From: Sanclemente Juan
Sent: 16 March 2022 19:16
To: Elliott Philip
Cc: Andrew.Russell ; Charleton Patricia
Dresner Melvyn (ST)
Subject: High Road West (HGY/2021/3175) - TfL's additional comments

TfL Spatial Planning Reference: HRGY/21/70

Borough Reference: HGY/2021/3175

Location: High Road West, London, N17 8DP

Proposal: Hybrid planning application for the '1) outline component comprising the demolition of existing buildings and for the creation of a new mixed- use development including residential (Use Class C3), commercial, business and service (Use Class E), leisure (Use Class E), community uses (Use Class F1/F2) and Sui Generis uses together with the creation of a new public square, park and associated access, parking and public realm works with matters of layout, scale, appearance, landscaping and access within the site reserved for subsequent approval; and 2) detailed component comprising Plot A including the demolition of existing buildings and the creation of 60 residential units (Use Class C3) together with landscaping, parking and other associated works'.

Dear Philip,

Following my email on the 3rd March 2022, I write to provide additional comments in relation to the above planning application and more specifically the applicant's response to TfL's stage 1 detailed comments and issues that were raised. These comments are additional to any responses you may have previously received from my colleagues in infrastructure or asset protection and from TfL as a party with a property interest.

This response to the applicant relates to proposals, which comprise a detailed element (also known as 'Plot A') that consists of 60 residential dwellings and an outline element for which all matters except access are reserved. As previously indicated, the proposals are part of a comprehensive regeneration of High Road West that will deliver up to 2,929 residential dwellings and 36,000 sqm of non-residential floorspace.

Please note that following a review of the 'Report for Consideration at Planning Sub-Committee', in respect to bus services, I would like to draw to your attention that the presumption that 'the level of [bus passenger] intensification would not have a significant detrimental impact on the operations of the local bus network' is incorrect. 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. Please refer to additional details below.

It should be further noted that these comments represent the view of TfL and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. In addition, these comments do not necessarily represent the views of the GLA.

- **Ref 17 – Highway Impact – Completed Development**

  Whilst TfL recognises that: 'a more robust uplift in residential trips generated by this development 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', our position is that the applicant's team needs to demonstrate that highway modelling is not required. As previously indicated: 'a net reduction / zero increase in car trips and / or no significant changes to the street network need to be demonstrated [by the applicant] to assess the need for highway modelling'. It should be further emphasised that full consideration of the implications of the quantum of car parking to be delivered / car parking arrangements, should be incorporated. Furthermore, the application should consider the need to look at the overall net additional impact at each of the access points to determine if a capacity/modelling exercise (e.g. capacity of right turn bays on the highway) is required. This should be assessed in conjunction with the total number of servicing trips and cycle movements. This should be confirmed with the Council.

- **Ref 20 – Access and Delivery & Servicing Arrangements**

  These matters are resolvable when the reserved matters applications come forward.

- **Ref 21 – Healthy Streets, Vision Zero, Walking and Cycling**

  The clarification on the 10m offset between the building line and High Road is noted. Whilst it is accepted that this will contribute positively to improving pedestrian capacity and changing the sense of place along the High Road, TfL's observation primarily seeks to draw your attention to the importance of striking the right balance of objectives, particularly the transport and place-making objectives where there are large numbers of people. TfL welcomes that the applicant's team offers reassurance in relation to improved pedestrian capacity, landscape and public realm improvement that can be afforded and secured through future reserved matters stages. Notwithstanding this, consideration of the implications of a new desire line for high flows of people at certain times and future recommendations to protect the operation of the public transport infrastructure from new/conflicting movement routes, should be incorporated as part of future RMA(s). As previously alluded to, this should achieve seamless interface for sports fans with the A1010 High Road and consider connections to the stadium. These and other matters raised by TfL are resolvable when the reserved matters applications come forward.

- **Ref 22 – Car Parking (1)**

  Taking into consideration site conditions and London Plan requirements, subject to the implementation of the lighting strategy and necessary improvements/pedestrian amenity being secured, the provision of on-street disabled persons' car parking spaces along Whitehall Street for the detailed element together with the access route under the bridge would be considered acceptable by TfL on this occasion. As the LB of Haringey is the local planning and highway authority, the Council should determine the acceptability of this approach. This matter is resolvable by condition.

- **Ref 23 – Car Parking (2)**

  The clarification on charging facilities to be delivered through future RMA(s) is noted. TfL is pleased that the applicant has further acknowledged the requirements to comply with the London Plan policy T6. Electric Vehicle Charging Points including passive provision is expected to be secured by condition. These matters are resolvable when the reserved matters applications come forward and/or with an appropriate legal agreement.

- **Ref 24 – Cycle Parking**

  Consistent with TfL's comments submitted via email on the 3rd March 2022, please see below.

  'The London Plan Policy T5, sets out cycle parking standards to help remove barriers to cycling and create a healthy environment in which people choose to cycle. Considering the detailed element of the scheme and submitted plans for Plot A, TfL has concerns about the cycle parking, specifically building A1 and the lack of provision of spaces for larger cycles for long-stay cyclists. Given that the schedule of accommodation sets out that all wheelchair accessible homes will be contained within building A1, TfL encourage the applicant to review the cycle parking and incorporate adequate provision within building A1 to cater specifically for non-standard bicycles. This should consider riders of certain type of bicycles, including people who use handcycles, tricycles, tandems and models adapted to suit the rider's specific needs, as well as cargo cycles. Further consideration should also be given to short-stay cycle parking provision for buildings A2 and A3, as spaces for visitors located in the landscape, adjacent to building A1's entrance are too remote from other user destinations, particularly building A3's entrance. All cycle parking is required to be designed and laid out in accordance with the London Cycling Design Standards (LCDS).'

  These issues are resolvable by planning condition and/or an appropriate legal agreement.

- **Ref 25 – Trip Generation and Highway and Public Transport Impact Assessment**

  These clarifications are helpful. Whilst matters relating to trip generation inputs and the London Overground assessment are solved, updated bus trip generation figures reveal a significant uplift, and this is likely to require service enhancement to accommodate new demand. Subsequently, bus trip generation figures for the High Road West development proposal have been reviewed by TfL to determine where bus service improvements, including but not limited to capacity enhancements, are expected to be required in the future. Please

refer to the following details.

Route W3: Recent loading data shows that the busiest point in the AM peak is westbound between White Hart Lane and Wood Green. In the PM peak the busiest point is eastbound approaching White Hart Lane. TfL will continue to review the bus network, as demand changes in response to the pandemic and will aim to optimise capacity at the busiest point. The development is forecast to generate an additional 97 westbound trips in the AM peak hour and 72 eastbound trips in the PM peak hour. These figures exceed the planning capacity of 70 passengers per bus for double deck buses. Therefore, it is expected that a S106 contribution of £950,000 would be required to cover the cost of 2 additional return journeys on route W3 for a period of 5 years (£95,000 per return journey per annum). While new demand is expected to be greater in the counter-peak direction in both the AM and PM peak hours, it is expected that there would be sufficient capacity to accommodate the increase.

Route 149: Recent loading data shows that the busiest point in the AM peak is southbound on Tottenham High Road south of White Hart Lane. In the PM peak the busiest point is northbound in Haggerston. However, the load at a busy northbound point on Tottenham High Road in the PM peak has approximately only 40 fewer passengers than at the busiest point. If TfL optimises capacity based on the busiest point in the PM peak hour, assuming a similar difference in load, there would be surplus capacity of approximately 30 spaces close to the development. The development is forecast to generate an additional 94 southbound trips in the AM peak hour and 70 northbound trips in the PM peak hour. Therefore, it is expected that a S106 contribution of £850,000 would be required to cover the cost of 1 additional return journey and 1 additional single journey on route 149 for a period of 5 years (£75,000 per single journey and £95,000 per return journey per annum). While new demand is expected to be greater in the counter-peak direction in both the AM and PM peak hours, it is expected that there would be sufficient capacity to accommodate the increase.

Route 259: Recent loading data shows that the busiest point in the AM peak is southbound at Woodberry Down. However, the load at the busiest point is approximately only 35 passengers higher than at the busy point on Tottenham High Road. In the PM peak the busiest point is northbound on Tottenham High Road. The development is forecast to generate an additional 74 southbound trips in the AM peak hour and 55 northbound trips in the PM peak hour. Therefore, it is expected that a S106 contribution of £475,000 would be required to cover the cost of 1 additional return journey for a period of 5 years (£95,000 per return journey per annum). While new demand is expected to be greater in the counter-peak direction in both the AM and PM peak hours, it is expected that there would be sufficient capacity to accommodate the increase.

Routes 279 and 349: It is forecast that the development will generate demand for both routes; and while it is entirely possible that service enhancements may be required in the longer term, it is accepted that there is greater uncertainty about the requirement for additional capacity given the forecast peak hour demand being less than that of the planning capacity for a single bus. Therefore, no contributions are being requested for either route at this stage.

Based on the outcome of this bus impact assessment review, it is expected that a S106 total contribution of £2,275,000 would be required. It should be noted that contributions should not be route specific as TfL is continuing to review the network and route numbers may be subject

to change.

- **Ref 26 – TfL Technical Approval and Infrastructure Protection**

  These clarifications are helpful. This matter is resolved.

- **Ref 27 – Travel Plan**

  This matter is resolvable with an appropriate legal agreement.

- **Ref 28 – Delivery and Servicing and Construction Logistics**

  This matter is resolvable with an appropriate legal agreement.

I hope these comments are helpful. Please do not hesitate to contact me if you would like to discuss further any of the issues raised above.

Kind regards,

Juan

Juan Sanclemente
Area Planner | TfL Spatial Planning - City Planning
Email: