a Valley Heat Network

Provide a site wide decentralised energy network

Implement renewable energy infrastructure

Outline the reuse of existing utilities infrastructure and/or proposals to upgrade the infrastructure

Maximise carbon dioxide reduction

Achieve appropriate daylight and sunlight levels and avoid overshadowing and wind tunnelling effects

Provide high quality homes and development that are adaptable to future changes in climate

### 6.37 Phasing and Implementation

Phasing should aim to minimise disruption to the local community and businesses

Phases should be large enough to enable neighbours to move together so that the community is retained, and support networks kept in tact

Phasing should ensure that Love Lane residents who are eligible for a new home only have to move once

A strategy should be put in place to ensure vacant land that is not ready for development is utilised in a creative way for the good of the community

## 7 Policy Assessment

*Contribution to Regeneration*



**7.1** The proposal provides the opportunity to tackle the entrenched social and economic barriers that residents face in North Tottenham and deliver on the benefits the community have identified through consultation, such as good quality affordable homes, jobs and training and new and improved community 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.

**7.2** The scheme represents a substantial and far-reaching investment, which expects to deliver 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.

**7.3** There is therefore strong policy support for the regeneration benefits of the proposal as set out in AAP1 subject to the details assessed below.

#### *Principle of Comprehensive Development*

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

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

7.5 Policy DM55 states: *“Where development forms part of an allocated site, the Council will require a masterplan be prepared to accompany the development proposal for the wider site and beyond, if appropriate, that demonstrates to the Council’s satisfaction, that the proposal will not prejudice the future development of other parts of the site, adjoining land, or frustrate the delivery of the site allocation or wider area outcomes sought by the site allocation”.*

7.6 Policy NT5 makes clear that ‘development should accord with the principles set out in the most up-to-date Council approved masterplan’, which as discussed above, is the approved HRWMF prepared by Arup in September 2014. This is therefore an important aspect of development plan policy when determining planning applications.

7.7 Paragraph 4.6 of the AAP states that Haringey wants to ensure development proposals do not prejudice each other, or the wider development aspirations for the Tottenham AAP Area whilst enabling the component parts of a site allocation to be developed out separately. High Road West and the various sites north of White Hart Lane are expressly set out in Table 2 of Policy AAP1 as requiring a comprehensive redevelopment approach.

7.8 Paragraph 4.9 of the AAP states that a comprehensive approach to development will often be in the public interest within the Tottenham AAP area. It goes on to state that whilst incremental schemes might be more easily delivered, the constraints proposed by site boundaries, neighbouring development or uses and below-ground services all have potentially limiting consequences for scale, layout and viability.

7.9 The applicant is proposing comprehensive development of the majority of the High Road West Allocation (with the exemption of the former Cannon Rubber Factory site) which has been developed pursuant to planning permission HGY/2012/2128. The proposals have been informed by extensive community and key stakeholder engagement. The adopted comprehensive approach facilitates the optimisation of the site, the timely and co-ordinated delivery of the development, the maximisation of on-site benefits and delivery on the HRWMF/ AAP vision and principles.

7.10 In respect to site assembly, there are several landowners with interests in the outline part of the site with the Council owning the majority of land to the southern part of the site. Policy AAP2 of the Tottenham AAP states that the Council will support land assembly to

achieve comprehensive development, and will use compulsory purchase (CPO) powers, only where necessary, to assemble land for development within the Tottenham AAP area. CPO will be used where landowners and developers can demonstrate that they have a viable, deliverable and Local Plan compliant scheme; and have made all reasonable attempts to acquire, or secure an option over, the land/building(s) needed, through negotiation. The comprehensive redevelopment of the assembled will deliver the site's allocation and AAP objectives by securing the optimum use of land, the proper planning of development (in terms of layout, design, and use) and supporting the achievement of wider regeneration initiatives or objectives.

- 7.11 Consideration will be given to the use of compulsory purchase powers, to facilitate the comprehensive delivery of the outline part of the site and the proposal is considered to meet the relevant criteria for a CPO subject to reasonable attempts to secure land through negotiation not succeeding. The site encompasses several other parcels, within the site allocation, that have extant permissions/ resolution to grant planning permission including the Goods Yard, Depot and Former Print Works sites. The submitted parameters plans and design code accommodates the independent delivery of these sites.

#### *Principle of Provision of Housing*

- 7.12 London Plan Policy H1 sets a 10-year target (2019/20-2028/29) for the provision of 522,870 new homes across London as a whole and 15,920 for Haringey.
- 7.13 Local Plan Policy SP2 states that the Council will maximise the supply of additional housing to meet and exceed its minimum strategic housing requirement.
- 7.14 The Tottenham AAP identifies and allocates development sites with the capacity to accommodate new homes. The High Road West area is allocated in the AAP (NT5) as an appropriate place for residential led mixed use development providing a minimum of 1,400 homes (a net increase of 1,200 homes) amongst other uses. Of the 1,400 dwellings anticipated, 222 homes have already been developed in the form of the Cannon Road housing area (HGY/2012/2128). This leaves a minimum of 1,178 dwellings still to be provided.
- 7.15 Given the above, the principle of the provision of new homes on the site (alongside a mix of other uses) is supported. The proposed scheme would deliver up to 2,929 homes (2,600 net additional). This is 5,858 additional homes when taking account of the extant Goods Yard and Depot Site permissions and would provide 17% of the number of homes required to be delivered within the current London Plan 10-year housing target timeframe.
- 7.16 The ES (Chapter 14) reports on an assessment of the likely significant socio-economic effects of the proposed scheme, including housing delivery and concludes that the proposed

new homes would have a major beneficial effect at the local level and a substantial beneficial effect at the borough level. Officers agree with this assessment.

#### *Loss of Existing Retail*

7.17 London Plan Policy SD7 seeks to realise the full potential of existing out of centre low-density retail and leisure parks and commercial sites to deliver housing intensification. Policy SP10 seeks to protect and enhance Haringey's town centres, according to the borough's town centre hierarchy and Policy DM41 promotes new retail spaces in town and local centres. AAP Site Allocation NT5 sets out that the site will enlarge the existing North Tottenham Local Centre or create a new local centre.

7.18 There is currently 13,195 sqm (GEA) of class E (a-b) floorspace within the High Road West site, predominantly hot food takeaways and convenience stores. This includes the B&M (circa 7,000 sqm GEA) and five small retail units located in the northernmost part of the site.

7.19 The proposed loss of the existing out-of-centre large retail store and smaller retail units is consistent with the development plan's 'town centres first' approach to retail provision and the Site Allocation, therefore is acceptable in principle. The proposed scheme includes between 6,225 and 22,000 sqm (GEA) of flexible commercial (E Class) uses, between 4,000 and 7,800 sqm (GEA) is proposed in the E (a-c) Use Classes), discussed below. The exact quantum and distribution of this floorspace is not known at this stage but is likely to predominantly comprise of smaller retail units and larger food and beverage units, suitable for independent local businesses. The existing floorspace, by use class, minimum floorspace parameters and net change in floorspace provision, by use class, is set out in table 5 below. This is in line with the AAP aspiration of providing up to 11,740 sqm of Town Centre Uses within the masterplan area, notwithstanding the proposed net loss of between 1,200 sqm and 9,195 (GEA) retail floorspace. It is envisaged that the proposed residential development would provide further support for the existing and proposed commercial units in the locality, contributing positively to the vitality and viability of the Local Centre.

#### *Loss of community uses*

7.20 Policy DM49 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.

7.21 The proposal will result in the demolition of the existing health centre floorspace (900 sqm GEA), library floorspace (500 sqm GEA), community hall floorspace (1,125 sqm GEA) and public house floorspace (1,195 sqm GEA).

7.22 The proposal includes between 0 – 1,000 sqm of healthcare floorspace (E(e)). Between 1,000 and 6,000 sqm of class F floorspace, including between 500 and 3500 sqm of library (F1 (d)) floorspace and 500 – 2,500 sqm of community hall (F2 (b)) floorspace is proposed.

Between 0 and 3,000 sqm GEA of public house and 0 – 3,000 sqm GEA of cinema floorspace is proposed. The proposal could therefore deliver a net gain of education/ community centred uses. This includes the provision of a new Library and Learning Centre and potential for leisure, cinema and or public house floorspace. The S106 will ensure that a replacement healthcare facility is delivered, prior to demolition of the existing centre, and will meet the needs of future population as request by the CCG. The overall quantum of community floorspace proposed is considered to be acceptable.

#### *Loss of Existing Industrial Premises/Land*

7.23 London Plan Policy E4 requires a rigorous approach to industrial land management, identifies that sufficient land and premises need to be retained for industrial and related functions but recognises that managed release may be required to provide other uses, in appropriate locations.

7.24 Policy SP8 supports the Borough-wide provision of office/light industrial floorspace as part of mixed-use development on suitable sites. Policy SP9 also supports the diversification of the borough's economy by supporting small and medium sized enterprises and new and expanding employment sectors. Policy DM40 seeks to facilitate the renewal and regeneration (including intensification) of existing employment land and floorspace in accessible locations.

7.25 The site includes approximately 11,750 square metres (GEA) of commercial floorspace in the B2/B8 use classes and a further 1,790 square metres in the E (g) use class, occupied by around 85 businesses. The proposal includes between 0 – 7,000 sqm (GEA) of B2 floorspace, between 0 – 1,000 sqm (GEA) of B8 floorspace and between 1,525 and 7,200 sqm (GEA) of E (g) floorspace, with a minimum of 4,686 sqm (GEA) of floorspace being delivered within the B2, B8 or E (g) use classes.

7.26 Given the Site Allocation NT5 seeks to deliver new high quality workspace and the proposed scheme incorporates flexible commercial space, including some replacement employment floorspace (as discussed below) the loss of existing office, light/general industrial floorspace is acceptable in principle. It is recommended that s106 planning obligations secure the implementation of an approved relocation strategy to assist with temporary and permanent relocation of existing businesses operating on the site to new premises within the development, or failing that, to other locations in the Borough.

#### *Loss of short-term accommodation*

7.27 Policy DM15 states that proposals for development that would result in the loss of special needs housing will only be granted permission where it can be demonstrated that

there is no longer an established local need for this type of accommodation or adequate replacement accommodation will be provided.

7.28 Whitehall Lodge currently operates as a C1 (hostel), providing emergency temporary accommodation. The use was established on a temporary basis and is proposed to be re-located, by Homes for Haringey to a site nearby. There would be no conflict with Policy DM15.

Table 5: Existing floorspace, minimum proposed floor space and net additional floorspace based on the minimum parameters.

	Existing floorspace (m2)	Minimum Masterplan floorspace (m2)	Net Additional Floorspace (m2)
Industrial - B2	10,800	0	-10,800
Industrial - B8	950	3,161	+2,211
Retail - E(a)	9,060	n/a	n/a
Food consumption – E(b)	4,135	n/a	n/a
Commercial, professional (other than medical) or financial services - E(c)	0	n/a	n/a
Total flexible retail - E(a - c)	13,195	4,000	-9,195
Indoor sports recreation and fitness - E(d)	0	500	+500
Medical/healthcare - E(e)	900	0	-900
Business uses (offices) - E(g)	1,790	1,525	-265
Learning/non-residential institutions - F1(d)	500	n/a	n/a
Public halls or exhibition halls - F1(e)	0	n/a	n/a
Learning/non-residential, public or exhibition halls - F1(d-e)	500	500	0
Place of worship - F1(f)	655	0	-655
Local community uses - F2(b)	1,125	500	-625
Energy centre - Sui Generis	0	200	+200
Public house - Sui Generis	1,195	0	-1,195
<b>Total</b>	<b>31,110</b>	<b>10,386</b>	<b>-21,647</b>

Source: Landlease

### Loss of Existing Housing

7.29 London Plan Policy H8 makes clear that loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace.

7.30 The proposed development results in the demolition of 279 existing dwellings in the Love Lane Estate.

7.31 The detailed element of the scheme would deliver 60 dwellings. The outline part of the scheme could deliver up to 2,869 dwellings. The illustrative master plan shows the delivery of 2,612 dwellings including 1,696 market dwellings and 916 affordable units (416 shared ownership and 500 social rent). The proposal will deliver a significant uplift in new housing, in accordance with London Plan Policy H8. The re-provision and uplift in affordable housing is assessed in detail below.

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

7.32 Policy DM40 supports proposals for mixed use, employment-led development where necessary to facilitate the renewal and regeneration of existing non-designated employment sites within highly accessible or otherwise sustainable locations. All proposals for mixed use development must also satisfy the requirements of Part A of Policy DM38 (maximise amount of employment floorspace, provide improvements to site's suitability for business and employment uses, make provision of affordable workspace (where viable), safeguard residential amenity, not conflict with retained employment use and enable connection to ultra-fast broadband).

7.33 Tottenham AAP Policy NT2 states the Council will support development which increases job density and therefore helps to meet the employment needs of the Borough and enables small firms to start up, and grow, in flexible industrial space. Site Allocation NT5 establishes indicative development capacities for commercial floor space (4,353 sqm) and town centre uses (11,740 sqm) (16,093 sqm overall).

7.34 The principles of the HRWMF seek to create a net increase in jobs and business opportunities in the area, through an increase in commercial space and provision of a range of workspaces as well as providing a range of retail and commercial units to encourage a greater mix and wider retail offer.

7.35 The proposed scheme includes 6,225 - 22,000 sqm (GEA) of flexible commercial uses (Class E). The proposal also includes between 0 and 8,000 sqm (GEA) of B2/B8 floorspace. This includes a minimum provision of 1,525 (GEA) of Use Class E (g) floorspace and a minimum of 4,686 sqm GEA of B2/B8/ E(g) floorspace.

7.36 The proposed amount of commercial floorspace proposed exceeds the NT5 allocated requirements for commercial uses and is generally consistent with guidance in the HRWMF to secure an appropriate provision of B uses.

7.37 It is also recommended that s106 planning obligations to secure the implementation of an approved Employment and Skills Plan to maximise employment and training opportunities for residents from the development (including during the construction phase).

## *Principle of the Development – Summary*

7.38 The provision of a residential-led mixed-use scheme comprising housing and commercial uses is acceptable in principle. The proposal is for comprehensive development of the remaining part of Site Allocation NT5. Whilst the proposal does not wholly accord with all the key principles set out in the HRWMF, notably in respect to a descending scale of building from Brook House, adjacent to the railway line, siting new commercial and leisure buildings opposite the stadium to create a sports and leisure destination for North London, the provision of tennis courts etc in the park, the provision of an increase in commercial floorspace, provision of enhancements and re-use of heritage assets, activation of the railway arches, conforming with London Plan density guidelines (which are no longer applicable, providing residential parking within 100 metres of front doors, provision of a multi-storey car park and podium parking, the proposal will deliver significant social and economic benefits and deliver on the vision set out in the AAP and when taken as a whole, conform with the key principles set out in the HRWMF. This includes, but is not limited to, a significant uplift in new homes, including affordable and accessible homes, energy and water efficient dwellings, significant public realm improvements, new pedestrian and cycle links, new community facilities, new public parks and new job and training opportunities. The proposal is flexible with respect to commercial use provision, that would include the re-provision of at least some of the existing commercial uses with high quality space, suitable for local independent businesses.

7.39 The proposed scheme would result in the loss of existing residential, commercial and community uses across the Love Lane Estate, High Road, Peacock Industrial Estate, Former Depot, Goods Yard and Cranbury Enterprise Park. However, the benefits for the proposed development, including the substantial uplift in housing, community uses and open space and a quantum of replacement commercial floorspace, that could exceed existing, is considered to outweigh the loss.

## *Development Density*

7.40 London Plan Policies H1 and D3 make clear that development must make the best use of land by following a design-led approach that optimises the capacity of sites. The policy states that a design-led approach requires consideration of design options to determine the most appropriate form of development that responds at a site's context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in Policy D2). In doing so it identifies a number of requirements in relation to form and layout, experience and quality and character.

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



7.42 The maximum parameters facilitate a residential density of up to 341.7 units/hectare (based on the maximum number of dwellings being delivered on the 8.57 hectare site). The submitted indicative masterplan (which includes both the outline and detailed applications) has a density of 337 units/hectare, which is just below the definition of 'higher density' development in the London Plan (at least 350 units per hectare). The following issues are assessed in different sections of this report:

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

7.43 In summary, the assessment in the above sections finds the proposed scheme to be acceptable, subject to securing necessary mitigation and officers are satisfied that the proposed amount of development does optimise the site's potential to deliver new homes and jobs as part of a new higher density neighbourhood.

7.44 The extant Goods Yard consented scheme has a density of 746 habitable rooms/hectare (270units/hectare) and the extant Depot consented scheme has a density of 798 habitable rooms/hectare (275 units/hectare). The refused Goods Yard and Depot Scheme proposed a density of 1,116 habitable rooms/ha (353 units/hectare).

#### *Dwelling Unit Mix*

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

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

7.47 The overall proposed dwelling mix set out in Table 05 below.

Table 06: Proposed dwelling mix in the detailed (Plot A and illustrative masterplan).

<b>Bedroom Size</b>	<b>No. of Units</b>	<b>% by unit</b>
Detailed element (Plot A)		
1 bed (2 person)	15	25%
2 bed (3 & 4 person)	16	26.67%
3 bed (5 person)	25	41.67%
4 bed (6 person)	4	6.67%
<b>Total</b>	<b>60</b>	<b>100%</b>
Illustrative masterplan		
Studio (1 bed 1 person)	85	3.25%
1 Bed 2 person	859	32.89%
2 Bed (3 & 4 person)	1,238	47.40%
3 bed (4, 5 & 6 person)	375	14.36%
4 bed (5 & 6 person)	55	2.10%
<b>Total</b>	<b>2,612</b>	<b>100%</b>

7.48 The proposed dwelling mix for the detailed part of the site comprises family sized units (48.24%) and 1- and 2-bedroom units (51.67%). The proposed indicative dwelling mix is 83.5% 1 and 2 bed units and 16.5% family sized housing. The final dwelling mix for the outline part of the proposal will be determined at detailed reserved matters stage. The proposed mix is not considered to represent an unacceptable over-concentration of 1- and 2-bedroom units given the site location and is generally consistent with the AAP approach to deliver smaller units in close proximity to public transportation and HRWMF principles. An assessment of the suitability of the dwelling mix, as it relates to affordable housing is contained in the section below.

## 8 Affordable Housing

### *Policy Background*

- 8.1 Paragraph 60 of the NPPF sets out the Government's objective of significantly boosting the supply of homes that meet the needs of groups with specific housing requirements. Paragraph 63 sets out the government's expectation that in circumstances where affordable housing is required, it is expected to be met on site unless an alternative mechanism can be robustly justified.
- 8.2 London Plan Policy H5 and the Mayor's Affordable Housing and Viability SPG set a strategic target of 50% affordable housing. Policy H5 identifies a minimum threshold of 35% (by habitable room) affordable housing, whereby applications providing that level of affordable

housing, with an appropriate tenure split, without public subsidy, and meeting other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor, can follow the 'fast track route' set out in the SPG; this means that they are not required to submit a viability assessment or be subject to a late stage viability review. The minimum required affordable housing in order to take advantage of the threshold approach increases to 50% for 'industrial land.'

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

8.4 Policy SP2 of the Local Plan requires developments of more than 10 units to provide a proportion of affordable housing subject to viability to meet an overall borough target of 40%.

8.5 Policy AAP3 sets out the affordable tenure split (DM13 A[b]) in the Tottenham AAP area should be provided at 60% intermediate accommodation and 40% affordable rented accommodation.

8.6 Site Allocation NT5 includes the requirement to create a new residential neighbourhood through increased housing choice and supply, with a minimum 1,400 new homes (1,178 net given the built Cannon Road scheme) of a mix of tenure, type and unit size (including the re-provision of existing social rented council homes, the offer of alternative accommodation for secure tenants, and assistance in remaining within the area for resident leaseholders from the Love Lane Estate).

8.7 Haringey's Housing Strategy 2017-22 (and Haringey's Intermediate Housing Policy statement 2018) provide guidance on the preferred tenure mix for affordable housing across the borough in order to deliver the overall aims of the Local Plan and meet housing need.

8.8 Revisions to the Housing Strategy agreed by Cabinet in February 2019 set out that the Council's preference for General Needs affordable housing is Social Rent or London Affordable Rent and the preference for intermediate rented housing is London Living Rent or Discount Market Rent, at rent levels equivalent to London Living Rent.

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

8.9 The Applicant is committed to delivering a minimum of 35% affordable housing by unit with a target of 40% provision by unit, subject to viability and grant funding. Phase A (to the south of White Hart Lane) is to deliver 40% affordable housing by unit with a tenure split weighted 55% social rent and 45% intermediate. The detailed element (Plot A) is proposing 100% (60 dwellings) as social rent. This includes 15 x 1 bedroomed units (25%), 16 x 2 bedroomed units (27%), 25 x 3 bedroomed units (42%) and 4 x 4 bedroomed units (6%).

8.10 The affordable housing statement that accompanies the application details an affordable housing split, based on the indicative scheme of 2,612 dwellings, across 27 blocks.

Overall residential tenure mix.

Table 07: Proposed residential component

Tenure	Units	Hab Rooms	% Hab Rooms
Private	1696 (64.9%)	4439	60.5%
Shared ownership	500 (54.6%)	1164	15.9%
Social rent	416 (45.4%)	1730	23.6%
Total	2612 (100%)	7333	100%

8.11 Tenure Split: The scheme proposes 59.8% Low-Cost Rent and 40.2% Intermediate by habitable room as set out in Table 08 below.

Table 08: Proposed Affordable Housing Tenure Split

Tenure	Units	Hab Rooms	% Hab Rooms
Social Rent	500	1730	59.8%
Shared Ownership	416	1164	40.2%
Total	916	2894	100%

8.12 Unit Size Mix: The scheme proposes a mix of affordable housing unit sizes including 44% family sized (3 bed+) Low-Cost Rent homes, as set out in Table 09 below.

Table 09: Proposed Affordable Housing Dwelling Mix

	1-bed	2-bed	3-bed	4-bed	Total
Social Rent	55	225	165	55	500
	11%	45%	33%	11%	100%
Shared Ownership	126	248	42	0	416
	30%	60%	10%	0	100%

8.13 Distribution: The affordable housing is envisaged to be distributed across the site in various buildings, as outlined in Table 10 below with mixes throughout buildings and expected phases. This will ensure an inclusive and mixed community in accordance with Policy DM11.

Table 10: Indicative Proposed Tenure Distribution

Plot	Market	Social Rent	Shared Ownership	Total
M2	0	0	30	30
L1	89	0	54	143
J1	95	0	60	155
A (detailed element)	0	60	0	60
G	0	40	0	40
H	0	0	26	26
N2,N3 & N4	50	0	56	106
N1	0	0	43	43
C1	11	168	0	179
D	380	0	0	380
M1	205	0	5	210
F	280	91	74	445
M3	31	0	0	31
K	140	0	0	140
J2	84	0	0	84
L2	89	0	0	89
I	0	0	68	68
C	52	0	0	52
B	190	141	0	331
<b>Total</b>	<b>1,696</b>	<b>500</b>	<b>416</b>	<b>2,612</b>

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

*Affordability*

8.15 It is envisaged that the affordable housing split would be 55% social rent and 45% shared ownership. In the indicative masterplan scheme providing 2,612 dwellings, 500 would be social rent and 416 shared ownership. Albeit the Landlord Offer for existing resident leaseholders may result in up to 46 of the shared ownership units being delivered as shared equity units. For clarity, in a shared equity arrangement, a tenant would own a leasehold for a proportion of the property with the remaining portion owned by a registered provider but unlike shared ownership, there would be no rent payable on the registered providers equity and no requirement for the registered provider to offer the tenant opportunity to purchase further equity in the property.

- 8.16 The shared ownership units are anticipated to be sold at the minimum 25% and a maximum of 75% share of equity. The tenant is then charged rental on the unsold equity (the equity owned by the registered provider (typically up to 2.75% (plus service charges))). In line with the current London AMR the household income threshold would not exceed £90,000. The proposal seeks to meet Haringey's Intermediate Housing Strategy requirement of utilising a cascade arrangement for offering the shared ownership units, firstly by offering 1 -2 bedroomed shared ownerships will be made available for gross household incomes of £,40,000 - £60,000 per annum and then to households with gross incomes that do not exceed £90,000 per annum. It is proposed that units would target a range of incomes dependent on the unit size and will prioritise those who live and/or work in the borough. Whilst the final offer will be established at reserved matters stage, the s106 agreement will secure maximum feasible delivery of affordable housing through staged viability reviews. A s106 planning obligation will to ensure that marketing of the proposed Shared Ownership homes prioritises households living or working in Haringey with maximum annual incomes lower than the maximum £90,000 and lower incomes set out above.
- 8.17 Whilst the applicant's affordable housing offer is not in line with the amended Housing Strategy and Intermediate Housing Policy (June 2018), insofar as the intermediate tenure is proposed to be all shared ownership or share equity, the proposed affordable housing offer is considered to be acceptable and will achieve the objectives of The Tottenham AAP Policy AAP3 to Improve the quality and range of affordable housing options, address housing needs in Haringey; secure a more inclusive and mixed, sustainable community; and increase housing delivery in Tottenham.

### *Viability Review*

- 8.18 The application is accompanied by a viability appraisal that sets out that the maximum level of affordable housing that can be supported by the proposed development, the appraisal finds that the illustrative schemes delivery of 35% affordable housing delivery exceeds the maximum contribution required by the viability appraisal. The appraisal is based on the delivery of the illustrative scheme with an estimated present day build cost of £73,233,798, an estimated existing use value of £73,653,250. An estimated CIL charge of £10,000,000, a compensation cost (confidential) and an estimated S106 cost of £1,253,650.
- 8.19 The applicant's viability appraisal has been independently reviewed by BNP Paribas Real Estate. The review sets out that the estimated viability of the scheme is contingent on the number of dwellings and amount of residential floorspace proposed and therefore it is considered essential that the scheme viability is revised upon the submission of reserved matters applications. The review also found a viability deficit and recommends securing early, middle and late-stage reviews via legal agreement.

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

8.21 As outlined in Section 7 below, the Council is proposing to increase the current Haringey CIL charge rate for the Eastern Zone of the borough from £15 to £50 per square metre, subject to Full Council approval. An approved development would be liable to pay the Haringey CIL rate that is in effect at the time that a permission is granted.

*Loss of existing housing and estate redevelopment*

8.22 London Plan Policy H8 makes clear that demolition of affordable housing, including where it is part of an estate redevelopment programme, should not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace.

8.23 Policy H8 sets out that demolition of affordable housing, including where it is part of an estate redevelopment programme, should not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace. Affordable housing that is replacing social rent housing must be provided as social rent housing where it is facilitating a right of return for existing tenants. Where affordable housing that is replacing social rent housing is not facilitating a right of return, it may be provided as either social rent or London Affordable Rent housing. Replacement affordable housing should be integrated into the development to ensure mixed and inclusive communities.

8.24 A key NT5 site requirement is the re-provision of existing Social Rented Council homes arising from the demolition of the Love Lane Estate.

8.25 NT 5 sets out the process for undertaking estate renewal which should follow the following steps:

- Engagement with residents across the site prior to the commencement of any proposals to inform them of what is being proposed, the process for how they will be engaged and the proposed timetable;
- The establishment of Residents Steering Group;
- An assessment of the potential for refurbishment;
- The establishment of the principles under which demolitions would be considered;
- The appointment of an Independent Advisor to help people through the process and to inform them of their right and options as tenants or leaseholders;

- The appointment of an architect to begin drawing up the site masterplan in consultation with the Residents Steering Group, including capacity testing, resulting in potential development options.
- The conducting of financial appraisals of the development options;
- Discussion with residents on the finds of the above studies, seeking agreement to the selection of a preferred proposal;
- Working up the preferred proposal for planning permission, including decant arrangements and the phasing of development;
- Appointment of a contractor to commence works.

### *Existing residential homes within the estate*

8.26 The Mayor's Good Practice Guide to Estate Regeneration GPGER provides detailed guidance for assessing appropriate approaches to estate regeneration.

8.27 The applicant has provided figures confirming the existing homes to be demolished as part of the proposed redevelopment. This includes 297 residential homes, comprising 40 social rent tenure homes, 211 affordable rent tenure homes (temporary accommodation), 22 private owned homes (including right to buy leaseholders), together with a further 24 non-resident leaseholders.

8.28 The applicant is proposing 35% affordable housing provision by unit, this includes 500 social rent tenure units based on the illustrative scheme. This would increase the overall provision of low cost rent accommodation (both social rent homes and temporary accommodation) on the site by approximately 250 homes. This is strongly supported. Given that all LAR units would be replaced with secure social rent homes, the application would also provide a net increase of more than 460 secure social rent tenure homes. This is strongly supported. The proposed social rent provision within the illustrative scheme mix is set out below, showing the proposed net increase in units.

8.29 Based on these dwelling figures, it is evident that there would be an increase in social rented accommodation by floorspace and habitable room, in accordance with London Plan Policy H8.

### *Right to return*

8.30 In terms of the right to return, the applicant's Landlord Offer on which the recent ballot was based confirmed that the right to return to the redeveloped High Road West neighbourhood would be offered to the 40 households on social rent tenancies and 211 households in non-secure temporary accommodation. To benefit from a right to return, households need to have lived on the estate since January 2021. This exceeds the minimum requirement set out in London Plan Policy H8 and the Mayor's GPGER and is



strongly supported. The phasing approach seeks to ensure residents only need to move *once through a 'single move' approach where possible, which is welcomed.*

#### *Fair deal for leaseholders*

8.31 The Mayor's GPGER seeks to ensure that leaseholders affected by estate regeneration are treated fairly and fully compensated. The Landlord Offer sets out the applicant's commitment to ensure fair compensation for resident leaseholders (market value, with an additional 10% compensation, plus all reasonable legal and moving costs paid). Resident leaseholders would also be offered an affordable home within the redeveloped neighbourhood via the offer of financial support in the form of an equity loan / shared equity homes. This approach is acceptable and accords with the key principles set out in the Mayor's GPGER.

#### *Full and transparent consultation*

8.32 The applicant has undertaken a ballot recently which was undertaken by an independent body, in line with the GPGER and GLA funding guidelines. Residents voted 56% "yes" in favour of the regeneration proposals, with a turnout rate of 69% of the eligible residents. This accords with the Mayor's Good Practice Guide to Estate Regeneration (GPGER). The Local Plan site allocation sets out a number of requirements relating to the engagement with existing residents through the establishment of a Residents Steering Group and discussion and feedback with this group in formulating the masterplan and in formulating phasing and decant options.

8.33 In its Statement of Community Involvement, the applicant has set out how it has addressed these engagement requirements leading up to the landlord offer, ballot and next steps. The applicant has established a Residents Charter and Design Guide in formulating the masterplan and detailed phase 1 element. This approach is expected to be used for all further estate regeneration phases. This consultation process has been underway for a number of years, leading up to the ballot. Overall, the approach accords with the key principles set out in the GPGER in terms of early engagement and feedback and the Site Allocation.

#### *Consideration of alternatives*

8.34 London Plan Policy H8 states that before considering demolition of existing estates, alternative options should be considered and the potential benefits associated with the option to demolish and rebuild an estate set against the wider social and environmental impacts. In this case, there is a detailed plan-led approach in place which sets out the rationale for the comprehensive redevelopment of the estate and establishes the principle of

demolition and redevelopment in order to optimise the regeneration and potential of the site. This is set out in the High Road West Masterplan (2014) and Tottenham Area Action Plan (2017).

8.35 The proposal includes the demolition of the Love Lane Estate and the provision of replacement of and an uplift in social rented and shared ownership homes within the masterplan area. The approach to leaseholders and public consultation accords with the Mayor's GPRGR. The GLA has not objected to the proposal on estate regeneration grounds, subject to the delivery of the maximum viable level of affordable housing. The proposal accords with London Plan Policy H8 and AAP Policy NT5.

#### *Affordable Housing - Summary*

8.36 Officers consider that both the amount and type of proposed affordable accommodation are acceptable (the Applicant is committed to delivering a minimum of 35% affordable housing by unit with a target of 40% provision by unit, subject to viability and grant funding), Early and Development Break Reviews will be secured through the S106 agreement. The quantum of affordable housing provision has been found acceptable via an independent review of the applicant's viability appraisal, subject to securing additional viability information at reserved matters stage and review mechanisms within the legal agreement. This, along with affordability levels of shared ownership housing will be secured by legal agreement. The proposal delivers like for like replacement of existing affordable housing and a net increase. The approach to leaseholders and public consultation complies with the Mayor's key principles on estate regeneration. The proposal accords with London Plan Policy H8 and AAP NT5.

## **9 Development Design**

### *Policy Background*

9.1 The recently published NPPF (July 2021) makes beauty and placemaking a strategic national policy, includes an expectation that new streets are tree-lined and places an emphasis on granting permission for well-designed development and for refusing it for poor quality schemes, especially where it fails to reflect local design policies and government guidance contained in the National Design Guide (January 2021) and, where relevant, National Model Design Code (July 2021).

9.2 London Plan Policy D4 encourages the use of masterplans and design codes and 3D virtual modelling and thorough scrutiny by officers and the design review process to help ensure high quality development (particularly, as in this case, the proposed residential component would exceed 350 units per hectare or include a tall building).

- 9.3 Local Plan Policy DM1 states that all development must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. Further, developments should respect their surroundings by being sympathetic to the prevailing form, scale, materials and architectural detailing. Local Plan Policy SP11 states that all new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use.
- 9.4 SP11 goes on to say applications for tall buildings will be assessed against the following criteria (summarised): adopted Area Action Plan (AAP) or masterplan framework, assessment supporting tall buildings in a Characterisation Study compliance with DM policies and all the relevant recommendations in the CABE / English Heritage "Guidance on Tall Buildings" 2007 (since superseded in 2015) and Historic England Advice Note on Tall Buildings. Local Plan Policy DM6 part C sets out detailed policy requirements for tall buildings; being in an area identified as suitable, represent a landmark by which its distinctiveness acts as a wayfinder or marker, is elegant and well proportioned, visually interesting when viewed from any direction, positively engage with the street environment, consider impact on ecology and microclimate, requiring where tall buildings are in close proximity to each other they avoid a canyon effect, consider their cumulative impact, avoid coalescence and collectively contribute to the vision and strategic objectives for their area.
- 9.5 London Plan Policy D9 requires that tall buildings are only developed in locations that are identified as suitable in Development Plans. It goes on to set out a number of visual, functional and environmental impacts of tall buildings that should be considered in planning decisions.
- 9.6 The Upper Lee Valley Opportunity Area Planning Framework proposes that future tall buildings will generally be in well-defined clusters in identified urban growth centres. Strategic Policy SP11 requires all new development to 'enhance and enrich Haringey's built environment and create places and buildings of high quality'. Policy AAP6 states that, in line with DM6, Tottenham Hale and North Tottenham as growth areas have been identified as being potentially suitable for the delivery of tall buildings.
- 9.7 The HRWMF sets out the principle that tall buildings will only be considered in parts of the masterplan area where existing character would not be affected adversely by the scale, mass or bulk of a tall building. The HRWMF envisages a "legible tall building spine" that descends from Brook House to create an appropriate heritage setting for statutorily listed and locally listed assets.
- 9.8 The HRWMF also sets the principles that tall buildings should be located to minimise overshadowing of adjacent development and used as part of a way finding and movement strategy (for example located towards the end of east-west routes). Key views of the stadium should be considered and maintained in the profile of buildings.

### *Quality Review Panel Comments*

9.9 Haringey's Quality Review Panel (QRP) has assessed the scheme at several stages in the schemes development including on the 27<sup>th</sup> of June 2018, 30<sup>th</sup> of January 2019, 28<sup>th</sup> of April 2021, 23<sup>rd</sup> of June 2021, 2<sup>nd</sup> March 2022 and 17 September 2021. The QRP reports are attached at **Appendices 7 – 12** of this Report.

The full QRP Report of the review will be attached in **Appendix 12** once published and responded to. Officer are satisfied that all point raised on 17 September 2021 have been addressed.

### *Site Layout*

9.10 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 (HRWMF) was prepared by Arup 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.

The HRWMF sets out the following relevant layout principles:

- Create a legible network of east-west streets that connect into the surrounding area, existing lanes off the High Road, pocket parks and other open spaces;
- Create attractive north-south links behind the High Road which connect public parks and squares, key public buildings and the station;
- Complement the scale of the proposed street layout with appropriate building heights;
- Establish clear building frontages along White Hart Lane with a high street type character integrating existing listed buildings;
- Incorporate a range of residential typologies including courtyard blocks of varying heights and terraced housing;
- Any tall buildings should be placed along the railway corridor to create a legible tall building spine. The buildings should use the existing Brook House (Rivers Apartments) as a reference point and descend in height;
- Demonstrate clear definition of fronts and back of buildings, public and private open spaces and active street frontages;
- Establish a simple palette of high-quality building materials for the Masterplan that includes significant use of brick; and
- Enhance the heritage value contribution of the High Road, reinforcing its fine grain and diversity of retail offer alongside improvements High Road frontages.

9.11 Figure 38 in the HRWMF sets out an overall indicative masterplan and also identifies the opportunity to create an east-west route across the site and the railway lines, between Brantwood Road in the east and Durban Road in the west.

9.12 The proposed scheme can be seen to comply with the following relevant HRWMF principles by:

- Providing an east-west street and north-south streets, broadly following the HRWMF alignment
- The proposed buildings step down in height from the railway line towards High Road
- Including a commercial and residential uses broadly in accordance with the indicative masterplan layout
- Providing tall buildings along the west of the site to create a spine of tall buildings alongside the railway (although these do not descend in height from the existing River Apartments building as envisaged – see discussion below)
- Establish guidance on a simple materials palette, including the significant use of brick
  - Providing a new public park (Peacock Park), new Civic Square (Moselle Square) and other public realm enhancements (Moselle Place, Orchard Mews, Breton Road, Whitehall Street)
- Providing a range of housing typologies with a mix of courtyard and other blocks with the tallest buildings located along the railway corridor;
- Buildings fronting onto public spaces and main roads, with the backs of the buildings and private spaces provided within courtyards;
- Providing defined public and private open spaces and active street frontages along the key routes;
- Safeguards a potential east-west bridge over the railway line, to the north of White Hart Lane
- Provides a north- south connection to Cannon Road to the north.

9.13 The proposed layout is based on a ‘streets and squares’ approach, with active ground floor frontages in the form of flexible commercial units, duplex/ maisonettes with front doors on the streets and communal residential entrances to a series of lower mansion blocks and tall buildings. The submitted design code sets out a range of guidelines to guide development of each of the development plots, this includes materials, detailed finishes, building heights and lower floor uses. The detailed design and layout of the buildings will be considered in future detailed reserved matters submissions which would still need to be considered by the Local Planning Authority in due course. Officers are satisfied that the quantum of development proposed can be accommodated within the site whilst providing a high quality development with active public realm. The Design Officer notes that the proposed streets and squares would be extremely well integrated into surrounding existing

streets, especially to the High Road, and to the presence of the Tottenham Hotspurs Stadium.

9.14 However, the proposed layout would differ from the HRWMF's relevant principles and indicative masterplan in respect to the residential density of development proposed, the heights and massing of the blocks and the way in which they descend in height towards White Hart Lane and High Road and the amount of public open space and parking proposed. Officers consider that, on balance, these departures are necessary to make efficient use of the site by providing a residential density that would facilitate the delivery of the proposed affordable housing, public open space and other community infrastructure. It is considered that benefits, including but not limited to, the provision of a significant quantum of affordable housing, a substantial amount of public realm, new pedestrian and cycle links and new commercial floorspace outweighs the identified departures from the HRWMF principles.

#### *Relationship with extant permissions*

9.15 The illustrative master plan includes blocks/ development plots and parameters that would facilitate the delivery of the existing Goods Yard and Depot consents whilst not compromising the delivery of the wider master plan area.

#### *Amount, location and type of Open Space*

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

9.17 Policy DM20, seeks to ensure that sites over 1ha in size which are located in identified areas of open space deficiency (as the majority of the site is), should create new publicly accessible open space on the site, in accordance with the open space standards set out in the Haringey Open Space and Biodiversity Study (2013), subject to viability. The Study calls for 1.64 hectares per 1000 people.

9.18 The submitted illustrative masterplan includes provision of a minimum of 33,300 sqm of open space, excluding the Public Park (Peacock Park) and Public Square (Moselle Square). The proposed park is a minimum of 5,300 sqm and public square 3,500 sqm. The site measures approximately 8.7 hectares, or 75% of the Site Allocation NT5 area (11.69ha).

The proposed provision of a minimum 41,800 sqm of open space is a significant uplift over the existing quantum of open space and commensurate with that envisaged in the HRWMF. The quantum of open space proposed is considered to be acceptable.

9.19 The ES (Chapter 14) and associate addendum reports on an assessment of the likely significant socio-economic effects of the proposed scheme, including on open space and play space. It considers open space as a whole (publicly accessible open space, communal residential amenity space and public realm) and finds that the proposed scheme would result in a Moderate to Major Beneficial effect at site level.

9.20 A s106 planning obligation can secure a Public Open Space Access and Management Plan (to be in accordance with the Mayor of London's adopted Public London Charter) (October 2021).

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

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

9.22 The proposed Peacock Park would be shielded from road traffic and railway noise by proposed buildings. The applicant has clarified that the noise environment of this space should be below the upper "desirable" noise level recommended for open spaces in the relevant British Standard, which is good for an urban park. However, other open spaces near the railway and High Road would likely be noisier.

9.23 The applicant's Daylight and Sunlight Assessment finds that the proposed Peacock Park and 54% of Moselle Square would receive at least 2 hours of sunlight on the 21<sup>st</sup> of March. Although further detailed assessments will be required as the detailed reserved matters stage which would still need to be considered by the Local Planning Authority in due course.

9.24 The landscaping strategy for the proposed public realm is based on creating different character areas. The proposed spaces are envisaged to incorporate measures to calm traffic and include opportunities to play, sit and rest. They also include high-quality hard surfaces, trees and rain gardens to help provide shade, a net increase in biodiversity and sustainable drainage. These spaces would also incorporate lighting and other street furniture (including litter bins) to help ensure that spaces are safe and attractive. Officers consider that the proposed landscaping strategy would ensure attractive, uncluttered and inclusive public spaces are created. Full landscaping details will be considered at detailed reserved matters stage which would still need to be considered by the Local Planning Authority in due course. The extent of public realm works will be secured by legal agreement.

9.25 Public art provision within the public open spaces would be secured through the S106 agreement in accordance with Policy DM48.

9.26 The applicant intends that the proposed publicly accessible spaces (including the park) would be privately owned, managed and maintained. If permission was granted, it would be possible to use s106 planning obligation to secure the subsequent approval of an Open Space Management and Access Plan, to secure public access and appropriate management and maintenance arrangements.

#### *THFC Matchday CrowdfLOW*

9.27 It is envisaged that the proposed civic square (Moselle Square) will provide a direct pedestrian link between Tottenham Hotspur Stadium and White Hart Lane Station. The submission is accompanied by a Crowd Flow Study that reviews the masterplan for crowd safety and management on major event days at Tottenham Hotspur Stadium. The assessment is based on the submitted parameters and illustrative masterplan and includes data from several previous crowdfLOW studies for the stadium.

9.28 The Study has been reviewed by the Council's independent crowdfLOW expert who has found that further assessment needs to be undertaken to support the suggestion that both northbound platform and southbound platform queues can be accommodated within the proposed Moselle Square, and there are no significant safety concerns. The submitted parameters and illustrative masterplan can accommodate the spatial requirements required to successfully manage crowd flows on event days. The proposed indicative layout would improve the existing queue management, circulation and way finding on event days by improving legibility to the stadium, increasing areas available for queuing and reducing pinch points in the approach to the stadium. The detailed layout of the site and an interim crowd management strategy during construction will be secured at reserved matters stage along with an event management plan. This will include further crowd management studies. These will be secured by planning condition.

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

9.29 London Plan Policy D9 (A) calls on development plans to define what is considered a tall building for specific localities, based on local context (although this should not be less than 6-storeys or 18 metres above ground to the floor level of the uppermost storey). The Local Plan (Strategic Policies 2013-2026) included a borough-wide definition of 'tall building' as being those which are substantially taller than their neighbours, have a significant impact on the skyline, or are of 10-storeys and over (or otherwise larger than the threshold sizes set for referral to the Mayor of London).



- 9.30 The strategic requirement of London Plan Policy D9 (Part B) is for a plan-led approach to be taken for the development of tall buildings by boroughs and makes clear that tall buildings should only be developed in locations that are identified in development plans. The Upper Lee Valley Opportunity Area Planning Framework proposes that future tall buildings will generally be in well-defined clusters in identified urban growth centres.
- 9.31 London Plan Policy D9 (Part C) sets out a comprehensive set of criteria for assessing the impacts of proposed tall buildings and these are discussed in detail below. Part D calls for free publicly-accessible areas to be incorporated into tall buildings where appropriate, but officers do not consider it appropriate for any of the residential towers proposed.
- 9.32 Strategic Policy SP11 requires all new development to enhance and enrich Haringey's built environment and create places and buildings of high quality. It makes clear that applications for tall buildings will be assessed against a number of criteria, including the following: an adopted Area Action Plan or masterplan framework for a site (i.e. the Tottenham AAP and the HRWMF in this case); assessment supporting tall buildings in a Characterisation Study; compliance with the Development Management Policies; and compliance with all relevant recommendations as set out in the CABI/English Heritage "Guidance on Tall Buildings" (2007 since superseded in 2015) and Historic England Advice Note on Tall Buildings.
- 9.33 Policy DM6 provides further criteria for the design of tall buildings, including to conserve and enhance the significance of heritage assets, their setting and the wider historic environment that would be sensitive to taller buildings. The policy also seeks to protect and preserve existing locally important and London-wide strategy views in accordance with Policy DM5. An urban design analysis is required to be submitted with applications for tall buildings assessing the proposal in relation to the surrounding context.
- 9.34 Policy AAP6 states that, in line with Policy DM6 (Figure 2.2), the North Tottenham Growth Area has been identified as being potentially suitable for the delivery of tall buildings.
- 9.35 The HRWMF massing principles seek to locate tall buildings towards the railway line, to create an edge to the development and build on the character established by the 22-storey River Apartments tower (81.5m Above Ordnance Datum (AOD)) at Cannon Road. Figure 52 of the HRWMF shows buildings reducing in height from this tower towards the High Road/White Hart Lane to create an appropriate heritage setting for statutory listed and locally listed buildings and Figure 53 sets out indicative proposed building heights. The building heights proposed by this application are set out in the table 13 below, alongside the approved heights in the extant consents and the indicative HRWMF heights.

Table 12: Proposed and consented building heights

Proposed		Fall-back Position – Extant Consented Schemes		
New Block	Heights ('full' details)	New Block	Heights ('Full' details & 'Outline' maximums)	HRWMF Indicative heights
North of White Hart Lane				
H-1a H-1b	18.175 to 30.975m AOD 1 to 4-storey	S1/D1/ D2	17.25/28.55/25.55m AOD Part 2/4/3 storeys	3-5-storeys
H-3	33.375 AOD Up to 5-storey	E1	31.5m AOD 5-storey	3-5-storeys
H-2	23.55m AOD Up to 2-storey	F1/F2	20.15/22.75m AOD 2-storey	3-5-storeys
J-1a J-1b	45.025 AOD 75.675 AOD 8-18 storey	C1/C2/C3/C4	75.5AOD/40 AOD/37AOD/34AOD Part 18/7/6/5	3-18-storeys
L-1a L-1b	57.9 AOD 84.5 AOD 12-21 Storey	B1/B2/B3	84.5/39.0/33AOD Part 21/7/3 storey	2 -18 Storeys
M-2	43.875 AOD 8 Storey	A1/A2	35.5-41.5 AOD Part 5/7 Storey	
M-1	108.05 AOD 29 Storeys	A2/B	22 to 43 AOD and 106m AOD Part 3/9/29 storeys	5-8-storeys 10-18- storeys
N1	46.175 AOD 10 Storey	C	19/37/43 AOD Part 1, 7 & 9-storeys	5-8-storeys
N2	36.25 AOD 7 Storey	D	29.65m to 32.70m AOD Part 5 to 6-storeys	5-8-storeys
N3-1 N3-2	30.4 AOD 36.55 AOD 4-6 storey	E	19/28/34m AOD Part 1, 4 & 6-storeys	5-8-storeys
N4-1 N4-2	27.1 AOD 37 AOD 4-8 storey	G	24.70m/27.36m/30.25m AOD Part 3/4/5 & 6-storeys	3-5 & 5-8- storeys
K1-1 K1-2 K1-3	27 – 38.050 4 – 7 Storey	-	24.07 – 37 AOD 3 – 7 Storeys	3-5 storeys
Other proposed plots north of White Hart Lane				
K2-1 K2-2	38.050 34.100	-	-	2-8 storeys

Proposed		Fall-back Position – Extant Consented Schemes		
New Block	Heights ('full' details)	New Block	Heights ('Full' details & 'Outline' maximums)	HRWMF Indicative heights
K2-3	27.200 3 - 7 storey			
L2	47.900 9 storey	-	-	5-8 storeys
J2	45.025 8 storey	-	-	5-8 storeys
M3	41.650 7 storey	-	-	5-8 storeys
I1-1 I1-2 I1-3	25.750 35.950 39.825 3-6 storey	-	-	3-5 storeys
I2-1 I2-2	29.000 23.900 2-4 storey	-	-	3-5 storeys
I3	29.475 4 storey	-	-	3-5 storeys
Plots south of White Hart Lane				
B-1 B-2 B-3 B-4	98.975 74.375 49.775 49.775 9 – 27 storey			3-8
C-1 C-2 C-3 C-4	58.325 47.400 42.950 41.250 7- 12 storeys	-	-	5-8
D-1 D-2	117.425 62.075 13- 29 storey	-	-	-
E	36.275 5 storeys	-	-	2-3
F-1 F-2 F-3 F-4	100.975 45.575 36.800 73.700	-	-	3-18

Proposed		Fall-back Position – Extant Consented Schemes		
New Block	Heights ('full' details)	New Block	Heights ('Full' details & 'Outline' maximums)	HRWMF Indicative heights
	5- 27 storey			
G	37.775 5 storey	-	-	3-5

9.36 The proposed scheme accords with the HRWMF principles of tall buildings being located next to the railway. However, the proposed tall buildings would be significantly taller than envisaged and would not reduce in height as much or as quickly towards White Hart Lane. Nevertheless, the proposed lower buildings are considered to generally accord with guidance in the HRWMF.

9.37 The Design Officer notes that 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 THFC's 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.

#### *Proposed Tall Buildings*

9.38 Based on the London Plan definition the majority of buildings would constitute 'tall buildings.'

9.39 The application scheme proposes significantly taller buildings than those envisaged in the HRWMF but are consistent with the scale of consented buildings on the Goods Yard and Depot Sites. The tall buildings are sited on a north-south axis, adjacent to the railway line as set out in the HRWMF. The detailed design of the buildings will be governed by the parameters plans with respect to uses, footprints, siting and height. Their detailed design will also be governed by the design code submitted with the application and would be subject to further determination of detailed reserved matters from the Local Planning Authority

9.40 Given that London Plan Policy D9 is the most up-to-date development plan policy on tall buildings and includes the most comprehensive set of impact criteria, and covers nearly all the criteria covered in Haringey's own tall buildings policies, this has been used as the basis of an assessment. It incorporates most of the relevant criteria set out in Local Plan Policy DM6, although specific criteria from this policy are also addressed below.

9.41 Location - As stated above, there is clear and specific policy support for the principle of tall buildings in the Tottenham Growth Area, although the proposed heights are taller than the indicative heights in the HRWMF as noted under Building Scale, Form and Massing above.

9.42 The proposed tall buildings are aligned with the railway, as envisaged in the HRWMF. Buildings taller than envisaged in the HRWMF have been previously accepted on the northern part of the site. It is envisaged that the proposed tall buildings will be of exceptional quality design and facilitate the efficient use of the site. This includes providing a residential density capable of delivering the proposed affordable housing, public open space, new pedestrian and cycle links, new commercial and community floorspace. These benefits are considered to outweigh the identified conflict with the HRWMF principle, in the planning balance.

9.43 Visual impacts – Part C (1) of London Plan Policy D9 sets out the following relevant criteria that are addressed in turn.

*(a) (i) long-range views – the top of proposed tall buildings should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views.*

*(a) (ii) mid-range views - the form and proportions of tall buildings should make a positive contribution to the local townscape in terms of legibility, proportions and materiality.*

9.44 Officers consider that the scheme would meet these criteria (see more detailed discussion below in terms of local and strategic views).

*(a) (iii) immediate views from the surrounding streets – the base of tall buildings should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.*

9.45 The application scheme has been subject to numerous pre-application discussions and design review panels and been developed to ensure that the parameters and design code facilitate buildings that will be well articulated, separated, have active frontages at street level (including primary entrances at street level) and not be overly dominant at ground level. Officers are satisfied that the tall buildings will relate well with the street and the lower buildings that they would spring from. The Design Officer notes they should 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).

(b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding.

9.46 The proposed towers form a spine of buildings along the western edge of the site (in general accordance with the HRWMF). The tall buildings align with east-west routes to and from the High Road and would assist wayfinding in the local and wider area, particularly in relation to White Hart Lane Station. The Design Officer notes 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.

*(c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan.*

9.47 Whilst the tall buildings are located in part of the site that is in outline form, the outline design and access statement and design code details set out illustrative treatments and forms of these buildings whilst fixing some rules that will guide the future detailed reserved matters submissions which would be subject to further determination by the Local Planning Authority. Officers are satisfied that the design code could facilitate the delivery of exemplary tall buildings. An obligation to ensure the existing architects oversee the delivery of the detailed design will be secured through a S106 obligation. The Design Officer notes they should be 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).

*(d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm.*

9.48 By virtue of the scale of the buildings proposed, it is likely that the tall buildings will result in a degree of (less than substantial harm) to the setting and significance of nearby heritage assets. The degree of harm will be mitigated by the scale and appearance of intervening buildings and local enhancements to the public realm around these assets as well as the architectural expression of these buildings. In light of this, officers consider that the less than

substantial harm caused to nearby heritage assets will be outweighed by the public benefits that the scheme would provide.

*(g) buildings should not cause adverse reflected glare.*

9.49 Potential solar glare impacts are addressed under Impacts on Amenity of Adjoining Occupiers below and are considered to be acceptable.

*(h) buildings should be designed to minimise light pollution from internal and external lighting.*

9.50 Light Pollution was scoped out at the EIA Scoping stage. There are no proposals to externally illuminate the proposed tall buildings and officers do not consider that there would be any significant adverse effects from internal lighting for this site. External lighting details can be conditioned.

Functional impacts – Part C (2) of London Plan Policy D9 sets out the following relevant criteria that are addressed in turn:

- *(a) the internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants.*

Fire safety is addressed below and is considered acceptable subject for plot A and the strategy of the outline part of the site is considered to be acceptable. Compliance with the submitted strategy for plot A and a detailed strategy for the outline element will be secured by condition.

- *(b) buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process.*

9.51 The London Plan (supporting text 3.4.9 for Policy D4) stresses the importance of these issues for higher density developments, those with a density of 350 units per hectare or more. Vehicular servicing is discussed under Transportation & Parking below. The proposed strategy for plot A is considered to be acceptable. The detailed arrangements for the outline part of the site will need to be secured by planning condition.

- *(c) entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas.*

9.52 Given the tall buildings form part of the outline application, access arrangements to the building are not fully detailed in the submission. Officers are satisfied that indicative layout and design code would facilitate active frontages along key public routes and ensure that there

would be no overcrowding or isolation in the surrounding areas, including on Tottenham Hotspur match and other event days.

- *(d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building.*

9.53 The capacity of the transport network is addressed under Transportation & Parking below. In summary, this is considered to be acceptable.

- *(e) jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area.*

9.54 The proposed ground floor commercial units and associated economic activity/job opportunities have been clustered around the proposed southern and northern squares and would have a satisfactory relationship with the proposed tall buildings and residential uses. These would make a positive contribution towards the regeneration of the area.

- *(f) buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings.*

9.55 The site is not within an 'aerodrome safeguarding' zone and subject to the inclusion of aircraft warning lights (on construction cranes and completed buildings) required by regulations, the proposed tall buildings are considered acceptable. Proposed roof-top PV arrays are addressed under Energy, Climate Change & Sustainability below and are considered acceptable.

9.56 Environmental impacts – Part C (3) of London Plan Policy D9 sets out the following relevant criteria that are addressed in turn:

- *(a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces around the building.*

9.57 These issues are addressed under Residential Quality below. In summary, officers consider that the proposed towers could be designed to provide acceptable conditions for future residents and occupiers of neighbouring properties.



- *(b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions.*

9.58 Potential air quality impacts are addressed under Air Quality below and are considered to be acceptable.

- *(c) noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building.*

9.59 Potential noise and vibration impacts are addressed under Residential Quality and Neighbour Amenity below. Officers are satisfied that tall buildings can be accommodated whilst providing a comfortable street level environment.

9.60 Cumulative impacts – Part C (4) of London Plan Policy D9 requires the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area to be considered when assessing tall building proposals.

9.61 The Environmental Statement and associated addendum, including the Heritage, Townscape and Visual Impact Assessments look at the potential cumulative effects of a number of consented and proposed schemes, including the Northumberland Development Project (which permits a 40m high ‘sky walk’ a 22-storey hotel, a 51m high sports centre and residential blocks up to 36-storeys in height – 131m AOD).

9.62 As outlined above, London Plan Policy D9 identifies most of the relevant criteria in Local Plan Policy DM6. However, a number of specific Local Plan criteria are addressed below:

- *Policy DM6 requires proposals for tall buildings to have regard to the Council’s Tall Buildings and Views SPD.*

9.63 The Council has not prepared such an SPD (the former Supplementary Planning Guidance 1c on Strategic Views was withdrawn in July 2014). The impact on strategic views is assessed below.

- *Policy DM6 (D) (a) requires tall buildings within close proximity to each other to avoid a canyon effect.*

9.64 The proposed tall buildings would be in a line, adjacent to the rail line and would be spaced out and viewed in the context of intervening buildings within the site that vary in height and massing, in an area that has been identified as being suitable for tall buildings. Given this, officers do not consider that there would be a canyon-like arrangement. The appearance,

scale and layout of the buildings would be secured at detailed reserved matters stage which would be subject to further determination by the Local Planning Authority. The Design Officer notes that 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.

- *Policy DM6 (D) (c) requires tall buildings to avoid coalescence between individual buildings.*

9.65 Given the proposed layout of the tall buildings, aligning on the north-south axis there could be coalescence between buildings when viewing the buildings from the north or south but this would be limited by available vantage points in these directions. Where overlapping does occur, officers consider that the proposed differing design approach to these building would reduce coalescence, and the places where a coalescence would be observed, are generally less sensitive, including very few parts of the busiest streets in the vicinity, The High Road / Fore Street, Northumberland Park or White Hart Lane (which would pass through a short bit of coalescence around the railway bridge, but not for the longer view from further west), or major parks and public spaces such as those around the stadium, Tottenham Cemetery, Bull Lane Playing Fields, Florence Hayes Rec, Tottenham marshes or the proposed Peacock Park (although there could be some coalescence in some views from Bruce Castle Park). The appearance, scale and layout of the buildings would be secured at detailed reserved matters stage which would be subject to further determination by the Local Planning Authority. The Design Officer's comments noted in the point above equally apply to this point.

- *Policy DM6 (D) (d) requires applications for tall buildings to demonstrate how they collectively contribute to the delivery of the vision and strategic objectives for the area.*

9.66 The proposal constitutes the comprehensive masterplan for the NT5 allocation minus a small proportion of the northern-most extent of the allocation which has been delivered independently. and some small plots occupied by existing buildings along and immediately behind the High Road. The proposal is considered to deliver on the vision and strategic objectives of the allocation and 2014 masterplan.

- *Policy DM6 (E) – requires the submission of a digital 3D model to assist assessment.*

9.67 This has been done and officers have used this to help them consider the proposals.

#### *Townscape and Visual Effects*

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

9.69 The Townscape and Visual Impact Assessment (TVIA) and associated addendum which forms part of the ES considers likely significant townscape and visual effects across a study area (1 km radius from the proposed tall buildings). This has also helped inform the assessment of likely significant effects on built heritage, which is addressed below. The TVIA draws on Accurate Visual Representations (AVRs) of the proposed scheme from 26 representative views in the surrounding area, including beyond the 1km study area, that were agreed with officers. The assessment also includes additional non-verified views that have been agreed with Officers.

9.70 The site does not fall within any Strategic Views identified in the Mayor's LVMF. It also does not fall directly within any Locally Significant Views as identified in Policy DM5, although it does fall in the background of Townscape View No. 28 (along Tottenham High Road from High Cross Monument to Bruce Grove Station). The stadium means that the proposed towers would not be visible from Linear and Townscape View No. 33b (To White Hart Lane Stadium). The HRWMF shows key views from the High Road looking westwards along new streets towards two landmark buildings on the western boundary (the now built Riverside Apartments at the end of Cannon Road and a tower, in the approximate location of proposed Blocks M and L).

9.71 The ES identifies nine Character Areas. These are: (1) High Road, (2) Relict Industrial, (3) Tottenham Hotspur Stadium, (4) Post-war and modern residential blocks, (5) Light industrial in environs of Brantwood Road, (6) Industrial and institutional (7), Tottenham Cemetery and Bruce Castle Park, (8) The Roundway and (9) wider residential development. The ES concludes that the likely effect of the completed development on character areas 1-6 and 8-9 would be beneficial (negligible beneficial- Major beneficial) whereas the effect on character area 7 would be minor adverse. Officers would note that the proposed towers would not, in all cases, have wholly beneficial effects. This is particularly the case where these Character Areas relate to Conservation Areas and other heritage assets, as discussed below. However, in many views from these areas the existing tall and taller buildings on and adjacent to the site (the existing Love Lane blocks and the recent Rivers Apartments) are already visible, and the significant public benefits arising from the development, including but not limited to, the provision of new housing (including affordable housing), public realm improvements, new public spaces, new access routes, new jobs and new community facilities, amounting to a vibrant new town centre, will outweigh the harm, in the planning balance.

9.72 The ES concludes that the permanent effect of the proposed scheme on 5/26 receptors (viewpoints) would be beneficial (neutral beneficial – moderate/Major beneficial), the impact on 16/26 receptors were deemed adverse (minor-moderate adverse) and the proposal was deemed to have no impact on 5/26 receptors.

9.73 Set out below in Table 14 is a summary of the findings of the ES and associated addendum – which summarises findings based on detailed narrative assessments for each of the assessed views.

Table 13: ES Summary of effects on Visual Receptors (verified views)

<b>Visual Receptors- Verified views</b>	<b>Likely effect operation</b>	<b>Likely effect cumulative</b>
View 1 – Alexandra Palace, oriented away from vista	Moderate/Major Beneficial	Moderate/Major Beneficial
View 8 – Sandpiper Close, Waltham Forest	Minor Beneficial	Minor Beneficial
View 12 – Greenwich Park, General Wolfe Statue	None	None
View 13 – Public footpath at Lordship Recreation Ground	Minor Adverse	Minor Adverse
View 14a – War Memorial Cemetery	Minor Adverse	Minor Adverse
View 14b – War Memorial Cemetery	Minor Adverse	Minor Adverse
View 15 - Bruce Castle Park, south of Kings Road, oriented north-east	Minor/Moderate Adverse	Minor/Moderate Adverse
View 16 - Bruce Castle Park, main pedestrian axis, oriented north-east	Minor/Moderate Adverse	Minor/Moderate Adverse
View 18 – Carbuncle Passage, Hartington Park entrance, oriented north-west	Minor Adverse	Minor Adverse
View 19 – High Road, north of junction with Bruce Grove	None	None
View 21 – High Road, oriented north, north of junction with Lordship Lane	Minor Adverse	Minor Adverse
View 22 – High Road, oriented north, opposite junction with Cedar Road	Minor Adverse	Minor Adverse
View 23 – High Road, oriented north, at junction with Bromley Road	Minor/Moderate Adverse	Minor/Moderate Adverse
View 27 – White Hart Lane Stadium from Bruce Castle	Minor/Moderate Adverse	Minor/Moderate Adverse
View 29 – Pymmes Brook, adjacent to Angel Edmonton Road, oriented south-west	Negligible beneficial	Negligible beneficial
View 30 – Northwest corner of Dysons Road and Middleham Road, oriented west	Nil	Nil

<b>Visual Receptors- Verified views</b>	<b>Likely effect operation</b>	<b>Likely effect cumulative</b>
View 31 – Northumberland Park, north of junction with Worcester Avenue	Negligible Adverse	Negligible Adverse
View 32 – High Road, opposite junction with White Hart Lane, oriented north-west	Moderate Adverse	Moderate Adverse
View 33 – Beaufoy Lane, west of junction with Tenderden Road, oriented north-east	Minor Adverse	Minor Adverse
View 34 – Queen Street, opposite junction with Academia Way, oriented east	Nil	Nil
View 35 – Shaftesbury Road, north-west of junction with Pretoria Road, oriented south	Negligible Beneficial	Nil
View 36 – Fore Street, at entrance to Florence Hayes recreation ground, oriented south-west	Negligible Beneficial	Negligible Beneficial
View 38 – Creighton Road, north side opposite junction with Beaufoy Road, oriented east	Moderate Adverse	Moderate Adverse
View 39 – South-east corner of junction between White Hart Lane and Love Lane	Minor/ Moderate Adverse	Minor/ Moderate Adverse
View 41 - White Hart Lane at Beaufoy Road (night-time)	Minor Adverse	Moderate Adverse
View 42 – Northumberland Park, south of junction with Bennetts Close	Negligible/ Neutral	Negligible/ Neutral

9.74 Officers generally agree with the assessment in the ES but the Conservation officer does not agree with the minor/ moderate adverse effect identified in the Environmental Statement for the following views

- 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 39: South-East corner of junction between White Hart Lane and Love Lane
- View 41: High Road North of Brent Wood Road
- View 42: Northumberland Park, South of Junction Wit H Bennetts Close.

9.75 London Plan Policy D9 calls for tall buildings to make positive townscape and visual contributions when seen from long, mid and immediate views. The ES considers that the following views are long, mid (or medium) and immediate (or close):

- Long - Views 1, 8, 12, 13, 14a, 14b, 15, 16, 18, 19, 21, 22, 27, 29 and 30
- Medium/mid – Views 23, 33, 34, 36 and 31
- Close/Immediate – Views 32, 35, 38, 39, 41, 42

9.76 Long-distance views. London Plan Policy D9 calls for the top of proposed tall buildings to make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views.

9.77 Officers consider that the application scheme would read well in long-distance views and provide positive additions to the skyline.

9.78 Medium/Mid-range views. London Plan Policy DM9 calls for the form and proportions of tall buildings to make a positive contribution to the local townscape in terms of legibility, proportions and materiality.

9.79 Likewise, officers consider that the application scheme would read well in mid-range views, with the verified views in the TVIA demonstrating that the proposed proportions would be acceptable when seen from locations in the nearby residential streets and parks and residential streets and would assist orientation and legibility at ground level.

9.80 Close/Immediate views from the surrounding streets. London Plan Policy D9 calls for the base of tall buildings to have a direct relationship with the street and maintain the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.

9.81 The proposed towers, are to be surrounded by smaller scale elements with active frontages proposed at ground floor level. The outline design and access statement, the submitted parameters plans and design code provide a suitable framework to ensure that the buildings are well articulated and finished to a high quality and have a positive relationship with their immediate surroundings. The Design Officer notes the 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.

9.82 An assessment of the likely effects of the proposed scheme on neighbour amenity is set out below.

9.83 A number of verified views of the proposed scheme are contained in **Appendix 1**. Overall, officers consider that the proposed scheme is generally in accordance with the HRWMF and that it would have an acceptable overall effect on the wider townscape and visual receptors, including strategic and local views.

#### *The proposed lower buildings*

9.84 As summarised in Table 13 above, the proposed lower buildings range in height between 2 and 29-storeys. To respect the setting of the heritage assets at the High Road and White Hart Lane frontages the blocks in the 'heritage interface' areas (shown in green in Figure 04 below) would be lower scale and distinct. The scale of development would increase fronting the proposed streets and squares within the site (shown in blue), stepping up incrementally from 3 to 4-storeys and up to 5 to 6-storeys - opening up to larger linear mansion blocks with similarities in form and articulation around the proposed Peacock Park and Moselle Square. All of these would provide contextual buildings for the proposed tall buildings (figure 6).

9.85 The Design Officer notes 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, comprising 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 is some flexibility, but a strong expectation; unlike most design codes, there are no "may" codes, which strengthens the certainty that the code provides. 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. 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.



Figure 06: The proposed lower buildings

9.86 The proposed parameters for Blocks H (1, 2 & 3), J (1 & 2), L (1 & 2) and M(2) are commensurate, albeit slightly larger, than that approved as part of the Goods Yard consent. The proposed parameters for blocks M (1), N (1, 2, 3) and N4 are all consistent with that previously approved under the Depot consent. Block K (1-1, 1-2 & 1-3) are similar to that in the Print Works application which has a resolution to grant (subject to legal agreement) from the Planning Sub Committee.

Detailed element:

9.87 Block A1 – a 5 storey L shaped building located to the south of the Headcorn and Tenterden Shared Garden. The building is to be finished in a red/ red multi brick with a mix



of mortar colours and feature brickwork, with a regular fenestration pattern and arch and sill detailing. Windows and doors are to be composite, set in reveals. Corner articulation provided by projecting balconies within façade recesses. Entrances to the building area defined by contrasting feature brickwork. The building is to have a flat sedum roof with PV panels sat behind the parapet.

9.88 Block A2/A3 – a part 6 storey building stepping down to 5 storeys opposite the existing dwellings fronting Headcorn Road. The building is orientated on a north south axis, backing onto the railway and fronts new public realm (White Hall Mews). The building is to be finished in red/ red multi brick with mortar variations and feature brickwork, with articulation provided by a regular fenestration pattern, projecting circulatory cores and balconies. Windows and doors are to be composite, set in reveals, with arch and/or sill detailing. The building is to have a flat sedum roof with PV panels sat behind the parapet.

9.89 The Design Officer notes that 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.

Outline element:

9.90 Block B – located to the south-western corner of the site, adjacent to the rail line and Orchard Place. This block is to adopted a Residential South Architectural Approach. This is envisaged to comprise of a double heigh recessed entrance, regular fenestration and balcony patterns variations in heights of component parts of the block and a crown to the top of the building. Materials are envisaged to comprise of rendered feature elements to the ground floor and a mix of buff, red and multi bricks.

9.91 In detailed comments, the Design Officer notes that this is probably the most challenging plot in design terms, but that the Parameter Plans and Deign Code contain within it sufficient flexibility that it should be capable of accommodating good quality housing as part of the overall development, provided Reserved Matters proposals successfully address its relationships to neighbouring plots, existing neighbours outside the site and the railway, provide sufficient amenity space, playspace, day and sunlight

9.92 Block C – located to the south-western corner of the site, adjacent to Brereton Road and High Road. The proposed architectural approach varies across the block comprising the

aforementioned residential design approach to the Brereton Road frontage. The frontage facing High Road is to adopt a heritage approach. This comprises taking cues from the nearby heritage assets, including materiality, roof lines and detailing. This could include string courses, mansard forms, door arches, brick window recesses and modern but complimentary materials.

9.93 The Design Officer notes 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.

9.94 Block D – located to the west of the site, to the south of White Hart Lane Station and to the north of the junction with Whitehall Street. The block is to adopt a civic architectural approach to the facades fronting the proposed Moselle Square and a feature building approach to the tallest component adjacent to the railway line.

9.95 The Civic architectural approach comprises podiums at lower floor levels with regular but graduated forms that provide containment to the public spaces. It is envisaged that the parts of the building will be finished in varied brick, with regular fenestration and materials variations that vary as you move up the levels to add interest and break up massing. This includes band detailing, inset balconies, complementary feature panelling, a crown top storey and a parapet. The part of the building that is to adopt the feature building approach is envisaged that building will land in the public space, outside the station and provide a terminal view to the key vista along Love Lane and serving as a landmark in the wider area. The building is envisaged to have a stepped form and a quality modern materials pallet.

9.96 The Design Officer comments that this is the “landmark” plot of the whole southern half of the development, this tower is proposed to have a unique “Feature Building” architectural approach and should be the tallest building in the development. 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.

9.97 Block E – located to the east of the site, to the south of the junction of Moselle Place and High Road. The building is proposed to adopt a feature approach. It is envisaged that the building will have two distinct elevation designs with the west elevation extending the verdant landscape of Moselle Square, at multiple levels. The east is envisaged to provide continuity with the street frontage of High Road whilst acting as a marker for the Station and Football Stadium. The ambition is that the final building design is delivered through design competition. This will be secured via legal agreement.

9.98 In detailed comments, the Design Officer notes this is the other “landmark”, and a particularly challenging design; a single-use building, with active frontage on all sides and no particular back, that must address the square yet hold the High Road frontage as part of the continuous historic high road, repairing the gap created by the stadium opposite, a monumental landmark building, against which, despite being smaller, this needs to architecturally compete! An open architectural competition is recommended to secure the exceptional design quality such a significant and tricky brief requires.

9.99 Block F – located centrally in the site, to the south of White Hart Lane, the east of the Station and to the west of William Street. The block is envisaged to adopt the aforementioned civic approach on its southern side and Residential South architectural approach to the north.

9.100 The Design Officer notes the proposals are generally pretty sound and logical from a design point of view. 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. However, the impact directly onto White Hart Lane of the tallest building in Plot F, is somewhat challenging, so the flexibility in the Parameter Plans and Design code to allow the position of this tower on the eastern side of this plot will be an important part of securing a good design at Reserved Matters.

9.101 Block G – located centrally within the site, to the south of White Hart Lane, to the north of William Street and the west of High Road. The block is envisaged to adopt the heritage architectural approach.

9.102 In detailed comments, the Design Officer notes this modest plot has proved challenging, but the Design Code and Parameter Plans should allow an acceptable scheme providing high quality housing, an active frontage to White Hart Lane, an appropriately modest relationship to its Listed Building neighbour to its east, and an urban design response to the vista to its north and the street corner on its western edge.

9.103 Blocks H – located towards the western edge of the site, to the north of White Hart Lane. The buildings are to adopt a heritage architectural approach to provide a sensitive setting for the adjoining listed and locally listed buildings and are in accordance with the existing planning permission for this site.

- 9.104 Blocks I - located towards the eastern edge of the site, to the north of White Hart Lane and adjacent to properties fronting High Road. The buildings are to adopt a heritage architectural approach to provide a sensitive setting for the adjoining listed and locally listed buildings.
- 9.105 The northern part of the block is envisaged to adopt the Peacock Park design approach. The approach seeks to transition between the natural landscape of the park and the residential/ mixed use buildings beyond. The buildings are to adopt an informal domestic character with ground floor duplex homes and animated communal entrances, continuous open frontages, mixed brick finishes and mixed window and balcony placements to upper floors.
- 9.106 In detailed comments, the Design Officer notes that although these proposed blocks are modest, their contexts of significant heritage assets are sensitive and relationships to their street and yard frontages are complex, but that the Design Code for them is sufficiently strict that good proposals at Reserved Matters applications should be possible.
- 9.107 Block J – Located to the west of the site, to the north of White Hart Lane and adjacent to the rail line. The building is to adopt a residential north architectural approach that comprises a taller building in the north-western corner with lower 5-8 storey sections to shoulder the tallest part of the building. The building is envisaged to be finished in brick, with duplex apartments at ground and first floor level creating a rhythm of private entrances at street level and projecting balconies to upper levels and are in accordance with the existing planning permission for this site.
- 9.108 Block K1 – Located to the east of the site, to the north of no. 817 High Road but to the south of 831 High Road. The block could be delivered independently of the masterplan pursuant to the recent Print Works application that the Planning Sub Committee resolved to grant planning permission.
- 9.109 If it does come forward as part of this permission, it is envisaged that the block will adopt a mixed architectural approach to form an interface between the existing buildings on High Road and the new higher density neighbourhood beyond. It is envisaged that the component parts of the building would vary in width, height, materials finishes, fenestration patterns and roof forms whilst providing active frontages at ground level to enhance the setting of the Conservation Area.
- 9.110 Block K2 – Located to the east of the site, to the south of no 867 High Road and to the west of the existing buildings fronting High Road. The block is proposed to adopt the mixed architectural approach to provide a sympathetic setting to the conservation area and

mediate between High Road and the higher density development towards the west of the site. The Design Officer notes that the Design Code is definitive on the form of these blocks, whilst leaving potential for considerable adjustment as more is discovered about the site before a Reserved Matters application. In this way, the Design Code seems to be as clear and definitive as possible to preserved design quality for this site.

- 9.111 Block M – Located towards the north-west of the site, adjacent to the railway line and to the south of Cannon Road. The tallest part of the block may be brought forward independently. If delivered by the masterplan, it is envisaged that the building would adopt a marker design approach, creating a landmark along the railway and aiding wayfinding to the proposed new park. It is anticipated that the building will adopt a distinctive design and materials palette and are in accordance with the existing planning permission for this site.. The southern-eastern part of the building is envisaged to adopt the Peacock Park design approach.
- 9.112 Block N1 – Located to the north -western corner of the site, immediately to the south of Cannon Road. The block is envisaged to adopt the feature building approach. The building may be delivered independent of the masterplan, as part of the extant depot consent, and are in accordance with the existing planning permission for this site..
- 9.113 Block N2 - Located to the north of the site, immediately to the south of Cannon Road. The building is envisaged to adopt the park-side design approach but may come forward independently of the masterplan, as part of the extant depot consent, and are in accordance with the existing planning permission for this site..
- 9.114 Block N3 - Located to the north-eastern corner of the site, immediately to the south of Cannon Road and to the west of High Road. Is envisaged to adopt the heritage design approach but may be delivered independent of the masterplan, as part of the extant depot consent , and are in accordance with the existing planning permission for this site..
- 9.115 Block N4 – Located towards the north-eastern corner of the site, to the west of High Road. It is envisaged that the building will adopt the heritage architectural approach , and are in accordance with the existing planning permission for this site..
- 9.116 Overall, officers are satisfied that both the proposed design approaches and design code will facilitate the creation a visually interesting, well thought through and high quality neighbourhood.

*Inclusive Design*

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

9.118 The applicant's Design and Access Statement (DAS) explains how the proposed scheme will be designed to meet inclusive design principles and good practice. All external routes, footway widths, gradients and surfacing would respect the access needs of different people. The proposed landscaping and play spaces will be designed to be safe (as discussed above), child-friendly and provide sensory interest (changing colours and scent) at different times of the year – with no separation based on housing tenure. Building access, internal corridors and vertical access would meet Building Regulations. 10% of the proposed buildings will meet M4(3) standards and 90% will meet category M4 (2) standards. In the detailed part of the scheme, 8% will be M4 (3), in response to the specific housing needs of the residents moving from Love lane to the Whitehall Mews. This level of provision is considered to be acceptable.

9.119 As discussed under Transportation and Parking below, car parking provision would be focused on the needs of wheelchair users, decanted residents and others that may have a particular need to access a car and proposed cycle parking includes spaces for 'adaptive' and large bikes. Overall, officers are satisfied that the proposed scheme would be accessible and inclusive. The particular requirements in relation to wheelchair accessible housing are discussed under the Residential Quality section below.

#### *Secured by Design*

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

9.121 The proposal will seek to provide active frontages at ground floor level in the form of flexible commercial units, duplex/ maisonettes with front doors on the streets and communal residential entrances. This should all help ensure a safe and secure development and an active public realm. The detailed design of the public realm, including proposed landscaping and lighting for Whitehall Mews, are also considered acceptable, as is the proposed strategies for the outline part of the proposal. The details for which will be secured at detailed reserved matters stage which would be subject to further determination by the Local Planning Authority.

9.122 The Designing Out Crime Officer (DOCO) raises no objection in principle, subject to conditions. If planning permission were to be granted, it would be possible to impose a

planning condition to require Secured by Design accreditation and ensure the DOCO's continued involvement in detailed design issues and to require the implementation of a Management and Maintenance Plan for the space.

### *Development Design – Summary*

9.123 The NPPF (July 2021) makes beauty and placemaking a strategic policy and places an emphasis on granting permission for well-designed development and for refusing it for poor quality schemes, especially where it fails to reflect local design policies and government guidance contained in, amongst other things, the National Design Guide (January 2021). London Plan and Local Plan policies require high-quality design and the HRWMF provides local guidance on place-making and design for Site Allocation NT5.

9.124 Officers consider that the proposed scheme is a well thought through and contains appropriate, parameters and design instructions to create an elegant design response to a significant site. The proposed masterplan and layout represent an improvement on the existing adopted masterplan, with a clear, legible street network, large public park, public square and other public realm whilst making efficient use of the site. The proposed street layout promotes creation of safe, active, inclusive and legible streets within the proposed development that will connect well with the surrounding network. The parameters, design code and indicative proposals demonstrate that streets and public spaces will be lined with good quality, well-designed low, medium and high rise blocks, verdant landscaping and provide an appropriate transition from the retained existing buildings along the High Road and White Hart Lane, to the proposed taller blocks.

9.125 It is considered that the proposal conforms with London Plan Policy D9, Local Plan Policies SP11, AAP6 and DM6 and generally accords with the principles and delivers on the objectives set out in the HRWMF. Officers consider that, overall, the proposed mix of heights (including 3 - 29 storeys) is successfully justified in accordance with this policy and guidance. In particular, whilst the buildings are taller than the indicative heights in the HRWMF, the separation distances between the buildings, the way in which building heights transition across the site and controls and design guidance contained within the design code, development specification and the illustrative material provided with the application provide a sound base to deliver an interesting high quality development that would deliver numerous benefits to the local community and wider Borough. Views of the development show it would generally not be any more detrimental than the existing and previously approved tall buildings, and by completing the intended row of tall buildings along the railway edge, as envisaged in the previously approved masterplan.

9.126 Officers consider that the QRP's concerns have either been addressed or are capable of being addressed at detailed reserved matters stage which would be subject to further review by the QRP and determination by the Local Planning Authority.

9.127 The proposal is capable of providing a significant amount of high quality public and private open space. This includes a new public park (Peacock Park), a new civic square (Moselle Square), shared podium gardens, private balconies. The proposed layout, distribution of uses and design would provide an accessible, safe and secure environment for future residents and the general public. It is recommended that s106 planning obligations secure public access to the proposed publicly accessible spaces and ensure that management and maintenance of streets and publicly accessible spaces is in accordance with the Mayor of London's recently adopted Public London Charter (October 2021). It is also recommended that that matters of scale, layout, landscaping and appearance details are reserved by way of planning conditions.

## 10 Residential Quality

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

### *Accessible Housing*

10.2 London Plan Policy D7 and Local Plan Policy SP2 require that all housing units are built with a minimum of 10% wheelchair accessible housing or be easily adaptable to be wheelchair accessible housing. London Plan Policy D5 requires safe and dignified emergency evacuation facilities, including suitably sized fire evacuation lifts.

10.3 The detailed part of the scheme proposes 8% of homes to meet M4 (3) standards (5/60 units). This is in response to a specific need of returning Love Lane residents. The shortfall in provision on the detailed part is to be met with an over provision in the outline part of the proposal. Overall, it is envisaged that the proposal will deliver 10% (M4(3) (wheelchair user dwellings) and 90% meeting M4 (2) (accessible and adaptable dwellings). The wheel chair accessible units are 2 bedroom and 3 bedroom units and are located in block A1 which is served by two lifts. It is envisaged that the development will deliver accessible housing across a range of unit sizes and types, including affordable units, duplexes and apartments of varying sizes.

10.4 Disabled vehicle parking, for the detailed element, is provided in the CPZ parking area on Whitehall Street. The proposed parking is 3 on street spaces which equates to 3% and can be increased, if required. The cycle store to the north of A3 contains a mix of bike racks and Sheffield Stands which provide for 5% ambulant disabled cycle parking. Proposed emergency evacuation provision is addressed under Fire Safety & Security below (and is



considered acceptable). A Car Parking Management Plan that prioritises and manages access to these proposed spaces will be secured by condition.

10.5 A minimum of 3% blue badge car parking will be delivered for each block with up to a further 7% blue badge car parking provision for each plot, with the first reserved matters application delivering 10% blue badge parking.

10.6 The approach to entrances, lobbies and common areas are designed to meet Approved Document M, Volume 1, Categories 2 and 3. It is also envisaged that directional signage, lighting, level thresholds at entrances, door and corridor widths, surface materials, detailing of lift cars and internal wares will facilitate inclusive movement throughout the development. These details will be secured at reserved matters stage.

#### *Indoor and Outdoor Space Standards*

10.7 All of the proposed homes are envisaged to meet or exceed the national described minimum space standards and floor to ceiling heights (2.5m) standards called for in London Plan Policy D6.

10.8 All flats would have access to amenity space in the form of private balconies/terraces and/or direct access to communal open space, in the form of ground floor courtyards, podium level gardens. The details of which will be secured at reserved matters stage, for the outline part of the site.

#### *Unit aspect, outlook and privacy*

10.9 Most of the proposed homes are envisaged to be dual aspect. The majority of single aspect dwellings would be east and west facing. The reserved matters will include daylight/sunlight and overheating assessment and analysis to ensure that a suitable living environment is provided for future occupants. Proposed blocks A1, A2 and A3 would be suitably separated from the existing buildings fronting Headcorn Road, Penhurst Road and Tenterden Road, as well as one another and primary windows and balconies have been sited on the proposed buildings, to avoid giving rise to adverse privacy impacts, whilst providing a reasonable outlook.

10.10 Whilst the detailed design of the outline element is subject to future reserved matters submissions, Officers are satisfied that the buildings within each of the proposed blocks will be designed to provide good quality outlook and privacy for both the future occupants and that of their immediate neighbours.

#### *Daylight/Sunlight/overshadowing – Future Occupiers*

- 10.11 The applicant's Daylight and Sunlight Report provides an assessment of the detailed element of the permission and an indicative assessment of two of the blocks in the outline permission (Blocks B & C).
- 10.12 The detailed nature of the detailed part of the application, with detailed proposed floor plans, allows Average Daylight Factor (ADF) to be used to consider daylight. The assessment found that 91% (232/254) of proposed habitable rooms tested would satisfy the relevant ADF figures for different room types. The assessment of sunlight used Average Potential Sunlight Hours (APSH). This found that 73% 44/60 of the main living rooms have at least 1 window orientated within 90 degrees of due south. The building layout has been designed to minimise the number of north facing units. Each unit is to have a balcony or private amenity space which will typically receive good levels of sunlight.
- 10.13 The applicant's assessment also tested likely Sun on Ground for the proposed communal garden between Plots A2 and A2/A3 and the private gardens to the duplex apartments in Plot A2/A3 against the BRE guidelines that spaces should receive 2 hours sun over at least 50% of the area on March 21. This found that 92% of the tested communal amenity areas would meet the BRE guidelines. In addition, 7/8 of the private gardens would receive at least 2 hours of direct sunlight to at least half of their area. All residents will have access to the communal garden.
- 10.14 Approximately 87% of the facades on Plot B and 81% of the facades on Plot C would receive in excess of 15% Vertical Sky Component (VSC) with only 0.30 and 0.01% of the respective facades receiving less than 5% VSC. Daylight is envisaged to be more restricted at lower floors (4<sup>th</sup> floor and below).
- 10.15 Approximately 83% of the facades of Plot D and 93% of the facades to Plot F would receive at least 15% VSC with 1.11% and 0.01% of the respective facades receiving less than 5%. Daylight is restricted at the lowest 3 floors of plot D (where it faces block B) and the lower floors on the eastern side, where the elevation is set in. The design code ensures that habitable rooms are avoided in this area.
- 10.16 The VSC façade study, for plots H and I demonstrate that 91% of the façade would receive in excess of 15% VSC, with the remaining 10% receiving between 5% and 15% VSC. The areas achieving between 5 and 15% are located on the flank elevations facing plot F. It is envisaged that non-primary windows would be sited on this façade.
- 10.17 The VSC façade study, for plot J shows that 89% of the façades would achieve at least 15% VSC, with only 0.36% receiving less than 5% VSC. Careful consideration would need to be given to the courtyard and the north facing elevations. Daylight is most restricted on the flank elevations, these should serve secondary windows/ non-habitable rooms.

- 10.18 Plot K comprises three buildings. The VSC façade studies demonstrate the vast majority of the façades will receive high levels of VSC, with 92% receiving at least 15% VSC. Daylight is restricted to the north and south elevations of building K2-1 but still exceeds 5% VSC.
- 10.19 The VSC facades for plot L, show that 78% of the façade areas will receive at least 15% VSC, with 21% receiving between 5% and 15% VSC. Lower levels of daylight are seen to the inward facing façades within the courtyards, and particularly to the façades directly opposite the towers.
- 10.20 87% of the façades to Plot M and 89% of the facades to Plot N would achieve at least 15% VSC. Daylight is restricted on the flank elevation of plot N, that faces Plot K where non-habitable and secondary windows should be sited as set out in the design code. The lower VSC levels front plot M is the lowest 3-4 stories that face Plot L.
- 10.21 An average of 67% of the facades of the outline blocks meet or exceed the BRE report guidelines for annual sunlight (this includes north facing elevations which face north). It is recommended that the number of living rooms meeting or exceeding the BRE guidance is maximised. The design code sets out requirements to maximise light provision to the proposed dwellings.
- 10.22 Moselle Square, Peacock Park and Communal Roof terraces of the indicative scheme have been tested for at least 2 sunlight hours on the 21<sup>st</sup> of March. 54% of Moselle Square and Peacock Park is envisaged to receive at least 2 hours of sunlight. All roof terraces are envisaged to receive at least 2 hours of sunlight on the 21<sup>st</sup> of March.
- 10.23 The majority of courtyards and amenity areas serving individual plots would also comply with the BRE Report numerical guidelines. Plots D, J, L and M are arranged with buildings on all sides which inevitably creates challenges ensuring that sunlight can reach the internal courtyard, particularly to the southern part. Whilst these courtyards would not strictly meet the BRE Report guidelines, possible redistribution of the building massing at detailed design stage should reduce shadowing and enable the landscape architect to design the amenity areas in a way which utilises the sunlight received and achieves a desirable outdoor space.
- 10.24 31 of the external amenity areas tested would exceed the BRE recommendations. It is recommended that play and seating areas are located in the areas with highest sunlight availability and footways/ throughfares are located in areas that receive less sunlight. The report suggests that reducing massing, including set backs to upper floors and recesses/ projections in elevations, siting duplex units on the lower floors, optimising room layouts by siting light sensitive rooms in areas of highest availability, increasing the amount of glazing in the most light limited areas, off-set balconies to maximise light to the rooms below, utilising light internal finishes and positioning amenity areas in areas of highest light availability. Many of these measures are incorporated into the submitted design code.

10.25 Officers are satisfied that the proposed buildings and associated amenity areas will be designed to maximise daylight and sunlight availability and provide a high quality living environment for future occupants.

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

10.26 The applicant's Noise Impact Assessment sets out that the primary noise sources affecting the site are the railway, vehicular noise (from High Road and White Hart Lane), Tottenham Hotspur match days and associated non-football related events. The report recommends that the design code incorporates acoustic design measures such as acoustic screening of noise sensitive spaces, the use of glazing with appropriate acoustic performance, and use of mechanical ventilation. It is envisaged that, with the mitigation, all blocks would provide an acceptable internal noise environment for the future occupiers. The report identifies a need for further assessment of blocks closest to the stadium (Plots C and E). It is also recommended that further assessment is required of the impact of the CO2 bottling facility at Langhedge Lane Industrial Estate. Appropriate mitigation and further survey work can be secured by planning condition.

10.27 In respect to the detailed element, balconies have been sited away from the railway line to reduce the influence of rail related noise on external amenity areas. Block A2/A3 has been sited to provide acoustic screening to Block 1, Mechanical Ventilation is proposed to minimise the need to open windows. Enhanced acoustic glazing is proposed to the facades facing the highest noise levels. A planning condition is proposed to secure the necessary noise mitigation.

10.28 In respect to public open space, the initial analysis suggests that the proposed garden for the detailed element, Peacock Park and Moselle Square would provide an appropriate noise environment, without the need for mitigation. Some areas of public realm closest to White Hart Lane, the railway line and High Road would provide a sub-optimal noise environment, however, these areas are envisaged to be designed to cater for transient users and therefore would be fit for purpose.

10.29 Given the outline nature of much of the site, the precise locations and orientations of private amenity spaces is unknown. It is recommended that private amenity areas are located on facades away from the noise sources. If that is not feasible, mitigation such as solid balustrades, recessed balconies winter gardens may be necessary as required by the design code.

10.30 The majority of the facades of Blocks A1, A2 and A3, that contain balconies, would achieve noise levels below 55 dB Aeq, 16 hour. Some of the balconies on the eastern façade of plot A1 (facing the rail line) could be exposed to noise levels of up to 64 dB Aeq 16 hour. It is considered that the provision of amenity space to these units outweighs the harm of the amenity space exceeding the recommended guidance.

10.31 It is predicated that the vibration levels for plots A1, A2 and A3 would be significantly below the relevant threshold in BS6472-2008 and therefore no vibration mitigation measures are deemed to be required.

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

### *Residential Quality – Summary*

10.33 The number of proposed wheelchair accessible homes and quality of these homes would meet requirements. The proposed homes and associated private and communal open space would generally be high quality and officers are satisfied that future residents would enjoy an acceptable residential amenity in terms of outlook and privacy, daylight and sunlight, wind/microclimate, noise and vibration. In respect to overheating, a balance will need be struck between the desire/ ability of some residents to open their windows for thermal comfort reasons and the need to mitigate noise from significant nearby noise sources (notably the rail line). Officers are satisfied that suitable mitigation (enhanced mechanical ventilation) can be secured by condition for plot A and further assessment and suitable mitigation can be secured by condition for the outline part of the proposal.

## **11 Social and Community Infrastructure**

### *Policy Background*

11.1 The NPPF (Para. 57) makes clear that planning obligations must only be sought where they meet the tests of necessity, direct relatability and are fairly and reasonably related in scale and kind to the development. This is reflected in Community Infrastructure Levy (CIL) Regulation 122.

11.2 London Plan Policy S1 states adequate provision for social infrastructure is important in areas of major new development and regeneration. This policy is supported by a number of London Plan infrastructure related-policies concerning health, education and open space. London Plan Policy DF1 sets out an overview of delivering the Plan and the use of planning obligations.

11.3 Strategic Policy SP16 sets out Haringey's approach to ensuring a wide range of services and facilities to meet community needs are provided in the borough. Strategic Policy SP17

is clear that the infrastructure needed to make development work and support local communities is vital, particularly in the parts of the borough that will experience the most growth. This approach is reflected in the Tottenham AAP in Policies AAP1 and AAP11. DPD Policy DM48 notes that planning obligations are subject to viability and sets a list of areas where the Council may seek contributions. The Planning Obligations SPD provides further detail on the local approach to obligations and their relationship to CIL.

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

#### *Site Allocation NT5 Infrastructure Requirements and the HRWMF*

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

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

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

#### *Proposed site-specific infrastructure provision*

- 11.7 The ES (Chapter 14) and associated addendum reports on an assessment of the likely significant socio-economic effects of the proposed scheme, including on primary and secondary school places and primary health care. This finds that the proposed scheme would have a Negligible impact on all of these forms of infrastructure, taking account of planned future provision and CIL payments or S106 payments. This is also the finding when considering the likely significant effects of the proposed scheme and the cumulative schemes, this includes the provision of Brook House Primary School as part of the Cannon Road development at the northern-most part of the NT5 allocation.
- 11.8 Library, community space and highways/public realm. The need for and proposed provision of overall open space, public realm including improvements to footways around the site, library and publicly accessible open space is addressed under Development Design above. In summary, this finds that there would be a beneficial increase in open space/ public realm and community facility provision. To ensure that the future residents of the development have suitable access to good quality public open space whilst the proposed and facilities are being delivered, the applicant has offered a £50,000 financial contribution to the improvement of Bruce Castle Park
- 11.9 School Places. The proposed scheme is estimated to result in a maximum of 1,100 children under the age of 15. The Council's School Place Planning Lead notes that there should be sufficient primary and secondary school capacity. Strategic CIL contributions could be used to fund additional school places in the future, should this prove necessary. Given this, officers agree with the ES assessment that the proposed scheme would have a Negligible effect on school provision.
- 11.10 Child care. The Childcare Act 2006 places a duty on local authorities to make sure that there are enough childcare places within its locality. The council is currently updating its Childcare Sufficiency Assessment. However, the 2015 Assessment and the sufficiency score cards (2016) do not identify a need to create more childcare places for the Northumberland Park Ward. In any event, the proposed scheme includes flexible commercial space (Use Class E), some of which could be used to provide space for children nurseries should this situation change.
- 11.11 Primary healthcare. The proposed scheme is estimated to result in the need for 4.7 FTE additional GP's (based on 1,800 patients per GP). The outline part of the scheme provides for at least 800 square metres of floorspace that could be used for a new healthcare facility. A medical facility was also secured as part of the Northumberland Development Project (which includes the Tottenham Hotspur Stadium) permission. It is proposed that the on-site delivery of a medical centre, if the Tottenham Hotspur Stadium Facility does not go ahead will be secured by S106. The S106 agreement will ensure uninterrupted healthcare facility provision within the site and potential for further provision. The CCG has recommended that a financial contribution is also sought to mitigate the uplift in demand. This could be used to fit out the proposed health care facility. Officers agree with the ES assessment that the proposed scheme would have a Negligible effect on healthcare provision.

11.12 Sports provision. The HRWMF considered likely indoor sports halls, swimming pool and playing pitch requirements as part of considering 'open space' needs arising from the Site Allocation. It assumed that the proposed Community Centre would include provision for a five-a-side pitch and indoor sports facilities and that additional swimming pool capacity was not required. There are currently over 20 sports, leisure and/or community facilities located within 2 miles of the site. This includes Whitehall & Tenterden Community Centre, The Grange, the GRACE Centre and Coombes Croft Library, all of which are located within the Site of the Proposed development. The proposal would deliver at least 500 sqm of indoor sport, recreation and fitness floorspace (E (d)), a further 500 sqm of community space (F2(b) use class) and 500 square metres of library and/or learning space (F1 (d-e)). The financial contribution to Bruce Castle Park may also be used for improvement sports provision. The quantum of provision proposed is considered to be acceptable.

*Proposed site-specific infrastructure provision - Summary*

11.13 The proposed development delivers a substantial gain in open space and community space provision. The proposed commercial space could accommodate children nurseries should commercial child-care providers seek to satisfy a demand and additional need. No particular need for additional school places in the area has been identified but, in any event, should a need arise, these, together with additional health care and sports provision for the area could be part funded by strategic CIL.

## 12 Child Play Space

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

12.2 The ES (Chapter 14) and associated addendum reports on an assessment of the likely significant socio-economic effects of the proposed scheme, including open space and play space. It finds that the proposed scheme would have a Negligible - Moderate beneficial effect on play space at site level and a Negligible effect at all other spatial levels.

12.3 Using the GLA's Population Yield Calculator (v.3.2) (October 2019), the proposed scheme estimates an on-site child population of 1,100 under 15's and 1,420 under 18's generating a requirement of 14,193 sqm of play space of all types. The proposed development is envisaged to deliver 3,080 sqm of door step play, 1,820 sqm of local playable space in addition to 3,930 sqm of parks and garden space. There are 5 existing play spaces providing 1.54 hectares of space within the GLA recommended accessibility standards from the application site. The ES concludes that the proposal would have a negligible impact on open space provision. The ES addendum considers an interim scenario



based on the partial delivery of the outline part of the scheme (the part of the outline site to the south of White Hart Lane). The ES addendum estimates that there would be 877 children (under 18) requiring varying forms of play, equating to a demand of 8,774 sqm of play space. The proposed illustrative scheme is envisaged to deliver 3,649 sqm of doorstep play and a 3,350 sqm public square (Moselle Square), in addition to podium gardens and roof terraces. The ES concludes that the interim scenario would have a negligible impact on play space. The applicant has offered a £50,000 financial contribution towards improvements to Bruce Castle Park which could be used to improve play facilities in the interim scenario. On balance, the proposed quantum of play space is considered to be acceptable. The details of the play spaces will be secured at reserved matters stage.

### **13 Heritage Conservation**

13.1 Paragraph 196 of the revised NPPF sets out that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use

13.2 London Plan Policy HC1 is clear that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail and places emphasis on integrating heritage considerations early on in the design process.

13.3 Policy SP12 of the Local Plan seeks to maintain the status and character of the borough's conservation areas. Policy DM6 continues this approach and requires proposals affecting conservation areas and statutory listed buildings, to preserve or enhance their historic qualities, recognise and respect their character and appearance and protect their special interest.

13.4 Policy AAP5 speaks to an approach to Heritage Conservation that delivers "well managed change", balancing continuity and the preservation of local distinctiveness and character, with the need for historic environments to be active living spaces, which can respond to the needs of local communities.

13.5 Policy NT5 requires consistency with the AAP's approach to the management of heritage assets. The High Road West Master Plan Framework's approach to managing change and transition in the historic environment seeks to retain a traditional scale of development as the built form moves from the High Road to inward to the Master Plan area.

13.6 The HRWMF promotes the adaptable reuse of heritage assets with appropriate future uses identifying how various individual buildings will be used, what works they will require including restoration and refurbishment works to adapt to the proposed use.

#### *Legal Context*

- 13.7 The Legal position on the impact of heritage assets is as follows. Section 72(1) of the Listed Buildings and Conservation Areas Act 1990 provides: "In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area." Among the provisions referred to in subsection (2) are "the planning Acts".
- 13.8 Section 66 of the Act contains a general duty as respects listed buildings in exercise of planning functions. Section 66 (1) provides: "In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."
- 13.9 The Barnwell Manor Wind Farm Energy Limited v East Northamptonshire District Council case tells us that "Parliament in enacting section 66(1) intended that the desirability of preserving listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given "considerable importance and weight" when the decision-maker carries out the balancing exercise."
- 13.10 The judgment in the case of the Queen (on the application of The Forge Field Society) v Sevenoaks District Council says that the duties in Sections 66 and 72 of the Listed Buildings Act do not allow a Local Planning Authority to treat the desirability of preserving listed buildings and the character and appearance of conservation areas as mere material considerations to which it can simply attach such weight as it sees fit. If there was any doubt about this before the decision in Barnwell, it has now been firmly dispelled. When an authority finds that a proposed development would harm the setting of a listed building or the character or appearance of a conservation area or a Historic Park, it must give that harm considerable importance and weight.
- 13.11 The authority's assessment of likely harm to the setting of a listed building or to a conservation area remains a matter for its own planning judgment but subject to giving such harm the appropriate level of weight and consideration. As the Court of Appeal emphasised in Barnwell, a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted.
- 13.12 The presumption is a statutory one, but it is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. An authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the strong statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering.

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

#### *Assessment of Significance*

13.14 The Tottenham High Road Historic Corridor consists of a sequence of five conservation areas. The North Tottenham neighbourhood is at the northern end of the historic corridor; it is, therefore, a threshold or point of entry to the historic corridor as a whole. The whole North Tottenham Conservation Area is in a fragile condition and it is currently designated a "Conservation Area at Risk" by Historic England.

13.15 Part of the High Road frontage and all of the White Hart Lane frontage of the site are within the North Tottenham Conservation Area. However, in its current condition, the site neither contributes to the quality and character of the Conservation Area nor the special interest and significance of the heritage assets in the surrounding area, other than: the local listed Station Master's House (52 White Hart Lane) Former Chapel and Pastor's House (Chapel Lane), St Francis De Sales Church and School, 6A White Hart Lane, 743-759 High Road and the substation (Neighbouring Coombes Croft Library and 731 High Road), the Grade II Listed Buildings at Nos. The Grange (32 – 34 White Hart Lane), No. 7 White Hart Lane and La Royale (819-821 High Road) and the nearby mature London Plane trees,. The existing 22/23 storey tall Rivers Apartments tower located immediately to the north of the site and the new Tottenham Hotspur Stadium also forms part of this context.

13.16 The proposed scheme locates tall buildings close to the western edge of the site (away from the High Road). As such, they would be set back from the North Tottenham Conservation Area frontages. However, they would form part of the immediate surroundings of the designated and undesignated heritage assets included Sub Area A (northern part of the High Road between Brantwood Road and White Hart Lane), Sub Area B (White Hart Lane) and Sub Area C (Tottenham High Road Central) of North Tottenham Conservation Area. The Conservation Area Appraisal and Management Plan (2017) considers the collection of Georgian buildings, including the Grade II Listed Grange and locally listed Station Master's House to be good examples of early railway buildings, which were key to the transportation developments in the area during the 19th Century. It is significant in that it has retained buildings representative of each period from Georgian through mid to late Victorian up to post war housing. The Grange and its two later flank wings are early to mid-19th century and form an impressive Georgian group but its setting is marred by the projecting blank end wall of the Victorian terrace on one side and the open yard entrance

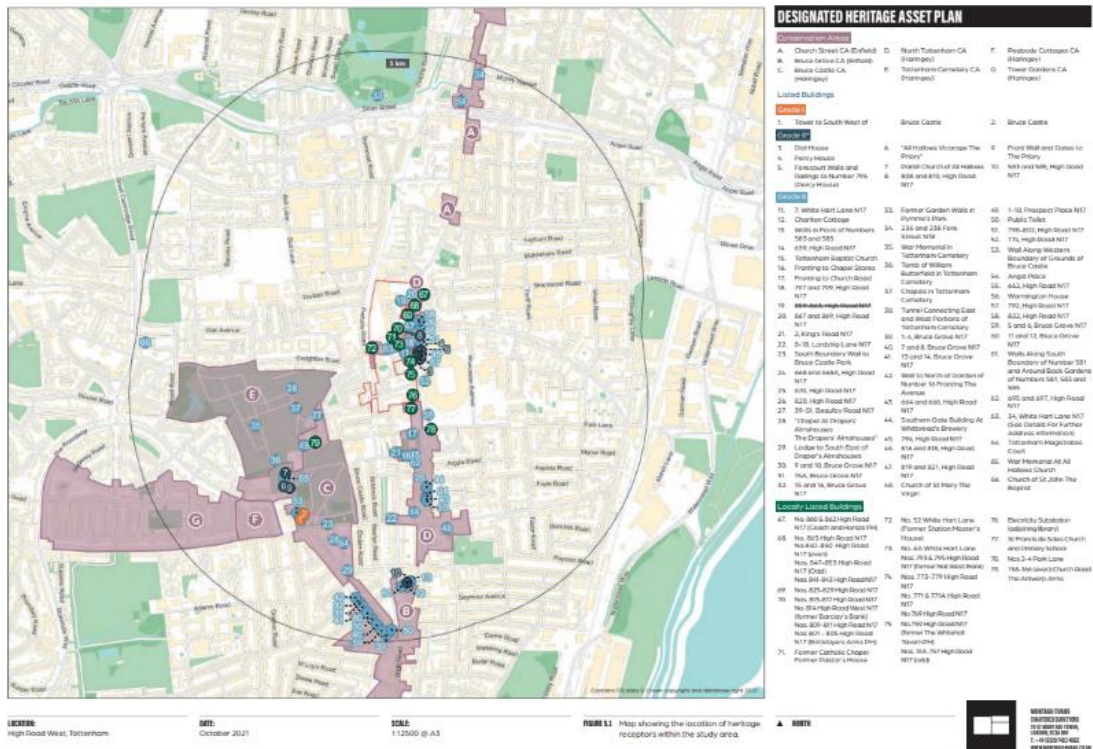
with security fencing. The Appraisal identifies the existing vehicular entrance area to the Goods Yard part of the site as a 'negative contributor' to the Conservation Area.

13.17 The built and visual context of the listed and locally listed buildings characterising the west side of the High Road has been progressively changing with the erection of some high-rise buildings such as the Rivers Apartment tower locate to the north of the conservation area and the erection of the Tottenham Hotspurs stadium. The NT5 allocation also expected to change the area in accordance with the HRWMF, which aims to transform the poor quality industrial and commercial sites into a mixed- use commercial and residential area complemented by high quality public spaces.

13.18 Volume 3 of the ES and associated appendices and addendum presents an assessment of the likely significant effects of the proposed scheme on built heritage. This comprises a Heritage and Townscape and Visual Impact Assessment (HTVIA).

13.19 The ES assessment started with the identification of built heritage assets within a 1km search area of the application site The 66 x Listed Buildings, 7 x Conservation Areas and 12 x non-designated heritage assets are identified in Figure 06 below.

Figure 07: ES Appendix 11.1 (Heritage Assets Plan)



13.20 The officer assessment below draws on the findings of the ES.

- 13.21 Nos. 797-799 High Road. The ES notes that these buildings are already experienced in the context of modern development, including Rivers Apartments, and that whilst the proposed towers would have a greater presence compared with this existing tower, they would, like the existing tower, be distant and separate from Nos. 797-799. The ES concludes that there would be a Minor Adverse effect.
- 13.22 Nos. 819-821 High Road (Listed Grade II). The ES notes that the building is already experienced in the context of taller buildings and that the proposed towers, which would visibly represent a new quarter beyond the High Road, would not materially change the way in which the listed pair is experienced. It concludes the proposed scheme would cause a Minor-Moderate adverse effect on these buildings.
- 13.23 Officers consider that the height and scale of the proposed towers would stand out in the background of heritage assets as prominent, contemporary structures in juxtaposition to the architectural and urban qualities of the Listed Buildings and also of the locally listed buildings at Nos. 823 to 829. As such, they consider that the proposed towers would cause 'less than substantial harm' to the setting and significance of these designated and non-designated assets.
- 13.24 No. 34 White Hart Lane (Listed Grade II). The nearest proposed plots to the building are the I plots. The ES concludes that the proposal would have a minor beneficial impact as a result of the demolition of nos 24-30 White Hart Lane and public realm improvements within its setting. Officers concur that the proposal would have a minor beneficial impact on the setting of this building.
- 13.25 No.7 White Hart Lane (Listed Grade II). The ES sets out that the setting of this building is formed by poor quality C19/C20 development. The proposed plot G is to the south west and the I plots opposite. The ES concludes that proposal will have a Minor adverse impact on this building. Officers concur and consider that the proposal will result in less than substantial harm to the building.
- 13.26 Nos.816, 818, 820 and 822 High Road (Listed Grade II). The ES notes that the setting of these buildings is urban and mixed with nearby historic buildings contributing positively to its setting with modern buildings to the north and south that detract from their setting. Proposed Blocks K, L and J will be behind the heritage assets. The ES concludes that proposal would have a Minor/Moderate Neutral effect on these buildings.
- 13.27 Due to the scale and proximity of the proposed buildings to the heritage assets, it is considered that the proposed buildings would result in less than substantial harm to the heritage assets
- 13.28 No. 808 – 810 High Road (Listed Grade II\*). The ES sets out that the setting of these buildings is largely poor quality C20 buildings. The I plots are proposed to the rear of the

heritage assets. The ES concludes that the proposal will have a Minor Neutral effect on the heritage assets.

13.29 Officers consider that due the scale of the proposed I blocks the proposal would result in less than substantial harm to the heritage assets.

13.30 Nos. 867-869 High Road (Listed Grade II). Officers consider that the creation of a communal garden area would improve the immediate setting of the Listed Buildings.

13.31 In terms of the wider setting, the ES notes that the Listed Buildings are experienced in a townscape that already includes tall buildings, including Rivers Apartments to the west and Stellar House to the north east on the High Road as well as Tottenham Hotspurs new stadium. It finds that the visibility of the proposed additional towers in views from Brantwood Road and the High Road would not affect the significance or the ability to appreciate the significance of these Listed Buildings and identifies a Minor Negligible effect

13.32 Officers consider that the height and scale of the proposed towers would stand out in the background of heritage assets as prominent, contemporary structures in juxtaposition to the architectural and urban qualities of the Listed Buildings. As such, they consider that the proposed towers would cause 'less than substantial harm' to the setting and significance of these Listed Buildings.

13.33 North Tottenham Conservation Area. The site includes Nos. 867-869 High Road High Road, which forms part of Sub Area A of the Conservation Area and marks the entrance to the Conservation Area from the north. It also includes the adjoining surface level car park and mature London Plane trees (as well as other mature London Plane trees in the High Road footway) which fall outside of the Conservation Area). Officers consider that the proposed public realm enhancements together with the retention of the existing mature trees would enhance this part of the Conservation Area and have a positive effect.

13.34 The site includes the Station Master's House and adjoining frontage between it and the Grange that is identified as being a detractor from the Conservation Area. Officers consider that the proposed retention of the Station Master's House, the proposed new high-quality Block H and significantly improved access in to the site would enhance this part of the Conservation Area and have a positive effect.

13.35 However, whilst the proposed scheme would directly enhance parts of the High Road Conservation Area, due consideration needs to be given to the overall effects of the proposed scheme on the significance of this Area and other heritage assets. Whilst the proposed tall buildings would be set back and somewhat remote from the High Road and White Hart Lane frontages (and arguably signal the existence of another character area), they would be very tall and wide in east-west views. The ES concludes that the proposed tall buildings would have a Minor Adverse effect on the Conservation Area.

- 13.36 Proposed tall buildings along the western edge of the site would be in line with the vision established by the HRWMF. Officers consider that, the height and scale of the proposed towers would stand out in the background of heritage assets as prominent, contemporary structures and would cause 'less than substantial harm' to the setting and significance of the Conservation Area.
- 13.37 Bruce Castle and All Hallows Conservation Area. This has considerable historic and architectural significance and includes three important historic buildings – Bruce Castle (Listed Grade I), All Hallows Church (Listed Grade II\*) and The Priory (Listed Grade II\*). The ES finds that the Rivers Apartments tower is already seen from the park and that the proposed scheme would not bring about a particularly noticeable change to the perception of the urban setting of the park. The ES concludes that the proposals would have a Negligible Neutral effect.
- 13.38 Officers disagree with this part of the concluding assessment in the ES regarding impact. Officers consider that the proposed tall towers (in particular), would be prominent features when viewed from the open spaces in the Conservation Area, which is characterised by its openness, landscaping in the park and small-scale development in long views. As such, officers consider that these proposed tall buildings would cause 'less than substantial harm' to the setting and significance of this Conservation Area.
- 13.39 Station Master's House (Locally Listed). The proposed scheme includes new buildings in close proximity to Station Master's House. The ES concludes that the significance of the building and its appreciation would not be materially affected by the proposed tall buildings and identifies a Negligible effect.
- 13.40 Officers disagree with this part of the concluding assessment in the ES regarding impact and are of the opinion that the proposed towers would be significantly taller than envisaged, and therefore consider that the proposal would result in 'less than substantial harm' to the setting and significance of Station Master's House.
- 13.41 Electricity Substation adjoining Library (Locally Listed). The ES states that the structure is in poor condition and that it is proposed for demolition. This is identified to have a Minor-Moderate adverse impact. Officers agree.
- 13.42 773-779 High Road, 771 and 771A High Street and 769 High Street (Locally Listed). The ES sets out that later additions have harmed the interest of the buildings. Plots G, E and F would form part of the setting of these buildings. Owing to the scale of the proposed buildings the proposal would result in less than substantial harm to the non-designated heritage assets. The ES concludes a Minor Adverse impact.
- 13.43 743 – 759 High Road (Locally Listed). The ES notes that the former public house has been subject to alteration, is of limited interest and is proposed for demolition. Officers concur with the ES insofar as the proposal would result in a Minor-Moderate adverse impact

- 13.44 Former Catholic Chapel and Former Pastors House (Locally Listed). The ES states that the buildings are of limited heritage interest and will be retained. The buildings are currently abutted by functional warehouse buildings that detract from their setting. Plots I and K will be close to the buildings. The provision of a courtyard would provide some minor benefit to their setting.
- 13.45 No. 790 High Road (Dial House) (Grade II\* listed) Forecourt Walls and Railings to number 796 (Grade II\*), 798-802 High Road (Grade II), 794 High Road (Grade II), 792 High Road (grade II). The ES concludes that the proposal would have a Negligible Neutral effect. Officers disagree with the assessment in the ES and consider that the proposed towers, would be uncharacteristically tall when viewed from this Grade II & II\* Listed Buildings and adversely affect their setting. As such, officers consider that these proposed tall buildings would cause 'less than substantial harm' to its setting and significance.
- 13.46 Tottenham Cemetery Conservation Area. The ES concludes that the proposal would have Minor to Moderate Adverse Officers agree with the assessment in the ES and consider that the proposed Towers would be excessively prominent features when viewed from the open spaces in the Conservation Area, which is characterised by its openness, landscaping in the park and small-scale development in long views. As such, officers consider that these proposed tall buildings would cause 'less than substantial harm' to the setting and significance of this Conservation Area.
- 13.47 Fore Street Angel and Fore Street South Conservation Areas (Enfield). The ES concludes that the settings of the Fore Street South/Angel Conservation Area in Enfield and views out of the Areas would not be affected by the proposed scheme since these are already characterised by large scale modern blocks of varying quality including Stellar House and the Rivers Apartments tower. The Inspector in the Goods Yard decision sets out that the Goods Yard towers would not bear any impact on this Conservation Area and its heritage assets and, the LPA identified no harm to this Area when granting permission for the extant Depot scheme. Officers agree with this conclusion, given their relationship with this area and existing tall buildings, the proposed development would therefore have no impact.
- 13.48 The ES notes potential impacts on a range of designated and non-designated heritage assets in addition to the most affected heritage assets listed above. Overall, it is considered that the proposed development would result in less than substantial harm in the mid- lower range. It is considered that the harm would be outweighed by the substantial public benefits, including but not limited to, providing new homes, new public realm, new pedestrian and cycle connections, a new public park and civic square.
- 13.49 Summary. Having carefully considered the proposals, including the findings in the applicant's ES, the Conservation Officer considers that the proposed towers would cause 'less than substantial harm' to the setting and significance of the above designated and non-



designated heritage assets considered together and that, having considered the specific impact of the proposed development on each relevant heritage asset, the prevailing level of harm would be at the mid- lower range of 'less than substantial':

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

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

- The delivery of up to 2,929 new homes including 500 new council homes, approximately 400 new intermediate units
- Delivery of a new library and learning centre
- New public spaces and public realm, including new cycle routes and a route between Tottenham Hotspur Stadium and White Hart Lane Station
- Delivery of a high quality sustainable development
- New energy centre
- Bio-diversity enhancements
- Creation of approximately 1,214 new FTE jobs and a further 1,202 FTE jobs indirectly, per annum, during construction.
- The development of local supply chains
- A £143.1 million estimated contribution to the local economy during construction
- Creation of a minimum of 374 FTE jobs on site, once complete.
- A circa £23.2 million annual boost to the local economy through estimated residential expenditure per annum.

13.52 Having carefully considered issues, officers consider that the public benefits of the proposals, as summarised above, outweigh the less than substantial harm that would be caused to the designated and non-designated heritage assets.

### *Heritage Conclusion*

13.53 Historic England makes no comment on the proposals but advises that the LPA should seek the views of its specialist conservation advisers. The Mayor of London (Stage 1 Report) considers that 'less than substantial harm' would be caused to the significance of heritage assets arising from the proposed height and massing of the scheme to all of the heritage assets assessed above.

13.54 Officers are bound to consider this strong presumption in line with the legal context set out above. The proposed scheme would provide some localised improvements to the settings of nearest heritage assets. However, officers consider that the proposed tall buildings would cause some 'less than substantial harm' to the setting and significance of a number of assets. This harm has been given significant weight and is considered to be outweighed by substantial public benefits including the provision of much needed housing, new community buildings, new public realm and affordable housing. Given this, officers conclude that, the proposals would have an acceptable impact on the character, appearance and special interest of the relevant heritage assets and comprise well managed change in accordance with Policies SP12, DM6, AAP5 and Site Allocation NT5 and guidance in the HRWMF.

#### **14 Impact on Amenity of Adjoining Occupiers**

14.1 London Plan Policy D6 notes that development proposals should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space. The Mayor's Housing SPG (2016) reinforces the need for privacy but cautions against adhering rigidly to minimum distance requirements and also calls for the BRE guidance on daylighting and sunlighting to be applied flexibly and sensitively to proposed higher density development, especially in town centres – taking account of local circumstances, the need to optimise housing capacity and the scope for the character and form of an area to change over time.

##### *Daylight/Sunlight, overshadowing and solar glare Assessment - Methodology*

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

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

14.4 The BRE Guidelines recommend that a room with 27% VSC will usually be adequately lit without any special measures, based on a low-density suburban model. This may not be appropriate for higher density, urban London locations. The NPPF advises that substantial

weight should be given to the use of 'suitable brownfield land within settlements for homes...' and that LPAs should take 'a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site'. Paragraph 2.3.47 of the Mayor's Housing SPG supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city.

14.5 The acceptable level of sunlight to adjoining properties is calculated using the Annual Probable Sunlight Hours (APSH) test. In terms of sunlight, the acceptability criteria are greater than 25% for the whole year or more than 5% between 21st September and 21st March.

14.6 The ES identifies the following definitions for the predicted impacts on receptors, which are used by a number of boroughs and which officers consider acceptable:

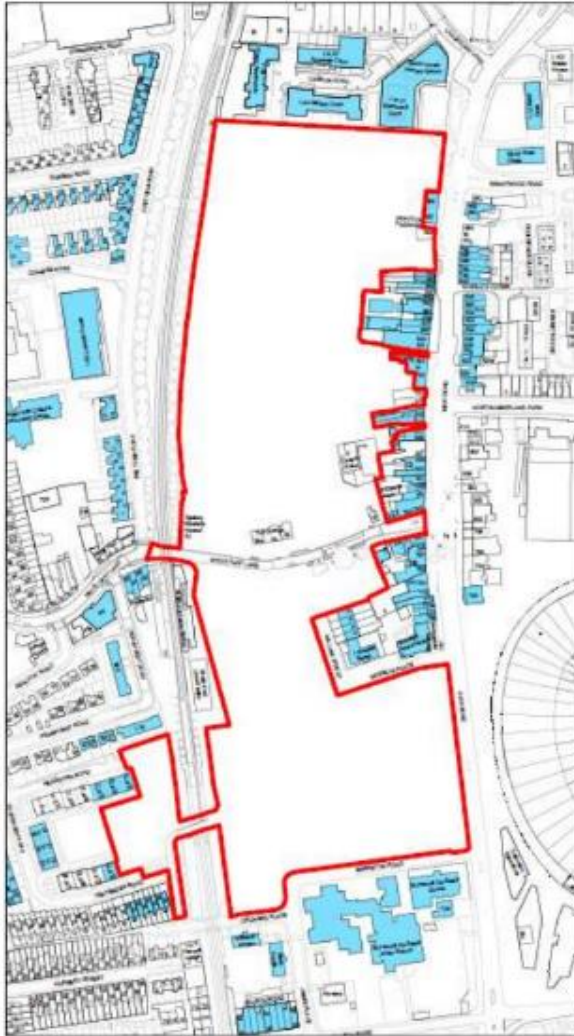
- Major (high) – less than 0.60 times former value (greater than 40% loss);
- Moderate (Medium) – 0.60-0.69 times former value (31% to 40% loss);
- Minor (Low) – 0.70-0.79 times former value (21% to 30% loss); and
- Negligible – Typically greater than or equal to 0.80 times former value.

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

14.8 In terms of solar glare, separate BRE guidance sets out a method involving plotting the geometry of the proposed reflective facades relative to the receptor location onto a sunlight availability protractor and determining the times of day and year at which reflected sunlight could occur.

14.9 Chapter 9 of the ES reports on an assessment of the likely significant effects of the proposals on 31 neighbouring residential properties/ groups, immediately adjoining the application site. This includes 168 sensitive receptors in respect to daylight/ sunlight amenity, 89 sensitive receptors to overshadowing and 5 sensitive locations for solar glare. The assessment is based on two scenarios. A Maximum parameters (worst case) scenario whereby the development is built out to its fullest within the proposed parameters and an interim scenario which is the submitted indicative scheme.

Figure 6 Sensitive Receptors for daylight and sunlight.



Sensitive receptors for overshadowing include:

- Communal amenity area to Tenterden Road;
- Rear gardens to 1 to 23 Peshurst Road;
- Communal amenity area to 2-28 Peshurst Road;
- Rear gardens to 1 to 17 Pretoria Road;
- Communal amenity area to Lorenzo House;
- Rear gardens to 34 to 45 Pretoria Road, 1 to 7 Durban Road and 6 to 8 College Road;
- Rear gardens to 46 to 67 Pretoria Road;
- Communal amenity areas and gardens to Rivers Apartments, Mallory Court and Beachcroft Court;
- Brook House Primary School Playgrounds;
- Communal amenity areas to Altair Close;
- Communal amenity area to 841 High Road; and
- Gardens to 2 to 8 William Street and 1 Moselle Street.

*Daylighting and Sunlight Assessment*

14.10 The assessment reported in the ES finds that, under the maximum parameters scenario, windows and rooms in 7 of the 45 buildings/ groups assessed would meet the VSC, NSL and APSH numerical guidelines set out in the BRE Guidelines. The assessment found that 13 of the 45 buildings groups assessed under the illustrative scheme scenario would meet the VSC, NSL and APSH numerical BRE Guidelines.

14.11 The situation for sunlight is similar, although in this case rooms in 56 of the 103 buildings assessed would meet the annual and winter APSH numerical guidelines.

14.12 Receptors (mainly homes, but including Brook House Primary School) in the remaining 46 buildings were found to be likely to experience a noticeable impact on daylight and/or sunlight. Table 17 below identifies these and sets out the likely significance of the adverse effect identified in the ES

Table 17: Daylight and Sunlight effects

Receptor	Maximum Parameters		Illustrative scheme	
	Daylight (Adverse)	Sunlight (Adverse)	Daylight (Adverse)	Sunlight (Adverse)
St Francis de Sales Church	Minor	-	Minor	
St Francis de Sales Junior School	Major	-	Moderate	-
St Francis de Sales Rectory	Minor	-	Minor	-
1-8 Williams House	Major	-	Major	-
1 – 12 Rees House	Minor	-	Minor	-
43 - 45 Tenterden Road	Minor	-		
46 - 50 Tenterden Road	Moderate	-	Minor	-
51-56 Tenterden Road	Minor	-	Minor	-
75 - 92 Tenterden Road	Moderate	-	Moderate	-
21 – 35 Tenterden Road	Moderate	Moderate	Moderate	Moderate
1 – 19 Penhurst Road	Major	Minor	Major	Minor

Receptor	Maximum Parameters		Illustrative scheme	
	Daylight (Adverse)	Sunlight (Adverse)	Daylight (Adverse)	Sunlight (Adverse)
2 – 28 Penhurst Road	Major	-	Minor	-
21 – 23 Penhurst Road	Minor	-	Minor No.21 only	-
25 – 27 Penhurst Road	-	-	-	-
57 – 63 White Hart Lane	Minor	-	Minor	-
65 White Hart Lane	Minor	-	-	-
1 – 11 Pretoria Road	Minor	-	Minor No. 2- 11 only	-
12 – 17 Pretoria Road	Moderate	Major No 15 only	Minor	-
Lerenco House	Major adverse	-	Moderate	-
2 – 8 Collage Road (evens)	Minor	-	-	-
1 – 4 Collage Park Road	Minor No.4 only	-	-	-
No.34, 35, 40 and 45 Pretoria Road	Minor	Major No.40 and 45 only	Minor No.40 and 45 only	Major No.40 and 45 only
No.36 – 39 and 41 – 44 Pretoria Road	Moderate	Major	Minor	Major
1-37 Durban Road Odds only	Minor No 1 and 17 only	-	-	-
46 – 49 and 53 - 67 Pretoria Road	Minor	Major No. 57 – 67 moderate only	Minor	Minor No 46 -48 & 58 – 67 only
50 – 52 Pretoria Road	Moderate	Major	Minor	-
Riverside Apartments	Minor – Moderate	Minor - Moderate	Minor	Negligible
Mallory Court	Major	Major	Major	Major
Ambrose Court	Moderate	Moderate	Moderate	Moderate
Beachcroft Court	Minor	-	Minor	-
Brook House	Minor	Minor	Minor	-

Receptor	Maximum Parameters		Illustrative scheme	
	Daylight (Adverse)	Sunlight (Adverse)	Daylight (Adverse)	Sunlight (Adverse)
867 – 869 High Road (odds)	Moderate	-	Moderate	-
840 – 850 High Road (evens)	Minor	-	-	-
831, 833, 841 and 849 – 853 High Road (odds)	Major	Minor 841 High Road Only	Major 841 & 849 – 853 Minor 831 and 833	-
835 – 843 and 845 High Road	Moderate 843 minor only	-	Moderate 835 & 837 Minor 839, 843 and 845	-
793 – 829 High Road (evens)	Minor 820 & 824 – 828 only	-	-	-
793 – 807 High Road (odds)	Minor	Moderate 797, 803 – 805 only	Minor 801 – 805 only	-
811A – 829 High Road (odds)	Major	Moderate 811A – 817 only	Major 811A Moderate 827 – 829 Minor 813 - 825	Minor 811A- 817 only
1-7 White Hart Lane	Minor 2-7 only	-	Minor 3-5 only	-
790 High Road	Minor	-	-	-
769 – 781 High Road (odds)	Major	Major 769 Moderate 771 and 777-781	Minor	Major 769 Moderate 777-781
783 – 791 High Road	Moderate 783 & 785 Minor 787 & 789	Moderate 785 – 789 only	Minor 789 only	Minor 785 - 789

Receptor	Maximum Parameters		Illustrative scheme	
	Daylight (Adverse)	Sunlight (Adverse)	Daylight (Adverse)	Sunlight (Adverse)
Bergen and Brooklyn Apartments	Major	Major	Major	Major
2 – 8 William Street (evens)	Major	Major	Major	Major
1 Moselle Place	Major	Major	Major	Major

14.13 Officers have scrutinised the detailed results of the assessment in the ES which take account of the use of existing rooms, balconies/self-shading and whether rooms are lit by more than one window. Residual VSC are reasonably good and appeal decisions for schemes in London have found that VSC values in the mid-teens are deemed acceptable. The vast majority of residential windows tested for daylight would be left with such levels and those that would be left with less would tend to experience only small absolute reductions. Overall, officers consider that, the levels of daylight and sunlight conditions would be acceptable – particularly as other residential amenity factors are also considered acceptable (see Overlooking/Privacy, Wind and Noise below).

#### *Overshadowing Assessment*

14.14 Chapter 9 of the ES reports on an assessment of the likely significant effects of overshadowing on surrounding main back gardens and amenity spaces. The ES also reports on an assessment of transient overshadowing of existing nearby gardens/amenity spaces for 21 March for the maximum parameters and illustrative scheme.

14.15 This BRE standard is met for 13 out of the 19 spaces. 6 of the 19 spaces tested would not meet the standard. The rear gardens of 1 – 19 Penhurst Road (4/10 gardens deemed to have a Major adverse effect) the rear gardens at Mallory Court (Major Adverse in the max parameters scenario and negligible in the illustrative scenario), the rear gardens of Beachcroft Court (Major Adverse), Brook House Primary School Playgrounds (Major Adverse on the western playground), the communal areas at no. 841 High Road (Major Adverse) and garden of 1 Moselle Street (Major Adverse for 3 of 4 gardens in the max parameters scenario and 1 of the 4 gardens in the illustrative scheme scenario). These results are largely due to configuration of the existing building within the site and close proximity of windows to existing and proposed built forms.

#### *Glare*



14.16 Chapter 9 of the ES reports on an assessment of the likely significant effects of solar glare from the detailed element of the proposed development. Owing to the outline nature of the remaining part of the proposal, insufficient information is available to determine the likely glare impacts from this part of the proposal. At this stage only plot assessed for its potential adverse impact on the railway line and associated signals is plot A. The impact is deemed to be negligible given the existing buildings and the introduction of the proposed development. The future detailed reserved matters applications will be accompanied by ES addendums to ensure that the proposal is acceptable in relation to glare, amongst other matters.

*Overlooking/privacy*

*Detailed element*

14.17 Block A1 would be located approximately 3.5 metres from the flank elevation of no. 51 – no. 56 Tenterden Road, approximately 16.5 metres from the rear elevation of 21 – 30 Headcorn Road and 17 metres from the principal elevation of Block A2. No. 51 – 56 Tenterden Road does not have any primary windows on its flank elevation. Block A1 would bring habitable windows in closer proximity to No.51 – 56 Tenterden Road however any views into the windows would be oblique and is not considered to result in unacceptable privacy or overlooking impacts. The separation distance between the proposed north facing windows and the south facing windows of no 21 – 39 Head corn Road are sufficient to avoid adverse privacy and overlooking impacts. Similarly, the separation distance between block A1 and A2 is considered sufficient to avoid unacceptable overlooking and privacy impacts arising between the habitable windows of the adjoining blocks and their private amenity areas.

14.18 Block A3 would be located approximately 8.5 metres from 31-35 Headcorn Road at its closest point. No. 31-35 Headcorn Road does not have any primary habitable windows on its east facing elevation (the elevation facing Block A3). The relationship between the windows and private balconies of the proposed block and those of No.31 – 35 are such that no adverse overlooking or privacy impacts would occur. The separation distance between block A3 and its existing neighbours would ensure that neighbouring privacy is preserved.

*Outline element*

14.19 Whilst the appearance of the proposed blocks in the outline element and their final layout is reserved for subsequent detailed approval by the Local Planning Authority, the parameters plans and design code govern what will be delivered as part of the reserved matters submissions.

- 14.20 Block B is proposed to be located between approximately 17.5 and 21.5 metres from the principal elevations of the nearest properties fronting Orchard Place, between 11 and 23 metres from the west facing elevation of Block C and between 12 and 24 metres from the south facing elevation of block D. The maximum and minimum separation distances proposed (as set out in the parameter plans) are considered adequate to ensure that neighbour amenity is suitably preserved.
- 14.21 Block C is to be located between approximately 17 and 20 metres from the north facing elevation of St Francis De Sales Junior School and 17 and 28 metres from the north facing elevation of St Francis De Sales Church. Block C is proposed to be at least 11 metres from Block D and 21 metres from block E. The proposed separation distances would ensure that neighbour and future occupant privacy is suitably preserved.
- 14.22 Block D is proposed to be sited between 37 and 40 metres to block A2 (on the opposite side of the rail line), at least 21 metres from Block F and 64 metres from Block E. The proposed separation distances would ensure that neighbour and future occupant privacy is suitably preserved.
- 14.23 Block E is proposed to be sited between 14 and 21 metres from its nearest existing residential neighbours on Moselle Place. These buildings have habitable windows and/or balconies in their south facing elevations. Block E is proposed for community uses. It is considered that the parameters would facilitate the delivery of a building that would not give rise to adverse privacy or overlooking impacts of these neighbours. However, careful consideration would need to be given to the placement of windows and balconies on the north elevation of block E, if the building comes forward at its minimum proximity to Bergan Apartments.
- 14.24 Block F is to be sited between approximately 13 – 16 metres from the shared boundary of the neighbouring buildings at William Street and between 74 and 77 metres from the east facing elevations of the nearest properties on Penhurst Road. Between 13 and 19 metres from the west facing elevation of Block G, between 26 and 30 metres from the nearest existing neighbouring buildings on White Hart Lane (at the closest point), between 40 and 45 metres from block H2 and between 47 and 50 metres from Station Masters House. Whilst Officers are satisfied that a building of the scale proposed could be accommodated on plot F, careful consideration will need to be given to siting balconies and primary habitable windows on the east facing elevation of the building, to ensure that neighbour privacy is suitably preserved.
- 14.25 Block G is located between 0 and 2.5 metres from the shared boundaries of the neighbouring buildings on William Street, White Hart Lane and High Road. Officers are satisfied that a building could be erected on the plot that preserves neighbour privacy, however, careful consideration will need to be given to the siting of primary windows and amenity spaces to the south and east facing elevation of the building.

- 14.26 Block H (H1, 2 & 3) is located between 2 and 15 metres of the shared boundary with of the nearest neighbour on White Hart Lane and between 0 and 5 metres from Station Masters House and immediately adjacent to Plot 11 and between 40 and 49 metres from the nearest existing properties on Pretoria Road (on the opposite side of the rail line) and between 7 and 14.5 metres from Block J. Whilst Officers are satisfied that the group of buildings could be designed to preserve neighbour and future occupant amenity. There are several close relationships between adjoining blocks that would need attention if habitable windows and private amenity spaces are proposed.
- 14.27 Block I (I1, I2 & I3) includes a block (I3) that immediately adjoins existing properties on High Road. Block I2 is located between 7 and 9 metres from the shared boundaries of the nearest properties on High Road. Blocks I2 and I3 are proposed to be located between 5 and 16 metres of one another, at their closest points. Block I1 is proposed to be at least 12 metres from block I2. Block I1 is proposed to immediately adjoin block H3 and is proposed to be between 7 and 15 metres of Block J and 11 – 27 metres to block K1. Whilst Officers are satisfied that buildings could be erected within the proposed parameters on the I plots, there are several close relationships with adjoining existing and proposed buildings that would need to be carefully designed to avoid adverse neighbour and future occupant privacy impacts.
- 14.28 Block J (J-1 and J-2) is proposed to be located between 47 and 55 metres from the principal elevation of the nearest existing properties on Pretoria Road (on the opposite side of the rail line), between 3 and 14 metres from Block L. The proposed separation distance to the neighbouring properties fronting Pretoria Road would be sufficient to preserve neighbour privacy. Careful consideration would need to be given to the siting of habitable windows and balconies on the north and south elevations of the buildings if the proposal was to come forward with the closest separation distances from the neighbouring blocks.
- 14.29 Block K (K1 and K2) are proposed immediately adjacent to the to the shared boundaries with several existing properties that front High Road. The blocks would be set between 4 and 11 metres of one another and between 23 and 42 metres from block L (at their closest points). Officers are satisfied that buildings could be accommodated within the plots, in line with the proposed parameters whilst preserving neighbour and future occupant privacy, the east facing elevations of the blocks (the elevation facing the immediate neighbours on High Road) and the north elevation of block K1 and the south facing elevation of block K2 and the north elevation of K2, would need to be designed to ensure neighbour and future occupant privacy is not adversely affected.
- 14.30 Block L (L-1 and L-2) is to be located between 61 and 72 metres from the nearest properties on Pretoria Road (at the closest point). The Block is proposed between 5 and 15 metres from Block M. The proposed separation distance from the properties fronting Pretoria Road is likely to be sufficient to preserve neighbour privacy. The north and south facing elevations of the block will need to be carefully designed to ensure that adverse privacy impacts do not arise between the adjoining blocks within the site.

14.31 Block M (M-1, M-2 & M-3) are to be located between 54 and 59 metres from the principal elevations of the properties fronting Pretoria Road and the flank elevation of the nearest property on Collage Road. The block is located between 8 and 18 metres from Block N1 at its closest point and between 16 and 23 metres from block N2 at its closest point and between 48 and 54 metres from Block N4. The proposed separation distance between the block and the properties fronting Pretoria Road and Collage Road would be sufficient to preserve neighbour privacy. Careful consideration would need to be given to the design of the north and south elevations of the block to ensure that suitable privacy is achieved for the future occupants of the block and that of the neighbouring blocks.

14.32 Block N (N1, N2, N3 and N4) – blocks N1 – N3 are located immediately adjacent to the shared boundaries with the flat blocks and school on Cannon Road and between 2 and 10 metres from the rear/ side elevations of the neighbouring buildings. Block N1 is proposed to be between 59 and 51.5 metres from the principal elevations of the properties fronting Pretoria Road. Block N4 is proposed to be at least 9.5 metres from the rear elevations of the nearest existing buildings on High Road. Block N1 and N2 are proposed to be 16 metres apart. Blocks N2 and N3 are proposed to be 13.5 metres apart and Block N3 and N4 is proposed to be 19 meters apart. Whilst Officers are satisfied that buildings can be delivered on the N plots, within the parameters proposed. The north facing elevations of blocks N1 – N3 and the east facing elevation of N4 will need to be designed to avoid giving rise to adverse privacy impacts. Similarly, consideration will need to be given to the east and west elevations of N2 to ensure that it does not have an adverse privacy impact on the neighbouring blocks. The extant permissions for this plot have demonstrated that an acceptable relationship can be provided.

### *Noise*

14.33 The mixed commercial and residential nature of the scheme means that, subject to using planning conditions to limit hours of use of any commercial units and to control noise from mechanical plant, it should not cause undue disturbance to neighbouring residents. The applicant's Site Construction Management Plan also sets out minimum standards and procedures for managing and minimising noise during construction (which could be secured by planning condition).

### *Amenity Impacts – Summary*

14.34 Amenity impacts must be considered in the overall planning balance, with any harm weighed against expected benefit. There would be some adverse impacts on amenity, as outlined above. However, officers consider that the level of amenity that would continue to

be enjoyed by neighbouring residents is acceptable, given the benefits that the proposed scheme would deliver.

## 15 Transportation and Parking

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

### *Transport Assessment*

- 15.7 The majority of the site has a PTAL 4, with the north and south western corner having a lower PTAL of 3). The central, western and parts of the south western corner of the site

have a PTAL rating of 5. Cycleway 1 is located circa 400 metres to the south of the site. The site is also located in the Tottenham North CPZ. The application is supported by a Transport Assessment (TA) and a separate Delivery and Servicing Management Plan, Framework Travel Plan and Outline Construction Environmental Management Plan.

- 15.8 The TA submitted with the application is based on a scenario in excess of the maximum parameters proposed (1,933 private units, 1,044 affordable units and 36,000 sqm (GEA) of commercial floorspace in the B, E and F use classes).

### *Trip Generation*

- 15.9 The applicant's TA estimates the likely trip generation for the main modes of transport based on applying trip rates derived from TRICS, based on a worst case scenario including all of the commercial space being delivered as Office Space. The expected worst case total development trips are set out in Table 20 below.

Table 20: Total trip generation by mode

Time Period	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)			Daily		
	In	Out	Total	In	Out	Total	In	Out	Total
Underground/Overground	574	332	906	265	616	881	4,007	4,007	8,015
Train	9	43	52	27	16	43	168	168	336
Bus	588	396	983	294	633	926	4,407	4,407	8,815
Taxi	4	8	13	8	7	16	75	75	150
Motorcycle	-	-	-	-	-	-	-	-	-
Car driver	21	40	60	27	27	55	276	276	552
Car passenger	7	31	37	21	13	34	185	185	370
Cycle	70	43	113	34	75	110	502	502	1,003
On foot	234	522	757	347	319	666	3,639	3,639	7,277
Other	6	1	7	1	6	7	31	31	61
<b>Total</b>	<b>1,512</b>	<b>1,416</b>	<b>2,928</b>	<b>1,025</b>	<b>1,712</b>	<b>2,737</b>	<b>13,290</b>	<b>13,290</b>	<b>26,580</b>

15.10 The Transport Assessment concludes that the proposed development would result in a net increase of 2 vehicular movements on the AM peak and a net decrease of 79 vehicular movements in the PM peak. The proposed development is not envisaged to result in any adverse impacts on vehicular traffic, above the current situation.

#### *Public transport capacity and protection*

15.11 The proposed development would not have an unacceptable impact on London Overground line capacity with an estimated increase in utilisation rate from 28.1% to 28.6% of maximum capacity to Liverpool Street in the AM peak and 31.2% to 39.1% in the PM peak. The service to Cheshunt is estimated to increase from 73.2% to 78.8% in the AM peak and 53% to 54% in the PM peak. The service to Enfield Town is estimated to increase from 31.2% to 33.9% capacity and in the AM peak and 34.1% to 34.9% in the PM peak.

15.12 In respect to bus services, it is estimated that a total of 983 additional passengers will travel to and from the site in the AM peak (08:00 – 09:00) and 926 additional passengers will travel in the PM peak (17:00 – 18:00). The most affected service in the AM peak is envisaged to be the 341 south services towards White Hart Lane which would see an estimated 74 additional passengers in the AM peak (an additional 12.24 passengers per service). In the PM peak, the most affected service is envisaged to be 341 south service away from White Hart Lane with an estimated 79 additional passengers using the service (an additional 13.17 passengers per service). This level of intensification would not have a significant detrimental impact on the operations of the local bus network.

15.13 Whilst TfL has raised concerns with some of the assumptions underpinning the transport assessment, in particular, the number of proposed dwellings the model is based on, the selection of sites used from TRIC's and the bus trip generation figures, it is considered that the assumptions are reasonable and the outcomes would be reasonably similar, if adjusted. TfL are satisfied that the proposed development would not have a significant impact on the network.

15.14 Network Rail and the Mayor's Stage 1 Report raises the need for protection of the adjoining London Overground railway line. It is recommended that a planning condition requires protection works to be in place during the demolition/construction phase.

#### *Site Access*

- 15.15 Vehicular access is currently provided by High Road (A1010), located on the eastern boundary of the site and is the key north- south arterial route. White Hart Lane runs east – west linking the A1010 and A10 (Great Cambridge Road). There are a number of smaller residential streets and access roads within the site boundary. Notably Whitehall Street provides an East – West route connecting High Road to Tenterden Road. Love Lane connects Whitehall Street and White Hart Lane, on a north-south axis adjacent to the rail line and Moselle Street and William Street converge to connect High Road and White Hart Lane. The northern part of the site is less permeable to vehicular and pedestrian traffic. The detailed part of the scheme (plot A) is accessed via Whitehall Street, Tenterden Road and Headcorn Street.
- 15.16 Plot A will continue to be accessed via Whitehall Street and Tenterden Road and Headcorn Street with a new public route connecting Whitehall Street to Headcorn Road.
- 15.17 The primary access points for the outline part of the scheme will remain as existing, centred on High Road and White Hart Lane providing primary vehicular access. Given the outline nature of this part of the site, the detailed internal arrangements are reserved for subsequent approval. Notwithstanding this, it is envisaged that the proposal includes a new pedestrian route from White Hart Lane Station and Tottenham Hotspur Stadium and a new north-south cycle route connecting Cannon Road through to Brereton Road. New east-west vehicular route is proposed to the north-eastern corner of the site, connecting High Road to Cannon Road and a new one way connection to the south connecting Whitehall Street to Brereton Road. The proposal seeks to safeguard a potential pedestrian/ cycle route, over the rail line, to the north western corner of the site. The proposal also includes network of secondary/ restricted access vehicular routes and pedestrian routes within the site (figure 7 & 8).



Figure 7: Proposed illustrative pedestrian and cycle access strategy.





Figure 8: Proposed illustrative vehicular access strategy.

15.18 TfL calls for improvements to the route under the bridge along Whitehall Street and a Stage 1 Road Safety Audit of the proposed shared surface routes and any other areas where there is potential for conflict between vehicles and vulnerable road users. It is recommended that combined Stage 1 and 2 Audits are reserved by condition and improvements to Whitehall Street secured by S106 obligation.

*Pedestrian and cycle movement*

15.19 All the proposed routes across the site would be accessible for pedestrians and cyclists. The TA includes an Active Travel Zone (ATZ) assessment. This identifies a number of key destinations within a 20-minute cycle of the site – highlighting that the proposed schemes would be well connected to the public transport network as well as nearby leisure, educational, cultural and commercial activities. The ATZ finds that the proposed public realm improvements and increased permeability that the proposal would improve the site's connectivity with the surrounding existing walking and cycling routes as well as these public transport networks and activities.

15.20 Haringey Cycling Campaign have objected to the proposal on the grounds of indirect routing of the proposed cycle routes. They also highlighted the need for cycling facilities to be designed into the scheme. The proposed cycle routes are largely situated in the outline part of the site, whereby cycle facilities and landscaping arrangements will be detailed at reserved matters stage. The proposed cycle routes are envisaged to offer secondary cycle routes on quieter roads and not primary strategic routes in themselves. Officers are satisfied that the suitable planning conditions can be attached to the permission to secure satisfactory cycle links and associated facilities within the outline part of the site.

### *Car Parking*

15.21 The detailed element of the scheme (plot A) does not propose any on-plot vehicle parking but would not be restricted from receiving permits for the CPZ. The plot is envisaged to be occupied by decanted residents from the Love Lane Estate. It is envisaged that the parking demand for the proposed units would be 26 vehicles. The CPZ is currently operating at 60% capacity, with 40 spaces available within 200 metres of plot A, which is considered sufficient to meet the forecasted demand. Two accessible parking bays are proposed on Whitehall Street, immediately to the south-east of the development.

15.22 Given the outline nature of the remaining part of the site, the parking requirements and distribution are not known at this stage. However, it is envisaged that the parking will be provided through a combination of on-plot parking (basement/ parking courts/ podium parking) and street parking. The proposed parking arrangements are envisaged to come forward on a plot by plot basis at reserved matters stage. The illustrative masterplan provides car parking for 3% of new residents in the form of accessible parking, with space safeguarded to increase the accessible provision to 10% along with parking for decanted residents. It is envisaged that electric charging points will be provided in excess of the London Plan guidance. It is also envisaged that the proposal would deliver 10 car club spaces.

15.23 Management and mitigation. If planning permission were granted, it would be appropriate to secure the following by planning condition/s106 planning obligation:

### *Cycle Parking*

15.24 For plot A, 113 long stay and 4 short stay cycle parking spaces are proposed. This is in accordance with London Plan Policy T5 and is acceptable. However, there is insufficient detail on the location and detailed provision of these spaces to ascertain that this meets guidance in the London Cycling Design Standards (including the need for at least 20% Sheffield stands and 5% wider spaces for non-standard bikes). It is recommended that a planning condition reserves approval of these details.

15.25 Owing to the outline nature of the remainder of the scheme, the detailed parking requirements and distribution are not known at this stage. The detailed cycle parking arrangements will be secured at reserved matters stage. It is envisaged that the proposal will provide cycle parking in accordance with the minimum requirements set out in London Plan Policy T5. It is likely that long stay cycle parking will be provided in the residential blocks either in podiums or designated cycle shelters. At least 5% of the long stay provision will be Sheffield stands with wider (1.8 metre access). Short stay spaces will be situated in visible and convenient locations in the public realm.

### *Travel Planning*

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

### *Delivery and Servicing*

15.27 The applicant's Delivery and Servicing Plan estimates that there would be around 25 delivery and servicing trips in the AM Peak hour, 11 in the PM Peak hour. For the detailed part of the scheme (Plot A) loading is envisaged to take place on Whitehall Street and the bottom of Headcorn Road. For the outline part of the scheme, it is envisaged that loading and unloading bays will be distributed throughout the site and restricted access routes would be available for servicing and deliveries. It is recommended that a detailed plan, for the outline element, is secured by a planning condition and that s106 planning obligations ensure that Travel Plan Co-Ordinators are responsible for monitoring the Plan.

### *Construction Activities*

15.28 The applicant's Outline Construction Environmental Management Plan (CEMP) takes account of the EIA cumulative schemes and sets out vehicular routing and access principles and identifies strategies to reduce potential impacts. It is recommended that a planning condition secures the approval of a detailed CEMP as part of each reserved matters submission.

### *Transportation - Summary*

15.29 The proposed scheme improves connectivity between the Cannon Road area and the High Road and White Hart Lane for vehicles, pedestrians and cyclists. The scheme would deliver a new north-south cycle link and a new public square that would provide a direct link from White Hart Lane Station and Tottenham Hotspur Stadium. Cycle and Car parking can be accommodated within the site and surrounding road network, in line with London Plan requirements. Notwithstanding the objection from Haringey Cycling Campaign, Officers are satisfied that suitable planning conditions can be attached to the permission to ensure that satisfactory cycle routes and associated facilities can be incorporated into the development. The scheme would result in a relatively small and manageable increase in vehicular trips, which subject to the recommended planning conditions and s106 planning obligations referred to above, would be manageable. An assessment of likely cumulative effects, including taking account of likely public transport trips associated with the development would be manageable. As noted above, the proposed development is capable of being delivered with beneficial impacts on crowd flows to Tottenham Hotspur Stadium on event days by providing a direct route to the station with adequate space for queuing. The independent review of the crowdfow assessment found that the proposed queue space would be adequate. The detailed arrangements, including temporary arrangements during construction and supplementary crowd flow assessment will be secured at reserved matter stage.

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

16.1 London Plan Policy SI2 sets out the Mayor of London's energy hierarchy: Use Less Energy (Be Lean); Supply Energy Efficiently (Be Clean); Use Renewable Energy (Be Green) and (Be Seen). It also sets a target for all development to achieve net zero carbon, by reducing CO2 emissions by a minimum of 35% on-site, of which at least 10% should be achieved through energy efficiency measures for residential development (or 15% for commercial development) and calls on boroughs to establish an offset fund (with justifying text referring to a £95/tonne cost of carbon). London Plan Policy SI2 requires developments referable to the Mayor of London to demonstrate actions undertaken to reduce life-cycle emissions.

16.2 London Plan Policy SI3 calls for major development in Heat Network Priority Areas to have a communal low-temperature heating system, with the heat source selected from a hierarchy of options (with connecting to a local existing or planned heat network at the top).

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

### *Energy*

- 16.9 The principal target is to for the development to achieve BREEAM communities "Excellent" Rating. The London Plan requires the 'lean', 'clean', 'green' and 'seen' stages of the Mayor of London's Energy Hierarchy to be followed to achieve a 'Zero Carbon' Standard targeting a minimum onsite reduction of 35%, with 10% domestic and 15% non-domestic carbon reductions to be met by energy efficiency. All surplus regulated CO2 emissions must be offset at a rate of £95 for every tonne of CO2 emitted per year over a minimum period of 30 years.

16.10 'Be Lean.' The proposed scheme adopts a 'fabric first' approach, including façade configuration and specification that balances the desire to have winter passive solar gains but avoid summer overheating; high performance glazing, reduced air permeability and good insulating fabric, use of high-efficiency mechanical ventilation and heat recovery, use of LED lighting and efficient cooling for the proposed commercial units.

16.11 The proposed measures are envisaged to achieve a 10.12% reduction above Part L 2013 for Plot A (an annual carbon dioxide emissions saving of 7.27 tonnes per year). For the outline representing a 12% site wide saving (a saving of 561 tonnes of carbon dioxide per year above the relevant SAP factor baseline). The detailed energy saving measures for the outline part of the scheme will be secured at reserved matters stage.

16.12 'Be Clean.' The applicant is intending to connect directly to the Meridian Water District Heating Network. Connection to the proposed DEN is expected to save 2,365 tonnes of carbon dioxide per year (a 45% saving above the SAP 2012 carbon factor baseline) for the whole site and a 38.7 tonne saving for plot a (59.96% above 2013 Part L requirements). If connection to the DEN is not feasible, an Air Source Heat Pump district heating solution is proposed as a back-up. Temporary arrangements for plot A is to use a high efficiency low NOx boiler.

16.13 'Be Green.' Photovoltaic (PV) arrays are estimated to come forward on 50% of the available proposed roof space. The proposed PV panels are anticipated to save 2,138 tonnes of carbon dioxide per year (a 2% saving above the SAP 2012 factor baseline) site wide, including a 4.15 tonne saving for plot A (a 16.05% reduction in carbon emissions above current Part L requirements).

16.14 Plot A – 'Lean, 'Clean' and 'Green'. Table 21 below sets out the Plot A emissions savings.

	<b>Annual Regulated CO2 emissions reduction above 2013 Part L (tCO2 / year)</b>	<b>% saving</b>
<b>Savings from 'Be Lean'</b>	7.27	10.12%
<b>Savings from 'Be Clean'</b>	38.70	59.96%
<b>Savings from 'Be Green'</b>	4.15	16.05%
<b>Total Cumulative On-site Savings</b>	50.12	<b>69.79%</b>

16.15 Overall – ‘Lean’, ‘Clean’ and ‘Green’. Table 22 below set out the overall carbon emission savings.

Table 22: Site-wide regulated carbon dioxide emissions savings (based on SAP2010 emission factors)

	<b>Total regulated emissions (Tonnes CO / year)<sup>2</sup></b>	<b>CO savings<sup>2</sup> (Tonnes CO / year)<sup>2</sup></b>	<b>Percentage savings (%)</b>
Part L 2013 baseline	4,106	-	-
Be lean	3,582	523	13%
Be clean	1,741	1,842	45%
Be green	1,708	33	1%
Cumulative	-	2398	59%

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

17.2 Carbon Offsetting. Despite the adoption of the ‘Lean’, ‘Clean’ and ‘Green’ measures outlined above, the expected carbon dioxide savings fall short of the zero-carbon policy target for proposed domestic and non-domestic uses. Overall, the amount of carbon to be offset (once connected to the proposed DEN) would be 21.7 tonnes per year for plot A. Based on 30-years of annual carbon dioxide emissions costed at £95 per tonne, this amounts to £39,060 (or £42,966 including a 10% management fee). It is recommended that s106 planning obligations secure this sum (including 10% monitoring fee), subject to any additional carbon savings that arise from more detailed design agreed with the LPA, by way of s106 planning obligations.

17.3 Whole Life-cycle Emissions. The applicant’s Whole-life Carbon Assessment has been undertaken in accordance with the latest published GLA guidance (October 2020). This assessment accounts for the estimated whole life-cycle carbon emissions of the proposed development and outlines the actions taken to reduce life-cycle carbon emissions. The aim of the assessment is to provide guidance to minimise the Whole Life Carbon impacts of the proposed development by setting appropriate targets and recommending design interventions. A detailed assessment of Plot A is included in the appendices of the assessment.



17.4 The assessment finds that the total embodied carbon emissions (the carbon dioxide emissions associated with producing the materials used in the construction, maintenance and deconstruction of the development) for Modules A-C were 193,467,835 kgCO<sub>2</sub>e/m<sup>2</sup>. The highest contributing emission source is the residential use contributing around 91% of the total embodied emissions. It is recommended that a planning condition is imposed to secure a more detailed life-cycle emissions assessment at reserved matters stage

17.5 For plot A, the assessment finds that the total embodied carbon emissions for Modules A1 – A5 were 415 kgCO<sub>2</sub>e/m<sup>2</sup> (below the 'standard' benchmarks) and were 218 kgCO<sub>2</sub>e/m<sup>2</sup> for Modules B-C (excluding B6 & B7) ('between the GLA's 'aspirational' and standard' benchmark).

### Overheating

17.6 The applicant's Sustainability and Energy Statement includes overheating and cooling analysis that sets out that the development will be designed to minimise the need for energy intensive air conditioning systems. The assessment highlights that noise and air pollution will be a limiting factor to achieving natural ventilation for some parts of the site. A detailed assessment will need to accompany the future reserved matters submissions.

17.7 For plot A, the assessment concludes that the design has the ability to mitigate overheating if the windows can be fully opened to allow sufficient airflow. However, if windows cannot be opened (due to noise) the units will not pass TM59. Alternative measures are required for some units (peak lopping or enhanced mechanical ventilation). A detailed scheme for noise and overheating mitigation will be secured by condition.

17.8 Energy conclusion. The overall anticipated on-site carbon emission reductions over Building Regulations (2013) and associated offsetting payments would meet London Plan Policy SI2. The proposed connection to an off-site DEN would also meet London Plan Policy SI4. The expected building performance such as at least 10% for domestic and 15% for non-domestic savings to come from building fabric can be achieved, in line with London Plan Policy SI2.

17.9 The proposed 'Green' savings would be below the 20% called for by Local Plan Strategic Policy SP4. However, officers are satisfied that the amount of proposed roof top PV arrays will be optimised while balanced against other demands for roof-top space.

### *Environmental sustainability*

17.10 Circular Economy. The applicant's Circular Economy Statement identifies the following five key steering approaches to designing for the circular economy for plot A:

- Retain the value of existing materials through deconstruction to enable recovery and reuse (where feasible)
- Adopt lean design principles to minimise the material intensity of the development and reduce waste.
- Ensure adequate storage and separation of municipal waste streams for the development to maximise recycling opportunities.
- Design for longevity of the use

17.11 The Statement sets out the Key Commitments; Bill of materials, Recycling and waste reporting form. The measures are considered to be acceptable

17.12 Construction waste. A Site Waste Management Plan (SWMP) has been produced for plot A and the wider masterplan to reduce and manage/re-use waste during demolition and construction. This is to inform a Resource Management Plan. The document is also expected to set out the waste management options either on- or offsite of the various waste types expected in line with the waste hierarchy, through the following routes: reduce, reuse, recycled, recover and dispose. It is recommended that this is secured by a planning condition.

17.13 Water consumption. In order to ensure compliance with London Plan Policy S15, it is recommended to use a planning condition to minimise the use of mains water in line with the Operational Requirement of the Building Regulations (residential development) to achieve mains water consumption of 105 litres or less per head per day and achieve BREEAM 'Excellent' standard for 'Wat 01' water category or equivalent (commercial development).

17.14 Thames Water have not raised concerns over the ability of the water network infrastructure to accommodate the needs of the proposed development, on the basis that no surface water connection is being made for the northern part of the site. However, they note that upgrade works will be required to facilitate the development and have suggested a condition to restrict future development until necessary infrastructure is provided and this is recommended by officers. Thames Water has also recommended that grease separators are installed in all commercial hot food premises and an informative regarding working near their assets. These will be conditioned.

17.15 Considerate Constructors Scheme. The applicant's Site Construction Management Plan states that the principal contractor would be required to manage sites and achieve formal certification under the Considerate Constructors Scheme. It is recommended that this is secured by a S106 planning obligation

17.16 Other environmental sustainability issues. Movement and transport, Landscape and ecology, air quality, noise, daylight and sunlight, flood risk and drainage are addressed in detail in other sections of this report.

## 18 Flood Risk, Drainage and Water Infrastructure

- 18.1 Policy DM28 Protecting and Enhancing Watercourses and Flood Defences states that a new development must be set back at a distance of 8 meters from a main river and 5 meters from an ordinary watercourse, or at an appropriate width as agreed by the Council and the Environment Agency, in order to provide an adequate undeveloped buffer zone.
- 18.2 It notes that development proposals on sites containing a main river or ordinary watercourse will be required to demonstrate how the objectives of the Thames River Basin Management Plan are
- 18.3 London River Restoration Action Plan have been taken into account. All major development will be required to investigate and secure the implementation of environmental enhancements to open sections of the river or watercourse; and investigate and secure the implementation of measures to restore culverted sections of the river or watercourse.
- 18.4 Development proposals must comply with the NPPF and its associated technical guidance around flood risk management. London Plan Policy SI12 requires development proposals to ensure that flood risk is minimised and mitigated and that residual risk is addressed.
- 18.5 London Plan Policy SI13 and Local Policy SP5 expect development to utilise Sustainable Urban Drainage Systems (SUDS).
- 18.6 Policies DM24, 25, and 29 continue the NPPF and London Plan approach to flood risk management and SUDS to ensure that all proposals do not increase the risk of flooding. DM27 seeks to protect and improve the quality of groundwater.
- 18.7 London Plan Policy SI5 requires proposals to ensure adequate wastewater infrastructure capacity is available.

### *Flood Risk*

- 18.8 The majority of site is in Flood Zone 1 and has a low probability of flooding from tidal and fluvial sources. The central and part of the eastern extent of the site is located in flood zone 2, due to its proximity to the Moselle River (classified as a Main River), which is culverted below White Hart Lane and High Road. The site is within a Critical Drainage Area.
- 18.9 The submitted Flood Risk Assessment (FRA) finds the 'daylighting' of the Moselle River to be prohibitive on the grounds of loss of trees, water quality, service diversions, impact on transport services, loss of public realm, impact on stadium access and the land take required to provide the river channel. The report sets out that the reserved matters

submissions will consider localised covered openings, installation of a water wheel and above ground watercourse markers. Subsequently, the applicant considered that the 8 metre easement requested by the Environment Agency can be reduced to 3 metres, in line with build over agreements for public sewers.

- 18.10 Plot A and parts of the outline site (blocks F and G) are at low-high risk of surface water flooding. The risk of flooding from the sewers is considered to be low. The site is also at risk of ground water flooding, particularly to basement levels. Risks of flooding from reservoirs is considered to be very low to negligible. Proposed mitigation measures include:
- The finished floor levels of plots F and G being 300mm above the estimated flood level with no ground floor level uses being 'more vulnerable' uses.
  - Site levels that fall away from building thresholds and directed towards drainage features (including plots A1, A2 and A3).
  - Adoption of sustainable urban drainage solutions that seek to reduce discharge rates by 70% in the northern and 40% in the southern part of the site (designed to prevent above ground flooding in the 1 in 100 year storm event including a 40% allowance for climate change). This could include attenuation tanks, rainwater harvesting, green roof and blue roof systems and permeable paving, detention pond and flow controls
  - Basement waterproofing
  - Provision of flood evacuation routing for plots F and G.

18.11 Foul water from Plot A is proposed to be discharged to the existing Thame Water foul sewers which will be subject to consent from Thames Water. A similar arrangement is proposed for the outline part of the site. It is estimated that foul flows would be 2.8 l/s for Plot A, 23 l/s for the northern part of the site and 68.2 l/s for the southern part of the site. This would represent a significant increase from the estimated foul water discharge from the existing site. Since all surface water is proposed to be discharged to a dedicated surface water sewer and there are no known issues associated with lack of capacity of the existing foul water sewer network, the risk of flooding from the foul sewers is considered to be low.

### *Drainage*

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

18.13 The surface water drainage arrangements for plot A are to discharge to the existing public surface sewer by gravity connection. The discharge rate will be limited to a 70% reduction against the existing flows in a 1 in 100 year storm event (20.5 l/s). The water will

be attenuated through the use of a roof garden, rain garden, permeable paving and below ground attenuation to achieve a storage volume of 129 cubic metres.

18.14 The surface water for the outline part of the scheme will be restricted discharge to the existing surface water sewer at a rate of 115.4 litres per second (a 70% reduction to existing). With green roofs, rain gardens, permeable paving, below ground attenuation, a detention basin and bioretention providing a storage volume of 641 cubic metres. An increased storage volume will be required if the independent permissions come forward.

18.15 The Council as Lead Local Flood Authority has no objection to the proposed drainage arrangements subject to conditions to secure a detailed surface water scheme and associated management and maintenance plan for the outline part of the site. The Environment Agency has no objection subject to conditions for surveys, a buffer zone and Piling/Foundations Method Statement. Thames water raises no network infrastructure capacity objections in relation to foul water or surface water. The aforementioned conditions could reasonably be imposed.

## 19 Air Quality

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

19.2 Policies DM4 and DM23 require development proposals to consider air quality and be designed to improve or mitigate the impact on air quality in the Borough and improve or mitigate the impact on air quality for the occupiers of the building or users of development. Air Quality Assessments will be required for all major developments where appropriate. Where adequate mitigation is not provided planning permission will be refused. Haringey is an Air Quality Management Area (AQMA).

19.3 The application is supported by an Air Quality Assessment, which includes an Air Quality Neutral Assessment, and an Air Quality Positive Statement. The applicant's Site Construction Management Plan also sets out minimum standards and procedures for managing and minimising dust and air quality impacts.

19.4 The applicant's Assessment considers ground floor NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> exposure at plots A2, C, F, I4 and N1 and 14 sensitive receptors to poor air quality and finds that the site, including the High Road and White Hart Lane frontages, would be below air quality objective levels for in the 2025 scenario.

19.5 The proposed scheme is envisaged to be 'Air Quality Neutral' (with expected emissions associated with transport and buildings falling below air quality benchmark values) and has been designed to minimise potential adverse air quality effects

- The proposed layout is to be designed to avoid creating street canyons where pollutants could be trapped and the proposed streets and spaces are to follow TfL's Healthy Streets approach which encourages walking and cycling;
- The scheme is envisaged to deliver a relatively low level of on-site car parking with an excess of 20% active Electric Vehicle Charging Points (EVCPs) and passive provision for remaining spaces to have EVCPs;
- Some homes are likely to require Mechanical Ventilation (with the need to open windows limited to purge scenarios necessary to clear the room of smells etc), but with the choice to open windows; and
- The proposed connection to an off-site District Energy Network means that there would be no onsite emissions from boilers.

19.6 The applicant's Assessment does identify potential minor – major adverse effects from dust during the demolition and construction. The Construction Environmental Management Plan sets out measures to minimise dust emissions including care programming of dust generating activities, provision of screening and the use of dampening systems. The Pollution Team raised no objection to the proposal subject to conditions. It is recommended that detailed construction management plans for each phase of the development and other mitigations are secured, by planning condition.

## 20 Wind and Microclimate

20.1 London Plan Policy D8 seeks to ensure that public realm areas are well-designed, including, ensuring that microclimate considerations such as wind are taken into account to encourage people to spend time in a place. London Plan Policy D9 calls for proposed tall buildings to carefully consider wind and other microclimate issues. Policy DM6 states that proposals for tall buildings should consider the impact on microclimate and Policy AAP6 requires a high-quality public realm for developments in Tottenham.

20.2 Chapter 16 of the ES reports on an assessment of the likely significant effects of wind. The illustrative masterplan was used for the microclimate analysis of the outline part of the scheme. The ES adopts significance criteria that are based on the Lawson Comfort Criteria for 'sitting', 'standing', 'strolling', 'walking' and 'uncomfortable'. It goes on to report on an iterative process of testing and adapting assumed integrated mitigation features, before identifying likely significant residual effects. As with other topics, the assessment in the ES takes account of subsequent permissions.

20.3 Chapter 16 of the ES has been reviewed by an independent specialist consultancy appointed by the Council. Likely significant wind effects are assessed in the ES by a computation fluid dynamics (CFD) led approach, validated by wind tunnel testing. Whilst account has been taken of the likely significant temporary effects during construction, the officer summary below focuses on permanent effects.

20.4 With identified mitigation in place (including trees and soft landscaping, canopies, vertical screens/balustrades etc), the residual effects identified in the ES have been agreed and are set out in table 23 below.

Table 23: summary of wind effects

Issue	Likely Significant Effect	Mitigation Measures	Likely Residual Effect
<b>Demolition and Construction</b>			
On-Site	Negligible	None required	Negligible
Off-Site	Direct, temporary, local, adverse effect of minor significance	Mitigation measures in place prior to completion of Proposed Development. Secured by appropriately worded planning condition	Negligible
Strong Winds	Negligible	None required	Negligible
<b>Completed and Operational Development (Configuration 3)</b>			
<b>On-Site</b>			
Thoroughfares	Negligible	None required	Negligible
Entrances	Negligible	None required	Negligible
Bus Stops	Negligible	None required	Negligible
Ground Level Amenity – Mixed Use	Negligible	None required	Negligible
Ground Level Amenity – Seating	Negligible	None required	Negligible
Ground Level Amenity – Seating	Direct, permanent, local, adverse effect of minor significance (Measurement locations 108, 189 and 495)	Mitigation measures, such as those suggested in paragraph 16.6.2.8, to be determined at reserved matters stage	Negligible (with developed measures at reserved matters stage)
Balconies (Plot A /Phase 1A)	Negligible	None required	Negligible

Roof Level Amenity – Mixed Use	Negligible	None required	Negligible
Pedestrian Crossings	Negligible	None required	Negligible
Strong winds	Negligible	None required	Negligible
<b>Off-Site</b>			
Thoroughfares	Negligible	None required	Negligible
Entrances	Negligible	None required	Negligible
Bus Stops	Negligible	None required	Negligible
White Hart Lane Overground Station Platform	Negligible	None required	Negligible
Ground Level Amenity – Seating	Direct, permanent, local, adverse effect of moderate significance (Measurement location 107)	Mitigation measures, such as those suggested in paragraph 16.6.2.8, to be determined at reserved matters stage	Negligible (with developed measures at reserved matters stage)
Pedestrian Crossings	Negligible	None required	Negligible

20.5 The independent review of the microclimate assessment found the applicants approach to the microclimate assessment to be acceptable. Some concerns were raised in relation the lack of testing for construction phases, not isolating plot A buildings in the assessment, lack of assessment of proposed seating, play areas, cycle routes and the lack of explanation for some aspects of the model.

20.6 It is recommended conditions are attached to the permission to ensure that appropriate additional microclimate assessment work takes place and suitable mitigation is delivered as part of the scheme. Subject to this, officers consider that the proposed scheme would result in an acceptable wind environment.

## 21 Trees

21.1 The NPPF (Para. 131) stresses the importance of trees and makes clear that planning decisions should ensure that new streets are tree-lined. London Plan Policy G7 makes clear



that development should seek to retain and protect trees of value and replace these where lost.

21.2 The applicant's Tree Survey records 134 trees (groups of trees and hedgerows) on and immediately adjacent to the site. Of these trees, 2 are Category A (the highest quality), 61 are Category B, 66 are Category C and 5 are Category U (unsuitable for retention). The Council's records do not indicate there are any trees on the site subject to a Tree Protection Order (TPO).

21.3 The proposals result in the loss of 67 arboricultural features. This includes 27 x Category B, 39 x Category C and 1 x Category U. Two mature prominent Category A London Plane trees (T5 & T63), on the High Road, would be retained and protected – two on the site near the High Road footway and two in the footway itself – would be retained. The arboricultural assessment estimates that approximately 236 new trees will be planted, representing a replacement ratio of 4:1. The assessment sets out suitable tree protection measures for plot A.

21.4 For the outline part of the scheme, it is recommended planning conditions are attached to the permission requiring further arboricultural assessment that details appropriate mitigation measures and tree protection measures for each subsequent reserved matters application.

## **22 Urban Greening and Ecology**

### *Urban Greening*

22.1 London Plan Policy G5 sets out the concept and defines Urban Greening Factor (UGF) as a tool used to evaluate and quantify the quality of urban greening provided by a development and aims to accelerate greening of the built environment, ensuring a greener London as it grows. It calls on boroughs to develop their own UGF targets, tailored to local circumstances, but recommends an interim target score of 0.40 for proposed development that is predominantly residential.

22.2 The applicant's Design and Access Statement includes a calculation of the Urban Greening Factor (UGF) for the proposed scheme. This envisages that the illustrative masterplan would have a UGF of 0.22 (an uplift of 0.15). Given that the proposal is envisaged to deliver an urban greening score increase, a substantial quantum of tree planting, seeks to optimise the provision of green roofs and provides public realm and circulatory improvements to the site, the envisaged urban greening score is considered to be acceptable. It is recommended that planning conditions are imposed to secure details of the green roof construction and soft landscaping and increased UDF where possible.

## *Ecology*

- 22.3 London Plan Policy G6 calls for development proposals to manage impacts on biodiversity and to aim to secure net biodiversity gain.
- 22.4 Local Plan Policy SP13 states that all development must protect and improve sites of biodiversity and nature conservation. In addition, Policy DM19 makes clear that development on sites adjacent to internationally designated sites should protect and enhance their ecological value and Policy DM20 supports the implementation of the All London Green Grid. AAP Policy AAP6 states that proposals for tall buildings that fall within 500m of a Special Protection Area (SPA)/Ramsar area need to ensure no adverse effects.
- 22.5 The applicant's Ecological Appraisal Report (ES Appendix 10.1) sets out the findings of a phase 1 habitat survey, which concludes that the site is dominated by hardstanding and buildings, offering limited ecological value. Mixed scrub, temporary grass and clover leys, urban street trees and a culverted river are other habitats in the site boundary. The most significant habitat identified is the green corridor on the western boundary. The corridor comprises dense scrub and young- semi-mature trees which is a priority habitat and a designated Green Corridor.
- 22.6 No bats or evidence of bats was identified during the ground level assessment of the site and buildings. However, 1 building and 1 structure were identified as having potential for roosting bats. Emergence and pre-dawn re-entry surveys found no evidence of roosting bats within the building. The structure (culverted river exit), was found to contain common and soprano pipistrelle. *Pipistrellus pygmaeus* bats were recorded to be foraging either side of the River Moselle (to the west of the culvert entrance), as well as commuting noctule and *nathusius pipistrelle* and *Pipistrellus nathusii* (single pass of each species). Bat activity along the adjacent railway embankment is considered likely. It is likely that works to the culvert will require an European Protected Species Licence.
- 22.7 The Ecological Appraisal Report identified the site as having some potential for nesting birds.
- 22.8 The report recommends the landscaping includes native species planting, including buffer planting adjacent to the green corridor and living roofs and bird, bat and bee boxes integrated into buildings and landscaped areas. The report also recommends that a lighting strategy is devised to minimise lighting of ecological features. It is recommended that further ecological assessment and associated mitigation and enhancement measures are secured by planning condition.

## *Habitats Regulation*

- 22.9 Given the proximity of the application site to two designed European sites of nature conservation, it is necessary for Haringey as the competent authority to consider whether there are any likely significant effects on relevant sites pursuant to Section 63(1) of the Conservation of Habitats and Species Regulations 2017 (“the Habitats Regulations”).
- 22.10 The application site is approx. 1.22km west of the Lea Valley Special Protection Area (SPA). The Lea Valley area qualifies as a SPA under Article 4.1 of the Birds Directive on account of supporting nationally important numbers of species. This area is also a Ramsar site. The Lea Valley SPA/Ramsar comprises four underpinning Sites of Special Scientific Interest (SSSIs).
- 22.11 The application site lies approx. 5.05 km west of the Epping Forrest Special Area of Conservation (SAC). However, it is within 6.2km the Zone of Influence (ZOI) as defined by Natural England in its Interim Guidance. The Epping Forest SAC is one of only a few remaining large-scale examples of ancient wood-pasture in lowland Britain and has retained habitats of high nature conservation value. Epping Forest SAC is also subject to a SSSI designation.
- 22.12 The Lea Valley SPA site is carefully managed to avoid impacts, with only limited access allowed to the wetland itself, with access closed seasonally to avoid impacts to wintering bird populations. As such, adverse effects as a result of increased recreational pressure are not considered likely. Likewise, the proposed scheme, with its limited car parking provision and promotion of use of electric vehicles by providing Electric Vehicle Charging Points is not expected to result in an adverse air quality effect.
- 22.13 The Habitat Regulations Assessments (HRA) for alterations to the Strategic Polices and The Tottenham AAP both conclude that there will be no likely significant effect on Epping Forest SAC through increased recreational pressure as nowhere within the Borough lies within the core recreational catchment for the site. The proposed development is envisaged to be largely care free (on-site mobility car parking spaces are to be provided alongside car parking for returning residents). Epping Forest SAC is not conveniently accessible by public transport and there are numerous high quality public open spaces that can be conveniently accessed in reasonable travel distance from the site. The potential risks to the SAC are further reduced by the proposed integration of greenspace within the proposed scheme, providing a link between residents and nature and that no direct or indirect significant adverse effects on Epping Forest SAC are expected as a result of the proposed scheme. Therefore, it is considered that there is no need for an appropriate assessment or mitigation. Notwithstanding this, the applicant has produced a ‘shadow’ Appropriate Assessment that confirms that the proposal would not adversely impact upon Epping Forest SAC. The applicant has offered up a £50,000 (SANGs) financial contribution to the improvement of Bruce Castle Park as interim mitigation whilst the park on site is being delivered. This would add value to an existing recreational opportunity to future residents of the site, that would likely further reduce recreational pressure on Epping Forest SAC. The financial contribution will be secured by legal agreement.

22.14 Natural England has reviewed the application and believes the financial contribution towards improving Bruce Castle Park should be treated as mitigation which triggers the need for an appropriate assessment. Officers do not agree and consider the development would not give rise to likely significant effects on European designated sites (Lee Valley SPA and Epping Forest SAC) pursuant to Section 63(1) of the Conservation of Habitats and Species Regulations 2017 (“the Habitats Regulations”). An appropriate assessment is therefore not considered to be required and the proposal is in accordance with Policies SP13 and DM19.

### *Biodiversity Net Gain*

22.15 The applicant’s biodiversity net gain design stage report sets out how 3.0 Metric was used to calculate Biodiversity Net Gain For the site. The calculation states that the existing site has a Biodiversity value of 3.18 and envisages that the proposed landscaping and ecological enhancement measures will achieve a biodiversity value of 5.35 (2.9 uplift in habitat units and a 90.97% positive net change of the site). The predicted uplift is largely derived from the loss of low quality existing habitats and the retention and supplementation of high quality habitats including tree and mixed shrub provisions. The envisaged net gain is significantly above the minimum 10% set out in the Environment Act. It is recommended that landscaping and ecological mitigation and enhancement details are secured by condition, along with a management and monitoring plan. Commitment to funding management and monitoring is proposed to be secured by legal agreement.

## **23 Waste and Recycling**

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

23.2 The applicant’s Waste Management Plan for plot A and the outline element of the scheme has been developed in accordance with guidance provided by Waste officers and BS 5906:2005 Waste management in buildings – a code of practice. The key principles include:

- Commercial and residential waste would be collected separately;
- The waste collector would not be required to pull full containers more than 10m to the collection vehicle;
- A minimum clear space of 150mm would be allowed between containers;
- Waste rooms would be designed and fitted out so they could be washed down and fire resistant;

- Waste collection vehicles would not be required to reverse more than 12m;
- Access roads for waste vehicles would have a minimum clear width of 5.0m and a maximum gradient of 1:12; and
- Storage and loading areas would be level, smooth, hard surfaced and provide drop kerbs and have a maximum gradient of 1:14 if the ground slopes down towards the collection vehicle.

23.3 Residential waste, recycling and food waste would be collected weekly and storage space has been provided in accordance with the generation rates provided by waste officers. Space has also been provided for bulky/non-standard waste items. Residents would not be required to walk further than 30m (horizontal distance) between their home and their allocated waste store. Most waste stores would be externally accessible and within 10m of the proposed stopping point for the waste collection vehicle. Any waste stores further than 10m from a collection point would have the waste brought to a suitable collection point within 10m of the collection vehicle on the day of collection by the on-site management team.

23.4 For the outline part of the site, it is envisaged that traditional waste collection arrangements will be pursued and appropriate storage capabilities and collection arrangements will be designed into the residential and commercial elements.

23.5 It is recommended that planning conditions are imposed to reserve the detailed management and maintenance arrangements for plot A and secure details for the outline element of proposal.

23.6 LBH Waste officers are content with the proposed storage arrangements but requested that Plot A1 has 3 x 140 litre food waste bins as opposed to a single 360 litre bin and advised that any proposed commercial waste stores should be designed to store a weeks' worth of waste despite capabilities for regular collections. This can be secured by condition.

## 24 Land Contamination

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

24.2 The applicant's Geotechnical & Geo- environmental Desk Study Report (ES Appendix 12.1) contains a Preliminary Contaminated Land Risk Assessment. The report acknowledges that the previous use of the site results in a potential for land and water contamination. It concludes by identifying Low to Moderate potential risks to a range of receptors, including construction workers and potential residents and recommends that an intrusive ground investigation is carried out to appraise the extent of Made Ground, the gas

regime and the groundwater regime. It also recommends that an Unexploded Ordnance survey is undertaken.

24.3 LBH Pollution officers raise no objection, subject to conditions relation to Land Contamination and Unexpected Contamination, Construction Environmental Management Plan (CEMP), Air Quality Assessment and Plant. It is proposed to impose the recommended conditions.

## 25 Basement Development

25.1 Policy DM18 relates to new Basement development and sets out that the construction of new basements, including in existing dwellings will only be permitted where it can be demonstrated that the proposal;

a Will not adversely affect the structural stability of the application building, neighbouring buildings and other infrastructure, including the adjoining highway, having regard to local geological conditions;

b Does not increase flood risk to the property and nearby properties from any source

c Avoids harm to the appearance or setting of the property or the established character of the surrounding area;

d Will not adversely impact the amenity of adjoining properties by reason of noise or increased levels of internal or external activity;

e Will not adversely impact the local natural and historic environment;

25.2 These points are addressed through a Basement Impact Assessment (BIA).

25.3 The parameters for Plots M, J, L and K include basements with finished floor levels of 7.00 AOD, 8.23 AOD and 7.77 AOD respectively. The basements to plots M, J and L will be at least approximately 13 metres and 25metres from the railway track, respectively. The railway track is situated on an embankment that is approximately 3 metres above the surrounding ground level.

25.4 Officers and Building Control are satisfied that principles set out in the outline Basement Impact Assessment are acceptable. It is recommended that a planning condition is imposed to secure a detailed basement impact assessment prior to the commencement of development on plots M, J, L and K.

## 26 Archaeology

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

- 26.2 London Policy HC1 states that applications should identify assets of archaeological significance and avoid harm or minimise it through design and appropriate mitigation. This approach is reflected at the local level in Policy DM9
- 26.3 The Site is located within The Lea Valley and Ermine Street Archaeological Priority Areas; therefore, there is potential for below ground heritage assets to be present.
- 26.4 Chapter 8 of the ES (which is supported by an Archaeological Desk Based Assessment) reports on an assessment of the likely significant effects on archaeology. The White Hart Lane and High Road frontage parts of the site form part of an Archaeological Priority Area, due to evidence of a Medieval settlement with possible Anglo-Saxon roots and the presence of a former Roman road (Roman Ermine Street). Following mitigation, in the form of archaeological investigation, the ES identifies a Minor Adverse residual effect.
- 26.5 The Greater London Archaeological Advisory Service (GLAAS) has assessed the proposal (identifying that the layout of the proposed scheme presents theoretical scope to preserve any important finds along the High Road frontage) and indicates the need for field evaluation to determine any further appropriate mitigation. GLAAS calls for a two-stage process of archaeological investigation comprising evaluation to clarify the nature and extent of any surviving remains, followed, if necessary, by a full investigation.
- 26.6 A meeting was held with the GLAAS in January 2022. It was agreed not to proceed with the geoarchaeological work at this stage, however it was requested that the ES provides some updated baseline information and reflects the potential for public benefits to be delivered by the Interim Scenario.
- 26.7 Accordingly, an update to the ES has been submitted which presents an assessment of the likely significant archaeology (buried heritage) effects of the Interim Scenario at the Southern Site. It concludes that, in consultation with The GLAAS, additional research and archaeological investigation could be undertaken at a later stage to assess opportunities to protect, promote and enhance areas of archaeological potential and that this could be implemented through an appropriately worded planning condition.
- 26.8 The GLAS has since recommended the imposition of four pre-commencement conditions to be imposed.

## **27 Fire Safety and Security**

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

27.2 The application is supported by a Fire Statement which sets out how the design and construction of the buildings will seek to satisfy the functional requirements of Part B of Schedule 1 to the Building Regulations 2010 (as amended, 2018), the Construction Design and Management Regulations 2015 (CDM) and the operational fire safety requirements of the Regulatory Reform (Fire Safety) Order 2005 (RRO).

27.3 The London Fire Brigade have been consulted and the Commissioner is satisfied that the statement complies with the London Fire Brigade's requirements for firefighting access. In accordance with the Mayor of London's guidance, it is recommended that a planning condition is imposed, requiring the development to be carried out in accordance with the planning fire safety strategy (included in the Fire Statement).

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

27.5 In light of the above, the application is considered to be acceptable with regard to its impact on fire safety, in accordance with national planning policy and the development plan.

## 28 Equalities

28.1 In determining this planning application, the Council is required to have regard to its obligations under equalities legislation including obligations under the Equality Act 2010. In carrying out the Council's functions due regard must be had, firstly to the need to eliminate unlawful discrimination, advance equality of opportunity between people who share those protected characteristics and people who do not and to the need to promote equality of opportunity and to foster good relations between persons who share a protected characteristic and persons who do not share it. The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status apply to the first part of the duty. Members must have regard to these duties in taking a decision on this application.

28.2 The applicant has provided an Equalities Impact Assessment (EqIA) that identifies and assesses any potential impacts on groups with 'protected characteristics' as defined by the Equality Act 2010, that would arise from the delivery of the proposal. It also identifies interventions and/or mitigation measures required to reduce any adverse effects, whilst also maximising any beneficial effects on the Local Impact Area (LIA) and the LBH.

28.3 Based on the demographic and social indicators prepared as part of the ES the following groups with 'protected characteristics' have been identified:

- Children and young people (aged 0-24 years);
- Those with a disability and/or long-term limiting illnesses;



- BAME communities including African, Middle Eastern and Asian Communities; and
- Muslim community.

28.4 The baseline analysis has also identified crime (and the perception of crime) and overcrowding as two key challenges affecting priority groups within the LIA.

28.5 Evidence provided by the Applicant indicates that there are currently 85 businesses located across the Site (which together support an estimated 690 FTE jobs), and which are likely to be impacted by demolition and construction activity associated with the Proposed development. A Commercial Relocation Strategy which seeks to support local businesses and reduce the overall impact of regeneration on local businesses has been prepared in 2018 and its implementation will be secured by S106 obligation.

28.6 The proposal will support the delivery of a range of socio-economic and regeneration outcomes for the LBH more widely. In total, the proposal will see the delivery of up to 2,612 new homes, of which up to 2,300 will be net additional to the LIA. Once completed, the proposal will help reduce overcrowding and see the number of (affordable) social rented units doubled (from 251 to 500 units), whilst also providing a variety of tenancies (such as Social Rent and Shared Ownership).

28.7 The demolition and construction phase of the proposal has potential to support up to 2,416 FTE jobs (i.e. both directly and more widely through indirect/supply chain and induced effects). In addition, once completed the development has the potential to accommodate up to 675 FTE jobs on-Site, of which 453 are estimated to be net additional once deadweight and displacement are taken into consideration. Finally, the proposal will support the delivery of an improved public realm (including new parks and open space, residential amenity and local playable space).

28.8 The nature of the effects considered vary depending on the priority group considered, and range from minor adverse when considering the effect of demolition and construction activities on business, organisations and employees, to negligible and beneficial when considering the effects of the proposed development. The equalities impacts of the development are therefore considered to be acceptable.

## 29 Other matters

29.1 Overlapping planning permissions – The submitted parameters plans and design code facilities the delivery of the extant planning permissions and extant planning applications with resolutions to grant planning permission, that are yet to be determined. Notwithstanding this, the independent delivery of these permission could result in a scenario whereby the implementation of one permission renders development pursuant to the other permission unlawful. In that event, it will be the liberty of the Local Planning Authority to determine whether it is expedient to take enforcement action against such a breach of planning control, in line

with the adopted enforcement plan. In the event that members resolve to grant planning permission, Officers are satisfied that mechanisms exist, through S106/ the use of planning conditions, to ensure that necessary mitigation secured by previous planning permissions on the site remain secure.

### **30 Conclusion and Planning Balance**

30.1 The proposed scheme would result in a residential-led mixed-use development for the remaining parts of the High Road West NT5 Site Allocation. The application has been submitted in a manner that would allow independent delivery of parts of the site that already have permission/ resolutions to grant permission. Whilst the proposed development does not fully conform with the 2014 masterplan, Officers are satisfied that the proposal makes efficient use of the site and delivers on the masterplan vision and principles, to the benefit of the community. Departures from the HRWMF include:

- The scale of the proposed buildings and the manner and degree in which they descend in height
- Whilst community buildings and commercial users are proposed to front Moselle Square they do not explicitly provide leisure space opposite the stadium to create a sport and leisure destination for north London or include the provision of tennis courts or other formal sports provision in the park
- The minimum parameters do not deliver a net increase in commercial floorspace
- The proposal does not enhance and include the re-use of heritage assets
- The proposal does not include the re-activation of the railway arches
- The proposal does not conform with the previous London Plan density guidelines
- The proposal does not include the quantum of parking envisaged by the HRWMF

30.2 These departures are considered necessary to make efficient use of the site and secure the delivery of a range of public benefits including the provision of additional homes (including affordable, accessible and family housing), provision of significant public realm enhancements, provision of a new civic square, provision of a new public park, provision of new and enhanced pedestrian and cycle connections across the site, the provision of a direct route from the stadium to White Hart Lane Station, biodiversity enhancements and the provision of highly water and energy efficient homes.

30.3 Officers welcome the proposed site layout, providing a substantial public park and civic square amongst other public realm, a vehicular/cycle/ pedestrian connection to Cannon Road and safeguarding a potential east-west pedestrian cycle route over the rail line.

30.4 The affordable housing offer is a minimum of 35% affordable housing by unit with a target of 40% provision by unit (subject to viability and grant funding). The proposed dwelling mix meets the Housing Strategy preferred target and affordable homes are envisaged to be satisfactorily integrated with market housing across the site. Officers consider that the offer

would be acceptable, subject to s106 planning obligations securing viability reviews and ensuring affordability.

30.5 The proposed scheme is not expected to have a significant adverse effect on school places or primary health care provision and, in any event, CIL payments could help fund planned additional provision to meet the demands from the expected 6,410 new residents.

30.6 The proposed maximum parameters and illustrative scheme is a higher density development (at approx. 341 and 337 units/hectare, respectively) and warrants careful scrutiny. The overall dwelling mix is envisaged to be 83.5% 1 and 2 bed units and 16.5% family sized housing and 10% of homes of various sizes would be 'wheelchair accessible'. The final quantum and mix will be determined at reserved matters stage. The proposed homes are envisaged to be high-quality and future residents are anticipated to enjoy an acceptable level of amenity (in terms of aspect, size of homes, open space, play space, outlook/privacy, daylight and sunlight, noise, wind conditions, air quality and overheating). The proposed fire strategy set out in the submitted Fire Statement is also considered acceptable.

30.7 Tall buildings are acceptable in principle in this growth area and the proposed tall buildings would be located on the western edge of the site, where the HRWMF encourages them to be located (although they would be significantly taller than the guidance suggests). The likely functional and environmental impacts of the proposed buildings are considered acceptable. Officers are satisfied that the submitted parameters and design code will facilitate the delivery of tall buildings of sufficiently high-quality to justify their proposed height and form and their likely effects on surrounding townscape. As such, it is considered that the proposed tall buildings would meet the policy tests established by the NPPF, London Plan Policy D9, Strategic Policy SP11, AAP Policy AAP6 and DPD Policies DM1 and DM6.

30.8 Whilst officers consider that the proposed scheme would result in 'less than substantial harm' to the wider setting and significance of a number of heritage assets, they consider that the proposed scheme would result in the following significant public benefits that would outweigh this harm:

- The delivery of up to 2,929 new homes including 500 new council homes, approximately 400 new intermediate units
- Delivery of a new library and learning centre
- New public spaces and public realm, including new cycle routes and a route between Tottenham Hotspur Stadium and White Hart Lane Station
- Delivery of a high quality sustainable development
- New energy centre
- Bio-diversity enhancements
- Creation of approximately 1,214 new FTE jobs and a further 1,202 FTE jobs indirectly, per annum, during construction.
- The development of local supply chains

- A £143.1 million estimated contribution to the local economy during construction
- Creation of a minimum of approximately 374 FTE jobs on site, once complete.
- A circa £23.2 million annual boost to the local economy through estimated residential expenditure per annum.
- Making a positive contribution towards the regeneration of Tottenham and acting as a catalyst for further regeneration and inward investment;
- Phasing to decant existing residents from the Love Lane Estate to high-quality housing, to facilitate its regeneration as called for in Site Allocation NT5;
- Making a positive contribution to reducing carbon dioxide emissions and surface water run-off;
- Generation of New Homes Bonus
- Generation of additional business rates and council tax

30.9 Amenity impacts must be considered in the overall planning balance, with any harm weighed against expected benefit. It is envisaged that there will be some adverse impacts on amenity, which have been identified in the report. However, officers consider that the level of amenity that would continue to be enjoyed by neighbouring residents is acceptable, given the benefits that the proposed scheme would deliver.

30.10 The proposed scheme would improve connectivity and permeability between the existing Cannon Road area and High Road and White Hart Lane, without creating a rat-run for motor traffic. The scheme is envisaged to have relatively limited car parking and generous cycle parking, in line with policy requirements, and additional road traffic would be relatively small (particularly given the proposed loss of the existing housing and commercial uses on the site and the restrictive nature of the proposed parking arrangements). Assessment by the applicant demonstrates that (when taking account of the proposed scheme and local committed development) there is unlikely to be significant impacts on London Overground line capacity or bus capacity. Planning conditions and s106 planning obligations could help manage on and off-site car parking and ensure that Car Club provision, travel planning, delivery and servicing and construction activities are satisfactory.

30.11 The proposed buildings, open space, landscaping and sustainable drainage features are envisaged to take account of climate change and to reduce carbon emissions (although expected carbon savings from built fabric performance is below what policy expects). Planning conditions could secure commitments in relation to water usage, BREEAM 'Very Good' for the commercial units and measures to further the Circular Economy agenda. Subject to s106 planning obligations, the scheme would be connected to the proposed Heat Network and include some roof level PVs to help deliver 64% carbon emissions savings (SAP2012 carbon factors) (with offsetting financial contributions making up the shortfall).

- 30.12 The proposed scheme would safeguard and incorporate mature London Plane trees along the High Road frontage and incorporate a good level of green infrastructure, despite an estimated shortfall against the London Plan Urban Greening Factor interim score target of 0.40. The proposed greening would deliver a significant Biodiversity Net Gain (predicted in excess of 90%) and officers do not consider that the scheme would give rise to significant effects (recreational pressure or air quality) on the Lee Valley or Epping Forest important European nature conservation sites.
- 30.13 Flood risk is low and likely environmental impacts, including noise, air quality, wind and microclimate, waste and recycling and land contamination, basement impact and archaeology could be made acceptable by use of planning conditions.
- 30.14 The proposed development would provide adequate space to enable Tottenham Hotspur Football Club to successfully manage crowd flows on event days. The detailed arrangements will be secured at reserved matters stage
- 30.15 Officers have taken full account of the findings of the submitted Environmental Statement and into account the responses to consultation and other relevant information in accordance with EIA Regulations, and other relevant legislation and guidance. The findings of the ES are referred to, where relevant, throughout the report. If planning permission were to be granted, satisfactory mitigation measures identified in this report, could be secured by planning conditions and/or s106 planning obligations.
- 30.16 The proposed scheme would provide an accessible and safe environment and significant additional affordable homes. Subject to securing the delivery of various features and provisions identified in this report, officers consider that the proposed scheme would have a positive equalities impact.

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

- 31.1 The estimated CIL chargeable amount is £10,000,000 subject to change and subject to:
- 31.2 The proposed flexible commercial uses do not come forward as a 'supermarket' and proposed basements serve residential development only; and
- 31.3 Affordable housing satisfies the criteria of Regulation 49 of the CIL Regulations (2010, as amended) and relief is granted before commencement.
- 31.4 If planning permission were granted, the CIL would be collected by Haringey after/should the scheme is/be commenced and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation. An informative should be attached to any planning permission advising the applicant of this charge and advising them that the scheme is judged to be phased for CIL purposes.

31.5 The proposed development would be liable to pay the Haringey CIL rate that is in effect at the time that any permission is granted.

## **32 RECOMMENDATIONS**

GRANT planning permission for the reasons set out above.