## Appendix 3: Neighbour Representations HGY/2021/3175

Commentator	Comment	Response
THFC Objection	<ul> <li>The applicant chose not to undertake any meaningful pre- application consultation with THFC prior to submission of the High Road West Application.</li> </ul>	The applicant has responded to say "Lendlease strongly refutes the suggestion that it has not met with THFC, nor provided crowd flow information in a timely manner. Multiple meetings have been held since the summer of 2021 followed by long periods of inertia from THFC." Officers consider the obligations under Policy DM55 have been met.
	• The degree of flexibility sought in both the composition of the uses within the scheme, the lack of any meaningful detailed design information, and the minimal commitment to the delivery of leisure and social infrastructure, raises fundamental concerns about what will actually be delivered.	A level of flexibility allows for detailed testing at RMA stage to further inform the massing and architectural approach so as to best respond to contextual and climatic conditions at the point of application.
		The Socio-Economic Chapter of the ES (paragraphs 3.21 – 3.24), states in the methodology section at paragraph 14.2.9 that 'The assessment presented in this Chapter is based on the worst- case scenario which assumes the lowest-possible quantum of employment floorspace and maximum number of residential units being delivered pursuant to the Proposed Development'.

Commentator	Comment	Response
Commentator	Comment     Comment     The lack of certainty and commitment makes it impossible to properly assess the impacts of the application and the public benefits it will actually deliver.	Paragraph 3.25 refers to the loss of the Tottenham Health Centre and the associated 0 sqm minimum floor area. THFC have recently secured reserved matters consent for several thousand sqm of healthcare floorspace as part of the THFC stadium consent and alongside approved space at 807 High Road. Lendlease are committed (through the S106) to ensure a continuity of GP service either on site or very close by. If other already consented developments deliver this floorspace the minimum figure would avoid an over provision of this type of floorspace in the area.  The Socio-Economic Chapter of the ES (paragraphs 3.21 – 3.24), states in the methodology section at paragraph 14.2.9 that 'The assessment presented in this Chapter is based on the worst- case scenario so officers are
	<ul> <li>CROWD FLOW ISSUES - THFC is currently reviewing the Crowd Flow submissions and will comment further in due course but are concerned about the lack of assessment of the interim impacts.</li> </ul>	satisfied that the impacts have been adequately addressed.  An absolute level of certainty will be achieved when all the detailed areas are approved through the reserved matters process.
		The applicant's crowd flow submissions have been

	independently peer reviewed
• COMPOSITION OF THE APPLICATION SCHEME - there is no actual guarantee that a large number of the proposed uses will actually be delivered. The objection raises concerns over the perceived low minimum floorspace requirements.	and whilst aspects such as queuing numbers and queueing density will need to be agreed between the applicant and the club, the peer review concludes that if refinements are made any issues can be satisfactorily addressed. Conditions require this information to be submitted and agreed at the RMA stage.  For any given reserved matter application, the proposal must accord with the Parameter Plans & the Design Code & the Development Specification. Whilst there is no minimum B2/B8 floorspace, there is a large area of Class E floorspace that is proposed. Given the changing nature of employment floorspace as a consequence of Covid and other factors plus the introduction of Class E which also incorporates elements of light industrial, it is considered entirely possible that flexible Class E floorspace might only be required in the future but the option to utilise other land- uses exist depending on demand.

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		Other permissions may deliver on healthcare provision and so flexibility is required to ensure that there would no be overprovision through unnecessary minimums. Obligations in the legal agreement would ensure continuity of provision and the delivery of sufficient services should it be necessitated.
	<ul> <li>Compliance with the TAAP and High Road West Masterplan Framework – the proposal fails to deliver the objectives of the TAAP and the HRWMF</li> </ul>	
		The Illustrative Masterplan is not for approval it simply shows potential layouts and buildings. The Printworks site that sits partially within the masterplan contains a multi- screen <u>cinema</u> which members resolved to grant this year.
		Leisure includes a variety of uses that the scheme proposes such as indoor sports provision as well as food and beverage, potential

Commentator	Comment	Response
		cinema space, the library, all
		the potential outdoor facilities,
		Moselle Square and Peacock
		Park. There is a diverse range
		of leisure proposed which
		caters for many different
		groups.
		At first glance community uses
		could be seen to be reducing
		but this does not acknowledge
		the relocation of the Grace
		Organisation to the nearby Irish Centre on Pretoria Road.
		New floorspace is also being proposed which would result in
		a benefit in this regard.
		a benent in this regard.
		The HRWMF is an important
		guidance document but is not
		written as advice rather than
		mandatory rules. The
		proposed application has high
		levels of conformity with Policy
		NT5 and the HRWMF. Where
		there are deviations, these are
		justified in the report. The
		numbers of homes and heights
		in places exceed the
		minimums in the framework
		but this has to be balanced
		against other public benefits
		such as the delivery of
		affordable homes including
		Council Housing which
		outweigh the lesser provision
		of leisure uses
		 The Illustrative Masterplan has
		been used to show certain
		positions such as density in a

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	<ul> <li>ASSESSMENT OF THE EFFECTS OF THE APPLICATION - In several instances, it appears that the applicant has relied on the illustrative scheme, rather than the maximum scale of development to show more advantageous outcomes. In this case the extreme degree of flexibility sought by the applicant is too great to allow the likely significant effects to be properly assessed. There are too many potential outcomes that need to be considered, that have not been assessed in the submitted Environmental Assessment (and Addendum)</li> </ul>	more practical way as the maximum parameters could not be delivered given the limits and rules contained across the control documents. It has also been used as a tool to demonstrate an approximate understanding of aspect.
		The Illustrative Masterplan proposes a scheme that seeks to show a policy compliant iteration that can be costed – The applicant has stated this is why it has been used for viability purposes. The applicant has committed to 35% affordable housing by unit as well as viability reviews within the legal agreement to secure any potential uplift.
		The submitted ES explores the relevant maximum and minimums where necessary and satisfactorily assesses the likely significant effects.
		The Illustrative Masterplan has been used for the wind assessment as it is more reflective of a likely policy compliant proposal. However, wind assessments would be required with each RMA that would need to show acceptable comfort levels.

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Commentator	<ul> <li>Comment</li> <li>ASSESSMENT OF PUBLIC BENEFITS AND MATERIAL CONSIDERATIONS - THFC considers that the degree of flexibility (and corresponding lack of certainty over the delivery of public benefits) is so broad that the Council is unable to lawfully discharge its duty pursuant to Section 38(6) of the 2004 Act.</li> <li>ASSESSMENT OF HERITAGE IMPACTS - due to the uncertainty surrounding the composition of the scheme, it is equally impossible for the Council to quantify the public benefits that the scheme will deliver. The Council is therefore unable to carry out the necessary balancing exercise.</li> </ul>	ResponseThe report has assessed the planning balance of the scheme against the relevant maximum and minimum parameters. The officer recommendation is based on this assessmentThe control documents outline the parameters for what can be proposed within the RMAs – these parameters enable an assessment of heritage impacts. The design code has specific heritage sections and outlines the limits that would minimise harm on assets.The Design Code places mandatory requirements for various plots to step down in height within the maximum parameter extents. The specific location of these steps is not defined so that RMAs would be able to best respond to contextual and climatic conditions at the point of application.Officers are satisfied that the heritage impact will be less than substantial based on the 

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	<ul> <li>DESIGN ISSUES - DISCREPANCIES BETWEEN THE DESIGN CODE AND PARAMETER PLANS - In a number of instances, the Design Code advocates mandatory lower heights than the parameter plans. If the provisions of the Design Code are actually mandatory there is no reason for the parameter plans to seek additional height at this outline stage.</li> </ul>	The parameters, design code, and development specification, in combination, set the controls to guide a form of development that officers consider to be acceptable on balance. Further plot testing and detailed design work would be required at RMA stage which the plans seek to support but not hamper through overly prescriptive controls.
	<ul> <li>DESIGN ISSUES - THE HTVIA AND THE DESIGN QUALITY OF THE APPLICATION - THFC does not consider that the HTVIA robustly or credibly assesses the full potential impacts of the application.</li> </ul>	The HTVIA is sufficient to allow officers to come to an informed judgement on heritage effects and this has been appropriately assessed in the planning balance.  Although Members resolved to grant the Printworks scheme, it has not yet been granted as the legal agreement is still
	<ul> <li>APPROACH TO CUMULATIVE ASSESSMENT – The Printworks permission has neither been included as a committed scheme for the purpose of cumulative assessment, nor has it been included within the second scenario. This is important as the Printworks scheme extends beyond the High Road West Application redline boundary.</li> </ul>	being negotiated. As such, the applicant has not included the Printworks scheme as a cumulative scheme for the purpose of the Environmental Statement or Addendum. The applicant has stated that the scheme can be incorporated and accommodated within the proposals should it be permitted and delivered.
		The control documents and supporting submissions are sufficient in order for the

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	<ul> <li>THFC does not consider that it is currently possible for the Council to lawfully assess and determine the High Road West Application.</li> </ul>	Council to come to an informed judgement on the proposals and balance benefits against harms.
Headcorn, Tenterden, Beaufoy & Gretton Roads RA (HTBG)	Concern with encroachment onto parts of our estate both during construction and thereafter permanently, as it seeks to include land which is currently included in the definition of the estate contained in leases of properties within our estate The design and scale of the proposed development of Whitehall Mews is out of character with existing premises on Headcorn and Tenterden Roads.	Please refer to the design, character, appearance, and amenity section of the delegated report for further detail.
	The height and style of the proposed development of Plot A known as Whitehall Mews overshadows and overlooks our properties. Their design does not reflect our architecture and is out of keeping with our homes in all respects.	Amenity impacts are considered in the report.
	Construction noise, dust and general disturbance. Loss of natural light	This can be controlled by condition.
	Lack of parking provisions for the new development.	The proposed units will be car free and those spaces that are proposed will be controlled. The site has a good level of public
	The grass area is within the definition of our estate, our residents wish to enjoy exclusive use.	There will be no encroachment onto this land.
	Crowdflow impacts	 The proposal will enhance Crowdflow management 

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	Concerns with existing buildings and access	This is not a consideration of this proposal.
	The scale of the proposed development known as Whitehall Mews would have an oppressive impact on our homes and is considered overbearing. As it lies to the east of our properties we would be particularly impacted during the early part of the day.	Amenity impacts are considered in the report.
	Support objections lodged by local traders who will be displaced by the proposed development.	The proposed development looks to provide business and residential use classes where existing businesses and residents will have the option to relocate within the new development or have support in relocating elsewhere within the surrounding area.
TAG Love Lane	Concerns about the ballot process and re-housing.	This is not a material planning consideration.
	Concerns with previous development by the applicant, and implementation of levels of affordable housing.	Concerns in relation to the developer are not material considerations. Affordable
	False promise to Council	housing will be secured through a S106 legal agreement 
	Unrealistic and vague time frames	Phasing will be controlled by condition.
	Damages mental health	Construction impacts will be controlled by condition
	An anti-child, anti-family plan	The proposal include a significant proportion of family homes and space for play areas

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	Environmental catastrophe	 The impact on the environment is assessed in detail in the report. 
	Unaffordable 'affordables'	There will be a significant proportion of affordable housing at Council rent and income level secured for Shared Ownership housing.
Haringey Cycle Campaign (HCC)	HCC were consulted in 2018 and again in 2021 on the plans for this development. We emphasised the need for cycle routes serving identified destinations, routed directly and clearly defined for legibility and to avoid pedestrian conflict. We also commented in 2021 that the main public open space should be more generous.	The application submitted in outline form and cycle routes and landscaping with be dealt with at reserved matters stage.
	The scheme now submitted proposes virtually invisible cycle routes that wander aimlessly to the North of the site and in a slightly less aimless fashion to the South. The Mayor's London Plan Guidance has statutory weight in planning decisions and makes it clear that development plans should "protect and improving existing cycle routes and create new strategic routes and local links", as the extract below. Additionally the statutory guidance in LTN1/20 makes it clear that cycle routes should be direct and easy to follow, as the core design principles (below left) and makes clear, wherever there are high pedestrian numbers, cycles must be physically separated from pedestrians, as the summary principles, below right.	stores complies with the
	The development is planned to have 2,869 new homes and at least 7,225sqm of commercial, office, retail and community uses and there will be considerable pedestrian traffic, generated both by the development and in the surrounding areas. The development is not a small housing estate where limited shared use might be acceptable.	illustrative for now, and the detail of the cycle routes will
	The Site Plan below shows the circuitous cycle routes proposed by the applicants, together with routes proposed by HCC, which we suggest would be better used and could give compliance with LTN1/20.	secured via the Future

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Commentator	The Design and Access Statement includes details of path surfacing that make no allowance for safe cycle use and do not comply with LTN1/20. Cycle users are given no indication of where they are meant to cycle and pedestrians will have no idea of where to expect cycles. In fact the proposed cycle routes will be virtually invisible. Although not directly a cycling matter, we would point out the main public space, Peacock Park has shrunk in size since the competition winning design of 2018. We suggest the wedge shaped park, narrowing to a point and hemmed in by tall buildings on all sides, will feel uncomfortable and should be redesigned to give a more relaxed and generous space. I would be grateful if you could register Haringey Cycling Campaign's objection to the proposals and in particular our objection to the cycle routes, which will not comply with current standards and good practice. Legible, safe and direct cycle routes are essential, which will serve increasing cycle use by residents and the wider community, improve health and mobility and help in the fight against climate change.	Responsegranted. The FutureConnectivity and Access Planis a plan to be prepared by theapplicant setting out how theDevelopment shall beconstructed to allow forpotential future pedestrian,cycling and vehicular accessacross the Development toand from any development onAdjacent Land and how theywill work with the Council andany Adjacent Developer to tryto secure (where appropriate)the following:(a) Pedestrian, cycling andvehicular access across theDevelopment to and from anydevelopment of the AdjacentLand;(b) Pedestrian cycling andvehicular access for occupiersof the Development to and through any development ofthe Adjacent Land;(c) Temporary uses,landscaping, and accessarrangements during theconstruction of any phaseddevelopment of the AdjacentLand;(d) Appropriate boundarytreatments and materials tofacilitate mutual accessarrangements;

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		<ul> <li>(e) how the plan shall be reviewed in the future as other developments come forward on the Adjacent Land to ensure that connectivity is provided at the earliest possible date taking into account relevant construction programmes.</li> <li>A number of off-site contributions towards the delivery of the Walking and Cycling Action Plan will be sought, in particular towards the High Road (A1010) Protected Cycle Track, "a new cycle route will need to balance the needs of existing bus infrastructure on the A1010 with new cycle facilities.</li> </ul>
		The design focus would be on the introduction of protected cycle facilities along the A1010 from Seven Sisters station to the borough boundary with LB Enfield."
Peacock Estate Management Limited	The loss of the Peacock Industrial Estate and the failure to provide appropriate mitigation/safeguards for displaced business owners	The proposed development looks to provide business and residential use classes where existing businesses and residents will have the option to relocate within the new development or have support in relocating elsewhere within the surrounding area.
	Proposals appear contrary to Council planning policy	The loss of employment space in assessed in the report.

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	Public Sector Equality Duty	Equalities impacts are adequately assessed
	Absence of part of the Environmental Impact Assessment	The EIA regulation have been complied with.
Whitehall & Tenterden Centre Whitehall Street	<ul> <li>Grace Organisation was founded in 1983 by the late Daphne Marche MBE. Location from inception is at Whitehall and Tenterden Centre, Whitehall Street where proposed regeneration is targeted.</li> <li>We are not opposed to regeneration but believe it is important to retain the identity of Tottenham, the positive community spirit and not destroying the historic core of Tottenham.</li> <li>Grace is here for the community and the upheaval of relocation, even though, we have been offered alternative premises this is causing distress to our clients. Many of whom have written letters of discontent to us which we are happy to forward to you. Researchers have identified that relocation needs to be taken into account the impact this will have on our clients. Many family members have expressed this especially those who have Alzheimer's/ Dementia.</li> <li>Grace has been recognised as a valuable provider by Haringey Council and provides a much-needed service to a vulnerable community that needs accessibility. We are a well utilised service with hundreds of families being supported by our services.</li> <li>Retention of our building with necessary upgrade to the site, in our opinion, would be best for our clients and for the continuation of our service.</li> </ul>	The Grace community will look to be relocated and those members will have support throughout the process.
GRACE, Whitehall & Tenterden Community Centre	Concern with the proposed relocation of the Grace Organisation	The Grace community centre will be relocated, and those individuals will gain support through the moving process.

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Tottenham Biz Representing the interests of businesses on Tottenham High Road, on White Hart Lane, in the Peacock Industrial Estate and in Nesta Works.	Businesses have the right to remain, in the Tottenham High Road area consistent with the views of local residents,	The proposed development looks to provide business and residential use classes where existing businesses and residents will have the option to relocate within the new development or have support in relocating elsewhere within the surrounding area.
	Concern with the ballot process and consultation	This is not a material planning consideration.
	Loss of employment space is contrary to policy and concerns with the consultation on the site allocation.	This is addressed in para 7.32 – 7.37 of the report. 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.
		Further details of the relocation strategy will be secured by S106 obligation.

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	There is no guarantee that all such businesses will be offered a right of return or be accommodated. Or how they will be accommodated during construction.The tenure of new space is unlikely to be the same or affordable.	This is a private matter and therefore not a material planning consideration.
	The applicant's planning statement incorrectly states that the application site is not designated as a Local Employment Area. That is incorrect. Policy SP8 makes clear that the site is both a Local Employment Area and a Regeneration Area.	assessed under Policy DM
	Equalities impacts	This is assessed under heading 28 in the report.
	Grant funding has not been taken into account in viability	This is assessed in the viability report which has been reviewed by the Council's 3 <sup>rd</sup> part assessor.
Haringey Defend Council Housing	Uncertain quantum of development	Whilst there is flexibility the quantum of development is control by the design code and development specification. Viability reviews will capture any uplift in development.
	Undersupply of family sized housing	The proposal includes an indicative dwelling mix of 16% which is high for a high density development.
	Single aspect homes	There are a high proportion of dual aspect homes and this will be controlled by reserved matters.

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	Excessive proximity to the events stadium	 Noise levels have been assessed in the reports.
	Environmental damage	 This is considered in the report.
	Undeliverable Decant Strategy	This will be controlled by condition.
	Viability and the likelihood of diminished social benefits over the lifetime of the development	Viability reviews are secured by S106
	Faulty consultation	This is not a material planning consideration
	Gentrification and area impact	The aim of the development is for high quality places that promote mixed and inclusive neighbourhoods supporting an attractive town centre with jobs and services for its communities; places that help meet people's wider needs and aspirations: for economic security; for health and well– being; for arts and culture; for safety and security; and for links to family and community
	<ul><li>Loss of community</li><li>Gentrification</li></ul>	The aim of the development is for high quality places that promote mixed and inclusive neighbourhoods supporting an

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		attractive town centre with jobs and services for its communities; places that help meet people's wider needs and aspirations: for economic security; for health and well– being; for arts and culture; for safety and security; and for links to family and community
	<ul><li>The Proposal brings opportunities</li><li>Support for the regeneration</li></ul>	Noted
	<ul> <li>Loss of shops and restaurants</li> <li>Loss of chicken and chip shop</li> <li>Loss of DW Timber and adverse effect on local businesses</li> <li>Loss of livelihoods and lack of alternative opportunities</li> <li>Loss of employment opportunities due to loss of Peacock Estate</li> <li>Loss of small businesses</li> <li>Loss of industrial space</li> <li>Lack of high quality jobs in and from the development</li> <li>Loss of employment on other sites</li> <li>Loss of investment in premises</li> <li>Contrary to employment policies</li> </ul>	The proposed development will provide business space, where existing businesses will have the option to relocate within the new development or have support in relocating elsewhere within the surrounding area
	Lack of leisure uses	Floorspace for leisure uses is provided within the proposal
	<ul> <li>No community facilities- GP etc.</li> <li>Strain on existing facilities</li> <li>Promises of space for craft and education must be provided</li> <li>Exercise space must be provided</li> </ul>	The proposed development looks to incorporate community uses, shops, surgeries, and services to cope with the additional housing. The surrounding schools also have capacity for new residents.

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	<ul> <li>Concerns with density</li> <li>Loss of high road character</li> <li>Development is out of scale with the surrounding area</li> <li>Plot B, D and F which blocks all views when approaching the stadium from the east</li> </ul>	This is addressed in the design section of the report.
	The proposal should contain houses	The proposal provides a mix of housing typologies and sizes including duplexes and family sized units
	Lack of car parking	The level of parking will be adequate due to the good public transport links and the surrounding area will be controlled parking zones.
	Loss of matchday parking	Matchday parking is a temporary arrangement and not protected by planning policy
	<ul> <li>Loss of a home</li> <li>Housing should be renovated</li> <li>Upheaval for families in homes to be demolished</li> <li>Loss of affordable housing</li> <li>Concern with share equity affordability</li> <li>Re-housing concerns</li> </ul>	The proposal has satisfied London Plan Policy H8.
	<ul><li>Poor doors</li><li>Segregation</li></ul>	The proposal will be tenure blind and include mixed blocks of private and affordable housing
	Housing should accommodate disabilities	The proposal will include 10% wheelchair accessible homes.

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	Residents must have outside space	Proposed housing will comply with London space standards for outdoor amenity space
	Not enough outside space for new residents	Significant new public space is provided.
	Biodiversity and ecology	The proposal provides enhancement to Biodiversity and ecology
	Lack of sport facilities	Sport provision can be accommodated within the development. A variety of recreational and other facilities are proposed and, in any event, there are a number of sites within the vicinity of the masterplan area that provide sports facilities.
	<ul><li>Lack of affordable housing</li><li>Will housing be affordable</li></ul>	The proposal provide a significant quantum and mix of affordable housing
	Tall buildings are too high close to Rivers apartments Development too close to Rivers apartments Loss of sunlight	The building closest to Rivers apartment reflects the existing permission for this site in which the impacts were found acceptable.
		Daylight and sunlight assessment has been carried out and is considered in amenity section of the report.
	Concerns with quality of life during development	This would be a temporary impact and can be mitigated by conditions

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	Carbon emissions from demolition and construction	A whole life carbon
		assessment has been carried
		out and found to be in line with
		London Plan Policy.
	Loss of the Grace centre	Alternative provision will be
		made off site to accommodate
		the Grace Centre.
	The cycle routes are not good	This will be addressed by further details in reserved
	Proposal benefits THFC	matters applications The proposal follows the
		principles of the High Road
		West Masterplan Framework
		and site allocation which
		require a new route from White
		Hart Lane Station to the
		High Road and stadium,
	Concerns over racial discrimination	An EQIA has been carried out
		and found significant equalities
		impacts.
	Concerns with ballot process	This is not a planning matter.
	Private land should not be provided to a developer	AAP Policy AAP1 support site
	Concerns with CPO process	assembly and use of CPO
		powers where necessary.
	Concerns with engagement process	The engagement process is
		set out the applicant's
		statement of community
		involvement and has satisfied
		the planning requirements.
	Concerns with existing estate maintenance	This is not a consideration of
		this planning application.
	Concerns around funding for the development	This is not a material planning
		consideration
	Concern around profits for private company	This is not a material planning
		consideration

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	Loss of income from property	This is not a material planning
		consideration