

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference No: HGY/2022/0752

Ward: Tottenham Hale

Address: Council Depot, Ashley Road, N17 9DP

Proposal: Full planning application for the erection of 272 homes including 50% socially rented homes extending 4-13 storeys, 174sqm of flexible Use Class E floorspace along with a new vehicular access to the site, car parking and two pedestrian north south routes. The proposal also includes both private and public hard and soft landscaping throughout the site.

Applicant: London Borough of Haringey

Ownership: Council

Officer contact: Christopher Smith

Date received: 16/03/2022

1.1 The application is being reported to the Planning Sub-Committee for determination as it is a major planning application where the Council is applicant.

1.2 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposed development would meet the requirements of Site Allocation TH7 by providing high-quality new housing on this vacant former Council depot site and would provide non-residential uses that would support the local community.
- The development would provide 272 new homes including 136 affordable homes (63% by habitable room) which will be delivered as affordable Council Rent properties. 92 (67%) of the Council Rent homes would have three or more bedrooms.
- The development would be of a high-quality design including very well-designed tall buildings which respect the visual quality of the local area, respond appropriately to the local context, and would not impact negatively on local heritage assets. The development is also supported by the Council's Quality Review Panel.
- The development would provide high-quality residential accommodation of an appropriate size, mix and layout within a well-landscaped environment that extends the character of the adjacent Down Lane Park, consisting of high-quality new public realm areas including an improved park edge, and would also provide new amenity and children's play spaces.
- The development has been designed to avoid any material adverse impacts on the amenity of nearby residential occupiers regarding a loss of sunlight and daylight, outlook or privacy and excessive levels of noise, light or air pollution.

- The development would provide 42 car parking spaces including eight (19%) wheelchair-accessible parking spaces which meets the requirements of the London Plan and would be supported by other sustainable transport initiatives including high-quality cycle parking.
- The development would include a range of measures to maximise its sustainability and minimise its carbon emissions. It would achieve an 84% reduction in carbon emissions. Block A has the potential to achieve Passivhaus certification. The development would achieve a suitable urban greening factor and ecology on and adjacent to the site would be protected and enhanced.
- The site's designated waste throughput has already been re-provided at an alternative site within Haringey.

2. RECOMMENDATION

- 2.1 That the Committee resolve to GRANT planning permission and that the Head of Development Management or the Assistant Director of Planning, Building Standards & Sustainability is authorised to issue the planning permission and impose conditions and informatives subject to the signing of a legal agreement providing for the obligations set out in the Heads of Terms below.
- 2.2 That delegated authority be granted to the Head of Development Management or the Assistant Director Planning, Building Standards and Sustainability 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.
- 2.3 That the agreement referred to in resolution (2.1) above is to be completed no later than 31st August 2022 within such extended time as the Head of Development Management or the Assistant Director Planning, Building Standards & Sustainability shall in her/his sole discretion allow; and
- 2.4 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.3) above, planning permission be granted in accordance with the Planning Application subject to the attachment of the conditions.
- 2.5 Planning obligations are usually secured through a S106 legal agreement. In this instance the Council is the landowner of the site and is also the local planning authority and so cannot legally provide enforceable planning obligations to itself.
- 2.6 Several obligations which would ordinarily be secured through a S106 legal agreement will instead be imposed as conditions on the planning permission for the proposed development.
- 2.7 It is recognised that the Council cannot commence to enforce against itself in respect of breaches of planning conditions and so prior to issuing any planning permission measures will be agreed between the Council's Housing service and the Planning service, including the resolution of non-compliances with planning conditions by the Chief Executive and the reporting of breaches to portfolio holders, to ensure compliance with any conditions imposed on the planning permission for the proposed development.

2.8 The Council cannot impose conditions on planning permission requiring the payment of monies and so the Director of Placemaking and Housing has confirmed in writing that the payment of contributions for the matters set out below will be made to the relevant departments before the proposed development is implemented.

2.9 Summary of the planning obligations for the development is provided below:

- Affordable housing – 136 homes at Council rents
- Parking permit restrictions
- TMO amendments (£5,000)
- Travel plan monitoring (£10,000)
- CPZ review and amendments (£20,000)
- Car club contributions
- Off-site highway works
- Improvements to public realm east and west of Down Lane Park (£120,000)
- Improvements to Park View Road underpass, including lighting (£140,000)
- Contribution towards North Tottenham Low Traffic Neighbourhood (£50,000)
- Monitoring of construction works (£20,000)
- Community-led site hoarding design (£5,000)
- Community plant growing initiatives (£10,000)
- Carbon offsetting contribution (£145,350)
- Play space contribution (£172,738.50)
- Metropolitan Police contribution (£21,296.42)
- Employment and Skills plan and measures
- Employment and Skills management and apprenticeship support contribution (£76,923.59)

CONTENTS

3. PROPOSED DEVELOPMENT AND SITE LOCATION DETAILS
4. CONSULTATION RESPONSE
5. LOCAL REPRESENTATIONS
6. MATERIAL PLANNING CONSIDERATIONS
7. COMMUNITY INFRASTRUCTURE LEVY
8. RECOMMENDATION

APPENDICES:

Appendix 1 Planning Conditions and Informatives

Appendix 2 Plans and Images

Appendix 3 Consultation Responses – Internal and External Consultees

Appendix 4 Consultation Responses – Greater London Authority Stage 1 Response

Appendix 5 Consultation Responses – Summary of Representations from Residents

Appendix 6 Quality Review Panel Reports

Appendix 7 Development Forum Minutes

Appendix 8 Pre-application Committee Minutes

3. PROPOSED DEVELOPMENT AND SITE LOCATION DETAILS

3.1 Proposed development

3.2 This is a planning application for the redevelopment of the former Council depot site to provide 272 new homes (Use Class C3) within a range of buildings from four to thirteen storeys in height, 174sqm of commercial space (Use Class E), new pedestrian and cycle routes through the site, vehicle access, car and cycle parking and new hard and soft landscaping.



3.3 The development is split into three distinct blocks (A, B and C). Each block would have its own courtyard or podium amenity space area. They are each separated by new north-south routes through the site and are surrounded by new soft landscaped public realm areas onto Park View Road and Down Lane Park.

3.4 The development would include 63% Council rent homes by habitable room. 34% of the total number of homes would have three or more bedrooms. A full breakdown of the housing tenure and mix is provided in the '*Housing Provision, Affordable Housing and Housing Mix*' section below. The development would be 'tenure-blind' with the market housing spread throughout the development. The majority of homes would have double or triple aspect.

3.5 42 car parking spaces and 512 high-quality cycle parking spaces would be provided. The new vehicle access from Ashley Road would provide a through-route to Park View Road for pedestrians and cyclists.

3.6 The development would have high levels of energy efficiency, low carbon heat sources and generate renewable energy on site. The development is a contemporary design, the buildings would be finished in light cream, dark cream and dark brown brick, cream pre-cast concrete and light and dark green ceramic materials.

3.7 **Site and Surroundings**

3.8 The application site is a former Council depot to the south and east of Park View Road, at the northern end of Ashley Road, and to the north of Down Lane Park. There are no buildings that currently occupy the site, which is essentially clear. Immediately to the east of the site is the Harris Academy school and its associated outdoor sports facility. The local land use character is residential to the north and west, with the park and education facilities to the south and east of the site.

3.9 The application site forms the northern part of Site Allocation TH7 of the Tottenham Area Action Plan 2017 (TAAP) which has been identified for new residential development and the extension of Ashley Road to form a pedestrian and cycle route through to Park View Road. Part of the site is a Safeguarded Waste Site (Park View Road Reuse and Recycle Centre) as identified by the Site Allocations DPD 2017.

3.10 The site is located within a Growth Area, the Upper Lee Valley Opportunity Area and the Tottenham Hale Housing Zone. The maximum PTAL of the site is calculated as ranging from 4-5. The site is within Flood Zone 2 and the Lea Valley Tier 3 Archaeological Priority Area. Part of the site is identified as an existing waste management site HAR9 within the emerging North London Waste Plan.

3.11 There are no conservation areas or listed buildings in proximity to the site there is a locally listed buildings within 300 metres of the site.

3.12 The site is 470 metres from the Lee Valley Special Protection Area (SPA), the Lee Valley Ramsar site and the Walthamstow Wetlands Site of Special Scientific Interest (SSSI). The site is also 4.25 kilometres from the Epping Forest Special Area of Conservation (SAC).

3.13 **Relevant Planning History**

3.14 *Application Site*

3.15 The most recent and relevant planning history for this site is described below.

3.16 HGY/2022/0569. EIA Screening Opinion for the proposed development at the Ashley Road Depot. Under assessment.

3.17 HGY/2021/3411. Prior notification: Demolition. Prior Approval Issued 26/01/2022.

3.18 *Harris Academy (Adjacent to Site)*

3.19 HGY/2019/0111. Variation of condition 2 (approved drawings) attached to planning permission HGY/2018/0745 (which approved variations to original permission HGY/2015/3096) to make minor alterations to the approved drawings list, in order to make minor amendments to omit the inclusion of the existing public footpath to the east of the site at Harris Academy Tottenham. Permission granted 09/04/2019.

3.20 HGY/2018/0745. Variation of condition 2 (approved drawings) attached to planning permission HGY/2015/3096 to make minor alterations to the approved drawings list, in order to make minor amendments to the footprint, layout and massing of approved Block

5 (sports hall) and amendments to the footprint, layout and massing of approved Block 4 and the link bridge attaching approved Block 4 to the existing building previously approved by HGY/2017/0140. Permission granted 22/05/2018

- 3.21 HGY/2015/3096. Demolition of existing buildings on the Ashley Road Depot site in association with the change of use from sui generis to Class D1 (school) and construction of sports hall, sports pitches and floodlights. Construction of infill extensions at first and second floor levels of existing building (previously converted to D1 (school) use using permitted development), construction of a three-storey extension to provide additional educational floor space and other minor works. Permission granted 01/04/2016.

4. CONSULTATION RESPONSE

4.1 Quality Review Panel

- 4.2 The scheme has been presented to Haringey's Quality Review Panel on two occasions. The Panel's written responses are attached in Appendix 6.

4.3 Planning Committee Pre-Application Briefing

- 4.4 The proposal was presented to the Planning Sub-Committee at a Pre-Application Briefing on 6th December 2021. The minutes are attached in Appendix 7.

4.5 Development Management Forum

- 4.6 A DM Forum was held on 8th December 2021. The main topics raised related to management of deliveries, site management, loss of existing buildings, highway works, trees and ecological improvements. Details and summaries of the comments made and how they were addressed are available in Appendix 8.

4.7 Planning Application Consultation

- 4.8 The following were consulted regarding the application:

Internal

- 4.9 LBH Design: Supports the design of the development including the siting of the tall buildings.
- 4.10 LBH Conservation: No objections.
- 4.11 LBH Housing: No objections.
- 4.12 LBH Transportation: No objections, subject to conditions and obligations.
- 4.13 LBH Carbon Management: No objections, subject to conditions and obligations.
- 4.14 LBH Regeneration: No objections.
- 4.15 LBH Nature Conservation: No objections, subject to conditions.
- 4.16 LBH Tree Officer: No objections, subject to conditions.

- 4.17 LBH Building Control: No objections.
- 4.18 LBH Flood and Water Management: No objections, subject to conditions.
- 4.19 LBH Waste Management: No objections.
- 4.20 LBH Pollution: No objections, subject to conditions.
- 4.21 LBH Parks: No objections, subject to further clarifications.
- 4.22 LBH Policy: No objections
- 4.23 LBH Street Lighting: No objections, subject to lighting equipment meeting the required technical specifications.

External

- 4.24 Greater London Authority (GLA): Stage 1 comments can be viewed in full in Appendix 4. The GLA's summary comments are provided below:

London Plan policies on safeguarded waste sites; commercial use; housing; affordable housing; urban design; heritage; environmental issues; sustainability; page 19 and transport are relevant to this application. The application does not fully comply with these policies, as summarised below:

- *Land use principles:* Any loss of this waste site without compensatory re-provision equal to the maximum throughput of the site is contrary to Policy SI9. As proposed the waste that had been processed by the Park View facility on site would be absorbed by the existing Western Road Recycling Centre without interventions to increase its relative throughput capacity. Clarifications are sought to determine whether Western Road could meet its emerging waste plan waste capacity apportionment, in conjunction with that of Park View, over the plan period. Following this, compliance with Policy SI9 will be assessed at the Mayor's decision making stage.
- *Affordable housing:* The affordable housing offer is 63% by habitable room, which exceeds the 50% Fast Track Route threshold for industrial/ publicly owned sites. The affordable housing offer comprises entirely social rent homes. The Council planning officers have confirmed that this is acceptable in this instance due to housing need.
- *Urban design:* The design and layout of the scheme is supported. The site is identified as suitable for the development of tall building, therefore the scheme complies with Policy D9. The applicant has responded well to comments made at pre-application stage and takes full advantage of its park side location. Overheating would need to be addressed, and the Fire Strategy Statement must be revised to provide further information and justification. The provision of wheelchair accessible and adaptable homes should be secured via condition in addition to the provision of evacuation lifts.
- *Sustainable development:* The energy strategy is exemplary, however, further information is required in respect of overheating; evidence of correspondence

for Edmonton Energy from Waste potential and the applicant should continue to engage with the council; the provision of on site network and future connection drawings; further information on ASHP (plan B); and details of PHPP would be welcomed. Furthermore, 'Be Seen' monitoring provisions and an appropriate carbon offset payment would need to be captured in any legal agreement. A Whole Life Cycle Carbon Statement has not been prepared, one must be provided in accordance with Policy SI12 in accordance with GLA guidance. The Circular Economy Statement lacks sufficient detail and a revised statement should be provided including the required information. The production of post construction statements would need to be secured by condition. Digital connectivity has not been addressed within the submission.

- *Environmental issues:* A UGF score of 0.45 is welcomed. However, a landscape drawing setting out how the UGF score has been reached should be provided. The mitigation measures required to ensure no adverse impacts on the adjacent SINC should be secured via condition. A biodiversity net gain of 104% is sought, which is welcomed. Further clarification on the SuDS proposed is required and every effort should be made to include rainwater harvesting, or appropriate justification if it is not proposed. An updated drainage strategy plan should also be provided. Further information is required including providing further evidence to justify the conclusions of construction dust risk assessment, and to inform the appropriate level of mitigation. Furthermore, an Air Quality Neutral assessment should be carried out and conditions secured regarding the use of machinery.
- *Transport:* All streets and public realm within and around the site should be designed in line with the healthy streets approach. The design of the public realm should reduce vehicle dominance and improve safety for pedestrians and cyclists. The relationship between the development and the adjacent park should be improved with greater permeability. There are concerns with vehicle dominance along the extension of Ashley Road due to the location of the servicing bays and the position of the proposed car parking bays, both blue badge and additional car parking. Further information on trip generation is required. All cycle parking should accord with LCDS requirements. Management Plans should also be secured.

- 4.25 Health & Safety Executive: Content with the proposed development and satisfied with the information provided with the application.
- 4.26 London Fire Brigade: No comments received.
- 4.27 Network Rail: No objections, subject to informatives.
- 4.28 Environment Agency: No comments to make.
- 4.29 Natural England: No objections.
- 4.30 Thames Water: No objections, subject to conditions and informatives.
- 4.31 Greater London Archaeological Advisory Service: No objections, subject to conditions.
- 4.32 Metropolitan Police Designing Out Crime Officer: No objections, subject to conditions.

4.33 Metropolitan Police: No objections, subject to the provision of a contribution towards local policing.

5. LOCAL REPRESENTATIONS

5.1 The application has been publicised by way of a press notice, several site notices which were displayed in the vicinity of and around the site and 187 individual letters sent to surrounding local properties. The number of representations received from neighbours, local groups, etc in response to notification and publicity of the application were as follows:

No of individual responses: 18

Objecting/Commenting: 14

Supporting: 4

5.2 The following local groups/societies (other than those consulted above) made representations

- None

5.3 The following Councillor(s) made representations:

- None

5.4 The following issues were raised in representations that are material to the determination of the application and are addressed in the next section of this report:

- Out of keeping with character of area
- Negative impact on character and appearance of area
- Excessive development density
- Excessive height
- Increased overlooking
- Increased overshadowing
- Loss of privacy
- Loss of day/sunlight
- Increased vehicular traffic
- Increased on-street parking
- Increased air, noise and litter pollution
- Insufficient public realm improvements
- Insufficient cycling/walking improvements
- Inappropriate highway works
- Lack of local community facilities
- Lack of local retail/café facilities
- Increased pressure on local services
- Increased anti-social behaviour
- Trees must be protected
- Increased pressure on local green space

5.5 The following issues raised are not material planning considerations:

- Loss of a private view (officer comment: this is a private matter and therefore not a material planning consideration).

- Loss of rights to light (officer comment: this is a private matter and therefore not a material planning consideration).
- Insufficient environmental assessment (officer comment: relevant environmental matters have been considered in detail as part of this application)
- Submission of application is premature (officer comment: the application has been assessed on the basis of the context at the time of submission)

6 MATERIAL PLANNING CONSIDERATIONS

Statutory Framework

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with policies of the statutory Development Plan unless material considerations indicate otherwise.

Considerations

- 6.2 The main planning considerations raised by the proposed development are:

1. Principle of Development
2. Tall Buildings
3. Housing Provision, Affordable Housing & Housing Mix
4. Design and Appearance
5. Heritage impact
6. Residential Quality
7. Impact on Neighbouring Amenities
8. Transport and Parking
9. Ecology and Urban Greening
10. Carbon Reduction and Sustainability
11. Flood Risk and Drainage
12. Land Contamination
13. Fire Safety

Principle of development

National Policy

- 6.3 The National Planning Policy Framework 2021 (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. It advocates policy that seeks to significantly boost the supply of housing and requires local planning authorities to ensure their Local Plan meets the full, objectively assessed housing needs for market and affordable housing.

Regional Policy – The London Plan

- 6.4 The London Plan 2021 Table 4.1 sets out housing targets for London over the coming decade, setting a 10-year housing target (2019/20 – 2028/29) for Haringey of 15,920, equating to 1,592 dwellings per annum.

- 6.5 London Plan Policy H1 'Increasing housing supply' states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, including through the redevelopment of surplus public sector sites.
- 6.6 London Plan Policy H4 requires the provision of more genuinely affordable housing. The Mayor of London expects that residential proposals on public land should deliver at least 50% affordable housing on each site.
- 6.7 London Plan Policy D6 seeks to optimise the potential of sites, having regard to local context, design principles, public transport accessibility and capacity of existing and future transport services. It emphasises the need for good housing quality which meets relevant standards of accommodation. London Plan Policy D9 states that tall buildings should only be developed in locations that are identified as suitable in Local Plans.
- 6.8 London Plan Policy S9 states that existing waste sites should be safeguarded and retained in waste management use and the loss of a waste site will only be supported where appropriate compensatory capacity is made within London. Policy SD7 states that take a town centres first approach to new non-residential development.

Sub-Regional Policy

- 6.9 The North London Waste Plan (NLWP) is a document produced by the North London Boroughs of Haringey, Barnet, Camden, Enfield, Hackney, Islington and Waltham Forest which aims to ensure that there is adequate provision of suitable land to accommodate waste management facilities of the right type in the right place and at the right time, up to 2036, in order to manage waste generated in North London. It also provides policies against which planning applications for waste-related development will be assessed.
- 6.10 The NLWP was found to be sound by an Inspector in October 2021 and some of the Boroughs referenced above have now adopted the document. Haringey's Cabinet supported the adoption of the NLWP on 21 June 2022 and a report to its Full Council on 18 July 2022 will recommend formal adoption of the NLWP. As such whilst the document will not be part of the Development Plan until formally adopted, it has significant weight as a material consideration in the decision-making process until that point. NPPF paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to various factors including the stage or preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given).
- 6.11 Policy 1 of the NLWP states that applications for non-waste uses on safeguarded waste sites will only be permitted where it is clearly demonstrated by the developer that compensatory capacity will be delivered on a suitable site in North London that must meet and, if possible, exceed the maximum achievable throughput of the site proposed to be lost. Part of the site, namely the Park View Road Reuse and Recycling Centre, is identified as an existing waste management site HAR9 in the NLWP.

Local Policy

- 6.12 The Haringey Local Plan Strategic Policies DPD 2017 (hereafter referred to as Local Plan) sets out the long-term vision of the development of Haringey by 2026 and also sets out the Council's spatial strategy for achieving that vision.

- 6.13 Local Plan Policy SP2 states that the Council will aim to provide homes to meet Haringey's housing needs and to make the full use of Haringey's capacity for housing by maximising the supply of additional housing to meet and exceed the minimum target including securing the provision of affordable housing. Local Plan Policy SP6 states that the Council will safeguard existing waste sites unless compensatory provision is made. Policy SP11 states that applications for tall buildings will be assessed against the area action plan within which they are located and shall be supported by a characterisation study or other supporting evidence.
- 6.14 The Development Management DPD 2017 (hereafter referred to as the DM DPD) supports proposals that contribute to the delivery of the strategic planning policies referenced above and sets out its own criteria-based policies against which planning applications will be assessed. Policy DM10 seeks to increase housing supply and seeks to optimise housing capacity on individual sites. Policy DM13 makes clear that the Council will seek to maximise affordable housing delivery on all sites. Policy DM41 states that proposals for new retail uses outside of town centres should demonstrate that there are no suitable town or edge-of-centre sites available in the first instance and demonstrate that they would not harm nearby town centres.
- 6.15 Policy DM6 states that tall buildings will only be acceptable in designated areas as per Table 2.2 of the DM DPD. The area around Tottenham Hale station is one of these designated areas. It also states that tall buildings should represent a landmark which by its distinctiveness must: be a way-finder or marker drawing attention to areas of high visitation; be elegant and well-proportioned and; positively engage with the street environment.
- 6.16 Policy SA4 of the Site Allocations DPD 2017 (SADPD) identifies several existing waste sites within Haringey and states that these will be safeguarded for waste use until alternative provision has been made. The Park View Road Reuse and Recycling Centre is identified as a Safeguarded Existing Waste Site within Table 2 of the SADPD.
- 6.17 The application site forms part of site allocation TH7 'Ashley Road North' in the Tottenham Area Action Plan 2017 (TAAP). TH7 is identified as being suitable for new residential development and the extension of Ashley Road as a pedestrian and cycling connection through to Park View Road. It also requires the creation of a new educational facility. This objective has already been met through the provision of a Harris Academy on the eastern side of the site since the TAAP was drafted.
- 6.18 TH7 has the following Site Requirements and Development Guidelines:

Site Requirements

- A new pedestrian and cycle route will be created extending the line of Ashley Road north to Park View Road, and through an improved foot tunnel, improving access into the Lee Valley Regional Park.
- Vehicular access to the site will be from Ashley Road/Burdock Road or Park View Road, but there will not be a link from one to the other.
- The site will contain part of the Harris Academy. Residential will be the primary use on the remainder of the site.
- The site's existing licensed waste capacity will be replaced prior to any redevelopment taking place.

Development Guidelines

- Paths connecting Watermead Way, Ashley Road and Park View Road should be rationalised, and made safer and more welcoming to resolve local safety concerns, and make the routes more direct, and thus better used.
- The mature trees on site, and in the park should be protected and incorporated into any future design. The amenity of Down Lane Park should be protected and improved.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- This site is identified as being 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.
- This site is in an area of flood risk, and a Flood Risk Assessment should accompany any planning application.

- 6.19 The TAAP also identifies a range of area-wide policies. Policy AAP1 states that all development proposals within the TAAP should come forward comprehensively to meet the wider objectives of the document, with masterplans provided where development forms only part of a site allocation. It also states that development proposals will be expected to provide a range of types and sizes of homes and create inclusive and mixed communities. Policy AAP3 states that the Council will seek the delivery of 10,000 new homes across the TAAP area.
- 6.20 Policy AAP3 supports the Housing Zone's "Portfolio Approach" to housing delivery. This approach balances housing tenures and dwelling mixes across Housing Zone areas with each site within Tottenham Hale making its own specific contribution based on its characteristics.
- 6.21 Policy AAP6 states that the significant change planning for Tottenham's Growth Areas provides the opportunity to establish a new urban character for these areas. Retained suburban areas will be protected from inappropriate development with taller buildings being permitted only where it can be demonstrated that the existing character of the area will not be compromised.
- 6.22 The Council at the present time is unable to fully evidence its five-year supply of housing land. The 'presumption in favour of sustainable development' and paragraph 11(d) of the NPPF should be treated as a material consideration when determining this application, which for decision-taking means granting permission unless the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusal or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole. Nevertheless, decisions must still be made in accordance with the development plan (relevant policies summarised in this report) unless material considerations indicate otherwise (of which the NPPF is a significant material consideration).

Assessment

- 6.23 Site Allocation and Masterplanning

- 6.24 Policy DM55 of the DM DPD states that where developments form only a part of allocated sites a masterplan shall be prepared to demonstrate that the delivery of the site allocation and its wider area objectives would not be frustrated by the proposal.
- 6.25 This application covers the north-western part of site allocation TH7 only. The remaining land within TH7 is occupied by the Harris Academy, which recently erected a sports hall and outdoor sports pitches on the land immediately to the east of the application site. This proposal completes the development of the site allocation in compliance with DM55.
- 6.26 This proposed development would also meet all other necessary site allocation objectives. Ashley Road would be extended north through the site to connect to Park View Road creating a route for cycles and pedestrians only. The applicant will provide a financial contribution to improve the foot tunnel access from Park View Road to the Lee Valley Regional Park as required by the site allocation. The public realm on Ashley Road and Park View Road would also be significantly improved in quality and safety terms through this proposal. The high quality trees on site and nearby within Down Lane Park would be protected where appropriate and the development will be designed to connect to the Council's District Energy Network in the future.
- 6.27 As such, it is considered that the proposed development would deliver the remaining requirements of Policy DM55 and Site Allocation TH7 not already met by the Harris Academy development.
- 6.28 Provision of New Housing
- 6.29 London Plan Policy H1 states that boroughs should optimise the potential for housing delivery on all suitable brownfield sites. Local Plan Policy SP2 states that the Council will aim to provide homes to meet Haringey's housing needs and will make the full use of Haringey's capacity for housing by maximising the supply of additional housing.
- 6.30 Policy DM10 of the DM DPD states that the Council will support proposals for new housing on sites allocated for residential development. This site is designated as being suitable for new residential development by Site Allocation TH7.
- 6.31 The site is located within the Tottenham Hale Housing Zone where the provision of 5,000 homes is expected in the ten-year period up to 2025.
- 6.32 The Council's Housing Strategy 2017-2022 states that the Council's first preference is that new affordable housing should be developed by the Council for provision as social rented homes at Council rents, with an aim of 40% of all new homes across the borough (by habitable room) being provided within affordable tenures. The site is one of several that the Council has identified as being suitable for new Council housing as part of its commitment to delivering three thousand (3,000) new Council homes at Council rents by 2031.
- 6.33 This proposed development would provide 272 new homes including 136 new affordable homes which will be delivered as Haringey Council Rent properties on a vacant brownfield site. This equates to 50% affordable housing on a unit basis and 63% on a habitable room basis (due to the large proportion of family-sized homes

provided within the affordable homes). Upon delivery, Haringey Council will be responsible for the on-going management and maintenance of the affordable homes.

- 6.34 This is a substantial contribution to the Council's affordable housing objectives as described above and would help meet the stated need for low-cost Council rented housing in the Borough.

Portfolio Approach

- 6.35 The site is located within the boundaries of a Housing Zone. The Housing Zone programme is explicitly designed to encourage developers, boroughs and other key partners to consider innovative and flexible approaches to accelerate sustainable development and increase housing delivery.

- 6.36 The Housing Zone and Tottenham AAP3 policy also seeks a portfolio approach to housing delivery to better align public sector resources. This approach also balances housing tenures and dwelling mixtures across Housing Zone areas. The Housing Zone programme is explicitly designed to encourage developers, boroughs and other key partners to consider innovative and flexible approaches to accelerate sustainable development and increase housing delivery.

- 6.37 This approach sets out that various sites may each contribute a higher or lower proportion of affordable housing in line with an overall Zone-wide target. The contribution will depend on individual site characteristics and viability. As part of this approach this site has been expected to contribute to a high level of affordable housing to achieve the overall aims of the portfolio approach. This site's contribution to housing in the area will result in an overall portfolio approach that achieves affordable housing at 34% by unit, and 39% by hab room across the new developments in Tottenham Hale.

- 6.38 This proposal would therefore contribute to the creation of a mixed and balanced community in this area.

- 6.39 In summary, the proposed residential development of this underutilised brownfield site is supported in land use terms and would deliver on the objectives and aspirations of the Site Allocation TH7. The principle of a residential development with predominantly low-cost affordable housing on the site is strongly supported by national, regional, and local policies. The provision of 272 new homes would make a substantial contribution towards meeting the Council's housing target in line with Policies H1, SP2 and DM10 and would also make an important contribution towards the Borough-wide target of 40% affordable housing.

6.40 Loss of Depot Facilities

- 6.41 The application site was formerly used as a Council depot. In this regard TH7 states that the site's existing licensed waste capacity will be replaced prior to any redevelopment taking place. The depot operations have recently moved north to a dedicated new facility accessed from Watermead Way, which opened in early 2022. The depot land to the north of Ashley Road is therefore now vacant.

- 6.42 The site forms the north-western part of Site Allocation TH7 which is identified for residential and education uses only. Depot facilities are not required to be retained on

site. Therefore, the removal of depot uses from this site is acceptable in principle in land use terms.

6.43 Loss of Designated Waste Site

- 6.44 A small part of the application site is identified as a safeguarded existing waste management site in the draft North London Waste Plan 2022 (HAR9) and the Site Allocations DPD (Table 2 under Policy SA4).
- 6.45 The North London Waste Plan Policy 1 states that applications for non-waste uses on safeguarded waste sites will only be permitted where it is clearly demonstrated that compensatory capacity will be delivered on a suitable site in North London. Policy SA4 of the Site Allocations DPD states that waste sites will be safeguarded for waste use until alternative provision has been made. Policy SI9 of the London Plan further supports this position.
- 6.46 The former Park View Road Reuse and Recycling Centre (PVRRC) covers a very small part of this application site – approximately 0.1ha (6%) of a 1.63ha site. It was formerly used as a storage facility for recycling and was not used for waste processing. The facility ceased operations in 2018. These recycling activities were moved to and consolidated at the Western Road site in Wood Green. The safeguarded waste capacity of the PVRRC facility is a volume of 6,326 tonnes per annum as described in Table 2 of the Site Allocations DPD.
- 6.47 The Western Road site is also used for storage of recycling and is not a waste processing facility. Western Road has managed a maximum volume in recent years of 11,478 tonnes of waste, recorded in 2014/15, with the site's waste throughput having been on a general downward trend since. This trend has continued downward even since PVRRC was closed and its waste throughput moved to the Western Road site. The volume of waste managed at Western Road has fallen steadily to 5,273 tonnes in the year 2021/22, which is well below the 2014/15 waste throughput levels.
- 6.48 In the potential worst-case scenario that PVRRC was still operational, was closed now and its full safeguarded waste capacity of 6,326 immediately shifted to Western Road, the maximum volume of waste throughput that could be expected at Western Road (11,599 tonnes per annum) would only marginally exceed the previously reported maximum volume of waste (11,478 tonnes per annum) processed at the Western Road site. However, the reality is that the Western Road site would not be required to manage that volume of waste throughput because the PVRRC has already been transferred to Western Road and there are no other waste activities to move from the safeguarded PVRRC site which has been closed for several years.
- 6.49 The Council's Waste Management team has confirmed, with the support of the North London Waste Authority, that another 6,000 tonnes of waste (above the recorded 2021/22 levels) could be managed at Western Road and that the operational efficiencies provided by a new digital booking system has the potential to increase the waste tonnage handling potential of that waste site even further.
- 6.50 Therefore, it is considered that there is capacity for the Council's Western Road waste site to process both its existing waste throughput and the maximum waste throughput attributed to the safeguarded PVRRC site before it closed. As such, the loss of this safeguarded waste site is acceptable.

6.51 Provision of Non-Residential Uses

6.52 In accordance with London Plan Policy SD7 and Policy DM41 of the DM DPD new non-residential development should be located in town centres where appropriate.

6.53 Two non-residential units are proposed to support the emerging new residential neighbourhood in this area. These units are relatively small, totalling 198sqm, and would be located adjacent to the park edge, enabling maximum visibility from public areas and providing natural surveillance across the park. Flexible Class E uses are proposed, which enables a range of uses including shops and cafes.

6.54 The uses are intended to support the residents of the development, provide facilities for the local community and activate local streets. These relatively small units are not expected to compete with existing and proposed uses within the emerging Tottenham Hale District Centre or other local non-residential facilities.

6.55 As such, the provision of non-residential activities is considered acceptable in this location.

6.56 Suitability of Site for Tall Buildings

6.57 London Plan Policy D3 states that all development must make the best use of land by following a design-led approach that optimises site capacity.

6.58 London Plan Policy D9 states that local development plans should define what is considered a tall building, and that buildings should not be considered 'tall' where they are less than six storeys (or 18 metres) in height. Policy D9 also states that boroughs should determine the locations where tall buildings may be an appropriate form of development and that tall buildings should be located in areas identified as suitable in local development plans.

6.59 The Tottenham AAP Policy AAP6 states that the significant change planned for Growth Areas such as Tottenham Hale provides an opportunity to establish a new urban character for the area. It also states that the appropriate height of development in these areas shall be guided by the principles of Policies DM1 and DM6 of the Development Management DPD.

6.60 Policy SP11 of the Local Plan states that tall buildings should be assessed in accordance with area action plans, characterisation studies and the policy criteria of the DM DPD. The council prepared a borough-wide Urban Characterisation Study (UCS) in 2016.

6.61 Policy DM6 of the DM DPD states that tall buildings will only be acceptable within identified areas. Figure 2.2 of the DM DPD identifies the area around Tottenham Hale station, south of Down Lane Park, as being suitable for tall buildings. It also prescribes a range of requirements for tall buildings. As well as being located in suitable areas and being acceptable in design terms, tall buildings should be a way finder or marker building indicating areas of civic importance and high visitation, should be well proportioned and visually interesting from any distance or direction and should positively engage with the street environment. Tall buildings should also consider their ecological and microclimate impacts. Clusters of tall buildings should also demonstrate

how they collectively contribute to the delivery of the vision and strategic objectives for an area.

- 6.62 The DM DPD defines 'tall' buildings as being those which are ten storeys or greater in height and 'taller' buildings as those which generally project above the prevailing height of the surrounding area and are lower than ten storeys.
- 6.63 The proposed development would include five buildings that are six storeys or greater in height. These buildings are all located on the southern side of the site, adjacent to the park and away from the majority of existing residential properties on Park View Road. Three of these buildings, those between six and seven storeys in height, are considered 'taller' buildings by the Local Plan.
- 6.64 The two 'tall' buildings (i.e. ten storeys or greater in height) are both located in the south-eastern corner of the site on either side of the extended Ashley Road.
- 6.65 The location of the proposed tall buildings is outside of the areas designated as being suitable for tall buildings area as identified in Table 2.2 of the DM DPD and the UCS also does not state that tall buildings would be acceptable in this location. The emerging Tottenham Hale District Centre is an area designated as being suitable for tall buildings area and is a short walk to the south of the site.
- 6.66 The site shares many of the characteristics of the designated tall building area in Tottenham Hale District Centre. It is located within the Tottenham Hale Growth Area and the Lee Valley Opportunity Area which are identified for significant amounts of new housing and jobs, and it benefits from easy access to public amenities including open green spaces at Down Lane Park and the Lee Valley Regional Park and a superb range of public transport options at Tottenham Hale train, underground and bus stations. The emerging Tottenham Hale district centre will also provide a range of commercial and community amenities to support new high-density development. There are also further commercial and community amenities a short walk to the west of the application site on Tottenham High Road.
- 6.67 This location has a strong relationship with the permitted cluster of tall buildings within the emerging Tottenham Hale District Centre, which has permissions for buildings up to 38 storeys, with a gradual and transitional 'stepping down' of building heights from the district centre to Ashley Road, across Down Lane Park and towards the lower scale buildings residential neighbourhood to the north.



6.68 The siting of tall buildings at the entrance to the development would provide a visual marker at the northern end of the existing Ashley Road, highlighting the function of the extended pedestrian and cycle route through the site and a gateway to the residential neighbourhood to the north and the Lee Valley Regional Park to the east. The tall buildings would also help to highlight this extended road as the principal access road to the development itself for any residents and visitors. The tall buildings would improve wayfinding to and through the site from the surrounding area including from Down Lane Park.



- 6.69 As such, the siting of tall buildings would be suitable in this location due to their close proximity to the designated tall building area in Tottenham Hale, the strong connectivity and amenity attributes of the site, the public benefits of providing a gateway for cyclists and pedestrians to the north and east and improving local wayfinding, and in providing a connection between the large-scale emerging district centre at Tottenham Hale and the existing residential neighbourhood to the north.
- 6.70 Although the siting of two tall buildings of ten and thirteen storeys in this location which has not previously identified as being suitable for tall buildings is contrary to Policy D9 of the London Plan and Policy DM6 of the DM DPD, it is considered that on balance this conflict with policy would not result in any harm.
- 6.71 The GLA's Stage 1 comments state that, notwithstanding the proposed development's non-compliance with the locational criteria of Policy D9 (specifically the site's location outside of an area identified as suitable for a potential tall building) GLA Officers will have regard to the level of compliance with Policy D9 as a whole when considering the suitability of tall buildings in this location, with reference to the visual, functional, environmental and cumulative impacts of the tall buildings, assessed below, and in conjunction with an assessment of all other material considerations.
- 6.72 The consideration of the tall buildings as a function of the overall development design and its impact on local character, protected views, local climatic conditions, neighbouring amenity, ecology and all other relevant matters will be assessed in the sections below.

6.73 **Tall Buildings**

Townscape

- 6.74 Policy D9 of the London Plan states that where suitable tall buildings must be acceptable in terms of their visual, functional, environmental and cumulative impacts.
- 6.75 Policy DM5 of the DM DPD states that obstructions to locally significant views should be minimised.
- 6.76 Policy DM6 of the DM DPD states that that all proposals for taller and tall buildings must be accompanied by an appropriate urban design analysis that explains how the buildings would fit into the local context.
- 6.77 The site is considered to be a transitional location in terms of building heights relative to the cluster of tall buildings which are currently emerging from the centre of Tottenham Hale and along Ashley Road and Watermead Way. The heights of buildings that have received planning permission in this area range from a peak of 38 storeys close to Tottenham Hale station stepping down to 22 storeys on Watermead Way then to 12 storeys on Ashley Road. There is a gentle stepping down of heights from the Tottenham Hale station area as can be seen in the image above.
- 6.78 On the southern side of Down Lane Park buildings have been permitted that would frame the park at heights of 11 and 12 storeys.
- 6.79 The 10 and 13 storey buildings proposed would be of a similar height to those 11 and 12 storey buildings. These two buildings would provide a visual connection between

the cluster of buildings on the southern part of Ashley Road and this proposed development at its northern end. The siting of these tall buildings at the entrance to the development from Ashley Road provides a visual indicator of the end of the existing Ashley Road, the termination of the park, and the start of the new route through the site to the north (and on to the adjacent residential neighbourhood and Lee Valley Regional Park). The tall buildings would be clearly visible from within the park and from the south on Ashley Road and thus would function as the principal gateway to both the development and the pedestrian and cycle route through the site, as well as improving local wayfinding.

- 6.80 The tall buildings would be sited in a location that is as far away as possible from existing residential properties and would not be located close to any listed or locally listed building or any conservation area.
- 6.81 The applicant has submitted a *Heritage Townscape & Visual Impact Assessment* (HTVIA) with the application which has assessed the visual and cumulative impacts of tall buildings in this location. The HTVIA document concurs with the paragraphs above in respect of the suitability of long, medium and immediate views of the tall buildings. In terms of cumulative impact, the tall buildings are considered to sit comfortably within the emerging wider spatial hierarchy in this area, which includes many tall buildings of a similar height and scale on Ashley Road and the southern side of Down Lane Park, and larger scale developments both nearby at Tottenham Hale and further afield at Tottenham Hotspur Stadium and the emerging High Road West Masterplan area (all of which are within the wider area of the Tottenham Area Action Plan).
- 6.82 The HTVIA also confirms that locally significant view 20 (Watermead Way railway bridge to Alexandra Palace) would not be adversely affected by tall buildings in this location. The Council's Design Officer has reviewed the HTVIA and agrees with this assessment, and the consideration that in all locally important views the proposed tall buildings would have either a minor beneficial, minor neutral or no impact.
- 6.83 The GLA's Stage 1 comments have raised no objection to the impact of the proposed tall buildings in terms of their overall height or impact on townscape views. The Council's Design and Conservation Officers also raise no objections to the height and townscape impact of the tall buildings.
- 6.84 Therefore, the proposed development would have a beneficial impact on the townscape and visual amenity of Tottenham Hale. The scale, form and detailed design of the proposed tall buildings would integrate well within the emerging character of this growth area and would provide an appropriate transitional development between the existing district centre in Tottenham Hale and the residential neighbourhood to the north as well as a visual marker and wayfinding building within the local area.

Microclimate

- 6.85 Policy DM6 states that proposals for tall buildings should consider the impact on microclimate and that tall buildings within close proximity to each other should avoid a canyon effect and consider the cumulative climatic impact of the buildings.
- 6.86 A Microclimate Analysis has been submitted with the application, which has simulated how the new buildings would respond to expected climatic conditions within the existing surrounding environment and assessed the model against the Lawson Comfort Criteria. The Lawson Comfort Criteria identifies six categories of pedestrian

activities that are deemed to be suitable in a given area, ranging from sitting outdoors, through standing and strolling, to the least suitable category of uncomfortable (i.e. unsuitable for all pedestrian activities).

- 6.87 The model has considered three scenarios – the existing, the post-development and potential future cumulative development options. Each scenario features balconies without screens and trees without substantial foliage, whereas in a more realistic scenario balcony screens and mature tree planting of the development would contribute to slowing down wind speeds.
- 6.88 The Microclimate Analysis concludes that throughout the year, including during winter months when wind levels are expected to be highest, wind conditions within and near to the site would be suitable for sitting, standing and strolling activities. No uncomfortable or unsafe conditions were found through the analysis undertaken. The Microclimate Analysis confirms that the wind conditions anticipated would have a negligible impact (i.e. no demonstrable effect) on the users of the surrounding roads and pavements, entrances and amenity areas.
- 6.89 The Microclimate Analysis document has been reviewed on the Council's behalf by a qualified third party (Senior Engineer at RWDI) to ensure its robustness and the accuracy of its conclusions. RWDI has stated that the wind assessment is indeed robust, and its results and conclusions are satisfactory and as expected for a scheme of this size and massing at a site with these characteristics.
- 6.90 As such, it is considered that the proposal would be acceptable in terms of its impact on the local microclimate.

Housing Provision, Affordable Housing and Housing Mix

Housing and Affordable Housing Provision

- 6.91 The Council's housing target as set by the London Plan is 1,592 dwellings per annum. London Plan Policy H1 states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, including through the redevelopment of surplus public sector sites. Policy DM10 of the DM DPD seeks to increase housing supply and seeks to optimise housing capacity on individual sites.
- 6.92 Policy AAP3 of the Tottenham AAP states that to improve the diversity and choice of homes and to support sustainable communities in Tottenham the Council will seek the delivery of 10,000 new homes across the AAP area.
- 6.93 The NPPF 2021 states that where it is identified that affordable housing is needed, planning policies should expect this to be provided on site in the first instance. The London Plan also states that boroughs may wish to prioritise meeting the most urgent needs earlier in the Plan period, which may mean prioritising low-cost rented units. Policy DM13 of the DM DPD states that developments with capacity to accommodate more than ten dwellings should provide affordable housing and highlights a preference for social and affordable rented accommodation.
- 6.94 The proposed development provides 272 new dwellings including 136 new affordable homes in Council rented tenure which is 50% (63% by habitable room) of the total number of homes. The homes would be provided in a 'tenure blind' manner by ensuring the affordable homes are indistinguishable from the market homes. Council

rented properties would be located in the lower-rise blocks, with family-sized units on ground floors, for ease of access to communal and play areas and the adjacent park.

- 6.95 Market homes would generally be located within blocks accessed by a single core for ease of management. These blocks would be located in the south-west and north-east sides of the site.
- 6.96 This proposal forms part of the Council’s Housing Delivery Programme which seeks to optimise the provision of affordable accommodation for Council rent to meet local need. It aims to address the Council’s housing waiting list through the provision of a wide range of housing typologies and to address issues relating to the over and under occupation of the existing housing stock to ensure the effective use of public assets and funding. Therefore, it is considered that the proposed provision of affordable housing units for Council rent would meet an identified need.

ASHLEY ROAD DEPOT SUMMARY						
		1B	2B	3B	4B	Total Homes
SOCIAL	Homes	10	34	67	25	136
	%	7%	25%	49%	18%	50%
	Habitable rooms	20	102	335	150	607
	%	3%	17%	56%	24%	63%
PRIVATE	Homes	56	80	/	/	136
	%	41%	59%	/	/	50%
	Habitable rooms	112	240	/	/	352
	%	32%	68%	/	/	37%
TOTAL	Homes	66	114	67	25	272
	%	24%	42%	25%	9%	100%
	Habitable rooms	132	342	335	150	959
	%	14%	36%	35%	15%	100%

Housing Mix

- 6.97 Policy DM11 of the DM DPD states that the Council will not support proposals which result in an over concentration of 1 or 2 bed units overall unless they are part of larger developments.
- 6.98 92 (50%) of the overall number of units would have three bedrooms or more and are therefore suitable for families. All of the family-sized housing would be provided in

Council rented tenure. As such, 67% of the Council rented housing would also be suitable for families. This provision includes a significant proportion (18%) of larger four-bedroom homes.

- 6.99 This substantial provision of family-sized homes would avoid an overconcentration of smaller units in the area and would significantly contribute towards meeting the demand for family housing locally and in the Borough generally. The development as a whole would provide a mix of residential units that would contribute towards the creation of mixed and balanced neighbourhoods in this area.
- 6.100 As such, the proposed development would be acceptable in terms of its provision of new housing stock generally, the provision of a large proportion of affordable housing in Council rent tenure including a substantial proportion of family housing for Council rent, and in terms of its overall housing mix.

Design and appearance

National Policy

- 6.101 Chapter 12 of the NPPF 2021 states that that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 6.102 It states that, amongst other things, planning decisions should ensure that developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, and should be visually attractive due to good architecture, layouts, and appropriate and effective landscaping.

Regional Policy – London Plan

- 6.103 The London Plan 2021 Policy D3 emphasises the importance of high-quality design and seeks to optimise site capacity through a design-led approach. Policy D4 of the London Plan notes the importance of scrutiny of good design by borough planning, urban design, and conservation officers as appropriate. It emphasises the use of the design review process to assess and inform design options early in the planning process (as has taken place here).
- 6.104 Policy D6 concerns housing quality and notes the need for greater scrutiny of the physical internal and external building spaces and surroundings as the density of schemes increases due the increased pressures that arise. It also requires development capacity of sites to be optimised through a design-led process.

Local Policy

- 6.105 Policy SP11 of the Haringey Local Plan requires 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.
- 6.106 Policy DM1 of the DM DPD requires development proposals to meet a range of criteria having regard to several considerations including building heights; forms, the scale and massing prevailing around the site; the urban grain; and a sense of enclosure. It requires all new development to achieve a high standard of design and contribute to the distinctive character and amenity of the local area.

6.107 DPD Policy DM6 expects all development proposals for tall and taller buildings to respond positively to local context and achieve a high standard of design in accordance with Policy DM1.

Quality Review Panel (QRP)

6.108 The development proposal has been presented to the QRP twice prior to the submission of this application. The most recent review took place on 19th January 2022. The Panel’s summarising comments of this latest review are provided below.

6.109 *“The Quality Review Panel welcomes the opportunity to consider the proposals for the Ashley Road Depot as they continue to evolve. The panel thanks the project team for their comprehensive presentation and the work done to date. It supports the aspirations for the site, in terms of tenure mix, housing size, typology mix and sustainability, and thinks that the proposals have the potential to become an exemplar for future development within the borough. It welcomes the response to the comments made at the previous review and thinks the improvements to the plan have been very successful. The panel is broadly supportive of the current proposals but would encourage further refinements to give greater distinctiveness to key buildings. It feels that the ambitions for sustainability are laudable and would like to see mechanisms in place to ensure that these ambitions are delivered in practice. Further details of the panel’s views are provided below.”*

6.110 Since the date of the second review the proposal has been amended to address the most recent comments from the QRP. The table below provides a summary of key points from the most recent review, with officer comments following:

Panel Comments	Officer Response
Building heights and massing	
The panel supports the approach to massing and building heights as revised from the previous presentation.	Comments noted.
It welcomes the reduction of Building B1 from five storeys to four storeys fronting onto Park View Road (north), and notes that the shift to a pitched / mansard roofline will also improve the relationship with the street.	Comments noted.
It supports the massing of the taller buildings, Building B2 (13 storeys) and Building C2 (10 storeys), and welcomes the elegant proportions of both. However, comprehensive testing of the microclimate effects of these buildings will be required, along with appropriate mitigation measures, such as tree planting.	Comments noted. Microclimate assessment has been undertaken and reviewed by a third party and found to be acceptable. Tree planting would be provided throughout the proposed development.
Place-making, public realm and landscape design	
The panel feels that the work undertaken on the public realm and landscape	Comments noted. A high proportion of play space for younger children is

<p>design has been successful and has the potential to create an important asset for residents and neighbouring communities. It feels that facilities like table tennis tables would further enhance the landscaped spaces.</p>	<p>provided on site. Other sports facilities would be provided in Down Lane Park as part of the upcoming comprehensive improvement scheme for the park.</p>
<p>The landscape proposals rely heavily on herbaceous planting; consideration of what the landscape will look like in winter may suggest inclusion of some more robust species. In this regard, indigenous evergreen 'marker' plants could also be used to articulate character areas.</p>	<p>The landscaping scheme has been designed to achieve a number of goals, including good site drainage, biodiversity improvements and visual amenity benefits. Details of landscaping would be secured by condition and the inclusion of evergreen species can be considered at this point.</p>
<p>Shadow diagrams should also be used to inform the landscape strategy at a detailed level.</p>	<p>The landscaping is not anticipated to be excessively overshadowed. The landscaped areas will be effectively managed to ensure their long-term quality. This matter will be secured through condition.</p>
<p>The panel welcomes the inclusion of rain gardens and is pleased to hear that management strategies are being carefully considered, as these can become unkempt and littered.</p>	<p>Comments noted. Management of drainage features would be secured by condition.</p>
<p>The panel would support greater clarity on the hierarchy of entrances and accesses to the buildings and courtyard spaces, to ensure that natural desire lines are defined and reinforced.</p>	<p>Building entrances are located on main routes through and around the site for clarity of access. Courtyards are located in private areas behind blocks that provide play and amenity space for residents. Desire lines would be re-enforced and respected.</p>
<p>Opportunities for horticulture and community growing should be explored; establishing management systems so that the community is in control of the growing spaces would be welcomed.</p>	<p>The courtyard gardens are community focussed spaces that have been designed to include spaces suitable for communal activities such as the growing of food.</p>
<p>At a detailed level, there may be potential to strengthen parts of the landscape by grouping some of the smaller planting areas together, for example in the front garden areas of adjacent dwellings.</p>	<p>The principles of the landscape provision have been designed in detail as shown in Section 8 of the Design and Access Statement. Seven landscaped 'character areas' have been identified based on street and housing typologies. Each would provide a different layout and type of planting.</p>
<p>The panel welcomes the decision to avoid having waste and recycling bins in front gardens.</p>	<p>Comments noted.</p>
<p>As there are pedestrian-only streets within the development, a management</p>	<p>Development servicing has been considered in detail. There two dedicated</p>

<p>strategy will be needed to allow access for essential vehicles, such as removal vans, to all parts of the new neighbourhood.</p>	<p>'drop off' service bays provided on the eastern and western sides of the development. Storage lockers are provided for parcel deliveries. Waste trucks can access the internal roads through a bollard-controlled access system. Removal vans would use the same service bays and may be permitted to access the new residential lanes and the park edge route subject to a management plan to be secured by condition.</p>
<p>The panel also notes that the western blocks of accommodation are at a distance from the parking provision, and it would encourage the design team to ensure that there is equitable access to parking and car club provision from all parts of the development.</p>	<p>Car use on the site is expected to be low. The main car park is within the podium under Block C. Four car parking spaces would be provided off Park View Road (north) between Blocks A and B. The car club spaces would be provided on Ashley Road. Homes on the western side of the site would be closer to existing car club spaces on Mafeking Road.</p>
<p>The panel feels that the design of the pedestrian and cycle-only route at the southern boundary of the site, adjacent to Down Lane Park, should mitigate potential problems with security and surveillance. It highlights that generous pathways, effective lighting strategies, good levels of surveillance and overlooking from adjacent flats, and avoiding the creation of hiding places are key ingredients of safe places.</p>	<p>Comments noted. The 'park edge' route has been designed to create an active and attractive interface between the site and Down Lane Park and improve security through the provision of low-level lighting, passive surveillance from residential front doors and upper floor windows and balconies.</p>
<p>Architectural expression</p>	
<p>The panel welcomes the approach to the architectural expression throughout the scheme. At a detailed level, it highlights some opportunities for further refinement.</p>	<p>Comments noted. Detailed design has advanced since the QRP review and further refinement and detailing is now included in the scheme design.</p>
<p>It feels that there is scope to introduce greater differentiation in the architectural character of key buildings within the scheme, such as buildings A4 and A1. A more distinctive design for Block A4 would celebrate the corner and bookend the view from the park, while Block A1 plays an important role in closing the view down Havelock Road.</p>	<p>Buildings A4 (by the north-western entrance to the park) and A1 (opposite Havelock Road) are now markedly different in their detailed design and materiality than the remainder of the development. Block A4 includes a dark brown brick and a chamfered corner feature neither of which are found elsewhere in the proposed development. The use of green ceramic tiles is also prominent on the ground floor of A4. Block A1 is more restrained in its finishing materials but has rich brick detailing so the building would appear as a high quality terminating feature at the end of Havelock Road.</p>

<p>The panel accepts that it is not possible to retain the Victorian park keepers' cottage at this important corner location and would encourage the design team to explore how Building A4 can be further refined to elegantly turn the corner as a 'marker' building while also reflecting and referencing the nearby Victorian streetscape.</p>	<p>Comments noted. The corner A4 building would be finished with elegant and characterful decorative tiles which increase its prominence in the street scene and emphasise its status as a marker building for the adjacent entrance to the park.</p>
<p>Building A5 might benefit from some further consideration of the upper floors, which currently look weak and apologetic when set against the strong colonnade below.</p>	<p>Building A5 has been completely redesigned to remove the former colonnade, along with a number of other changes to the detailed design, which officers consider present a much more convincing elevation. This building now presents a highly domestic scale, which responds to the two storey houses opposite. The upper maisonettes and their access balcony act as a set-back, rooftop element, behind the high parapet of the lower maisonettes, which retain a horizontal rhythm and individual house-by-house expression through the inclusion of pilasters.</p>
<p>The panel would also encourage greater differentiation between the balconies and access decks that sit next to each other at the junction of Buildings A1 and A5, to avoid an awkward juxtaposition.</p>	<p>Whilst the balconies on the second floor of these two buildings may appear similar on elevation drawings, in plan form there is a clear forward step between the balconies on building A1 and the access deck on A5. This is sufficient to provide a clear differentiation between these two areas once the buildings are built.</p>
<p>Inclusive and sustainable design</p>	
<p>The panel welcomes the clarity of the analysis and strategic decisions that have been taken so far to integrate sustainable design principles into the design. In particular, it feels that the ambition to achieve an exemplar Passivhaus scheme is laudable.</p>	<p>Comments noted.</p>
<p>It also supports the biodiversity targets proposed, as well as the approach adopted towards sustainable urban drainage.</p>	<p>Comments noted.</p>
<p>The commitment to achieving LETI targets within the scheme is also welcomed, but the panel would encourage the design team to push even harder and aim for the 2030 LETI target of 300 kgCO₂/m².</p>	<p>Comments noted. The applicant's design team has pushed for the highest level of carbon reduction throughout the lifetime of the development and are restricted in part by site layout and buildability. The development would meet all GLA whole-life carbon targets and some LETI targets</p>

	and further work towards improving carbon reduction would be undertaken prior to commencement of development and secured by condition.
While these commitments are all extremely positive, the panel would like to see mechanisms in place to ensure that the identified standards for each individual building are 'locked in' during the onward detailed design and construction phases.	Commitments would be secured by condition through a detailed finishing materials condition and the requirement for the architects to be kept on as overseers of the development through the RIBA design stages.

6.111 As set out above, the applicant has sought to engage with the QRP during the pre-application stage. The development proposal submitted as part of this application has evolved over time to respond to the detailed advice of the panel. It is considered the points raised by the QRP have been addressed to an appropriate extent.

6.112 *Assessment*

6.113 Height, Bulk and Massing

6.114 The existing depot site is surrounded mostly by brick and concrete walls, barbed wire, high level wooden screening panels and metal fencing. As such, the site has a highly utilitarian appearance in the local area, which to the north and west has an otherwise highly residential character. The existing depot site turns its back to surrounding streets as its sole entrance for vehicles and staff is located on Ashley Road. A former vehicle access on Park View Road (west) has been disused since the recycling centre closed in 2018. As such, the site has a very poor relationship with surrounding streets and offers minimal visual amenity when viewed from the surrounding residential neighbourhood.

6.115 The proposed development is formed of three main blocks that would be separated by new routes through the site on a north-south axis. Each block incorporates multiple buildings of differing heights. Buildings would be mostly four and five storeys in height with a notable increase in proposed building height on the southern boundary addressing the adjacent park where heights step up to six, seven, ten and thirteen storeys. As such, this development would include both tall and taller buildings on its southern edge only. The suitability of the site for tall buildings and their townscape impact has been considered in the relevant section above and thus is not repeated here.

6.116 The other blocks of the development generally rise above the prevailing buildings heights in the surrounding area but to an extent that can be reasonably justified. The northern and western sides of the development are mostly four storeys in height and would be constituted of a two-storey frontage with access deck above, a set-back upper floor and an angled habitable roof level. This is only a single storey above the existing dwelling houses opposite on Park View Road which are two storeys plus roof in height.



6.117 These four storey rows of homes would be terminated at each end by a taller block with a strong form, which would contribute to articulating key features in the existing and proposed street scenes such as road junctions, the entrance to the park and the new north-south routes through the site. Block A1, for example, at the junction of Park View Road and Havelock Road would provide a suitable terminating for views along Havelock Road.



6.118 The 'taller' six and seven storey buildings, which are a significant step down in height from the ten and thirteen storey tall buildings, face onto the park and would contribute towards framing the park as an important local amenity area. The park would already be framed on its southern side by the emerging and permitted eleven and twelve storey buildings on Ashley Road. The proposed six and seven storey buildings would reinforce this framing as well as contributing towards the general 'stepping down' in scale and massing of the built form from Tottenham Hale towards the existing residential neighbourhood to the north.

6.119 The scale and massing of the six and seven storey blocks would be reduced through the integration of vertically proportioned glazing, double-height apertures forming entrances to the internal courtyard gardens and sizeable separation gaps between the blocks.



6.120 Therefore, as the proposed building heights represent a gentle increase over the heights of existing buildings in the immediate surroundings, and given that their detailed designs have been carefully considered within the local context, it is considered that the proposed development would be of a scale, bulk and massing that would not appear out of keeping with the wider urban context.

6.121 Architectural Expression, Fenestration and Materiality

6.122 The detailed design of the tall buildings reads successfully in medium and long-distance views due to the significant contrast between the base, middle and top of these buildings. The particularly distinctive top would act as a 'crown' by finishing with a raised parapet and sawtooth brick detailing, which reinforces its wayfinding characteristic. The tall buildings would have a strong resemblance to the tall buildings in the Tottenham Hale cluster, which employ a similar gridded elevational composition topped by a crown-like element.

6.123 The proposed tall buildings would appear as smaller versions in comparison to those at the heart of Tottenham Hale, would be striking and distinctive in their design and would appear as appropriate features within the character and appearance of the surrounding area.

6.124 The development would achieve a distinct character through a differentiation between the residential street-type properties in a more traditional domestic brick and fenestration, the park-side mansion blocks with facades that echo those on the south side of the park, the glazed brick of the 'park gateway' building on the south-west corner of the development with its non-residential ground floor, and the two tall

buildings towers with their gridded facades and double-height glazed brick base elements.



6.125 The 'stacked maisonette' typology of the buildings that would front onto the Park View Road on the northern and western edges of the site have been designed in detail to ensure that the ground and first floor maisonettes read as two storey terraced houses, with a strong horizontal rhythm, provision of traditional front doors and front gardens. The upper maisonettes have been designed to be set further back behind a parapet wall that hides their access balcony, and with a pitched roof disguising the top floor.

6.126 The locations where blocks and maisonettes meet, at the corners of blocks and streets, have been carefully designed to turn their respective corners comfortably. Gable ends would be animated through the provision of sensitively located windows that provide overlooking and passive surveillance to gap spaces whilst avoiding overlooking and privacy concerns between homes.

6.127 The materials chosen would be robust, durable, attractive and appropriate to the local context.

6.128 Public Realm Improvements

6.129 The development proposal provides a fantastic opportunity to improve local access to Down Lane Park and create a stronger link to the wider Lee Valley to the east. The continuation of Ashley Road improves connectivity for pedestrians and cyclists significantly. The alignment of the secondary 'residential lane' through the centre of the site is strongly supported as a means of further improving connectivity for local residents to the park and as a means through which to provide a sensitively designed and characterful 'mews style' residential street. The proposed landscaped strips along the northern and western edges of Park View Road would integrate the proposed

development into the existing street grid whilst retaining existing mature trees, improving landscaping to those streets and providing a more spacious streetscape, and therefore are strongly supported.

- 6.130 The proposed park street would provide east-west pedestrian and cycle connectivity as well as a much improved and planted setting for Down Lane Park. The new routes have clear and unambiguous boundaries between public and private spaces, with the proposed blocks enclosing private communal courtyard gardens, and with ground floors animated with regularly spaced, frequent front doors to ground floor properties. The street layout is therefore considered to be an exemplary provision of robust and comprehensible spaces in accordance with current best practice.



- 6.131 Both the public streets and private communal courtyards would be provided with attractive, robust and durable hard and soft landscaping. The overwhelming majority of existing trees, many of which are fine mature samples, would be retained and protected. New street trees would supplement the retained trees to provide a continuous street tree lining to the Park View Road and Down Lane Park edges.
- 6.132 The new streets and paths through and around the site would be appropriately landscaped, accommodating mixtures of herbaceous and evergreen plants to provide year-round greenery and street furniture to support clear routes to front doors.
- 6.133 The public realm improvements around this site would be substantial and would add further to the high design quality of this proposed development.

6.134 Summary

- 6.135 The proposed development would replace a former Council depot site which is no longer required in this location, and which currently has a highly limited and low quality relationship with the surrounding area, with a series of buildings of high-quality contemporary design within a highly landscaped setting that are reflective of local characteristics, bring activity onto surrounding streets and enable greater permeability for local pedestrians and cyclists.
- 6.136 The building heights, and the scale and massing of the development overall, would contribute to optimising the development of the site and would not appear out of keeping with the surrounding area. The overall development would have a positive visual impact on the local built environment and would bring significant improvements to the local public realm including the adjacent park.
- 6.137 The development is supported by the Quality Review Panel. The Council's Design Officer also supports the development by stating that: *"These proposals are well designed and appropriate to the site."* The Design Officer also states that the development proposal: *"will provide high quality homes at a reasonable density that marks a transition between the lower form and density, almost suburban two storey terraced housing of the existing residential streets to the north and west, and the new, very high density, high rise heart of Tottenham Hale. The proposed streets and private courtyards promise to be superb quality public and private realms, with great landscaping and framed by buildings of logical layout, clear fronts and backs, elegant proportions and attractive, durable, robust materials and details. They will fit into their context, animate the edge of the park and provide better connections between existing neighbourhoods, the new district centre and local parks."*
- 6.138 As such, it is considered that the development is acceptable in design terms.

Heritage Impact

- 6.139 There are no conservation areas, listed buildings or locally listed buildings close to the site. The nearest listed or locally listed building is more than 300 metres away to the south at the other end of Ashley Road (Berol House). The Tottenham High Road Conservation Area is the nearest to the site and is more than 400 metres away to the east.
- 6.140 *Policy Context*
- 6.141 London Plan Policy HC1 seeks to ensure that development proposals affecting heritage assets and their settings, should conserve their significance. This policy applies to designated and non-designated heritage assets. Local Plan Policy SP12 and Policy DM9 of the DM DPD set out the Council's approach to the management, conservation and enhancement of the Borough's historic environment, including the requirement to conserve the historic significance of Haringey's heritage assets and their settings.
- 6.142 DPD Policy DM9 states that proposals affecting a designated or non-designated heritage asset will be assessed against the significance of the asset and its setting, and the impact of the proposals on that significance; setting out a range of issues which will be taken into account. It also states that buildings projecting above the

prevailing height of the surrounding area should conserve and enhance the significance of heritage assets, their setting, and the wider historic environment that could be sensitive to their impact.

6.143 *Legal Context*

6.144 There is a legal requirement for the protection of Conservation Areas. The legal position on the impact on these 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".

6.145 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."

6.146 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."

6.147 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.

6.148 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. 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.

6.149 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.

6.150 *Assessment of Impact on Heritage Assets and their Setting*

6.151 The setting of a heritage asset is defined in the glossary to the NPPF as: "The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral". There is also the statutory requirement to ensure that proposals 'conserve and enhance' the conservation area and its setting.

6.152 There are no designated or non-designated built heritage assets within 300 metres of the application site. The Tottenham High Road Historic Corridor extends along the High Road, including Bruce Grove Conservation Area, approximately 450m to the west of the site. The locally listed Berol House is located approximately 350m south of the site, while Down Lane and Parkhurst School is located approximately 380m north-west of the site.

6.153 These distances of the proposed development from any heritage assets are significant. With due consideration to the intervening townscape and the changing context around Tottenham Hale and Ashley Road, it is considered that the proposed scheme would not result in any adverse impacts on any built heritage assets. The new buildings would not appear prominent or overwhelming in views relating to the historic environment and they would not affect the way any built heritage assets are appreciated and experienced. Therefore the development can be considered to preserve the setting of the Conservation Area and result in no harm to the non-designated heritage asset at Berol House. The Council's Conservation Officer has reviewed the proposal and concurs with this view and therefore has raised no objection from a conservation perspective.

6.154 *Archaeology*

6.155 Policy HC1 of the London Plan states that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Policy DM9 of the DM DPD states that all proposals will be required to assess the potential impact on archaeological assets and follow appropriate measures thereafter in accordance with that policy.

6.156 The site is located within the Lea Valley Tier 3 Archaeological Priority Area. An *Archaeological Desk-Based Assessment* has been submitted with the application.

6.157 The Greater London Archaeological Advisory Service (GLAAS) has been consulted on this application. GLAAS advises that the development proposal is in an area of archaeological interest and as such could cause harm to archaeological remains. A field evaluation is therefore required to determine appropriate mitigation.

6.158 GLAAS recommends that a condition securing a two-stage investigation process would provide an appropriate safeguard for the proposed development. This would ensure that an initial site evaluation is undertaken and following this, if heritage assets

of archaeological interest are found, a 'stage 2' investigation shall take place prior to the commencement of works on site.

- 6.159 As such, with the imposition of a condition on any grant of planning permission requiring details of a two-stage investigation process to be submitted for assessment, the proposed development would be acceptable in terms of its impact on heritage assets.

Residential Quality

- 6.160 The Nationally Described Space Standards set out the minimum space requirements for new housing. The London Plan 2021 standards are consistent with these. London Plan Policy D6 requires housing developments to be of high-quality design, providing comfortable and functional layouts, benefiting from sufficient daylight and sunlight, maximising the provision of dual aspect units and providing adequate and easily accessible outdoor amenity space. It provides qualitative design aspects that should be addressed in housing developments.
- 6.161 The Mayor of London's Housing SPG seeks to ensure that the layout and design of residential and mixed-use development should ensure a coherent, legible, inclusive and secure environment is achieved. Standard 29 of the SPG requires the number of single aspect homes to be minimised, with north-facing single aspect properties avoided. Policy DM1 requires developments to provide a high standard of amenity for its occupiers.
- 6.162 In general terms, the development is of a very high-quality layout and residential standard, having been through a rigorous design process including assessment by the Quality Review Panel.

General Residential Quality

- 6.163 All homes would meet the internal space standards requirements of the London Plan. 86% of the proposed homes would be dual or triple aspect. Of the single aspect homes none are north facing. Only one of the social rent homes would be single aspect (less than 1% of the total). All homes would have a private amenity space in the form of a projecting balcony or rear garden that meets the requirements of the Mayor's Housing SPG Standard 26. None of the balconies would be north facing. All homes would also have access to all three of the proposed communal courtyards, as well as the adjacent park.
- 6.164 All buildings would have centrally located building cores to reduce walking distances to flats. Entrances would be glazed to enable good levels of sun and daylight with views through to rear amenity areas providing a welcoming sense of arrival. The majority of buildings have eight homes or less per core in line with Standard 12 of the Housing SPG and the average for the development as a whole is six homes per core. Five floors of the buildings with deck access have nine units per floor. This is only marginal exceedance of the guidance and is offset by the quality of the deck access arrangements which includes the provision of well-lit and well-ventilated dwelling entrances and avoid a long internal corridor.
- 6.165 The applicant has also confirmed that all homes would be able to access full fibre broadband connectivity in accordance with Policy SI6 of the London Plan.

Daylight, Sunlight and Overshadowing

- 6.166 The BRE guidelines for day/sunlight in proposed developments was updated in June 2022. On the date this application was submitted the former BRE guidelines from 2011 were still relevant. The *Daylight & Sunlight* report submitted with the application has modelled the development against the 2011 guidelines. Although these have now been replaced it is considered that they still provide an appropriate guide against which to assess levels of residential amenity in new residential development in accordance with adopted policy.
- 6.167 The Mayor's Housing SPG states that BRE guidelines for daylight and sunlight need to be applied flexibly and that the guidelines should be applied sensitively to higher density development in opportunity areas and accessible locations, taking into account the need to optimise housing capacity and for the character of an area to change over time.
- 6.168 In terms of daylight 72% of the rooms meet the BRE guidelines for daylight quantum (average daylight factor) and 78% meet the guidelines for sky visibility (no sky line). Many rooms far exceed the guidelines and the development has been designed with an emphasis on providing greater levels of daylight to main living areas, rather than to lesser-used spaces such as kitchen/dining rooms. Furthermore, the proportion of rooms that have only a minor shortfall against the BRE guidelines rise to 91% for daylight quantum and 93% for sky visibility.
- 6.169 In relation to sunlight 66% of rooms meet the BRE guidelines in terms of the recommended levels of sunlight (annual probable sunlight hours) and 79% of rooms meet the guidelines for winter (winter probably sunlight hours). Many rooms fall below the criteria to only a marginal extent which is still considered adequate for an urban area. 93% of the rooms would therefore have adequate levels of sunlight annually and 91% of the rooms would have adequate sunlight in winter.
- 6.170 The lower levels of day and sunlight for some homes in this development are the result of a combination of factors including development orientation, the siting of these units on the lower floors of the development and in the corners of courtyards, and the existence of shading from balconies on upper floors. An efficient development layout provided on a constrained site in an urban area will inevitably include some homes that fail to meet the day and sunlight guidelines. Furthermore, homes on the ground floor and adjacent to courtyards would instead have other benefits including easier access to shared amenity spaces and the adjacent park where excellent day and sunlight levels are available.
- 6.171 The BRE guidelines for overshadowing have been applied to the development's proposed amenity spaces. The podium space on Block C exceeds the recommended target of 50% of the space receiving two or more hours of sunlight on 21st March (spring equinox) and the courtyard for Block B falls very marginally below it. The courtyard to Block A falls 15% below the stated target. This is partially a result of the layout of the courtyard which is triangular, and which means sunlight is less able to reach its corners. The *Daylight & Sunlight* document states that both courtyards to Blocks A and B would still have good levels of sunlight in late spring and summer months when they are most likely to be used.

Outlook and Privacy

6.172 Many homes, including a substantial number of social rented properties, would have good quality outlook across the adjacent park. Buildings that face one another directly are generally separated by at least 18 metres, other than the distance across the route between Block A and Block B (14 metres) which has been carefully designed in the form of a residential lane with a 'mews type' character.



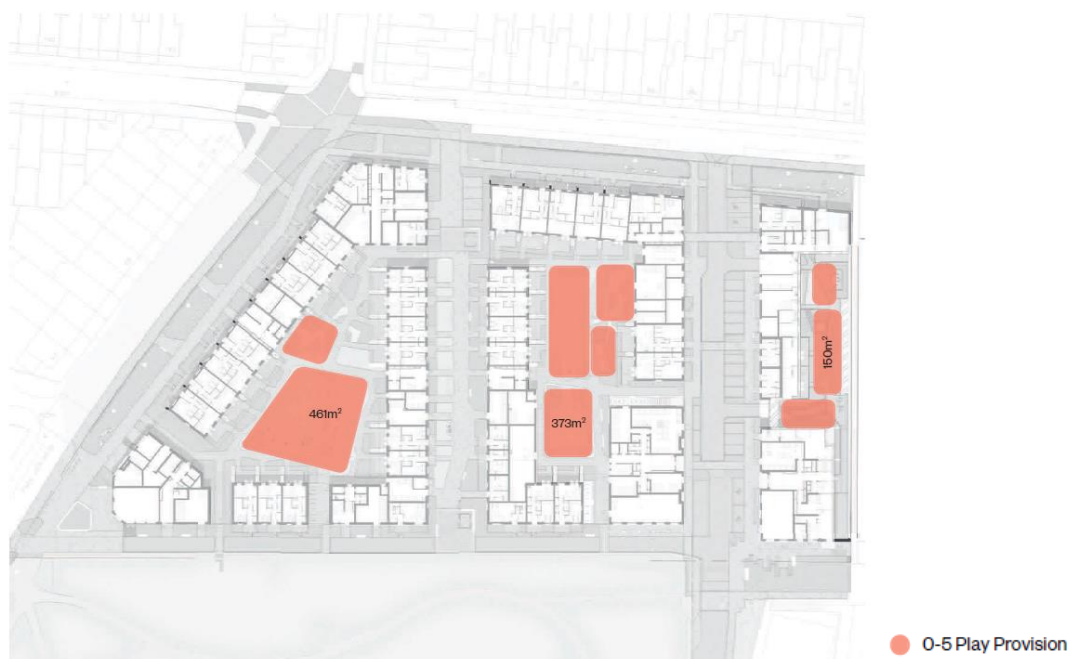
6.173 In the case of these 'mews' buildings the main habitable rooms are located at the rear at ground floor to ensure there is adequate private amenity for the residents. Kitchens and hallways would be located fronting onto the new route. Where buildings are otherwise closer than the 18 metres one of the buildings would be set at an angle to avoid direct overlooking between windows, or alternatively windows have been sensitively located to achieve the same objective. Balconies have been carefully designed with the inclusion of bespoke screening features to minimise overlooking and maximise the privacy of all residents. Exact details of the boundary designs would be secured by condition.

Children's Play Space

6.174 Policy S4 of the London Plan seeks to ensure that all children and young people have safe access to good quality play and informal recreation space, which is not segregated by tenure. At least 10 sqm per child should be provided to all qualifying developments. The Mayor's Child Play Space calculator estimates a total of 280 children will occupy the development which creates a requirement of 2,802.3sqm of play space.

6.175 984sqm of play space would be provided within the new courtyard and podium areas, which is marginally below the 1,030sqm play space estimate for under 5s as indicated by the Play Space Calculator. These play spaces are designed to accommodate

children up to five years old and as such are located close to the new homes. Residents will be able to access each of the three play areas provided throughout the development without restriction. Additional 'play on the way' features not included in the figure above would be provided on key public routes through and around the development, which means the play space target for younger children would be exceeded for this development.



6.176 Play space for children over the age of five is available within existing parks in the local area, such as Down Lane Park and Hartington Park, with the Lee Valley Regional Park also available for recreational activities. All of these public amenity spaces are within a five-minute walk of the proposed development. Down Lane Park and Hartington Park include playground facilities for younger children plus sports facilities and open spaces for older children.

6.177 An improvement programme for the play and open space areas within Down Lane Park is under consultation with the local community and this application will contribute towards those improvements through a financial contribution secured through a planning obligation which would offset the shortfall of on-site play space.

Access and Security

6.178 NPPF paragraph 97 states that planning decisions should promote public safety and should take into account wider security requirements.

6.179 London Plan Policy D5 requires all new development to achieve the highest standard of accessible and inclusive design, and seek to ensure new development can be used easily and with dignity by all. London Plan Policy D7 requires that 10% of new housing is wheelchair accessible and that the remaining 90% is easily adaptable for residents who are wheelchair users. DPD Policy DM2 also requires new developments to be designed so that they can be used safely, easily and with dignity by all.

6.180 10% (28) of the proposed homes have been designed to meet wheelchair user home standards in accordance with Building Regulations requirement M4(3). All other

dwellings would meet the accessible and adaptable homes requirements of M4(2). Blocks B1, B2 and C1, where the wheelchair user homes are located, would be accessible by two lifts. The wheelchair homes would be split between social rent and market tenures in accordance with the proportions of the overall housing tenure split. Wheelchair homes would be located within a short distance of the wheelchair accessible parking spaces.

- 6.181 General pedestrian and cycle access to the site would be improved through the provision of two new pedestrian and cycle priority routes through the site and additional public realm including new pathways around the development on the northern, western and southern sides. All main residential entrances have been designed to be accessed directly from adjacent pedestrian routes and to be easily identifiable.
- 6.182 The development has been designed with input from the Designing Out Crime Officer of the Metropolitan Police. Windows have been carefully positioned to maximise natural surveillance over the public realm areas. The development would also improve natural surveillance over Down Lane Park. Residential cores would be fitted with audio-visual identification measures and all blocks would have two layers of fob access control. Windows and doors that could be accessed from public areas would have to meet the Police's additional security requirements. Lighting would be provided to all footpaths, courtyards, entrances, refuse and cycle store areas. Cycle parking would be secure and covered.
- 6.183 As the development would provide a significant number of new homes the Metropolitan Police have stated that the proposed population growth would require resources towards additional policing in order to ensure that safety and security in the local area is maintained. A financial contribution towards local policing is therefore provided and secured by planning obligation.
- 6.184 The development would include defensible space, located between footways and front elevations, throughout that would provide a clear identification of private and public space, improve the visual quality of the public realm and would be designed to discourage climbing and anti-social behaviour.
- 6.185 The Designing Out Crime Officer has reviewed this application and raised no objections subject to conditions.

Air, Noise and Light Pollution

- 6.186 The proposed development is in a suitable location for residential development in respect of the existing local air quality and noise conditions. To the north and south of the site are a large park and a residential street which do not currently have high levels of noise or air pollution. Park View Road to the west is a busier street than that to the north in terms of vehicle movements. The Air Quality Assessment submitted with the application states that the background pollution levels in this area are significantly below objective limits. The buildings on the western side of the proposed development would be set back from the road by 12 metres which would further reduce the impact of noise and vehicle pollution.
- 6.187 The Harris Academy school on the eastern side of the site is not considered to be a significantly noise creating use. The school grounds include multi-use games areas (MUGAs) on their western side. The MUGAs and their associated lighting are not

permitted to be used after 10.30pm Monday to Friday and 9pm on all other days (restriction imposed by conditions of planning permission ref. HGY/2019/0111 for the construction of the school). These hours were considered sufficient to protect the amenity of existing residential properties on Park View Road and as such are also considered suitable to protect the amenity of the future residents of this proposed residential development.

- 6.188 As such, the residential quality of the proposed development is of a very high quality and in accordance with the policies referenced above and is therefore considered to be acceptable.

Impact on Neighbouring Amenity

- 6.189 London Plan Policy D6 outlines that design must not be detrimental to the amenity of surrounding housing, and states that proposals should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context, while also minimising overshadowing. London Plan Policy D14 requires development proposals to reduce, manage and mitigate noise impacts.
- 6.190 Policy DM1 of the DM DPD states that development proposals must ensure a high standard of privacy and amenity for a development's users and neighbours. Specifically, proposals are required to provide appropriate sunlight, daylight and aspects to adjacent buildings and land, and to provide an appropriate amount of privacy to neighbouring properties to avoid material levels of overlooking and loss of privacy and detriment to amenity of neighbouring resident.

Day and Sunlight Impact

- 6.191 The proposed development is well-separated from existing residential properties. To the north the separation distance to dwelling houses on the northern side of Park View Road is greater than 20 metres, and to the west the houses on Park View Road are 27 metres away. Dwellings on Havelock Road are also close to the site and thus have been assessed as part of the *External Daylight & Sunlight Report (EDSR)* submitted with the application. There are no other residential properties in the immediate vicinity of the site that could be affected by the proposed development in terms of a loss of day/sunlight.
- 6.192 In terms of daylight 'vertical sky component' (VSC) and 'no sky line' (NSL) are the relevant tests as set by the Building Research Establishment (BRE) guidelines. The guidelines would not be met if a room is modelled to have a proportional reduction of more than 20% of its former daylight value against either of the VSC or NSL tests.
- 6.193 The EDSR results indicate that only 1 and 2 Havelock Road, and 66-93 (consecutive), 95 and 96 Park View Road have the potential to be impacted by the proposed development in terms of changes to their daylight and sunlight conditions.
- 6.194 30 (85%) of 35 windows for the properties on Havelock Road indicated above would meet the BRE's VSC guidelines and the remaining five are shown to have relatively minor transgressions against the guidance of no greater than 32% reductions. In terms of NSL, 18 (90%) of the 20 rooms assessed would meet the guidance requirements and one of the remaining windows would have just a minor transgression. Room R4 at 1 Havelock Road is shown to have a significant reduction in NSL of 48.8%. Floor plans for a recent ground floor extension at that property (application ref. HGY/2017/2467)

indicate that R4 is one of several windows to an open plan kitchen and living space to the rear of the property at ground floor level. As such, it is considered that any loss of daylight to this specific window would be mitigated by the daylight provided from other windows to the same habitable space and therefore the overall loss of daylight to the associated room would not be significant.

- 6.195 77 (47%) of the 163 windows modelled for the properties on Park View Road would meet the VSC guidelines and the majority of the remaining windows would have relatively minor transgressions against the VSC guidelines of no greater than 35%. The only window affected to a greater extent is a secondary side window to 67 Park View Road. There is a primary window available to the same room which would meet the BRE VSC targets and therefore it is considered that this room would receive sufficient daylight from the main window. In terms of NSL, 79 of 83 windows (95%) meet BRE guidelines and the four remaining windows have minor transgressions no greater than 30% of their former value.
- 6.196 In terms of sunlight, 'annual probable sunlight hours' (APSH) is the relevant test as set by the BRE guidelines. The BRE guide recommends that main living room windows should receive at least 25% of the total probable sunlight hours throughout the year and also recommends that at least 5% of the APSH should be received during winter months (i.e. the period between 21st September and 21st March).
- 6.197 The EDSR results indicate that all windows modelled would meet the APSH sunlight guidelines with the exception of one secondary window at 67 Park View Road, which is otherwise sufficiently sunlit by its primary window, and two windows at 2 Havelock Road which have marginal transgressions against the target guidelines in winter only of 4% of probable sunlight hours rather than the guideline of 5%.
- 6.198 In summary, most windows to affected properties on Havelock Road and Park View Road would meet the BRE guidelines for daylight. The BRE sunlight guidelines are also met for almost all windows to affected properties. The remaining windows would not fall significantly below the BRE day and sunlight thresholds. Therefore, it is considered that as the majority of windows would not lose material levels of daylight or sunlight and therefore the development would be acceptable in terms of its impact on the light to nearby residential properties.

Outlook and Privacy

- 6.199 The separation distance between existing homes and proposed buildings is at least 20 metres in all cases. This is a good separation distance for an urban area and would ensure existing homes in the area retain good levels of outlook. Most private amenity spaces for the proposed development face towards the park, internal courtyards or the development's internal pathways and streets. Further screening between the new and existing properties is also provided by existing tree planting, which would be retained. As such, any loss of privacy to existing residential properties would be minimal.

Air Quality, Noise and Light Impact

- 6.200 Policy S11 of the London Plan states that development proposals should be air quality neutral. Policy DM23 states that developments should not have a detrimental impact on air quality, noise or light pollution.

- 6.201 There would be a significant reduction in vehicle movements from the development in comparison with the previous use of the site as a Council depot. The development would be heated through low-carbon measures. Boilers would not be installed other than as a short-term temporary measure.
- 6.202 The new homes are not expected to create a significant amount of noise disturbance in the local environment.
- 6.203 The development would include new lighting throughout to ensure public realm areas are safe and secure. This lighting would be designed sensitively to maximise safety whilst minimising unnecessary light spill. This matter can be adequately controlled by condition.
- 6.204 As such, the air quality, noise and light impact on neighbouring properties and the adjacent school would not be significant.

Construction Impact

- 6.205 Any dust, noise or other disturbances relating to demolition and construction works would be temporary nuisances that are typically controlled by non-planning legislation. The demolition of the former Council depot buildings has already been completed. The construction methodology for the development would be controlled by condition to minimise its impact on existing residential properties and the adjacent school.
- 6.206 Therefore, it is considered that the impact of the proposed development on the amenity of neighbouring properties and the neighbouring school is acceptable.

Transport and Parking

- 6.207 London Plan 2021 Policy T1 requires all development to make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and to ensure that any impacts on London's transport networks and supporting infrastructure are mitigated. Policies T4, T5 and T6 of the same document set out key principles for the assessment of development impacts on the highway network in terms of trip generation, parking demand and cycling provision.
- 6.208 Local Plan 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 is supported by DPD Policy DM31. Policy DM32 states that the Council will support proposals for new development with limited on-site parking where the site PTAL is at least 4, where a controlled parking zone exists, where public transport is available, where parking is provided for disabled people and where the development can be designated as 'car capped'.
- 6.209 The site was occupied until recently by a Council depot with operational parking for 75 refuse collection vehicles and 75 car parking spaces. The site has a maximum PTAL of 5 and is located within the Tottenham Hale North Event Day Controlled Parking Zone operating Monday-Friday 08:30-18:30, Monday-Friday (Event Days) 08:00-20:30, Saturday-Sunday 08:00-20:00 and Public Holidays 12:00-20:00.

6.210 A Stage 1 Road Safety Audit was carried out to assess the proposed development's impact on the local highway and recommended changes were integrated into the design and layout of the scheme.

6.211 *Assessment*

6.212 Access

6.213 Ashley Road would be extended into the site to enable pedestrians and cyclists to connect to Park View Road. The northern and southern ends of this street would be controlled by bollards, which enables residents with parking spaces within the development to reach those spaces but provides no through-route for private vehicle traffic.

6.214 Another pedestrian and cycle pathway would be provided through the centre of the development on a north-south axis. On the southern boundary of the development, adjacent to the park, would be another pedestrian and cycle route that is also bollard controlled. Management and maintenance of all bollards throughout this development would be secured by condition. Pedestrian pathways would be provided around the development adjacent to Park View Road as part of the proposed public realm improvements.

6.215 Footways would be included on both sides of the Ashley Road highway extension to ensure pedestrian movements are separated from vehicle traffic. Swept path plans have been submitted with the application which show that cars and delivery vehicles would be able to manoeuvre into, out and within the development without difficulty.

6.216 Highway works are proposed to connect an existing pathway located within the northern part of the park across Ashley Road via the provision of a raised table crossing. This can be secured through a planning obligation. The interaction of the proposed park edge route on the southern side of the development with this new crossing on Ashley Road must be considered further as part of a separate condition.

6.217 Transport Impact – Road Network

6.218 The site PTAL of 5 enables a low level of parking to be provided which would limit the impacts on proposed development on the highway network. The development would result in a reduction of vehicle trips on the local highway network due to the substantial reduction in the available parking spaces on site (from 75 spaces to 42 spaces).

6.219 Transport Impact – Public Transport Network

6.220 The analysis provided with the application indicates that the number of additional bus trips per service would be negligible for the bus services most likely to be used by occupiers of and visitors to the proposed development.

6.221 An assessment of the potential impact on the rail network shows that the operational capacity of the local London Underground, Overground and National Rail services would not be significantly affected with no perceptible impact expected to London Underground services (0.1% increase in usage). Network Rail has raised no objections to the proposed development, subject to informatives.

6.222 Car Parking

- 6.223 42 car parking spaces would be provided, of which 8 (19%) would be wheelchair accessible parking spaces. This is an overall parking ratio of 0.15 for the development which is compliant with the London Plan. The wheelchair accessible parking provision would far exceed London Plan requirements (10%). Two car club bays would also be provided on Ashley Road. Car parking would be managed in accordance with a parking management plan to be secured by condition. The management plan will prioritise access to parking for disabled occupiers and residents with families.
- 6.224 The proposed development would qualify for a car-capped status in accordance with Policy DM32 of the DM DPD, which prevents occupiers of the development from being given on-street parking permits.
- 6.225 All parking spaces would be fitted with electric vehicle charging infrastructure, with 20% of parking spaces having access to active charging points. This will be secured by condition.
- 6.226 Ten on-street parking spaces on Park View Road (north) and Ashley Road would be lost as the result of the new access points required to facilitate the proposed new north-south routes, due to the provision of the new raised table crossing on Ashley Road and as the result of two parking spaces on Ashley Road being converted to car club bays. An additional seven on-street parking spaces would be lost as the result of off-site highway improvements schemes which would improve highway safety in the vicinity of the site. Noting that parking stress surveys of the local area have shown that parking capacity is at approximately 70% and given that occupiers of the new housing would not be permitted to apply for on-street parking permits, it is considered that the loss of seventeen existing parking spaces can be accommodated on existing streets and is therefore acceptable.
- 6.227 The availability of potential parking in the local area for visitors to the development has been assessed through the provision of a parking stress survey with this application, which shows that the low expected number of visitors could be adequately accommodated in surrounding streets.
- 6.228 Cycle Parking
- 6.229 Cycle parking would be provided throughout the site in dedicated secure cycle stores. Additional 'short stay' publicly accessible cycle parking would be available within the public realm areas. The amount of cycle parking would include 5% cycle parking for larger cycles and would be in accordance with London Plan minimum cycle standards. Cycle parking is also provided for staff of the commercial units. Details of the exact layout and arrangement of the cycle stores would be secured by condition.
- 6.230 Deliveries and Servicing
- 6.231 Up to 22 delivery/service vehicles would visit the development each day. Peak demand is expected to be between 11am and midday which would avoid conflict with the School Street that has been implemented on Ashley Road.
- 6.232 Dedicated loading bays would be provided on Ashley Road and Park View Road (west). These would be located close to dedicated and secure parcel storage facilities integrated within the development. This system should speed up the parcel delivery

drop-off process and prevent failed delivery attempts. A detailed delivery and servicing plan would be secured by condition.

6.233 Waste stores of an appropriate size would be available throughout the development. Waste vehicles would be permitted to enter the site to collect bins from these stores. Waste and emergency vehicles are the only vehicles permitted to access through the site. The new routes have been designed to allow waste vehicles to pass through unhindered.

6.234 Two of the waste stores would have their collections taken from Park View Road (west). These collections would require the waste vehicles to temporarily block the highway road for a brief period. The Council's Transportation Officer has assessed this situation and stated that the low traffic flows on Park View Road would result in only a very limited and short-term impact from this brief road obstruction.

6.235 The Council's Waste Management Officer has not raised any objections to these waste collection arrangements.

6.236 Highway and Public Realm Improvements

6.237 The applicant has submitted an Active Travel Zone assessment with the application. Amendments to the local road layout are recommended to improve road safety and encourage pedestrian movements in the local area. These recommendations include upgrades to Havelock Road/Park View Road junction and improvements to the underpass between Park View Road and Tottenham Marshes.



6.238 It is also proposed that a raised table crossing would connect Down Lane Park with Tottenham Marshes by improving connectivity across Ashley Road. The development would result in an increase in pedestrian and cycle activity in the vicinity of the site through significant qualitative and quantitative improvements to the public realm around the site and the provision of substantial financial contributions towards cycle and walking infrastructure improvements.

6.239 Highway improvement works will be secured by planning obligation as part of this application.

6.240 Construction Works

6.241 Construction works are generally controlled by non-planning legislation. An Outline Construction Logistics Plan has been submitted as a chapter of the Transport Assessment. It is estimated that there would be 25 construction vehicle movements per day during the first three months of the construction process with four movements per day during the remainder of the programme. Routes for construction traffic would be allocated to avoid conflict with the Council's School Street opening hours on Ashley Road. The construction staff would be encouraged to travel to site using public transport and bicycles. A Detailed Construction Logistics Plan would be secured by condition.

6.242 *Summary*

6.243 The Council's Transportation Officer has assessed this application and raises no objections subject to conditions. Parking provision at a ratio of 0.15 is supported in this area with high public transport accessibility. This level of parking would be supported by sustainable travel measures including parking permit restrictions, high quality cycle parking, car club spaces and travel plans. The number of vehicle movements from the development would be much fewer than the former Council depot activities on the site. The impact on on-street parking and local modes of public transport is expected to be low.

6.244 As such, it is considered that the application is acceptable in transport and parking terms, and in terms of its impact on the public highway.

Ecology and Urban Greening

Policy Context

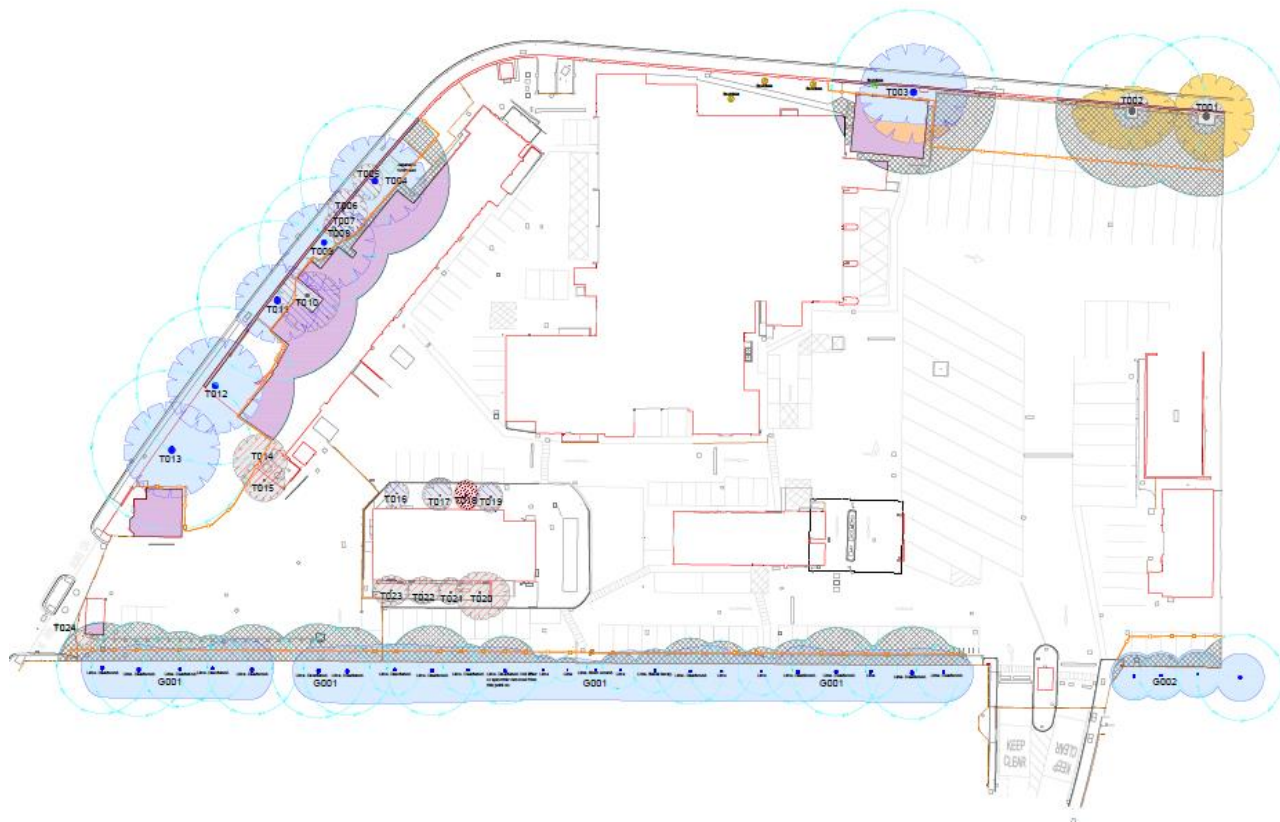
6.245 London Plan Policy G4 states that development proposals should not result in the loss of open space. Policy G5 requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design. Predominantly residential developments should meet a target urban greening score of 0.4. Policy G6 states that Sites of Importance for Nature Conservation (SINCs) should be protected, seeks to manage impacts on biodiversity and seeks secure biodiversity net gain. Policy G7 states that existing trees of value should be retained and replacement trees should be shown to be adequate through an appropriate tree valuation system.

6.246 Policy SP13 of the Local Plan seeks to protect and improve open space and provide opportunities for biodiversity and nature conservation. Policy SP11 promotes high quality landscaping on and off-site.

6.247 DPD Policy DM1 requires proposals to demonstrate how landscape and planting are integrated into the development and expects development proposals to respond to trees on or close to a site. Policy DM19 states that developments adjacent to SINCs should protect or enhance the nature conservation value of the designated site. Policy DM20 states that development that protects and enhances Haringey's open spaces will be supported. Policy DM21 expects proposals to maximise opportunities to enhance biodiversity on-site.

Trees

6.248 None of trees on the site fall within the highest Category 'A'. All of the mature Category 'B' and 'C' Lime and London Plane trees around the northern, southern and western boundaries of the site would be retained (see below). 15 Category 'C' trees must be removed to facilitate the development proposal and its related landscaping improvements. These would be replaced with a total of 74 new trees, which is a substantial net increase in the number of trees on site and as such tree cover would be significantly enhanced. A condition will ensure the value of the proposed trees outweighs that of the trees removed.



6.249 The alignment of the proposed buildings and proposed hardstanding works would encroach slightly into the root protection areas of some trees. No damage is expected to occur to these existing trees if 'no dig' or other specialist construction techniques are utilised in these areas, as appropriate. Limited pollarding of two London Plane trees on the northern side of the site is also required. Limited root pruning is also likely to occur and is not expected to cause damage to the affected trees.

6.250 The Council's Tree Officer has confirmed that the approach to tree protection, management and replacement as described above is acceptable, subject to an arboricultural method statement for works within root protection areas to be secured by condition in accordance with the recommendations of the submitted *Tree Survey, Arboricultural Impact Assessment, Preliminary Arboricultural Method Statement & Tree Protection Plan*. Further details of exact tree species and a five-year management regime must also be secured by condition.

Ecology and Biodiversity

- 6.251 The development proposal would be sited adjacent to Down Lane Park which is a designated Local SIN. The site is within two kilometres of the Lee Valley Special Protection Area (SPA), the Lee Valley Ramsar site and the Walthamstow Wetlands Site of Special Scientific Interest (SSSI). The site is also within 4.2 kilometres of the Epping Forest Special Area of Conservation (SAC).
- 6.252 An *Ecological Impact Assessment* (EclA) has been submitted with the application. The EclA states that the Epping Forest SAC, Lee Valley SPA and Ramsar sites, and the Walthamstow Wetlands SSSI are all designated ecological sites of international and national importance. The site is more than 500 metres from these designated sites. The EclA states that, in terms of impact on the Epping Forest SAC from recreational pressure associated from this development proposal, there would be no significant impact. The EclA continues to state that, in terms of impact on the Lee Valley SPA and Ramsar (including the Wetlands SSSI) from recreational pressure, construction activities, urbanisation, atmospheric pollution, water abstraction and water quality, there would also be no significant impact. Natural England has been consulted on this application and raise no objections to the proposed development.
- 6.253 The EclA has assessed the site's suitability for bats and found that only the former residential cottage on the site has a greater than low or negligible suitability for bat roosts. No roosts were found on site during surveys. Some bat commuting activity was noted in the area, which is likely to result from the use of Down Lane Park as a foraging resource. Other species were noted during surveys including bird nests. The EclA states that none of the species found were sufficiently important to be considered as important ecological features.
- 6.254 Japanese knotweed was found on site and is an invasive species. This must be dealt with in an appropriate manner before works can commence, which can be secured by condition.
- 6.255 The development proposal would include retained trees and native wildflower grasslands on the southern side of the site, providing resources for the local wildlife that uses the park. Flowering species and the proposed green roofs within the development would support birds, bats, small mammals and invertebrates. Bat and bird boxes would be provided. Bee bricks would also be integrated into the development.



- 6.256 The landscaping that would be provided on site would offset the potential impact on ecology from the additional recreational usage of Down Lane Park. There would be a biodiversity net gain of 103% as part of the development which is significantly above the mandated 10% provision as required by the Environment Act 2021 and which would significantly benefit the designated SINC area.
- 6.257 The Council is in the process of undertaking public consultations for significant improvements to Down Lane Park which will deliver wide-ranging landscaping, infrastructure and other improvements to the park which will also benefit its ecology.
- 6.258 Construction works could impact negatively on the SINC and bats through noise and dust emissions and works to trees. Therefore, a construction environmental management plan must be secured by condition to ensure these potential impacts are mitigated.
- 6.259 It is possible that lighting from the proposed development could impact on bat commuting routes associated with the line of mature Lime trees on the southern side of the site. To mitigate this risk a sensitive lighting strategy must be secured by condition to ensure that lighting-related impacts to these protected species are minimised. The strategy should ensure that new bat roosting features delivered as biodiversity enhancements to the scheme are not directly lit and the recommendations of the EclA must be followed in this regard.
- 6.260 A landscape and ecology management plan (LEMP) is also recommended to ensure that the development landscaping is suitable for foraging and commuting bats.
- 6.261 The Council's Nature Conservation Officer has confirmed that the ecological measures and proposed mitigation and enhancement measures are supported subject to conditions.

Urban Greening Factor

6.262 Prior to the demolition of buildings on site it was predominantly covered in hardstanding. The proposed development would provide large areas of tree planting, semi-natural vegetation, flower rich planting, green and blue roofs and sustainable drainage measures, amongst other green and planted features, that would significantly increase the ecology and biodiversity on site. The landscaping provision can be secured by condition to secure a high-quality scheme with effective long-term management.



6.263 An assessment of the Urban Greening Factor (UGF) has been provided by the applicant based on the surface cover types as described above. The proposal delivers an UGF of 0.45, which is greater than the policy requirement for predominantly residential development of 0.4 as described in London Plan Policy G5.

6.264 Therefore, it is considered that the proposed development is acceptable in terms of its impact on trees (a net increase of 59 trees), its ecology and biodiversity impact, and its provision of urban greening, subject to conditions.

Carbon Reduction and Sustainability

6.265 The NPPF requires development to contribute to the transition to a low carbon future, reduce energy consumption and contribute to and conserve the natural environment.

6.266 London Plan Policy SI2 states that major developments should be zero carbon, and in meeting the zero-carbon target a minimum on-site reduction of at least 35 per cent beyond Building Regulations is expected. Local Plan Policy SP4 requires all new developments to introduce measures that reduce energy use and carbon emissions. Local Plan Policy SP11 requires all development to adopt sustainable design and construction techniques to minimise impacts on climate change and natural resources.

- 6.267 DPD Policy DM1 states that the Council will support design-led proposals that incorporate sustainable design and construction principles and Policy DM21 expects new development to consider and implement sustainable design, layout and construction techniques.
- 6.268 The proposed development has sought to adopt a progressive approach in relation to sustainability and energy to ensure that the most viable and effective solution is delivered to minimise carbon emissions.

Carbon Reduction

- 6.269 Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon. The London Plan 2021 further confirms this in Policy S12.
- 6.270 The applicant has submitted an *Energy and Sustainability Statement* in support of this application. Photovoltaic panels would be provided on building roofs. The development is expected to connect to the Council's district energy network, which will provide heating and hot water to the proposed dwellings. If the development cannot connect to the energy network it will instead be heated through the provision of air source heat pumps.
- 6.271 The development would use no fossil fuel combustion and would be close to zero carbon. The fabric efficiency of the buildings would be exceptional. The majority of buildings within the development, including the entirety of Block A, would be capable of achieving Passivhaus certification and the remaining buildings would have a very low demand for comfort heating of habitable spaces.
- 6.272 The overall predicted reduction in carbon dioxide emissions for the proposed development shows a substantial reduction of 84% from the 2013 Building Regulations baseline model. This represents an annual saving of approximately 275 tonnes of carbon per year. 51 tonnes a year must be offset through a financial contribution of £145,350 which can be secured through a planning obligation.

Whole Life Carbon and Circular Economy

- 6.273 Policy S12 of the London Plan requires development proposals referable to the Mayor of London to calculate carbon emissions over the lifetime of the development and demonstrate that appropriate actions have been taken to reduce life-cycle carbon emissions.
- 6.274 S17 of the London Plan states that referable applications should promote circular economy outcomes and should aim to be net zero-waste.
- 6.275 The analysis undertaken in the *Energy and Sustainability Statement* submitted with the application indicates that the operational energy strategy for the development would significantly reduce carbon emissions in its later stages and the up-front emissions i.e. those used during the build stage will form the majority of the development's carbon footprint. The applicant's structural design team have worked hard to minimise carbon in the building materials. Further carbon reductions would be secured prior to the start of construction works by condition.

- 6.276 The development would meet the GLA's whole life carbon benchmarking requirements and would meet some of the more aspirational LETI (London Energy Transformation Initiative) 2020 design targets.
- 6.277 The applicant has submitted a *Circular Economy Statement* which confirms a range of circular economy principles have been used for this development including reusing and upcycling materials from the existing buildings and infrastructure as appropriate including in proposed building elements and foundations, diversion from landfill, processing waste locally, minimising construction waste and designing for longevity, adaptability, flexibility and disassembly at end of life. Materials from the perimeter fence will be reused in the landscaping. Reporting of the achievement of circular economy targets would be secured by condition.

Overheating

- 6.278 London Plan Policy SI4 requires developments to minimise adverse impacts on the urban heat island, reduce the potential for overheating and reduce reliance on air conditioning systems. Through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.
- 6.279 The applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 weather files, and the cooling hierarchy has been followed in the design. The report has modelled 62 homes (out of 272 homes, 23%) and 6 corridors under the London Weather Centre files. All rooms pass the overheating requirements for 2020s climate model predictions with the features including natural ventilation, high g-value glazing, external shading of south-facing windows, internal blinds, mechanical ventilation for some homes and active cooling for some homes.
- 6.280 Future overheating scenarios have also been considered and can be addressed through the future integration of comfort cooling and ceiling fans if needed. The Council's Climate Change Officer supports the overheating modelling undertaken and the mitigation measures proposed.

Summary

- 6.281 The proposal satisfies development plan policies and the Council's Climate Change Officer supports this application subject to the conditions and planning obligations. As such, the application is considered acceptable in terms of its carbon reduction and sustainability.

Flood Risk and Drainage

- 6.282 London Plan Policy SI12 states that flood risk should be minimised and Policy SI13 states that development proposals should aim to achieve greenfield run-off rates with water managed as close to source as possible.
- 6.283 Local Plan Policy SP5 and Policy DM24 of the DM DPD seek to ensure that new development reduces the risk of flooding and provides suitable measures for drainage.
- 6.284 The site is located within Flood Zone 2 which has a medium risk of flooding. The application has therefore been submitted with a *Flood Risk Assessment and Drainage Strategy (FRADS)*. The FRADS points out that the site has no history of flooding and

is at low risk from fluvial and surface water flooding. The site is also outside of identified critical drainage areas.



6.285 The development proposal includes a range of sustainable urban drainage systems and features to manage surface water on-site. The development is expected to achieve the required greenfield run-off rates. These include green and blue roofs, bio-retention areas, swale planting and a detention basin to mitigate surface water overflow, all of which would contribute towards the attenuation of surface water as well as contributing towards improving water quality and providing public amenity and biodiversity benefits.

6.286 The Council's Flood & Water Management Lead Officer has indicated that the drainage proposals are acceptable in principle subject to conditions for a detailed surface water drainage scheme and drainage calculations to be submitted and for confirmation of long-term management and maintenance. The Environment Agency have reviewed this application and have no comments to make.

6.287 The development would connect into the existing Thames Water sewer network. Thames Water has no objections to this proposal, subject to conditions.

6.288 As such, the proposed development is considered acceptable in terms of its risk of flooding and water management arrangements.

Land Contamination

- 6.289 Policy DM23 of the DM DPD requires proposals to demonstrate that any risks associated with land contamination can be adequately addressed to make the development safe.
- 6.290 A *Desk Study and Ground Investigation Report* has been submitted with the application. The report acknowledges the former depot use of the site and its provision of potential ground contaminants including a fuel filling station, oil tanks and asbestos buildings. Vehicle washing and repair facilities were also formerly provided at the site. The site also formerly included a reuse and recycling centre that has now closed. The site is largely covered by concrete and tarmac hardstanding. 33 samples were recovered for testing which found elevated levels of a range of contaminants.
- 6.291 The Council's Pollution Officer has reviewed the submitted documentation and states that further site investigations must be undertaken before construction work commences in accordance with the advice and recommendations of the report. This can be secured by condition. The Environment Agency has reviewed this application and have no comments to make.
- 6.292 Therefore, the proposed development is considered acceptable in terms of its land contamination risks, subject to conditions.

Fire Safety

- 6.293 In 2021 the Government introduced Planning Gateway One (PG1) for all 'relevant' developments i.e. those that contain two or more dwellings and which are 18 metres (or seven storeys) or greater in height. PG1 requires a fire statement to be submitted with planning applications for these relevant developments and also establishes the Health and Safety Executive as a statutory consultee for relevant development.
- 6.294 Policy D12 of the London Plan states that all development proposals must achieve the highest standards of fire safety. To this effect major development proposals must be supported by a fire statement.
- 6.295 The *London Plan Fire Statement* submitted with the application confirms that all external walls and any attachments such as balconies, soffits and balustrades would be constructed of fire-safe materials of Class A2-s1, d0 or higher. The masonry and metal frame of the proposed development would have the same high level of fire-rating.
- 6.296 All blocks would be fitted with sprinkler systems. Fire service vehicles would be able to reach the development via Park View Road, Ashley Road and the new park edge route, as necessary. The buildings over 18 metres in height would be provided with firefighting shafts, lobbies and lifts which would enable fire service personnel to access the building from ground floor level. All buildings lower than 18 metres in height would be fitted with a dry riser located within the stair enclosure which provides acceptable levels of access for firefighters and their equipment.
- 6.297 The covered car park has open sides, would be fitted with smoke control measures and would be further protected by an automatic fire suppression system.

- 6.298 The Health and Safety Executive has been consulted on this application and has confirmed that it is content with the proposal and satisfied with the information provided with the application, including the fire statement.
- 6.299 The GLA has stated that the *Fire Statement* measures and additional details including the provision of evacuation lifts should be secured by conditions.
- 6.300 As such, the proposed development is considered acceptable in respect of its fire safety provision.

Conclusion

- 6.301 The proposed development would meet the requirements of Site Allocation TH7 by providing high-quality new housing on this vacant former Council depot site and would provide non-residential uses that would support the local community.
- 6.302 The development would provide 272 new homes including 136 affordable homes (63% by habitable room) which will be delivered as Council Rent properties. 92 (67%) of the Council Rent homes would have three or more bedrooms.
- 6.303 The development would be of a high-quality design including very well-designed tall buildings which respect the visual quality of the local area, respond appropriately to the local context, and would not impact negatively on local heritage assets. The development is also supported by the Council's Quality Review Panel.
- 6.304 The development would provide high-quality residential accommodation of an appropriate size, mix and layout within a well-landscaped environment that extends the character of the adjacent Down Lane Park, consisting of high-quality new public realm areas including an improved park edge, and would also provide new amenity and children's play spaces.
- 6.305 The development has been designed to avoid any material adverse impacts on the amenity of nearby residential occupiers regarding a loss of sunlight and daylight, outlook or privacy and excessive levels of noise, light or air pollution.
- 6.306 The development would provide 42 car parking spaces including eight (19%) wheelchair-accessible parking spaces which meets the requirements of the London Plan and would be supported by other sustainable transport initiatives including high-quality cycle parking.
- 6.307 The development would include of a range of measures to maximise its sustainability and minimise its carbon emissions. It would achieve an 84% reduction in carbon emissions. Block A has the potential to achieve Passivhaus certification. The development would achieve a suitable urban greening factor and ecology on and adjacent to the site would be protected and enhanced.
- 6.308 The site's designated waste throughput has already been re-provided at an alternative site within Haringey.
- 6.309 All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted for the reasons set out above. The details of the decision are set out in the RECOMMENDATION

7. COMMUNITY INFRASTRUCTURE LEVY

7.1.1 Based on the information given on the submitted CIL form (and excluding the social housing for which it is expected social housing relief from CIL would be sought) the Mayoral CIL charge will be £1,335,501.22 (22,125.6sqm x £60.36) and the Haringey CIL charge will be £461,097.50 (22,125.6sqm x £20.84).

7.1.2 The CIL charge will be collected by Haringey from commencement of the development 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 in line with the RICS CIL Index. An informative will be attached advising the applicant of this charge.

8. RECOMMENDATION

GRANT PERMISSION subject to conditions in Appendix 1

Registered No. HGY/2022/0752

Applicant's drawing No.(s):

3742A-LB-XX-00-DP-A-120000-P3, 3742A-LB-ZZ-00-DP-A-120200-P3, 3742A-LB-ZZ-01-DP-A-120201-P3, 3742A-LB-ZZ-02-DP-A-120202-P3, 3742A-LB-ZZ-03-DP-A-120203-P3, 3742A-LB-ZZ-04-DP-A-120204-P3, 3742A-LB-ZZ-13-DP-A-120214-P3, 3742A-LB-B-XX-DE-A-130201-P3, 3742A-LB-B-XX-DE-A-130202-P3, 3742A-LB-B-XX-DE-A-130203-P3, 3742A-LB-C-XX-DE-A-130301-P3, 3742A-LB-C-XX-DE-A-130302-P3, 3742A-LB-BA-00-DP-A-120100-P3, 3742A-LB-BA-01-DP-A-120101-P3, 3742A-LB-BA-02-DP-A-120102-P3, 3742A-LB-BA-03-DP-A-120103-P3, 3742A-LB-BA-04-DP-A-120104-P3, 3742A-LB-BA-05-DP-A-120105-P3, 3742A-LB-A-XX-DE-A-130101-P3, 3742A-LB-A-XX-DE-A-130102-P3, 3742A-LB-A-XX-DE-A-130103-P3, 3742A-LBA-00-00-DP-L-20001, 3742A-LBA-00-00-DP-L-20000, 3742A-LBA-00-00-DP-L-20002, 3742A-LBA-00-00-DP-L-20003, 3742A-LBA-00-00-DP-L-20004, 3742A-LBA-00-04-DP-L-20005, 3742A-LBA-00-04-DP-L-20006, 3742A-LB-A-XX-DE-A-140000-GA, 3742A-LB-A-XX-DE-A-140001-GA, 3742A-LB-BA-06-DP-A-120106, 3742A-LB-BA-07-DP-A-120107, 3742A-LB-XX-XX-DP-A-100010, 3742A-LB-XX-XX-DP-A-100020, 3742A-LB-ZZ-05-DP-A-120205, 3742A-LB-ZZ-06-DP-A-120206, 3742A-LB-ZZ-07-DP-A-120207, 3742A-LB-ZZ-08-DP-A-120208, 3742A-LB-ZZ-09-DP-A-120209, 3742A-LB-ZZ-10-DP-A-120210, 3742A-LB-ZZ-11-DP-A-120211, 3742A-LB-ZZ-12-DP-A-120212, 3742A-LB-ZZ-13-DP-A-120213, 3742A-LB-ZZ-B1-DP-A-120199, 3742A-LB-ZZ-ZZ-DE-A-100030, 3742A-LB-ZZ-ZZ-DE-A-100031, 3742A-LB-ZZ-ZZ-DE-A-100040, 3742A-LB-ZZ-ZZ-DE-A-100041; 3230-1100-T-031-B, 3230-1100-T-032-B, 3230-1100-T-033-B.

Supporting documents also approved:

Energy and Sustainability Report Rev. H, Drainage calculations dated 12th April 2022, Air Quality Neutral Assessment dated March 2022, Sustainability requirements for small non-residential spaces document dated June 2022, Circular Economy Statement Rev. C, Ecological Impact Assessment, Tree Survey, Arboricultural Impact Assessment, Preliminary Arboricultural Method Statement & Tree Protection Plan, Biodiversity Net Gain calculations, Urban Greening Factor calculations, Design and Access Statement, London Plan Fire Statement, Fire Statement Form, Flood Risk Assessment and Drainage Strategy, Heritage Townscape & Visual Impact Assessment, Transport Assessment, Planning Utilities Assessment, Outline Site Waste Management Plan, Operational Waste Management Strategy.

