

ADDENDUM REPORT FOR ITEMS

UPDATE FOR CONSIDERATION AT PLANNING SUB-COMMITTEE Item No. 7

Reference No: HGY/2021/3175	Ward: Northumberland Park
<p>Address: High Road West N17</p> <p>Proposal: Hybrid Planning application seeking permission for:</p> <p>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</p> <p>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</p> <p>Outline:</p> <ul style="list-style-type: none">• 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 <p>Detailed:</p> <p>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.</p> <p>Applicant: Lendlease (High Road West) Limited</p> <p>Case Officer Contact: Philip Elliott</p>	

See also-

Appendix 3 – Neighbour Representations

Appendix 11 - QRP Report (17 September 2019)

Appendix 12 - QRP Report (03 March 2022)

Appendices enclosed

- i) 14th March Objection from THFC
- ii) 16th March Objection from THFC (with appendices 1-3)
- iii) 16th March letter received Daniel Levy (Chairman) (with massing comparison)
- iv) 16th March Objection from Arup
- v) Final LBH Transport Comments
- vi) CCG Further representation
- vii) TFL further comments

ADDITIONAL REPRESENTATIONS AND CLARIFICATIONS

Para 5.3-

Correction- TAG Love Lane ~~Love Lane Residents Association~~.

THFC Objection 04/03/22- *is set out in appendix 3 but not summarised at para 5.5 and raised the following points:*

- Lack of meaningful pre-application consultation with THFC prior to submission
- Concerns with the flexibility in the uses and design
- Concerns with lack of certainty on public benefits
- Crowd flow concerns
- The proposal fails to deliver the objectives of the TAAP and the HRWMF
- Concern that the applicant has relied on the illustrative scheme, rather than the maximum scale of development to assess the impact of the development
- The degree of flexibility and corresponding lack of certainty over the delivery of public benefits mean the Council is unable to lawfully discharge its duty pursuant to Section 38(6) of the 2004 Act.
- The Council cannot quantify the public benefits and carry out the necessary balancing exercise for the heritage assessment .
- Discrepancies between the design code and parameter plans
- THFC does not consider that the HTVIA robustly or credibly assesses the full potential impacts of the application.
- The Printworks permission has not been included in the cumulative assessment
- The Council cannot lawfully assess and determine the High Road West Application.

14th March Objection from THFC Appendix i

Summarised below.

The Crowd Flow Study provided requires a further 30 day notification in line with EIA regulations.
THFC need time to review the Crowd Flow Study and respond to it and insufficient time has been provided.
Officer report does not address previous comments

16th March Objection from THFC – Appendix ii

Summarised and addressed below.

THFC's crowd flow consultants conclude that the Crowd Flow Study does not provide sufficient confidence that safe and efficient crowd flow operations can be provided both during the 10 year construction period and also in the permanent "end state".

The interaction between the High Road West Application and the current crowd flow operations associated with the Tottenham Hotspur Stadium give rise to very real practical, legal and financial considerations that have not been considered by officers

The ultimate risk to THFC in the event that the applicant's proposals do not work, is that the Tottenham Hotspur Stadium licence will be revoked or for example the capacity of the Stadium is reduced.

THFC wrote to the Council's Head of Building Control in his capacity as chair of the Tottenham Hotspur Stadium Safety Advisory Group to set out its concerns and understands that he has recommended to officers that an emergency meeting of the SAG (involving all relevant stakeholder members) should take place to consider the Crowd Flow Study before the Council (in its capacity as local planning authority) determines the High Road West Application. This advice has been ignored.

Officer note: The Head of Building Control has confirmed in written advice:

"At no point did I say that the SAG should take place before the Planning Committee, as it is not my remit to make such a statement as I am not a planning professional.

As Chair of SAG I will arrange a meeting to discuss in detail crowd flow, where I will invite LendLease to present their proposals in detail to the wider SAG, including the Metropolitan Police, British Transport Police, London Fire Service, London Ambulance Service, Transport providers (London Overground and Arriva Rail London), THFC and Council colleagues. In addition as I have previously stated, should the scheme gain permission, then I would propose more regular SAG meetings as the site works progress in order to monitor what is known as zone X (area leading to the transport hub), where I would invite personnel from LendLease and/or their contractors to the meetings in order to provide up to date information to the Group."

The Head of Building Control's advice has not been ignored and has been followed. A SAG meeting is being organised for April 2022.

The Council's 3rd party crowd flow expert's concerns have not been reported-

- The Crowd Flow Study has not been based on the correct data and in particular the Study has not been based on the provision of adequate queuing space values.
- The proposed strategy would not work in events involving a hard finish – such as concerts.
- The temporary arrangements during the construction period would not provide safe and effective management of pedestrian flows on event days – and that the proposal needs to be revisited using confirmed queuing numbers. (our emphasis)

The issue of crowdfow is fundamental and cannot be conditioned.

The officers report has ignored several heritage assets and taken a different view to the Conservation Officer in places, meaning it is impossible for the Committee to properly understand the degree of harm as required by statute and policy

It is not at all clear whether the maximum parameters or the illustrative scheme have been assessed.

Reliance on the illustrative scheme rather than the maximum parameters.

Inconsistencies between the parameters and design codes mean that it is very difficult to assess harm.

Inconsistencies in the approach taken compared to THFCs Goods Yard and Depot proposals.

Omissions of analysis of some key heritage assets including the Grade II* Dial House.

No assessment has been provided of the worst-case maximum parameters and, based on the officer's advice, it is impossible to tell what this would be.

The flexibility sought in the application is too great to allow the likely significant effects to be properly assessed, there are simply too many potential outcomes that need to be considered and have not been.

At the reserved matters stage, the Council will have no means of making the Applicant provide any more than the minimums (of healthcare and employment space) and therefore that is what must be assessed and included in the planning balance. This has not been made clear to members of the Planning Sub-Committee

B2 and B8 uses are not included in the description of development and therefore cannot be relied on in the policy assessment.

The proposal deviates from the HRWMF and NT5 site allocation as it does not create a new leisure destination for London, nor increase the quality and quantity of community facilities proportionate to population growth

Density has not be calculated correctly and could be much higher

16th March letter received Daniel Levy (Chairman) summarises the key points raised in earlier objection letters received on 4, 14 and 16 March Appendix iii

16th March Objection from Arup- instructed by THFC Appendix iv

The ambition and commitment to communities and place that is embodied in the HRWMF and TAAP is lost in the current proposal. In my view, the application as it stands will not deliver the Council's aspirations for High Road West. It misses the opportunity to deliver good placemaking through truly mixed-use development appropriate to the proposed scale of homes and is unlikely to deliver good growth for North Tottenham. It is not aligned with the vision for a "vibrant, attractive, and sustainable neighbourhood and a new sport and leisure destination for North Tottenham".

Officer note- the additional objections raised a number of detailed points which require further consideration.

CONSULTEE RESPONSE UPDATES

Final Transportation Comments are included at Appendix v.

Officer note- Further consideration of the matters raised is required.

NHS North Central London CCG Further response 16th March (appendix vi)

Suggest that a legal agreement should include a requirement for a healthcare delivery plan to be submitted with the Reserved Matters Applications for Phase 2 which would identify, in consultation with the Council and CCG the location of the new health centre, the timing of provision and the design and specification. We understand that the intention is to provide the new facility as shell and core floorspace and as such additional capital investment will be needed to fit-out the new facility. In addition, the future rental level should be affordable to the CCG.

Support the proposed s106 heads of terms to secure the new healthcare facility to be in operation prior to demolition of the existing Tottenham Health Centre and suggest that a healthcare delivery plan is needed to ensure the continuation of healthcare services and to ensure that the new health centre can be delivered, and additional capacity is provided to accommodate the additional demand generated by the development. Also suggest that there should be a mechanism to monitor and evaluate the construction impacts and mitigation measures to ensure that services delivered from the Tottenham Health Centre would not be disrupted during the construction stage.

There is an identified significant site-specific impact which requires direct mitigation by way of a s106 contribution in addition to the replacement health facility. The CCG has requested a contribution of £3,073,120 which could be reviewed as part of the suggested healthcare delivery plan.

Officer note- Further consideration of the matters raised is required.

TFL-

Whilst TfL is satisfied that the proposals are unlikely to have a significant impact on the strategic road network and we also accept the verdict of the Transport Assessment that no mitigation is required at White Hart Lane station, given the effect of the recent congestion relief project that was completed at this station, updated bus trip generation figures reveal a significant uplift, and this is likely to require service enhancement to accommodate new demand. As a result, it is expected that a S106 total contribution of £2,275,000 would be required. However, TfL is open to discuss appropriate trigger points that fit with the phasing of this development

Other points to be address by condition are also raised.

Officer note- Further consideration of the matters raised is required.

Appendix 12: Plans and Documents List Amendments

The plans and documents listed should be amended as follows:

Supporting documents

- Affordable Housing Statement (dated October 2021)
- Arboricultural Impact Assessment (dated October 2021)
- Basement Assessment Impact (BIA) 1 of 6, 2 of 6, 3 of 6, 4 of 6, 5 of 6 and 6 of 6 (dated October 2021)
- Biodiversity Net Gain Design Stage Report (dated November 2021)
- Circular Economy Statement (dated October 2021)
- ~~Community Infrastructure Levy (CIL) – Form 1: CIL Additional Information (dated 2nd November 2021)~~
- Construction Environmental Management Plan (dated October 2021)
- ~~Covering Letter (dated 2nd November 2021)~~
- ~~Covering Letter (dated 1st February 2022)~~
- Crowd Flow Study (dated 3 March 2022)
- Delivery and Servicing Plan (dated October 2021)
- Design and Access Statement (dated October 2021)
- Design Code
- Detailed Circular Economy Statement (dated October 2021)
- Development Specification
- Economic Benefits Statement (dated October 2021)
- Energy and Sustainability Statement (dated October 2021)
- Environmental Statement Volume 1: Main Document (dated October 2021)
- Environmental Statement Volume 2: Figures (dated October 2021)
- Environmental Statement Volume 3: Heritage Townscape and Visual Impact Assessment (dated October 2021)
- Environmental Statement Volume 4: Chapter 2 Appendices (dated October 2021)
- Environmental Statement Volume 4: Chapter 7 Appendices (dated October 2021)
- Environmental Statement Volume 4: Chapter 8 Appendices (dated October 2021)
- Environmental Statement Volume 4: Chapter 9 Appendices (dated October 2021)
- Environmental Statement Volume 4: Chapter 10 Appendices (dated October 2021)
- Environmental Statement Volume 4: Chapter 11 Appendices (dated October 2021)
- Environmental Statement Volume 4: Chapter 13 Appendices (dated October 2021)
- Environmental Statement Volume 4: Chapter 14 Appendices (dated October 2021)
- Environmental Statement Volume 4: Chapter 16 Appendices (dated October 2021)
- Environmental Statement Volume 5: Non-Technical Summary (dated October 2021)
- Environmental Statement Addendum Volume 1: Chapters 01 – 018 (dated February 2022)
- Environmental Statement Addendum Volume 2: Chapters 01 – 018 Figures (dated January 2022)

- Environmental Statement Addendum Volume 3: Heritage Townscape and Visual Impact Assessment (dated January 2022)
- Environmental Statement Addendum Volume 4: Appendices Chapters 2, 7, 9,10 and 13 (dated January 2022)
- Environmental Statement Addendum Volume 5: Non- Technical Summary (dated January 2022)
- Equalities Impact Assessment (dated October 2021)
- Equalities Impact Assessment (dated 17 February 2022)
- Equalities Impact Assessment (dated 8 March 2022)
- Fire Safety Statement (dated October 2021)
- Financial Viability Assessment ~~Redacted For Publication~~ (dated 28th October 2021)
- Flood Risk Assessment (FRA) Part 1 of 9, 2 of 9, 3 of 9, 4 of 9, 5 of 9, 6 of 9, 7 of 9, 8 of 9 and 9 of 9 (dated October 2021)
- Framework Travel Plan (dated October 2021)
- Geotechnical & Geo- environmental Desk Study (dated October 2021)
- Health Impact Assessment (dated October 2021)
- HRW Advice Note Natural England – Habitat Regulations Assessment (dated January 2022)
- High Road West Crowd Flow Study (dated 8 February 2022)
- High Road West Policy NT5 and Arup Masterplan Note (dated 25 February 2022)
- Inclusive Design Statement (dated October 2021)
- Interim Scenario Equalities Impact Assessment (January 2022)
- Interim Scenario Rapid Health Impact Assessment (January 2022)
- Interim Scenario Site Suitability Noise Assessment (January 2022)
- Illustrative Area Schedule – Residential (dated October 2021)
- Lighting Masterplan and Planning Guides (dated October 2021)
- Operational Waste Strategy (dated October 2021)
- Planning Statement (dated October 2021)
- Planning Note (Dated 25 February 2022)
- Planning Note (dated 9 March 2022)
- Plot A Area Schedule (dated October 2021)
- Plot A TM59 Overheating Report (dated February 2022)
- Residential Travel Plan (dated October 2021)
- Response to Comments Letter (dated 28 February 2022)
- Retail Impact Assessment (dated October 2021)
- Site Suitability Noise Assessment (dated October 2021)
- Site Waste Management Plan (dated October 2021)
- Statement of Community Involvement (October 2021)
- Statement of Community Involvement Update (February 2022)
- Socio-Economic Benefits Statement (January 2022)
- Sunlight and Daylight Report (dated October 2021)
- Sustainability Statement (dated October 2021)
- Transport Assessment (dated October 2021)
- TM59 Overheating Assessment (dated October 2021)

- Utilities Statement (dated October 2021)
- Ventilation and Extraction Statement (dated October 2021)
- Whitehall Mews (Plot A) Design and Access Statement (dated October 2021)
- Whole Life Carbon Report (dated October 2021)
- Whole Life-cycle Carbon Assessment – Plot A (dated October 2021)

DETAILED	
Drawing Number	Drawing Title
HRWPA-PTE-A1-0-D-A-022000	Plot A - Building A1 - Plans - Level 0
HRWPA-PTE-A1-ZZ-D-A-022001	Plot A - Building A1 - Plans - Level 01-02
HRWPA-PTE-A1-ZZ-D-A-022002	Plot A - Building A1 - Plans - Level 03-04
<u>HRWPA-PTE-A2-ZZ-D-A-022003</u>	<u>Plot A - Buildings A2 - A3 - Plans - Level 0 - 01</u>
<u>HRWPA-PTE-A2-ZZ-D-A-022004</u>	<u>Plot A - Buildings A2 - A3 - Plans - Level 02 - 05</u>
<u>HRWPA-PTE-AX-ZZ-D-A-023000</u>	<u>Plot A - Building A1-A3 - Proposed Sections</u>
<u>HRWPA-PTE-AX-ZZ-D-A-033000</u>	<u>Plot A - Proposed Site Sections</u>
HRWPA-PTE-A1-ZZ-D-A-024000	Plot A - Building A1 Elevations - East and South
<u>HRWPA-PTE-A1-ZZ-D-A-024001</u>	<u>Plot A - Building A1 Elevations - West and North</u>
<u>HRWPA-PTE-A2-ZZ-D-A-024003</u>	<u>Plot A - Building A2 - A3 - Elevations - East and South</u>
HRWPA-PTE-A2-ZZ-D-A-024004	Plot A - Building A2 - A3 - Elevations - West and North
HRWPA-PTE-AX-ZZ-D-A-011000	Plot A - Site Plan - Level 0
HRWPA-PTE-AX-ZZ-D-A-011001	Plot A - Site Plan - Roof Plan
HRWPA-PTE-XX-ZZ-D-A-008000	Plot A - Existing Elevations & Section - 100 Whitehall Lodge
<u>HRWPA-PTE-AX-ZZ-D-A-011004</u>	<u>Plot A - Demolition Plan</u>
HRWPA-PTE-XX-ZZ-D-A-008001	Plot A - Existing Plan & Elevations - Community Centre
<u>HRWPA-PTE-AX-ZZ-D-A-011011</u>	<u>Plot A - Block Plan</u>
<u>HRWPA-PTE-XX-ZZ-D-A-000002</u>	<u>Plot A - Site Plan - Existing</u>
<u>HRWPA-PTE-XX-ZZ-D-A-008000</u>	<u>Plot A - Existing Elevations & Section - 100 Whitehall Lodge</u>
<u>HRWPA-PTE-XX-ZZ-D-A-008001</u>	<u>Plot A - Existing Plan & Elevations - Community Centre</u>
HRWPA-PTE-XX-ZZ-D-A-008002	Plot A - Existing Plans - 100 Whitehall Lodge
HRWPA-PTE-XX-ZZ-D-A-008003	Plot A - Existing Plan - Community Centre
<u>21-01-HRWPA-PTE-ZZ-ZZ-ZZ-L-A-0-5002</u>	Summary Schedule of Accommodation
HRWPA-SEW-ZZ-GF-D-L-007100	Plot A_Landscape General Arrangement
HRWPA-SEW-ZZ-GF-D-L-007101	Kerbs and Edges General Arrangement
HRWPA-SEW-ZZ-GF-D-L-007102	Boundaries General Arrangement
HRWPA-SEW-ZZ-GF-D-L-007103	Soft Landscape & Tree Planting Character Plan
HRWPA-SEW-ZZ-GF-D-L007200	Site Sections
HRWPA-SEW-ZZ-GF-D-L-007301	Typical Soft Landscape Details