

Appendix 3: Internal and External Consultee Representations HGY/2021/3175

Commentator	Comment	Response
Headcorn, Tenterden, Beaufoy & Gretton Roads RA (HTBG)	Concern with encroachment onto parts of our estate both during construction and thereafter permanently, as it seeks to include land which is currently included in the definition of the estate contained in leases of properties within our estate	Please refer to the design, character, appearance and amenity section of the delegated report for further detail.
	The design and scale of the proposed development of Whitehall Mews is out of character with existing premises on Headcorn and Tenterden Roads.	
	The height and style of the proposed development of Plot A known as Whitehall Mews overshadows and overlooks our properties. Their design does not reflect our architecture and is out of keeping with our homes in all respects.	Amenity impacts are considered in the report.
	Construction noise, dust and general disturbance. Loss of natural light	This can be controlled by condition.
	Lack of parking provisions for the new development.	The proposed units will be car free and those spaces that are proposed will be controlled. The site has a good level of public transport accessibility.
	The grass area is within the definition of our estate, our residents wish to enjoy exclusive use.	There will be no encroachment onto this land.
	Crowdflow impacts	The proposal will enhance crowdflow management
	Concerns with existing buildings and access The scale of the proposed development known as Whitehall Mews would have an oppressive impact on our homes and is considered overbearing. As it lies to the east of our properties we would be particularly impacted during the early part of the day.	This is not a consideration of this proposal. Amenity impacts are considered in the report.

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	Support objections lodged by local traders who will be displaced by the proposed development.	The proposed development includes commercial floorspace, to which some businesses could re-locate. The Commercial Relocation Strategy seeks to support the re-location process and reduce the impact of the development on local business.
TAG Love Lane	Concerns about the ballot process and re-housing. Concerns with previous development by the applicant, and implementation of levels of affordable housing. Unrealistic and vague time frames Damages mental health An anti-child, anti-family plan Environmental catastrophe	This is not a material planning consideration. Concerns in relation to the developer are not material considerations. Affordable housing will be secured through a S106 legal agreement. Phasing will be controlled by condition. The Construction Environmental Management Plan(s) and development phasing that will be secured by condition will seek to minimise disruption during construction. The business relocation strategy and the landlord offer seek to minimise disruption to existing residents and local business The proposal includes new public realm, leisure, commercial and community facilities that could serve to improve mental health The proposal include a significant proportion of family and accessible homes and space for play areas.

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	Unaffordable 'affordables'	The impact on the environment is assessed in detail in the report. There will be a significant proportion of affordable housing at Council rent and income level secured for Shared Ownership housing. The affordable housing will be secured by legal agreement.
Haringey Cycle Campaign (HCC)	HCC were consulted in 2018 and again in 2021 on the plans for this development. We emphasised the need for cycle routes serving identified destinations, routed directly and clearly defined for legibility and to avoid pedestrian conflict. We also commented in 2021 that the main public open space should be more generous. The scheme now submitted proposes virtually invisible cycle routes that wander aimlessly to the North of the site and in a slightly less aimless fashion to the South. The Mayor's London Plan Guidance has statutory weight in planning decisions and makes it clear that development plans should "protect and improving existing cycle routes and create new strategic routes and local links", as the extract below. Additionally the statutory guidance in LTN1/20 makes it clear that cycle routes should be direct and easy to follow, as the core design principles (below left) and makes clear, wherever there are high pedestrian numbers, cycles must be physically separated from pedestrians, as the summary principles, below right. The development is planned to have 2,869 new homes and at least 7,225sqm of commercial, office, retail and community uses and there will be considerable pedestrian traffic, generated both by the development and in the surrounding areas. The development is not a small housing estate where limited shared use might be acceptable. The Site Plan below shows the circuitous cycle routes proposed by the applicants, together with routes proposed by HCC, which we suggest would be better used and could give compliance with LTN1/20. The Design and Access Statement includes details of path surfacing that make no allowance for safe cycle use and do not comply with LTN1/20. Cycle users are given no indication of where they are meant to cycle and	The application submitted in outline form and cycle routes and landscaping will be dealt with at reserved matters stage. A financial contribution towards cycle network improvements is to be secured in the legal agreement.

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	pedestrians will have no idea of where to expect cycles. In fact the proposed cycle routes will be virtually invisible. Although not directly a cycling matter, we would point out the main public space, Peacock Park has shrunk in size since the competition winning design of 2018. We suggest the wedge shaped park, narrowing to a point and hemmed in by tall buildings on all sides, will feel uncomfortable and should be redesigned to give a more relaxed and generous space. I would be grateful if you could register Haringey Cycling Campaign's objection to the proposals and in particular our objection to the cycle routes, which will not comply with current standards and good practice. Legible, safe and direct cycle routes are essential, which will serve increasing cycle use by residents and the wider community, improve health and mobility and help in the fight against climate change.	
Peacock Estate Management Limited	The loss of the Peacock Industrial Estate and the failure to provide appropriate mitigation/safeguards for displaced business owners Proposals appear contrary to Council planning policy Public Sector Equality Duty Absence of part of the Environmental Impact Assessment	The proposed development looks to provide business and residential use classes where existing businesses and residents will have the option to relocate within the new development or have support in relocating elsewhere within the surrounding area. The loss of employment space is assessed in the report. The proposal is considered to accord with the adopted development plan as a whole. Equalities impacts are adequately assessed in the report The EIA regulations have been complied with.
Whitehall & Tenterden Centre Whitehall Street	Grace Organisation was founded in 1983 by the late Daphne Marche MBE. Location from inception is at Whitehall and Tenterden Centre, Whitehall Street where proposed regeneration is targeted.	The Grace community will look to be relocated and those members will have support throughout the process.

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	We are not opposed to regeneration but believe it is important to retain the identity of Tottenham, the positive community spirit and not destroying the historic core of Tottenham. Grace is here for the community and the upheaval of relocation, even though, we have been offered alternative premises this is causing distress to our clients. Many of whom have written letters of discontent to us which we are happy to forward to you. Researchers have identified that relocation is a stressful life event, and even more so at an older age 'consideration needs to be taken into account the impact this will have on our clients. Many family members have expressed this especially those who have Alzheimer's/ Dementia. Grace has been recognised as a valuable provider by Haringey Council and provides a much-needed service to a vulnerable community that needs accessibility. We are a well utilised service with hundreds of families being supported by our service. It continues to grow with more and more families accessing our services. Retention of our building with necessary upgrade to the site, in our opinion, would be best for our clients and for the continuation of our service.	
Haringey Defend Council Housing	Uncertain quantum of development Undersupply of family sized housing Single aspect homes	Whilst there is flexibility the quantum of development is control by the design code and development specification. Viability reviews will capture any uplift in development. The proposal includes an indicative dwelling mix of 16% which is high for a high density development. There are a high proportion of dual aspect homes and this will be controlled by reserved matters.

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	Excessive proximity to the events stadium Environmental damage Undeliverable Decant Strategy Viability and the likelihood of diminished social benefits over the lifetime of the development Faulty consultation Gentrification and area impact	Noise levels have been assessed in the report and future reserved matters submissions will be accompanied by further noise assessment. This is considered in the report. This will be controlled by the legal agreement. Viability reviews are secured by S106 and could result in the greater social benefits being delivered. The Council's planning consultation was in accordance with regulations and the Statement of Community Involvement (SCI). This is not a material planning consideration. The aim of the development is for high quality places that promote mixed and inclusive neighbourhoods supporting an attractive town centre with jobs and services for its communities; places that help meet people's wider needs and aspirations: for economic security; for health and well-being; for arts and culture; for safety and security; and for links to family and community. The proposed development delivers on these aims.
Haringey Cycle Campaign	No changes to submission of further details Access to cycle storage Not connected to existing cycle routes White Hart Lane does not comply with Healthy Street Principles	This will be addressed by further details in reserved matters applications and further mitigation has been secured in the legal agreement in the form of a financial contribution to local cycle network enhancements.

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Peacock Estate Management Limited	Failure to consider previous deficiencies and insufficient information Businesses to remain Loss of B8/B2 floorspace Failure to support small and micro businesses Failure to engage with the Estate's BAME community of business owners and customers	The proposed development will provide business space, where existing businesses will have the option to relocate within the new development or have support in relocating elsewhere within the surrounding area.
Tottenham Hotspur Football Club ("THFC")	Lack of pre-application engagement with THFC Too much flexibility sought in the submission makes it impossible to consider all material considerations and undertake a planning balance exercise and lawfully make a decision on the application. It will not be possible to insist upon more than the minimum floorspaces permitted. Crowd Flow Study concerns regarding safe movement of people including during construction phases and risk to operation of the stadium, issues which cannot be deferred to reserved matters stages	Response to objection letters received on the 4th, 14th, and 16th of March and the 30th of June 2022, in addition to the applicant's response to these letters dated 7th of July 2022. This is not a material planning consideration. Engagement has happened with THFC and other relevant parties. The submission includes a detailed element and an outline element. The latter will be subject to further reserved matters submissions that will be guided by the control documents submitted with the application (Parameters Plans, Development Specification and Design Code) which along with the other supporting documents and plans, provide sufficient detail with respect to what is sought in the submission to enable an assessment of the application to be made. The Crowd Flow Study has been independently reviewed by a Crowd Flow expert who has found that the proposed queuing provision both during construction and on completion would be at least equal to or better than the existing situation. Further Crowd Flow Assessment is secured at reserved matters stage along with

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	Lack of commitment to employment, leisure and community uses and associated benefits calling into question the delivery of a mixed use development Non- compliance with the TAAP, site allocation and High Road West Masterplan Framework (including concerns from Arup masterplanners) Discrepancies between the design code and parameter plans	Construction Environmental Management Plans to ensure Crowd Flow is suitably considered and accommodated throughout the detailed design and construction programme. The legal agreement will secure a suitable mechanism to allow event management to take place on the site. The proposed development will provide business space, where existing businesses will have the option to relocate within the new development or have support in relocating elsewhere within the surrounding area. Floorspace for leisure and community uses is provided within the proposal. This is secured by condition and in some instances, in the legal agreement. The proposal is for a mixed use development which is capable of being delivered to complement existing provision in the locality. Whilst the proposal conflicts with some aspects of the development plan and High Road West Masterplan, the proposal is considered to accord with the development plan and High Road West Masterplan when read as a whole and would make a significant positive contribution to the sustainable transformative regeneration of the area. The control documents (parameters plans, development specification and design code) will guide future reserved matters submissions and have to be read together. i.e. the reserved matters submissions would have to accord with all 3 control documents as well as the adopted local plan and associated guidance.

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	Design and heritage impact concerns particularly with respect to the level of detail and flexibility provided by the application making assessment of impact difficult. Inadequate public consultation (time given to consider information submitted late in the process) Inconsistencies with the Council's case for the Goods Yard / Depot appeal In terms of Open Space, there should be a strict application of the standards set out in the Haringey Open Space and Biodiversity Study. The same degree of harm to heritage assets identified by the Council in Goods Yard / Depot appeal must also be caused by the High Road West Application, if not more – possibly substantial harm.	The control documents (parameters plans, development specification and design code) along with other supporting documents provide sufficient clarity for the design intent of the scheme to enable an assessment of the developments impact to be made. The detailed design will be considered at reserved matters stage, whereby the submission would have to accord with all 3 control documents, the development plan and associated guidance. Notwithstanding this, an illustrative scheme has been presented to demonstrate one way in which the development could come forward within the remit of the submitted control documents and has not been relied on for assessment purposes other than in the context of Wind. The Council's planning consultation was in accordance with regulations and the Statement of Community Involvement (SCI). The Officer report provides an assessment consistent with the approach taken for the Goods Yard Appeal. Open Space and its compliance with the Open Space and Biodiversity study is included in the report. Heritage assets and the harm identified to them have been described in the report and balanced against the public benefits of the scheme when making a recommendation. There are notable differences between the Appeal scheme and the proposed development relating to scale of development and the of benefits the

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	Loss of jobs (almost half of what currently exists) The spacing and orientation of the tall buildings would be inappropriate. Concerns with the Environmental Impact Assessment (EIA)	proposed development delivers above the appeal scheme. As set out in the report, it is estimated that in the worst case scenario of providing the minimum amount of commercial floorspace allowed within the control documents and when taking into account displacement of existing jobs the proposal is estimated to yield a net gain of 240 FTE equivalent jobs. The spacing and orientation of the buildings is yet to be determined. The control documents set out an acceptable basis for these buildings to come forward in a sympathetic way. The control documents provide sufficient detail to enable the likely significant effects on the environment to be assessed. This is reflected in the submitted Environmental Statement.
Arup on behalf of THFC	The ambition and commitment to communities and place that is embodied in the HRWMF and TAAP is lost in the current proposal. In the author's view, the application as it stands will not deliver the Council's aspirations for High Road West. It misses the opportunity to deliver good placemaking through truly mixed-use development appropriate to the proposed scale of homes and is unlikely to deliver good growth for North Tottenham. It is not aligned with the vision for a "vibrant, attractive, and sustainable neighbourhood and a new sport and leisure destination for North Tottenham". Development phasing (late delivery of public realm)	The proposed development would deliver a mix of uses and public benefits such as housing, affordable housing, civic square, public park, library & learning centre, as well as comprehensive regeneration. It will provide new employment and well designed places that knit in with the surrounding area. The phasing plans submitted with the application are illustrative. Final phasing will be secured by planning condition. Officers

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		will seek the delivery of the public realm at the earliest feasible phase.
Newlon Housing Trust	Access to parking at 1 Moselle Street and access for service and emergency vehicles (via William Street) Adverse neighbour amenity impacts in relation to daylight and sunlight on the occupants of 1 Moselle Street	Access details will be addressed by further details in reserved matters applications. Daylight and sunlight assessment has been carried out and is considered in amenity section of the report.
Other representations	Loss of community Gentrification	The aim of the development is for high quality places that promote mixed and inclusive neighbourhoods supporting an attractive town centre with jobs and services for its communities; places that help meet people's wider needs and aspirations: for economic security; for health and well-being; for arts and culture; for safety and security; and for links to family and community.
	The Proposal brings opportunities Support for the regeneration	Noted.
	Loss of shops and restaurants Loss of chicken and chip shop Loss of DW Timber and affect on local businesses Loss of livelihoods and lack of alternative opportunities Loss of employment opportunities due to loss of Peacock Estate Loss of small businesses Loss of industrial space Lack of high quality jobs in and from the development Loss of employment on other sites Loss of investment in premises Contrary to employment policies	The proposed development will provide business space, where existing businesses will have the option to relocate within the new development or have support in relocating elsewhere within the surrounding area. The legal agreement secures a proportion of the proposed commercial spaces as affordable workspace.
	Lack of leisure uses	Floorspace for leisure uses is provided within the proposal.
	No community facilities- GP etc. Strain on existing facilities Promises of space for craft and education must be provided Exercise space must be provided	The proposed development looks to incorporate community uses, shops, surgeries and services to cope with the

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		additional housing. The surrounding schools also have capacity for new residents.
	Concerns with density Loss of high road character Development is out of scale with the surrounding area Plot B, D and F which blocks all views when approaching the stadium from the east	This is addressed in the design section of the report.
	The proposal should contain houses	The proposal provides a mix of housing typologies and sizes including duplexes and family sized units
	Lack of car parking Loss of matchday parking	The level of parking will be adequate due to the good public transport links and the surrounding area will be controlled parking zones. Matchday parking is a temporary arrangement and not protected by planning policy.
	Loss of a home Housing should be renovated Upheaval for families in homes to be demolished Loss of affordable housing Concern with share equity affordability Re-housing concerns	The site allocation and masterplan has been subject to extensive public consultation. The August – September 2021 independent ballot yielded a 55.7% vote in favour of the proposal for the regeneration of Love Lane. The ballot had a 69.4% turnout. The Love Lane Landlord Offer guarantees secure tenants a new council home in the new development or the option to move to another council home in LBH. The development is to be phased to minimise the number of moves for residents. Rents are to be provided similar to current homes, long term tenancy is offered. Removals and other reasonable moving expenses paid for and a home loss payment when moving. The Offer guarantees non-secure tenants living in

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	Lack of affordable housing Will housing be affordable	The proposal provide a significant quantum and mix of affordable housing.
	Tall buildings are too high close to Rivers Apartments Development too close to Rivers Apartments Loss of sunlight	The building closest to Rivers apartment reflects the existing permission for this site in which the impacts were found acceptable. Daylight and sunlight assessment has been carried out and is considered in amenity section of the report.
	Concerns with quality of life during development	This would be a temporary impact and can be mitigated by planning conditions.
	Carbon emissions from demolition and construction	A whole life carbon assessment has been carried out and found to be in line with London Plan Policy.
	Loss of the Grace centre	Alternative provision will be made off site to accommodate the Grace Centre.
	The cycle routes are not good	This will be addressed by further details in reserved matters applications. A financial contribution towards local cycle network improvements will be included in the legal agreement.
	Proposal benefits THFC	The proposal follows the principles of the High Road West Masterplan Framework and site allocation which require a new route from White Hart Lane Station to the High Road and stadium.
	Concerns over racial discrimination	An EQIA has been carried out and demonstrates that the proposed development will result in some negative and some positive impacts on priority groups. Negative impacts are proposed to be mitigated to reduce the level of harm.
	Concerns with ballot process	This is not a planning matter.

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	Private land should not be provided to a developer Concerns with CPO process	AAP Policy AAP1 support site assembly and use of CPO powers where necessary.
	Concerns with engagement process	The engagement process is set out in the applicant's statement of community involvement and has satisfied the planning requirements.
	Concerns with existing estate maintenance	This is not a consideration of this planning application.
	Concerns around funding for the development	This is not a material planning consideration
	Concern around profits for private company	This is not a material planning consideration
	Loss of income from property	This is not a material planning consideration
	Loss of existing library	The existing library is proposed to be replaced.
	Creation of wind tunnels due to high rise buildings	Owing to the outline nature of the application a detailed assessment of the microclimate impacts cannot be undertaken. Each forthcoming reserved matters submission will be accompanied by further microclimate assessment reports to ensure that an appropriate microclimate is achieved.
	Vehicle congestion and strain on the surrounding roads	The proposed development will look to be car free.
	No sustainable modes of transport provided	The proposal incorporates cycle routes new pedestrian and cycle links enhancing the existing transport infrastructure.
	The area does not need more flats	Haringey has a duty to meet its housing needs. The proposal makes a meaningful contribution to the Borough's housing land supply.