Planning Sub Committee

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference No: HGY/2022/0563 **Ward:** Northumberland Park

Address: The Goods Yard and The Depot, 36 & 44-52 White Hart Lane (and land to the rear) and 867-879 High Road (and land to the rear), London, N17 8EY.

Proposal: Full planning application for (i) the demolition of existing buildings and structures, site clearance and the redevelopment of the site for a residential-led, mixed-use development comprising residential units (C3); flexible commercial, business, community, retail and service uses (Class E); hard and soft landscaping; associated parking; and associated works. (ii) Change of use of No. 52 White Hart Lane from residential (C3) to a flexible retail (Class E) (iii) Change of use of No. 867-869 High Road to residential (C3) use.

Applicant: Goods Yard Tottenham Limited.

Ownership: Private

Plans and Document: See **Appendix 1** to this report.

1.1 The application has been referred to the Planning Sub-committee for decision as the planning application is a major application that is also subject to a s106 agreement.

1.2 The planning application has been referred to the Mayor of London as it meets Categories 1A (1) ,1B(1c) and 1C(1c) as set out in the Town and Country Planning (Mayor of London) Order 2008.

SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposal follows the approval at appeal of a development of a very similar scale and design
- The proposal is a well-designed, residential-led mixed-use scheme providing a range of residential accommodation and 2,068sqm (GEA)) of commercial space, including at least 400sqm of business space (Use Class E(g) (i)(ii)(iii)).

- The proposed scheme safeguards industrial uses on the Peacock Industrial Estate
- The proposed scheme allows for an incremental delivery of comprehensive proposals for site allocation NT5, in accordance with Policy NT5 requirements and guidelines and the adopted High Road West Masterplan Framework.
- The scheme would deliver a mix of dwelling sizes, including family sized homes and including 97 Low Cost Rented homes and 181 Shared Ownership homes, representing a 33% provision of affordable housing by unit number and 36% provision by habitable room.
- The layout and design of the development optimises the potential of the site, provides acceptable levels of open space and respects the scale and character of the surrounding area and the amenity of neighbours.
- The architectural quality of the proposed tall buildings is of sufficiently high quality to justify their proposed height and form and their likely effects on the surrounding area.
- The proposal secures the future of the Listed Buildings at Nos. 867-869 High Road and the locally listed Station Master's House and improves their immediate setting. The 'less than substantial harm' to the wider setting and significance of a number of heritage assets would be outweighed by the significant public benefits that the proposed scheme would deliver.

2 RECOMMENDATION

2.1 That the Committee resolve to GRANT planning permission and that the Head of Development Management or the Assistant Director Planning, Building Standards & Sustainability is authorised to issue the planning permission and impose conditions and informatives subject to referral to the Mayor of London for his consideration at Stage 2 and signing of a section 106 Legal Agreement providing for the obligations set out in the Heads of Terms below and a section 278 Legal Agreement providing for the obligations set out in the Heads of Terms below.

2.2 That the section 106 legal agreement referred to in resolution (2.1) above is to be completed no later than 11th September 2023 or within such extended time as the Head of Development Management or the Assistant Director shall in her/his sole discretion allow.

2.3 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.2) above, planning permission is granted in accordance with the Planning Application subject to the attachment of the conditions.

2.4 That delegated authority be granted to the Head of Development Management or the Assistant Director 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.

Conditions Summary – (the full text of recommended conditions is contained in **Appendix 11** of this report).

1) Time Limit – 5 years
2) Approved Plans and Documents
3) Phases – approval of Phasing Plan (PRE-COMMENCEMENT)
4) Minimum amount of Business Floorspace - At least 400sqm of Business floorspace (Use Class E(g) (i) (ii) or (iii).
5) Accessible Housing – 'Wheelchair user dwellings' and 'Accessible and adaptable dwellings'
6) Commercial Units - Ventilation/Extraction
7) Commercia Units - Café/restaurant Opening Hours - 07.00 to 23.00 (Monday to Saturday) and 08.00 to 23.00 (Sundays and Public Holidays).
8) Commercial Units – BREEAM 'Very Good'(PRE-COMMENCEMENT)
9) Commercial Units – Noise Attenuation
10) Noise Attenuation - Dwellings
11) Depot Block G – Wind Mitigation
12) Detailed Fire Statement – development to be carried out in accordance with.
13) Landscape Details
14) Trees & Planting – 5-year Replacement
15) Temporary Landscaping/Use (Depot part of site)
16) Tree Protection Measures (PRE-COMMENCEMENT)
17) Biodiversity enhancement measures
18) External Materials and Details
19) Living roofs
20) Ground Floor Rear Boundary Details – Depot Block D
21) Energy Strategy
22) Overheating (Non-residential)
23) Future overheating (Dwellings)
24) Circular Economy
25) Whole Life Carbon
26) Energy Monitoring
27) PV Arrays
28) Brook House Yard Management Plan
29) Secured by Design

30) Stage I Written Scheme of Investigation of Archaeology (PRE-COMMENCEMENT)
31) Stage II Written Scheme of Investigation of Archaeology
32) Foundation Design – Archaeology (PRE-COMMENCEMENT)
33) Water Supply Infrastructure (PRE-COMMENCEMENT)
34) Land Contamination – Part 1 (PRE-COMMENCEMENT)
35) Land Contamination – Part 2
36) Unexpected Contamination
37) Basement Vehicular Access Control Arrangements
38) Road Safety Audit – White Hart Lane (PRE-COMMENCEMENT)
39) Road Safety Audit – Embankment Lane (PRE-COMMENCEMENT)
40) Car Parking Design & Management Plan
41) Cycle Parking Details (PRE-COMMENCEMENT)
42) Delivery and Servicing Plan
43) Detailed Construction Logistics Plan (PRE-COMMENCEMENT)
44) Public Highway Condition (PRE-COMMENCEMENT)
45) Railway Infrastructure Protection Plan
46) Demolition/Construction Environmental Management Plans (PRE-COMMENCEMENT)
47) Management and Control of Dust (PRE-COMMENCEMENT)

3 Business and Community Liaison Construction Group (PRE-COMMENCEMENT)

50) Telecommunications
51) Façade treatment
52) Brook House Yard boundary treatment
53) District energy network

Informatives Summary – (the full text of Informatives is contained in **Appendix 11** to this report).

1) Working with the applicant
2) Working with the applicant.
3) Community Infrastructure Levy.
4) Hours of Construction Work.
5) Party Wall Act.
6) Numbering New Development.
7) Asbestos Survey prior to demolition.
8) Dust.
9) Written Scheme of Investigation – Suitably Qualified Person.
10) Deemed Discharge Precluded.
11) Composition of Written Scheme of Investigation.

12) Disposal of Commercial Waste.
13) Piling Method Statement Contact Details.
14) Minimum Water Pressure.
15) Paid Garden Waste Collection Services.
16) Sprinkler Installation.
17) Designing out Crime Officer Services.
18) Land Ownership.
19) Network Rail Asset Protection.
20) Site Preparation Works.
21) Listed Building Consent – (Nos. 867-869 High Road)
22) s106 Agreement and s278 Agreement.

Section 106 Heads of Terms:
Implementation & Business relocation

1) **Partial implementation** – preventing inappropriate 'mixing and matching' of the extant Depot scheme and the proposed scheme.

2) **Business Relocation Strategy** – to assist existing business on the Carbery Enterprise Park re-locate within the development or, failing that, within the borough.

Affordable Housing

3) **Affordable Housing**:
   - Minimum of 35.9% by habitable room
   - Minimum of 40% by habitable room if sufficient grant available.
   - Tenure mix – 60% Intermediate (Shared Ownership) housing & 40% Low Cost Rent housing by habitable room.
   - LB Haringey to be offered first right to purchase up to 77 of the Low Cost Rented homes at an agreed price per square foot (Index Linked)
   - Low Cost Rent homes to be London Affordable Rent – or where LB Haringey purchases Low Cost Rent homes, the first 61 at Social Rent and any additional homes at London Affordable Rent
   - Quality standards & triggers for provision (no more than 25% of Market Units occupied until 50% of Affordable Units delivered, no more than 50% of Market until 100% of Affordable Units delivered)
   - Location of different tenures (by Block).

- Affordable housing residents to have access to the same communal amenity and play space as Market housing (where Blocks have a mix of tenures).

4) **Affordability**:
   - Weekly London Affordable Rent levels to be in accordance with the Mayor of London's Affordable Homes Programme (2016-2023) as follows (all Index Linked): 1-bed - £161.71, 2-bed - £171.20, 3-bed - £180.72 and 4-bed - £190.23).
   - Intermediate homes to be Shared Ownership – sold at the minimum 25% share of equity and rental on the unsold equity up to 2.75%.
   - Approve plan for marketing Shared Ownership homes to households living or working in:
     - Haringey - with max. annual income of £40,0000 (Index Linked) for 1 & 2-bed homes and £60,000 for 3-bed homes – for 3-months prior to and 3-months post completion of each Phase.
     - London – with max. annual income of £90,000 (Index Linked) not until after 6 months of completion of each Phase.
     - Provided that annual housing costs for each home do not exceed 28% of the above relevant annual gross income levels.

5) **Viability Review Mechanism**:
   - Early Stage Review (if not implemented within 24-months).
   - Break Review (if construction suspended for 30-months or more).

Open Space Management

6) **Publicly Accessible Open Space Access & Management Plan** – ensuring public access and future management & maintenance (in accordance with the Public London Charter) (October 2021).

7) **Future Use of 'Pickford Yard Gardens' Amenity Space** – use by residents of proposed buildings immediately to the south, in the wider NT5 Site Allocation (subject to use of reasonable endeavours).

Transportation

8) **Future Connectivity & Access Plan** – setting out how the development shall be constructed to allow for potential future pedestrian, cycling and vehicular access across the proposed development and adjoining land.

9) **Car-Capping**:
   - Prohibiting residents (other than Blue Badge holders) from obtaining a permit to park in the CPZ
   - £4,000 for revising the associated Traffic Management Order.

10) **Enfield CPZ Contribution** – Baseline car parking survey, monitoring and if monitoring shows overspill car parking to be a significant problem, a financial contribution of up to £20,000 towards consultation/implementation of a CPZ.

11) **Residential & Commercial Travel Plans**:
   - Appointment of a Travel Plan Coordinator (to also be responsible for monitoring Delivery Servicing Plan).
   - Provision of welcome induction packs containing public transport and cycling/walking information, map and timetables to every new household.
   - £3,000 for monitoring of Travel Plan initiatives.

12) **Car Club**:
   - Establishment or operation of a Car Club Scheme.
   - Minimum of 4 x Car Club spaces (with actual number tbc following discussions with prospective operators).
   - 2 years' free membership for all households and £50 per year credit for the first 2 years.

Employment & Training

13) **Local Employment & Training**:
   - Employment & Skills Plan – including Construction Apprenticeships Support Contribution & Skills Contribution (to be calculated in accordance with the Planning Obligations SPD).
   - Commitment to being part of the borough's Construction Programme.

Carbon Management & Sustainability

14) **Future connection to District Energy Network**:
- Submission of Energy Plan for approval by LPA
- Connect the whole development (including Station Master's House and Listed Buildings at Nos. 867-869 High Road) to a site-wide energy centre.
- Ensure the scheme is designed to take heat supply from the proposed DEN (including submission of DEN Feasibility Study)
- Design of secondary and (on-site) primary DHN in accordance with LBH Generic Specification and approval of details at design, construction and commissioning stages.
- Use all reasonable endeavours to negotiate a supply and connection agreement with the proposed DEN within a 10-year window from the date of a permission.
- Collaborate with the LPA to deliver a future connection point from the site to the south to allow for the onward development of an energy network

15) **Carbon offsetting**:
- Payment of an agreed carbon offset amount (residential & non-residential) plus 10% management fee on commencement;

Telecommunications

16) **Ultrafast broadband infrastructure** and connections to be provided.

Construction

17) **Commitment to Considerate Constructors Scheme**.

Monitoring

18) **Monitoring costs** – based on 5% of the financial contribution total & £500 per non-financial contribution.

Section 278 Highways Agreement Heads of Terms:

1) Works to tie in with the High Road and White Hart Lane.

3.1 In the event that members choose to make a resolution contrary to officers' recommendation, members will need to state their reasons.

3.2 That, in the absence of the agreement referred to in resolution (2.1) above being completed within the time period provided for in resolution (2.2) above, the planning application be refused for the following reasons:

i. In the absence of a legal agreement preventing the partial implementation of the Goods Yard extant consent (HGY/2018/0187) or the partial implementation of the Depot extant consent (HGY/2019/2929), the partial implementation of the proposed scheme and either of these extant schemes could result in an unacceptable form of development, contrary to good planning and Tottenham Area Action Plan Policies AAP1 and NT5.

ii. In the absence of a legal agreement securing the implementation of an approved Business Relocation Strategy, the proposed scheme would result in the unacceptable loss of industrial land, contrary to London Plan Policy E4, Strategic Policies SP8 and SP9 and DMD Policy DM40.

iii. In the absence of a legal agreement securing (1) the proposed provision of on-site affordable housing; (2) Early Stage and Development Break Viability Reviews; (3) and the first right of the Council to purchase up to 61 of the proposed Low Cost Rent homes, the proposed scheme would fail to foster a mixed and balanced neighbourhood where people choose to live, and which meet the housing aspirations of Haringey's residents or assist in estate regeneration. As such, the proposals would be contrary to London Plan Policies H4 and H8, Strategic Policy SP2, and DM DPD Policies DM 11 and DM 13, Policy TH12 and Policy NT5.

iv. In the absence of the legal agreement securing an Open Space Management and Access Plan and obligations relating to the future use of and access to the proposed Pickford Yard Gardens, the proposed scheme would fail to secure well-maintained open space and fail to safeguard the comprehensive development of Site Allocation NT5. As such, the proposals would be contrary to Strategic Policy SP12, Tottenham Area Action Plan Policies AAP1, AAP11 and NT5 and DM DPD Policy DM20.

v. In the absence of a legal agreement securing financial contributions towards social infrastructure provision (community space, library and publicly accessible open space), the proposed scheme would (1) fail to meet the requirements for a Fast Track application as set out in London

Plan Policy H5 and would require a Financial Viability Appraisal to justify the proposed amount and type of affordable housing; and (2) fail to make a proportionate contribution towards the costs of providing the infrastructure needed to support the comprehensive development of Site Allocation NT5. As such, the proposals are contrary to London Plan Policy DF1, Strategic Policies SP16 and SP17, Tottenham Area Action Plan Policies AAP1, AAP11 and NT5 and DM DPD Policy DM48.

vi. In the absence of a legal agreement securing the public benefits of the scheme (including affordable housing, potential contribution to Love Lane Estate regeneration, financial contributions towards social infrastructure provision, reduction to carbon dioxide emissions and local employment and training), the proposed scheme would lead to 'less than substantial harm' to heritage assets that would not be outweighed by public benefits, contrary to NPPF paragraph 196, London Plan Policy HC1, Strategic Policy SP12, Policy AAP5, AAP Site Allocation NT5 and DPD Policy DM9.

vii. In the absence of a legal agreement securing (1) a Future Connectivity & Access Plan; (2) Car Capped Agreement and financial contributions to amend the relevant Traffic Management Order (TMO) to change existing on-street car parking control measures; (3) a financial contribution towards a survey, consultation and potential implementation of an Enfield CPZ; (4) Travel Plans and financial contributions toward travel plan monitoring; and (5) Car Club provision, the proposals would have an unacceptable impact on the safe operation of the highway network, give rise to overspill parking impacts and unsustainable modes of travel. As such, the proposal would be contrary to London Plan Policies T1, T2, T6, T6.1 and T7, Spatial Policy SP7, Tottenham Area Action Plan Policy NT5 and DM DPD Policy DM31.

viii. In the absence of a legal agreement securing the implementation of (1) any necessary temporary heating solutions; (2) an energy strategy, including connection to a DEN; and (3) carbon offset payments, the proposals would fail to mitigate the impacts of climate change. As such, the proposal would be unsustainable and contrary to London Plan Policies SI2 and SI3 and Strategic Policy SP4, and DM DPD Policies DM 21, DM22 and SA48.

ix. In the absence of a legal agreement securing an Employment and Skills Plan the proposals would fail to ensure that Haringey residents benefit from growth and regeneration. As such, the proposal would be contrary to London Plan Policy E11 and DMD Policy DM40.

x. In the absence of a legal agreement requiring broadband connectivity designed into the development, the proposed scheme would fail to provide

sufficient digital connectivity for future residents and businesses, contrary to London Plan Policy SI6 and DMD Policy DM54.

3.3 In the event that the Planning Application is refused for the reasons set out above, the Head of Development Management or the Assistant Director (in consultation with the Chair of Planning sub-committee) is hereby authorised to approve any further application for planning permission which duplicates the Planning Application provided that:

i. There has not been any material change in circumstances in the relevant planning considerations, and

ii. The further application for planning permission is submitted to and approved by the Assistant Director within a period of not more than 12 months from the date of the said refusal, and

iii. The relevant parties shall have previously entered into the agreement contemplated in resolution 2.1 above to secure the obligations specified therein.

CONTENTS

APPENDICES:

3. PROPOSED DEVELOPMENT AND LOCATION DETAILS

Background and Previous Appeal Decision

3.1. A previous application (HGY/2021/1771) was refused on the grounds that the proposed tall buildings (Goods Yard Blocks A and B and Depot Block B (by virtue of the their scale and proximity to each other and the existing Rivers Apartments tall building would have adverse impacts on long and mid range views in the locality and harm heritage assets and insufficient provision of publicly accessible open space.

3.2. Following an appeal public inquiry, the Appeal Inspector concluded that the proposed tall buildings would cause a low level of harm to the character and appearance of the area and a low level of less than substantial harm to the North Tottenham Conservation Area, The Grange, 797-799 High Road and 819-821 High Road but found very substantial public benefits clearly outweighed the harm. The benefits included housing provision, contribution to regeneration, economic benefits and biodiversity enhancements. In respect to open space, the Inspector concluded that the proposed provision would be a significant shortfall again the Policy DM20 requirement, but in accordance with the open space requirements set out in Policy NT5 and the High Road West Masterplan Framework and made appropriate provision for publicly accessible open space. Overall, the Inspector found a conflict with the adopted development plan, when read as a whole, but concluded the harms associated with the development do not outweigh the benefits.

3.3. The proposed development is similar in scale and layout to the appeal scheme and therefore is a material consideration that must be given significant weight. This application was initially submitted in an effort to address the reasons for refusal but was not progressed to a decision at that time. Following the appeal decision, fire regulations and guidance changed which meant that the scheme, as originally submitted, would not be able to comply with requirements relating to fire safety. In line with latest fire safety regulations and guidance and in consultation with the Health and Safety Executive (HSE) amendments were made to the scheme which includes alterations (mostly internal) to provide additional lifts, secondary stair cores necessitating corresponding changes to internal layouts. This has resulted in some increases in the scale of the development since submitted. Compared the appeal proposal there is a 1 storey increase to the ‘shoulder’ of the southern tower but no changes to the height of width of the towers so the proposal is broadly the same scale.

3.4. The key changes since the approved appeal are:

- A reduction in the number of residential units, from 867 to 844

- An increase in the proportion of family housing within the housing mix from 17% to 20%

- Inclusion of an additional shoulder storey to the Goods Yard south tower

- Moving The Depot tower further away from Rivers Apartments to its north by 1m.

- Reconfiguration and enlargement of basement to accommodate additional lift and stair core requirements. All parking is now provided at basement level.

• Amendments to the facades including use of a slightly lighter tone of materials notably to the core of towers

• Minor changes to landscaping to align with the above

3.5. The affordable housing provision and provision of homes at Council rents remains the same as approved despite the decrease in overall unit number. The proposal contributes approximately £250,00 more in infrastructure provision through the increase in CIL rates since the previous decision. The development plan has not changed materially since the appeal decision so the policy position remains the same as at the time of the appeal decision.

Proposed Scheme

Layout & Access

3.6. The proposed scheme locates a north-south street (Embankment Lane) parallel to the eastern boundary (the shared boundary with the Peacock Estate). This boundary would form the interface between the application site and the wider High Road West Development Area. The street will be a no through road for vehicular traffic. The western edge of the site being occupied by the proposed 'Goods Yard Walk/ Ecology Walk' amenity space for residents living in proposed Goods Yard Blocks A to F. The proposed east-west street (Pickford Lane) runs perpendicular to High Road and Embankment Lane, adjacent to blocks A-G and connects Cannon Road to High Road, across The Depot part of the site. Pedestrian and cycle permeability is retained through shared footway/cycle way between Goods Yard Block A and Depot Block B. The proposed location of the blocks is similar to the previously consented Goods Yard and Depot Schemes, including the relationship of blocks D and E next to existing buildings on the southern side of Cannon Road.

Figure 01: The proposed layout

3.7. There would be four open spaces along the proposed north-south route on the Goods Yard. This includes a pocket park adjacent to GY Block A (approx. 7m x 11m). A pocket park and trim trail adjacent to blocks GY A – E (approx. 4m x 74m) and a pocket park to the south of GY Bock G (approx. 14m x 14m). A larger park (Peacock Park) (approx. 33m x 37m) is proposed to the southern boundary of the Depot part of the site, between blocks B and G. These would be connected by a network of streets of between 12m and 14m wide, designed to prioritise walking and cycling, that would include linear rain gardens and limited in parallel and perpendicular car parking spaces. A communal green amenity space 'Goods Yard Walk' would run along the western railway edge of the Goods Yard part of the site.

3.8. Vehicular, cycle and pedestrian access points for the site would be in the south from White Hart Lane (in a similar location to the existing Goods Yard access) and in the north from the existing four-arm signal-controlled junction with the High Road and Brantwood Road. The southern access would comprise a 5.5m wide carriageway with footways a minimum of 2 metre width either side. This would reduce to 3.7m wide from proposed Depot Block B northwards to Goods Yard Block A (to cater just for refuse collection, loading/unloading and emergency access) and just emergency access north of proposed Block A).

3.9. The northern access from the High Road would also comprise a 5.5m carriageway, narrowing to 4.4m wide between proposed Block D and Peacock Park, before widening back to 5.5m again between proposed Blocks A, B, C and D and connecting with Cannon Road. There would be no carriageway connection between the Depot and the Goods Yard parts of the site. This is to

prohibit ‘rat-running’ traffic, although there would be connectivity for pedestrians, cyclists and emergency vehicles.

Buildings and uses

3.10. The proposed scheme includes the change of use of a retained and refurbished Station Master’s House (No. 52 White Hart Lane) from residential (its last lawful use) to Use Class E and Nos. 867-869 High Road from office use to 6 x 2-bed residential flats. The latter is the same as was granted planning permission and Listed Building Consent in September 2020 (HGY/2019/21929 and HGY/2019/2930) and the proposed conversion would rely on this extant Listed Building Consent.

3.11. The proposed new-build development comprises 15 Blocks, some of which would be interlinked. The ground floor of the Blocks would comprise residential, commercial and ancillary uses (including entrance lobbies, circulation space, waste storage, cycle storage, plant, post rooms and parking/ parking area access). Commercial floorspace would be located on the ground floor within The Goods Yard Blocks E, F, G and H, the Station Master’s House and The Depot Blocks ABC and G. The Goods Yard Blocks A to F and The Depot Blocks A and C would include a single-level basement for plant and car and cycle parking uses. Table 01 summarises the proposed land uses and parking provision.

Table 01: Proposed land uses and parking provision.

Total floorspace	**95,069sqm (GIA)**	
Residential	Goods Yard 143 x 1-bed 235 x 2-bed 108 x 3-bed 7 x 4-bed	The Depot 100 x 1-bed 191 x 2-bed 57 x 3-bed 3 x 4-bed
	844 homes 78,737sqm (GIA)	
Commercial (Use Class E)	2,040sqm (GIA)	
Ancillary & parking	13,756sqm (GIA)	
Open Space	25,195sqm, of which 15,650sqm is open space/amenity space/public realm and play space and 9,545sqm is private balcony/terrace space and 2,900 sqm is play space.	
Car parking	155 Spaces including 89 accessible spaces, 4 car club spaces and 2 visitor spaces.	
Cycle parking	1,671 long-stay residential spaces, 15 long-stay commercial spaces and 78 short-stay visitor	

3.12. Based on the most up-to-date GLA Population Yield Calculator, the estimated future resident population once the proposed scheme is completed would be 1,795.5 people (including approx. 305 children). This is an estimated 488

additional people (113 more children) than the consented schemes (HGY/2018/0187 & HGY/2021/3175) but a similar quantum to permission HGY/2021/1771. Chapter 6 of the ES states that the applicant expects the proposed scheme to be delivered over a five-year construction period starting in 2023 as set out in Table 02 below. The expected on-site population would increase incrementally over this period.

3.13.

Table 02: Proposed phasing

	2023	2024	2025	2026	2027	2028
Phase 1A: Goods Yard Blocks C, D, E, F, G & H						
Phase 1B: Goods Yard Block B						
Phase 2: Goods Yard Block A						
Phase 3A: The Depot Blocks D, E, F & G						
Phase 3B: The Depot Block ABC						

Building heights

3.14. Table 03 below summarises the proposed heights of the proposed buildings, both in terms of storeys above ground and metres Above Ordnance Datum (AOD).

Table 03: Proposed building heights.

Block	Storey height	Metres AOD height	Basement	
Goods Yard				
A	32	97.33 to 114.23	Single level	
B	27	79.33 to 98.03		
C	6	34.33		
D	6	34.33		
E	7	37.63		
F	7	28.33 to 36.43		
G	5	32.72 to 39.64	None	
H	3	24.23		
Station Master's House	2	21.40		
The Depot				

A	29	84.60 to 104.00	Single level	
B	9	42.60		
C	5	32.50		
D	6	32.70	None	
E	6	26.70 to 32.60		
F (Nos. 867 & 869 High Road	3	23.91 to 25.21		
G	6	24.71 to 35.19		

Nature of application and Environmental Impact Assessment

3.15. This is a "full" planning application for the retention and conversion of the two Listed Buildings at 867 and 869 High Road and the locally listed Station Masters House (53 White Hart Lane) and the redevelopment of the rest of the site. Please note, Listed Building Consent has already been granted for internal and external works to Nos. 867 and 869 High Road associated with their proposed conversion.

3.16. The proposed development falls within the scope of Paragraph 10B to Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. As such, it represents 'EIA development' and is accompanied by an Environmental Statement (ES). Regulation 3 prohibits the Local Planning Authority (LPA) from granting planning permission without consideration of the 'environmental information' that comprises the ES, any further information and any representations made by consultation bodies or by any other person about the environmental effects of the proposed development.

3.17. The scope of the ES and associated addendum reports (wherein the ES) on an assessment of the potential cumulative effects of the following consented and proposed schemes: No. 807 High Road, the Printworks (Nos. 819-829 High Road), the Northumberland Terrace 'cultural quarter', the Northumberland Development Project and the Lendlease High Road West Scheme. The ES also discusses in a number of technical chapters the proposed development in the wider context of the High Road West Masterplan Framework. The findings of the ES are discussed in the body of this report as necessary and any adverse environmental effects have been identified.

The Site and Surroundings

3.18. The application site is 'r' in shape, comprising the Goods Yard running north-

south and The Depot running east-west. It measures approx. 2.5 hectares.

Depot part of the site

3.19. The Depot part of the site is roughly rectangular in shape (approx. 166m wide and 69-75m deep). It has a level of 13.44m AOD in the south, rising to 24.22m near the centre and decreasing to approx. 13.36m along the northern boundary.

3.20. The site accommodates Nos. 867 and 869 High Road (Grade II Listed Buildings), a large retail store, currently occupied by B&M Home Store, five small retail units and a surface level car park. The High Road frontage, including Nos. 867 and 869, are within the North Tottenham Conservation Area.

3.21. There are two large London Plane trees on the eastern part of the site, near the High Road (one on the northern boundary and one close to No. 869) and two other large London plane trees in the High Road footway. There are a number of other smaller less noteworthy trees on the site and immediately to the west in the railway embankment.

Goods Yard part of site

3.22. The Goods Yard is roughly triangular in shape (80m wide at its widest point narrowing to approx. 20m in the north). The topography here steadily increases in height from White Hart Lane to the north from approx. 12.22m Above Ordnance Datum (AOD) to 14.76m AOD.

3.23. The Goods Yard comprises mainly of a hardstanding area formed following its temporary use as a construction compound for stadium development. It is currently used temporarily for car parking to support the safe return of fans to live games under restricted capacities. The site also includes the Carbery Enterprise Park in the south east corner (2 x 2-storey buildings of 11 industrial units) and the locally listed Station Master's House at No. 52 White Hart Lane (built to serve White Hart Lane rail station, the two-storey detached house is currently vacant). The White Hart Lane frontage is within the North Tottenham Conservation Area.

3.24. There are a number of low-quality sycamore and birch trees on site, together with a number of similar trees to the west of the site on the railway embankment.

Existing Land Uses

3.25. Table 04 below sets out the existing uses on the site.

Table 04**:** Existing uses

Use (Use Class)	**Existing Floorspace (GIA)**
Depot part of site	
B&M Home Store (E(a) retail) & 195 car parking spaces	4,557sqm
5 x small retail units (Use Class E(a) retail/other)	284sqm
Nos. 867-879 High Road – (Use Class F1(a) adult education)	673sqm
Goods Yard part of site	
Station Master's House - vacant housing (Use Class C3)	175sqm
Carbery Enterprise Park - 11 general industrial/light industrial/office units (Use Classes B2, E (g) (i) and(iii))	1,012sqm

Boundaries

3.26. The existing northern boundary comprises a brick wall of varying height from between approx. 2.1m to 5.4m in height. Immediately to the north of the site is the Cannon Road housing scheme, which was built on the site of the former Cannon Rubber Factory in 2014/15. It comprises four residential buildings, which from west to east are: River Apartments (part 22/part 23-storeys – 86.2m AOD), Mallory Court (6-storeys) which backs on the application site, Ambrose Court (9-storeys) and Beachcroft Court (part 4/part 5-storeys), which includes the Brook House 2FE Primary School on the ground and first floors. Cannon Road itself splits in to two north-south cul-de-sacs. The southern cul-de-sac adjoins the application site northern boundary. A new vehicle/pedestrian/cycle connection is proposed between the two sites. The eastern arm of Cannon Road includes a games/outdoor learning space that is connected with the school.

3.27. Further to the north, in the London Borough of Enfield, is the Langhedge Lane Industrial Estate and the Joyce and Snells Estate, where Enfield Council has received a planning application for an estate renewal scheme comprising approx. 1,992 homes and associated social infrastructure and open space.

3.28. Immediately to the south-east of the Depot part of the site is No. 865 High Road, a poor-quality pastiche three-storey residential building, with residential rooms in its rear return looking north over the site. To the east is the High Road which comprises a range of three to four-storey mixed use buildings, including housing on some upper floors. Further to the east are the residential streets based around Brentwood Road.

3.29. To the east of the Goods Yard and to the south of the Depot parts of the site is the Peacock Industrial Estate. The Industrial Estate comprises part one/part 2-storey industrial, warehouse and office buildings which turn their back on the application site and are accessed from White Hart Lane and the High Road. Nos. 32-34a White Hart Lane comprises Grade II Listed buildings occupied as The Grange community centre.

3.30. To the south of White Hart Lane is White Hart Lane Overground Station, which has recently been re-built and enlarged, and the Council -owned Love Lane Estate.

3.31. The western boundary of the site is formed by the Lea Valley railway lines. To the west of this is Pretoria Road, with mainly housing fronting the street and Durban Road which joins it from the west, and, in the London Borough of Enfield, the Commercial Road Industrial Estate.

3.32. The site is fairly close to Cycle Superhighway 1, which runs from Old Street to Tottenham Hotspur Stadium and is well served by bus services (Routes 149, 259, 279, 349 and N279) on the High Road). The site is between about 50 and 300m away from White Hart Lane Overground Station and the W3 bus route on

3.33. White Hart Lane. It is also within a walkable distance of Northumberland Park station to the south-east (approx. 1.2km), Silver Street station to the north (approx. 0.8km) and Meridian Water station to the east (approx. 1.4km). The site is within the Tottenham North Controlled Parking Zone (CPZ) and the Stadium Event Day CPZ.

3.34. Most of the Goods Yard part of the site has a PTAL rating of 4 ('Good'), with the White Hart Lane frontage benefitting from a PTAL of 5 ('Very Good'). The eastern part of the Depot part of the site has a PTAL of 4 and the western part has a PTAL of 3 ('Moderate'). The site's vehicular access forms one arm of a four-arm signal-controlled staggered junction with the High Road.

4.

Relevant Planning and Enforcement History

The site

4.1. Goods Yard – Temporary planning permission (HGY/2015/3002) granted in February 2016 for a period of three years for the Goods Yard to be used as a construction compound associated with the new stadium.

4.2. Goods Yard - Hybrid planning permission (HGY/2018/0187), granted on appeal, against non-determination, in June 2019 for a residential-led mixed use redevelopment comprising up to 316 residential units, 1,450sqm of employment (B1 use), retail (A1 use), leisure (A3 and D2 uses) and community (D1 use) uses.

4.3. Depot – Hybrid planning permission (HGY/2019/2929) and Listed Building Consent (HGY/2019/2930) granted in September 2020 for the conversion of Nos. 867- 869 High Road and redevelopment of the rest of the site for a residential led mixed-use scheme with up to 330 residential units (class C3), 270sqm of retail/café use (Use Class A1/A3), area of new public open space, landscaping and other associated works.

4.4. Goods Yard - Planning permission (HGY/2020/3001) granted in March 2021 for ground works to facilitate the temporary use (18 months to September 2022) for car parking (approx. 415 spaces).

4.5. High Road West – Planning permission (HGY/2021/3175) was granted in August 2022 for outline planning permission for a residential mixed use development comprising residential, commercial leisure and sui generis uses alongside public open space with matters of layout, scale, appearance, landscaping and access reserved for subsequent approval along side a detailed component comprising demolition of existing buildings and creation of new residential floorspace and associated landscaping and parking.

4.6. Goods Yard and Depot – Planning Permission (HGY/2021/1771), granted on appeal, for the demolition of the existing buildings and structures and redevelopment of the site for residential led mixed use development comprising residential units, commercial uses, hard and

soft landscaping, parking and associated works alongside the change of use of no.52 White Hart Lane from residential to flexible retail and the change of use of no. 867-869 High Road to residential use.

4.7. The application was refused by the planning committee on the ground that the proposed tall buildings (Goods Yard Blocks A and B and Depot Block B (by virtue of the their scale and proximity to each other and the existing Riverside Apartments tall building would have adverse impacts on long and mid range views in the locality and harm heritage assets and insufficient provision of publicly accessible open space.

4.8. Following an inquiry, the Appeal Inspector concluded that the proposed tall buildings would cause a low level of harm to the character and appearance of the area and a low level of less than substantial harm to the North Tottenham Conservation Area, The Grange, 797-799 High Road and 819-821 High Road but found very substantial public benefits clearly outweighed the harm. The benefits included housing provision, contribution to regeneration, economic benefits and biodiversity enhancements. In respect to open space, the Inspector concluded that the proposed provision would be a significant shortfall again the Policy DM20 requirement, but in accordance with the open space requirements set out in Policy NT5 and the High Road West Masterplan Framework and made appropriate provision for publicly accessible open space. Overall, the Inspector found a conflict with the adopted development plan, when read as a whole, but concluded the harms associated with the development do not outweigh the benefits.

4.9. The proposed development is similar in scale and layout to the appeal scheme and therefore is a material consideration that must be given significant weight.

The wider area

4.10. The Printworks (Nos. 819-829 High Road) – current planning (HGY/2021/2283) and Listed Building Consent (HGY/2021/2284) applications for the demolition of 829 High Road; change of use and redevelopment for a residential-led, mixed-

use development comprising residential units (C3), flexible commercial, business and service uses (Class E) and a cinema (Sui Generis).

4.11. 807 High Road – Planning permission granted in September 2021 (HGY/2021/0441) for the demolition of the existing buildings and the erection of a replacement building up to four storeys to include residential (C3), retail (Class E, a) and flexible medical/health (Class E, e) and office (Class E, g, i) uses; hard and soft landscaping works including a residential podium; and associated works.

4.12. Northumberland Terrace – Planning permission (HGY/2020/1584) and Listed Building Consent (HGY/2020/1586) granted in April 2021 for the erection of a four-storey building with flexible A1/A2/A3/B1/D1/D2 uses and change of use and alterations and extensions to a number of existing buildings (Nos. 799 to 814 High Road).

4.13. White Hart Lane Station – Planning permission (Ref: HGY/2016/2573) granted in November 2016 fora new station entrance, ticket hall, station facilities and station forecourt (completed).

4.14. Northumberland Development Project – Planning permission (HGY/2015/3000) and Listed Building Consent (HGY/2015/3000) granted in April 2016 for demolition of existing buildings, works to Warmington House and comprehensive phased redevelopment for a 61,000 seat stadium, with hotel (180-bed plus 49 serviced apartments), Tottenham Experience (sui generis), sports centre (Class D2); community (Class D1) and/or offices (Class B1); 585 homes; and health centre (Class D1) – towers up to 36-storeys.

4.15. Former Cannon Road Rubber Factory – Planning permission (HGY/2012/2128) granted In February 2013 for 222 residential units, a 2-form entry primary school and three commercial units (including a 22-storey tower) and subsequent approval of details. The development was completed in 2015.

4.16. The scheme now presented for your consideration broadly follows the layout, scale, materials and landscaping of previously consented Depot Scheme (reference HGY/2019/2929), Goods Yard Scheme (HGY/2018/0187), Depot and Goods Yard Scheme (HGY/2021/1771) and Landlease scheme (reference HGY/2021/3175). Table 5 below provides a summary of the previously consented schemes on the site and how they compare to the proposed scheme.

Table 05: Existing Goods Yard and Depot Consents

Aspect of Development	Extant Depot scheme (HGY/2021/1771) Extant Goods Yard Scheme (HGY/2018/0187)Both of which are incorporated into the parameters of the Lendlease High Road West Scheme (HGY/2021/3175)	Good Yards and Depot Appeal Scheme (HGY/2021/1771)	Proposed scheme
Total Residential floorspace (inc basement)	11,180sqm (4,800sqm GY and 1,250 D)	77,758	78,737 (GY 46,117 and D 32,620) sqm
Residential Units	Up to 646 (316 GY and 330 D)	867	844 (GY 493 and D 351)
Of which are affordable housing	126 (based on illustrative schemes) (35% by habitable room rising to 40% subject to grant funding)	297 (35.9% by habitable room rising to 40% subject to grant funding)	292 (35.93% by habitable room rising to 40% subject to grant funding)
		one bed 238 (27%) two bed 482 (55.6%) three bed 136 (15.7%) four bed 11 (1.3%)	One bed 243 (39%) Two bed 426 (50.5%) Three bed 165 (19.5%) Four bed 10 (1%)
Non-residnetial (commerical/ amenity floorspace)	Up to 1,720sqm (1,450sqm GY and 270 sqm Depot)	1,870sqm	2,068 sqm
Open space	11,180sqm (4,800sqm GY/	15,650sqm	15,630sqm

	6,380 D)		
Play Space	Up to 2,610sqm 1,360sqm GY and 1,250sqm D)	2,900sqm	2,900sqm
Maximum Building Heights	GY 24 storeys D 29 Storeys	GY Block A 32 storey D Block A 29 storey	GY Block A 32 storey Depot Block A 29 Storeys

Amendments since the original submission

4.17. During the application process, fire regulations and guidance changed which meant that the scheme, as originally submitted, would not be able to comply with requirements relating to fire safety. In line with latest fire safety regulations and guidance and in consultation with the Health and Safety Executive (HSE) further amendments to the scheme were made which includes alterations (mostly internal) to provide additional lifts, secondary stair cores necessitating corresponding changes to internal layouts.

4.18. Externally, the alterations to the Goods Yard part of the site include an increased basement footprint, an additional storey to block A, modest increase to the envelope of block A (extending southwards) and new windows to the façade. The balcony sizes to block B have been altered and the building envelope has been extended southwards. Block F (1) has been reduced by a storey and basement parking access provided between blocks F1 and F2.. Alterations to the Depot part of the site include changes to balcony sizes on Block ABC with the envelope of Block A altered through the introduction of an angle to the north and an additional bank of window and minor changes to the entrance arrangements for block E. This has resulted in a circa 262sqm increase in net internal floorspace and a circa 194 square metre increase in commercial/amenity floorspace. Figures 2 & 3 below provide envelope and footprint comparison between the originally submitted scheme,

Figure 02: Envelope Outline comparison between submission scheme (blue dash), amended proposed scheme (solid blue) and appeal scheme (solid red) (HGY/2021/3175).

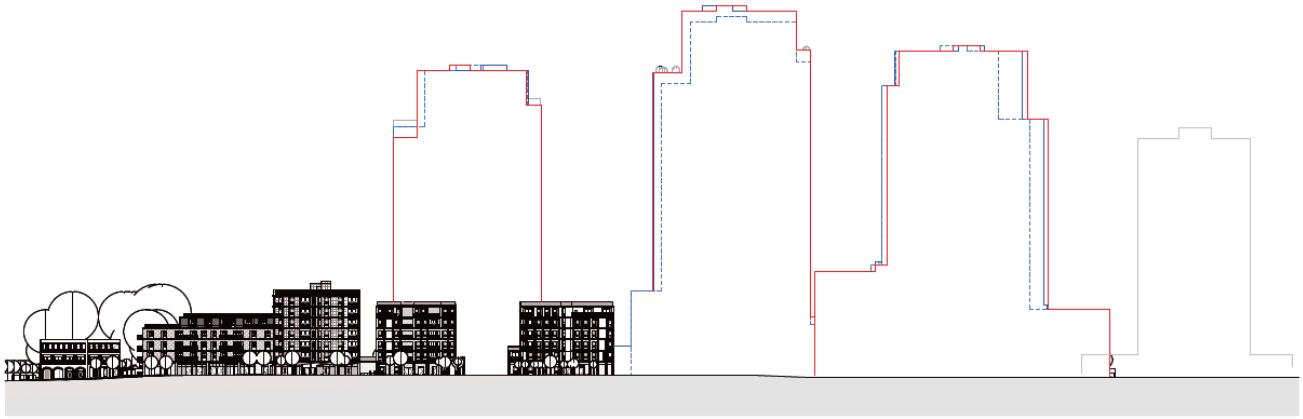


Figure 04: Outline comparison between submission scheme (blue dash), amended proposed scheme (solid blue) and appeal scheme (solid red) (HGY/2021/3175).

FIGURE 36. Site Plan - Outline Comparison

4.19. **Fall-back Position**

4.20. A fall-back position relates to an alternative proposal that could be reasonably achieved, be that one which already has extant planning consent (although is not yet implemented) or one which is permitted development that could be undertaken without the need for express planning permission. The previous

Goods Yard and Depot extant consents expire on 27/06/2025 and 24/09/2025 respectively and, subject to satisfying pre-commencement planning conditions and obligations, could both be implemented. The Goods Yard and Depot appeal consent (HGY/2021/1771) expires on 24/10/2025, subject to satisfying pre-commencement planning conditions and obligations, could be implemented. Both constituent parts of the application site are owned by the applicant, with, it is understood, a leasehold interest in the B&M store (on the Depot part of the site) that runs to September 2023, and officers consider that there is a 'real prospect' that one or both of the extant schemes would be implemented and built-out.

4.21. Case law has determined that such a fall-back position is a material planning consideration. As such, the assessment of the application scheme in the Material Considerations section of this report considers, where appropriate, the merits of the application against development plan policies and other material considerations in the following ways:

- Firstly, by considering the application as a stand-alone application scheme; and
- Secondly, by considering the application against the fall-back position established by the extant consents – including likely additional benefits and dis-benefits/harm that would result from the application scheme over and above those associated with the two extant consents.

4.22. This application is in 'full', whereas some of the extant consents are outline and hybrid (partly in 'outline' and partly in 'full'). This makes direct comparison difficult. Where relevant, account has been taken of previously approved plans, documents, planning conditions and planning obligations.

4.23. **Partial implementation and mixing and matching**

4.24. Officers have some concern that it might be possible to partially implement the extant consented Depot scheme (HGY/2019/2929) alongside development on the Goods Yard part of the site or partially implement the extant Goods Yard scheme allowed on appeal (HGY/2018/0187) alongside development on the Depot part of the site. Such 'mixing and matching' could result in unacceptable separation distances between tall buildings (Block B on the Depot part of the site and Block A on the Goods Yard part of the site).

4.25. If permission were to be granted, it would be possible to use a s106 planning obligation to prevent this.

4.26. The Lendlease permission (HGY/2021/3175) incorporated parameters to accommodate permissions HGY/2019/2929 and HGY/2018/0187) on the applicable parts of the site. The appeal consent (HGY/2021/1771) and proposed scheme fall outside of the maximum parameters of Planning permission HGY/2021/3175. A mechanism has been incorporated into planning permission HGY/2021/3175 to enable parameters to be amended in response to consents subsequently granted by the Local Planning Authority.

4.27. **Consultation and Community Involvement**

4.28. The applicant's Statement of Community Involvement (SCI) sets out the consultation took place prior to the submission of planning application reference HGY/2021/1771. The application scheme comprises modest design updates to this previous application and therefore is considered to remain of relevance. It undertook consultation in April and May 2021, January 2022, at pre-application stage. This includes: letters, adverts in 2 x local newspapers and leaflets and news letters to over 4,400 local residents and businesses inviting comment on emerging proposals and publicising two webinars; a dedicated section on the applicant's website with information about the emerging proposals and a feedback form and 2 x webinars, with 8 and 34 attendees. Emerging proposals were also discussed at the applicant's regular Business and Community Liaison Group.

4.29. The applicant's Design and Access Statement and associated agendum details further consultation meetings and workshops with Officers, the GLA, QRP and the Health and Safety Executive .

5. CONSULTATION RESPONSE

5.1. The following were consulted regarding the applications:

Internal Consultees

- LBH Building Control
- LBH Carbon Management
- LBH Conservation Officer
- LBH Design Officer
- LBH Drainage
- LBH Ecology
- LBH Economic Regeneration
- LBH Education (School Places Planning)
- LBH Emergency Planning and Business Continuity
- LBH Health in all Policies
- LBH Housing
- LBH NHS Haringey
- LBH Planning Policy
- LBH Pollution
- LBH Tottenham Regeneration
- LBH Transportation
- LBH Tree Officer
- LBH Waste Management

External Consultees

- Affinity Water
- Arriva London

- Brook House Primary School (Head Teacher)
- Enfield (London Borough of)
- Environment Agency
- Georgian Group
- Greater London Authority
- Greater London Archaeology Advisory Service (GLAAS)
- Historic England
- London Overground
- London Fire Brigade
- Mayor's Office for Policing
- Metropolitan Police - Designing Out Crime Officer
- National Grid
- National Planning Case Unit (EIA Development)
- Natural England
- Network Rail

- Newlon Housing Association
- NHS Clinical Commissioning Group
- Residents Associations (Cannon Road RA, Headcorn, Tenterden, Beaufoy & Gretton RA, Northumberland Park RA, Love Lane Residents Association & Love Lane RA (TAG)
- Sport England
- Thames Water
- Tottenham Civic Society
- Tottenham CAAC
- Transport for London
- Tree Trust for Haringey
- UK Power Networks
- Waltham Forest (London Borough of)

5.2. An officer summary of the responses received is below. The full text of internal and external consultation responses is contained in **Appendix 2.**

Internal:

Building Control – The revised design is code compliant and would be an acceptable solution under Building Regulations

Carbon Management – No objections subject to conditions and S106 obligations

Conservation Officer – No objections

Design Officer – Support for the proposed design

Ecology Officer – No objections to the previous proposal

Lead Local Flood Authority – The proposed surface water drainage arrangements are considered to be acceptable.

Pollution – No objection, subject to conditions on Land Contamination, Unexpected Contamination, NRRM and Demolition/Construction Environmental Management Plans.

Public Health – No comments received.

Regeneration – No comments received.

School Places Planning – Satisfied that there is sufficient school capacity – no specific comments on the previous proposal.

Transportation – The proposal, subject to conditions and obligations would have acceptable transportation impacts.

TFL – No objection subject to conditions securing a Road Safety Audit, Electric Vehicle Charging Points, Car Parking Management Plan, Travel, Deliveries and Servicing and Construction Logistics Plan and a Permit Free Planning Obligation and £195,000 contribution towards bus service improvements being secured.

Tree Officer – All 4 Category A trees, on the Depot part of the site next to the High Road, would be retained. Robust tree protection measures must be used to ensure these are safeguarded. An arboricultural method statement is required for any works in the RPA of any trees. The proposed landscaping includes a significant number of additional trees which should be secured by condition with associated maintenance plan.

Waste Management – Detailed requirements for refuse, recycling and food storage set out (based on guidelines). Commercial occupiers must arrange for scheduled waste collection. RAG traffic light status AMBER.

External:

Cadet Gas – Noted on the previous proposal that there is gas apparatus within the site and advice is given to the developer over the necessary liaison with and consents from the company.

Enfield (London Borough of) –No comment received.

Environment Agency - The EA has assessed the proposals as having a low environmental risk and has no comments to make (other than that other consents from the EA may be required) (the same comment made in relation to the scheme as revised).

Historic England – No comment – the Council should seek the views of your specialist conservation advisers, as relevant.

Historic England – Archaeological Service (GLAAS) – Recommend that a Stage 1 Written Scheme of Investigation and details of foundation design is secured by planning condition.

London Overground Infrastructure Protection – No objection subject to a condition relating to demolition/construction method statement.

London Fire Brigade – The proposed scheme would comply with the London Fire Brigade's requirements for firefighting access.

Metropolitan Police (Designing Out Crime Officer) – No objection in principle, to the previous proposal subject to a planning condition requiring a 'Secured by Design' accreditation to be achieved for each building, before the building is occupied and the inclusion of an informative.

Mayor of London – The Mayor's Stage 1 Report states that the application does not fully comply with the London Plan for the reasons set out below (with possible remedies being set out as to how these deficiencies could be addressed):

- Land use principles - Further optimisation of the site's potential development capacity over and above the extant planning permission is supported as part of a comprehensive residential led mixed-use scheme (paragraphs 27 to 32);
- Housing and affordable housing - 36% affordable housing (by habitable room) comprising 40% low cost rent and 60% intermediate housing is proposed, with provision for the overall quantum of affordable housing to be increased to 40% affordable housing with grant. The proposed tenure split complies with the Tottenham Area Action Plan (paragraph 37 to 49);
- Urban design - The layout, landscaping, density and residential quality is supported. (paragraph 52 to 57);
- Heritage - The scheme would cause less than substantial harm to a number of designated heritage assets. As such, the public benefits associated with the application will need to outweigh this harm. This could be the case in this instance, subject to these benefits being secured at Stage 2 and further clarification on a number of issues (58 to 62);
- Tall buildings - Tall buildings are proposed in a location which is identified as suitable for tall buildings. The scheme complies with the qualitative assessment criteria in Policy D9 (66-73);

- Transport – A financial contribution of £195,000 is required for bus service improvements. Further details on the design quality of cycle parking facilities is required. A review of the proposed southern site access is required, together with Stage 1 Road Safety Audits (paragraph 85 to 101); and
- Climate change and environmental issues - The energy, urban greening and drainage strategies are acceptable. The applicant is proposing to connect the site to the planned Lee Valley District Heat Network. This is strongly supported and should be secured. Additional energy efficiency measures were also encouraged (paragraph 102 - 108).

The full Stage 1 Report is attached as **Appendix 4**. These issues are addressed in the relevant section of the report.

National Planning Case Unit – No comments on the Environmental Statement.

Natural England – No comment with regards to statutory designated sites. Reference to Standing Advice on protected species.

Network Rail – Comments in relation to works next to the railway (Demolition, Scaffolding/Plant, Boundary Treatments, Maintenance Access, Railway Encroachment, Materials, Lighting, Drainage, Track Support Zone, Overhead Line Equipment and Site Layout).

NHS Clinical Commissioning Group – There is no guarantee that CIL receipts will be allocated towards increasing capacity. There is a site-specific impact from this development proposal which cannot be directly mitigated using a CIL payment. A s106 contribution of £442,020 is requested (based on HUDU Planning Contributions Model).

Sport England – The Council could seek contributions through CIL or s106 planning obligations – but it is not clear if, or how, the Council intends to mitigate the impact on demand for local sport facilities. If the Council intends to use s106, then the Sports Facilities Calculator could help indicate the likely demand for certain sports type facilities. Encourage the use of the Sport England/Public Health England ‘Active Design’ guide to help ensure the scheme incorporates opportunities for people to take part in sport and physical activity.

Thames Water – Waste - no network infrastructure capacity objections in relation to foul water and surface water, but recommend that petrol/oil receptors are fitted to car parking/washing/repair facilities to void oil polluted discharges entering local watercourses. Water – Request for conditions to safeguard water mains and other underground water assets. Unable to determine the infrastructure needs of this application. Should the Council look to approve the application ahead of further information being provided, a 'Grampian Style' condition should be applied. Informative should alert developers to underground water assets on the site.

Waltham Forest (London Borough of) - No comments.

LOCAL REPRESENTATIONS

5.1. Notification was sent to the following:

- Letters to neighbouring properties
- 1 notices erected in the vicinity of the site

5.2. A Further consultation was carried out on 22nd May 2023 following the receipt of amended plans

5.3. The number of representations received from neighbours, local groups etc. were as follows:

No of individual responses: 30.
Objecting: 24 from 20 separate addresses, including Cannon Road Residents' Association
Supporting: 5 from 3 separate addresses.
Others: 2.

5.4. Further details of neighbour representations and the officer response are set out in **Appendix 3.**

5.5. The main issues raised in representations from adjoining occupiers on the scheme as originally submitted are summarised below.

Objections:

- The proposed Depot Block A would be closer to the existing River Apartments than previously approved (approx. 33m rather than approx. 50m) and also more directly south – not in accordance with the HRMF.
- Adverse impact on daylight, sunlight, overshadowing and privacy of residents of River Apartments.
- Noise Impact Assessment does not take account of existing noise
- Adverse impact on well-being of residents and school children across the Cannon Road area.

- Adverse impact on daylight, sunlight, overshadowing and privacy of residents of other residents.
- Standard of accommodation
- Design and materials are not high quality
- Proposed heights are excessive
- Excessive density
- Insufficient green space
- Structural stability of surrounding buildings
- Disruption during demolition and construction phase.

Support:

- 3 x general support for regeneration

5.6. The following issues raised are not material planning considerations:

- Loss

6. MATERIAL PLANNING CONSIDERATIONS

6.1 The main planning issues raised by the proposed development are:

1. Principle of the Development
2. Policy Assessment
3. Affordable Housing
4. Development Design
5. Residential Quality
6. Social and Community Infrastructure
7. Child Play Space
8. Heritage Conservation
9. Impact on Amenity of Adjoining Occupiers
10. Transportation and Parking
11. Energy, Climate Change and Sustainability
12. Flood Risk, Drainage and Water Infrastructure
13. Air Quality
14. Wind and Microclimate
15. Trees
16. Urban Greening and Ecology
17. Waste and Recycling
18. Land Contamination
19. Basement Development
20. Archaeology
21. Fire Safety and Security
22. Equalities
23. Conclusion

6.2 Principle of the development

6.2.1 *Policy Background*

6.2.2 The current National Planning Policy Framework NPPF was updated in July 2021. The 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.

6.2.3 *The Development Plan*

6.2.4 For the purposes of S38(6) of the Planning and Compulsory Purchase Act 2004 the Local Plan comprises the Strategic Policies Development Plan Document (DPD), Development Management Policies DPD and Tottenham Area Action Plan (AAP) and the London Plan (2021).

6.2.5 A number of plans and strategies set the context for Tottenham's regeneration. These documents should be read in conjunction with the AAP. The application site is located within a strategically allocated site - NT5 (High Road West). A key policy requirement of the site allocation is that proposed development within NT5 should accord with the principles set out in the most up-to-date Council-approved masterplan. This is the High Road West Masterplan Framework (HRWMF), which is discussed in detail below.

6.2.6 The Council is preparing a new Local Plan and consultation on a Regulation 18 New Local Plan First Steps documents took place between 16 November 2020 and 1 February 2021. The First Steps document sets out the key issues to be addressed by the New Local Plan, asks open question about the issues and challenges facing the future planning of the borough and seeks views on options to address them. It has very limited material weight in the determination of planning applications.

The London Plan

6.2.7 The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. The London Plan (2021) sets a number of objectives for development through various policies. The policies in the London Plan are accompanied by a suite of Supplementary Planning Guidance (SPGs) and London Plan Guidance that provide further guidance.

Upper Lea Valley Opportunity Area Planning Framework

6.2.8 The Upper Lea Valley Opportunity Area Planning Framework (OAPF) (2013) is supplementary guidance to the London Plan. A Development Infrastructure Study (DIFS) in relation to the OAPF was also prepared in 2015. The OAPF sets out the overarching framework for the area, which includes the application site.

6.2.9 The OAPF notes the redevelopment of the High Road West area is supported by a comprehensive masterplan. The OAPF sets out the ambitions for the High Road West area to become a thriving new destination for north London, with a sports, entertainment and leisure offer supported by enhanced retail, workspace and residential development.

The Local Plan

6.2.10 The Strategic Policies DPD sets out the long-term vision of how Haringey, and the places within it, should develop by 2026 and sets out the Council's spatial strategy for achieving that vision. The Site Allocations development plan document (DPD) and Tottenham Area Action Plan (AAP) give effect to the spatial strategy by allocating sufficient sites to accommodate development needs.

Strategic Policies

6.2.11 The site is located within the Northumberland Park Area of Change as per Haringey's Spatial Strategy Policy SP1. The Spatial Strategy makes clear that in order to accommodate Haringey's growing population, the Council needs to make the best use of the borough's limited land and resources. The Council will promote the most efficient use of land in Haringey.

6.2.12 SP1 requires that development in Growth Areas maximises site opportunities, provides appropriate links to, and benefits for, surrounding areas and communities, and provides the necessary infrastructure and is in accordance with the full range of the Council's planning policies and objectives.

Tottenham Area Action Plan

6.2.13 The Tottenham AAP sets out a strategy for how growth will be managed to ensure the best quality of life for existing and future Tottenham residents, workers and visitors. The plan sets area wide, neighbourhood and site-specific allocations.

6.2.14 The AAP indicates that development and regeneration within Tottenham will be targeted at four specific neighbourhood areas including North Tottenham, which comprises the Northumberland Park, the Tottenham Hotspur Stadium and the High Road West area.

NT5 Site: High Road West

6.2.15 The site allocation for the wider area (NT5 – High Road West) covers approx. 11.69ha and calls for a master planned, comprehensive development creating a new residential neighbourhood (with a net increase of 1,200 dwellings) and a new leisure destination for London. The residential-led mixed-use development is expected include a new high-quality public square and an expanded local shopping centre, as well as an uplift in the amount and quality of open space and improved community infrastructure.

6.2.16 The NT5 site allocation contains site requirements, development guidelines and sets out the steps for undertaking estate renewal. These are set out below. The application of relevant site requirements, development guidelines and estate renewal steps to the application site is set out in the sections following.

<u>NT5 Site Requirements</u>

- The site will be brought forward in a comprehensive manner to best optimise the regeneration opportunity.
- Development should accord with the principles set out in the most up-to-date Council-approved masterplan.

- Creation of a new residential neighbourhood through increased housing choice and supply, with a minimum 1,400 new homes of a mix of tenure, type and unit size (including the re-provision of existing social rented council homes, the offer of alternative accommodation for secure tenants, and assistance in remaining within the area for resident leaseholders from the Love Lane Estate).
- Creation of a new public square, connecting an enhanced White Hart Lane Station, and Tottenham High Road, to complement the redeveloped football stadium.
- New retail provision to enlarge the existing local centre, or create a new local centre, opposite to and incorporating appropriate town centre uses within the new stadium, including the new Moselle public square. This should complement not compete with Bruce Grove District Centre.
- Enhance the area as a destination through the creation of new leisure, sports and cultural uses that provide seven day a week activity.
- Improve east-west pedestrian and cycling connectivity with places such as the Northumberland Park Estate and Lee Valley Regional Park.
- The site lies within the North Tottenham Conservation Area and includes listed and locally listed buildings. Development should follow the principles under the 'Management of Heritage Assets' section of the APP.
- Where feasible, viable uses should be sought for existing heritage assets, which may require sensitive adaptations and sympathetic development to facilitate.
- Deliver new high-quality workspace.
- Increase and enhance the quality and quantity of community facilities and social infrastructure, proportionate to the population growth in the area, including:

    - A new Learning Centre including library and community centre;
    - Provision of a range of leisure uses that support 7 day a week activity and visitation; and
    - Provision of a new and enhanced public open space, including a large new community park and high-quality public square along with a defined hierarchy of interconnected pedestrian routes.

<u>NT5 Development Guidelines</u>

- Produce a net increase in the amount and the quality of both public open space and private amenity space within the area.
- To deliver transport improvements including a new, safe and attractive entrance to White Hart Lane Station and improved rail connectivity.
- Re-provision of employment floorspace lost as a result of the redevelopment as new leisure, sports and cultural floorspace and as modern, flexible workspaces.

- This could be achieved by workspaces with potential to connect to High Road retail properties, and/or through the creation of workspace behind the High Road and the railway arches.
- This central portion of the site is in an area of flood risk, and a Flood Risk Assessment should accompany any planning application.
- This site is identified 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.
- Create a legible network of east-west streets that connect into the surrounding area, existing lanes off the High Road, and open spaces.
- Establish clear building frontages along the High Road and White Hart Lane to complement the existing character of the Local Centre.
- Incorporate a range of residential typologies which could include courtyard blocks of varying heights and terraced housing.
- In the part of the site facing the new stadium, development should respond to both the existing High Road Character and the greater heights and density of the new stadium. This needs to be carefully considered given the height differential between the existing historic High Road uses and future stadium development.
- Larger commercial and leisure buildings should be located within close proximity to the new public square linking the station to the stadium.
- Due to the size of the site and scale of development envisaged, particular consideration of the effect of the works on the nearby communities, including how phasing will be delivered. This is referenced in the High Road West Masterplan Framework (HRWMF).
- Where development is likely to impact heritage assets, a detailed assessment of their significance and their contribution to the wider conservation area should be undertaken and new development should respond to it accordingly.
- The Moselle runs in a culvert underneath the site and will require consultation with the Environmental Agency.

6.2.17 The THFC Stadium is the first stage of wider regeneration, and the intention is for it to be fully integrated within the comprehensive regeneration of High Road West and Northumberland Park. The priority is to ensure that on match and non-match days, the area is lively and attracts people to make the most of the stadium development, the High Road, and wider urban realm improvements that will take place as part of this development. Provision is therefore proposed for new community facilities and leisure orientated retail development to further build and cement the area's reputation as a premier leisure destination within North London.

High Road West Master Plan Framework (HRWMF)

6.2.18 Policy AAP1 (Regeneration and Master Planning) indicates that the Council expects all development proposals in the AAP area to come forward comprehensively to meet the wider objectives of the AAP. To ensure comprehensive and coordinated development is achieved, masterplans will be required to accompany development proposals which form part of a Site Allocation included in the AAP.

6.2.19 The current approved High Road West Master Plan Framework (HRWMF) is that prepared by Arup in September 2014. This highlights opportunities for improvement and change in the subject area and identifies where housing, open space and play areas, as well as community, leisure, education and health facilities and shops could be provided. The HRWMF also helps to demonstrate how the growth and development planned for High Road West could be delivered through strategic interventions over the short to longer term.

6.2.20 The Council has entered into partnership with Lendlease who since the appeal decision have received planning permission for the comprehensive redevelopment of a substantial proportion of Site Allocation NT5 (including the application site).

6.2.21 5 Year Housing Land Supply

6.2.22 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).

6.3 **Policy Assessment**

Loss of Existing Retail and Education Uses

6.3.1 London Plan Policy SD7 seeks to realise the full potential of existing out of centre low-density retail and leisure parks and commercial sites to deliver housing intensification. Policy SP10 seeks to protect and enhance Haringey's town centres, according to the borough's town centre hierarchy and Policy DM41 promotes new retail spaces in town centres. AAP Site Allocation NT5 does not seek to retain large-format retail on the site, but rather seeks to either enlarge the existing North Tottenham Local Centre or create a new local centre.

The existing out-of-centre retail store (4,760sqm (GIA)) and five small retail units

(319sqm (GIA)) date from the early 1980s and the main store was originally occupied by Sainsbury's. Following planning permission in March 2012 for a larger retail store (12,170sqm (GIA)) on Northumberland Park on the edge of the Tottenham High Road North Local Centre as part of THFC's stadium project, Sainsbury's re-located to that new larger store. The existing store on the site is currently occupied by B&M, a grocery and general merchandise store. Three of the small units are occupied by a grocer, hair dressers and pharmacy and three are vacant. The applicant's Regeneration Statement (3.2) identifies the existing occupied floorspace is estimated to support approx. 160 FTE jobs.

6.3.2

6.3.3 The proposed loss of the existing out-of-centre large retail store and five small retail units is consistent with the development plan's 'town centres first' approach to retail provision and the Site Allocation and is acceptable in principle. The proposed scheme includes 2,068sqm (GEA) of flexible commercial (E Class) uses, discussed below.

6.3.4 The proposals would also result in the loss of the existing education (F1(a) use in Nos. 867-869 High Road (approx. 806sqm). The continued use of these properties for this purpose was permitted in 2011 and the buildings are currently partly used for adult education/office purposes. Whilst London Plan Policy S3 seeks to safeguard education uses, the proposals would facilitate the conversion of the Listed Buildings back to their original use (which is considered to be the best use of heritage assets) and officers consider that an exception to policy would be acceptable. The proposed loss of retail and education uses has been granted permission by the extant Depot consent.

Loss of Existing Industrial Premises/Land

6.3.5 London Plan Policy E4 requires a rigorous approach to industrial land management, identifies that sufficient land and premises need to be retained for industrial and related functions but recognises that managed release may be required to provide other uses in appropriate locations.

6.3.6 Policy SP8 supports the Borough-wide provision of office/light industrial floorspace as part of mixed-use development on suitable sites. Policy SP9 also supports small and medium sized businesses that need employment land and space. Policy DM40 seeks to facilitate the renewal and regeneration (including intensification) of existing employment land and floorspace in accessible locations.

6.3.7 The site includes the Carbery Enterprise Park (11 x 2-storey units and approx. 10 x car parking spaces) comprising approx. 1,125sqm (GIA) of Use Class E (i) and (iii) office/ light industrial space, and Use Class B2 general industrial space. The rest of the Goods Yard part of the site was formally a goods yard, then, as recently as April 2016, a scrap yard (*Sui Generis*). The clearance of buildings and infrastructure associated with the scrap yard was authorised by the temporary permission for use of this land as a construction compound for the building of the new stadium. The Environment Agency approved an application by Redcorn Limited to surrender the Waste Management Licenses for the site. This part of the site currently has temporary permission for car parking associated with the stadium. The applicant's Regeneration Statement (3.4) identifies the existing occupied floorspace is estimated to support approx. 30

FTE jobs.

6.3.8 Given that the site as a whole forms part of Site Allocation NT5 allocated in the development plan and the proposed scheme al incorporates flexible commercial space, including some replacement employment floorspace (as discussed below) the loss of 1,125sqm (GIA) of office, light/general industrial floorspace is acceptable in principle. It is recommended that s106 planning obligations secure the implementation of an approved relocation strategy to assist with temporary and permanent relocation of existing businesses operating from the Carbery Enterprise Park to new premises within the development, or failing that, at other locations in the Borough.

Loss of Existing Housing

6.3.9 London Plan Policy H7 makes clear that loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace.

6.3.10 The Station Masters House is vacant residential space, which is understood was last used as one large home, with a small 1-bed flat located in the ground floor annex. The proposed conversion and extension of this building for café/ restaurant use (Use Class E(a)), would result in the loss of approx. 175sqm (GIA) of residential floorspace. However, no occupants would be displaced and the very significant additional amount of residential floorspace outlined below makes the loss of residential space here acceptable in principle.

Principle of Proposed Flexible Commercial Uses

6.3.11 Policy DM40 supports proposals for mixed use, employment-led development where necessary to facilitate the renewal and regeneration of existing non-designated employment sites within highly accessible or otherwise sustainable locations. All proposals for mixed use development must also satisfy the requirements of Part A of Policy DM38 (maximise amount of employment floorspace, provide improvements to site's suitability, make provision of affordable workspace where viable, safeguard residential amenity, do not conflict with retained employment use and connect to ultra-fast broadband).

6.3.12 Tottenham AAP Policy NT2 states the Council will support development which increases job density and therefore helps to meet the employment needs of the Borough and enables small firms to start up, and grow, in flexible industrial space. Site Allocation NT5 establishes indicative development capacities for commercial (4,350sqm) and town centre uses (11,740sqm) (16,090sqm overall).

6.3.13 The principles of the HRWMF seek to create a net increase in jobs and business opportunities in the area through an increase in commercial space and provision of a range of workspaces. The principles of the plan also seek to provide a range of retail and commercial units to encourage a greater mix and wider retail offer.

6.3.14 The proposed scheme includes 2,068sqm (GEA) of flexible commercial uses (Class E) approximately 2,00sqm more than proposed in the appeal scheme. This would include the conversion of the Station Masters House (both floors) and the provision of a number of ground floor commercial units (ranging

between 80 and 230 sqm (GIA)) around the site as follows:

- GY Station Master's House – approx. 216sqm;
- GY Block H – approx. 698sqm (facing White Hart Lane and proposed north/south street);
- GY Blocks E, F and G – three units (approx. 188, 185 and 244sqm) (facing the proposed southern square and north/south street);
- D Block ABC – approx. 130sqm (facing the proposed northern square and Peacock Park); and
- D Block G – approx. 215sqm (facing the proposed Peacock Park).

6.3.15 The proposed conversion of the School Masters House to flexible retail. The proposed new commercial units would be for flexible commercial uses falling within Use Class E – which includes retail, cafes/restaurants, office/light industry, health/ fitness and health facilities, creches, day nurseries and day centres.

6.3.16 The proposed amount of commercial floorspace proposed is considered to make a proportionate contribution to NT5 allocated requirements for commercial uses and is generally consistent with guidance in the HRWMF. In line with the extant Goods Yard consent, it is recommended that a planning condition secures at least 400sqm of the proposed space as office, R&D, light industrial (Use Class E(g) (i)(ii)(iii) to mitigate the loss of the Carbery Enterprise Park.

6.3.17 It is also recommended that s106 planning obligations to secure the implementation of an approved Employment and Skills Plan to maximise employment and training opportunities for residents from the development (including during the construction phase).

Principle of Provision of Housing

6.3.18 London Plan Policy H1 sets a 10-year target (2019/20-2028/29) for the provision of 522,870 new homes across London as a whole and 15,920 for Haringey.

6.3.19 Policy SP2 states that the Council will maximise the supply of additional housing to meet and exceed its minimum strategic housing requirement.

6.3.20 The Tottenham AAP identifies and allocates development sites with the capacity to accommodate new homes. The wider High Road West area is allocated in the AAP (NT5) as an appropriate place for residential development alongside a mix of other uses and call for a minimum of 1,400 homes and a net increase of 1,200 homes). Of the 1,400 dwellings anticipated, 222 homes have already been developed in the form of the Cannon Road housing area (HGY/2012/2128). This leaves 1,178 dwellings still to be provided.

6.3.21 Given the above, the principle of the provision of new homes on the site (alongside a mix of other uses) is acceptable. The proposed scheme would deliver 844 new homes. The proposed conversion of the Station Master's House (No. 52 White Hart Lane) (currently vacant). The proposals would therefore result in a net gain of 843 homes. This is 23 less homes than the extant Goods Yard and Depot Permission allowed at appeal (reference HGY2021/1771) and 197 more than the previous Goods Yard and Depot Permissions combined

(references HGY/2018/0187 & HGY/2019/2929). The proposed house quantum represents 5.29% of the number of homes required to be delivered within the current London Plan 10-year housing target timeframe.

6.3.22 The ES (Chapter 7) reports on an assessment of the likely significant socio-economic effects of the proposed scheme, including housing delivery and concludes that the proposed new homes would have a Major beneficial effect at the local level and a Moderate beneficial effect at the borough level (when considered in isolation and alongside the cumulative schemes). Officers agree.

Principle of Comprehensive Development

6.3.23 Policy AAP1 (Regeneration and Master Planning) makes clear that the Council expects all development proposals in the AAP area to come forward comprehensively to meet the wider objectives of the AAP. It goes on to state that to ensure comprehensive and coordinated development is achieved, masterplans will be required to accompany development proposals which form part of a Site Allocation included in the AAP and that applicants will be required to demonstrate how any proposal:

a) Contributes to delivering the objectives of the Site, Neighbourhood Area, and wider AAP;
b) Will integrate and complement successfully with existing and proposed neighbouring developments; and
c) Optimises development outcomes on the site.

6.3.24 Policy DM55 states: “Where development forms part of an allocated site, the Council will require a masterplan be prepared to accompany the development proposal for the wider site and beyond, if appropriate, that demonstrates to the Council’s satisfaction, that the proposal will not prejudice the future development of other parts of the site, adjoining land, or frustrate the delivery of the site allocation or wider area outcomes sought by the site allocation”.

6.3.25 Policy NT5 makes clear that ‘development should accord with the principles set out in the most up-to-date Council approved masterplan’, which as discussed above, is the approved HRWMF prepared by Arup in September 2014. This is therefore an important material consideration when determining planning applications.

6.3.26 Paragraph 4.6 of the AAP states that Haringey wants to ensure development proposals do not prejudice each other, or the wider development aspirations for the Tottenham AAP Area whilst enabling the component parts of a site allocation to be developed out separately. The various sites north of White Hart Lane are expressly set out in Table 2 of Policy AAP1 as requiring a comprehensive redevelopment approach.

6.3.27 Paragraph 4.9 of the AAP states that a comprehensive approach to development will often be in the public interest within the Tottenham AAP area. It goes on to state that whilst incremental schemes might be more easily delivered, the constraints proposed by site boundaries, neighbouring development or uses and below-ground services all have potentially limiting consequences for scale, layout

and viability.

6.3.28 Although HRMF seeks to ensure that the site is brought forward in a comprehensive manner, the phasing provisions of the HRWMF explicitly recognise existing land ownership. Indeed, Phase 1A (Cannon Road area) was delivered independently. This acknowledgement that component parts of site allocations may be progressed separately (subject to them not prejudicing the delivery of the Site Allocation and HRWMF) was confirmed by the Goods Yard Appeal Decision in June 2019 and again by the Council's and the Planning Inspectorate's decision to grant permissions for various parcels of land within the site allocation.

6.3.29 The applicant is proposing to develop four parts of Site Allocation NT5 that it owns (the Goods Yard, the Depot, No. 807 High Road and the Printworks). This application is supported by a masterplan that demonstrates that the development of the combined Goods Yard-Depot site could be satisfactorily developed without prejudicing the delivery of the wider NT5 Site Allocation.

6.3.30 There are a number of key interfaces with existing and future adjoining spaces that would need to be secured in order for the proposed scheme to be acceptable. These are addressed in more detail under Development Design, but in summary relate to (i) connectivity with the existing Cannon Road area; (ii) access to and use of the proposed Embankment Lane and Northern Square by occupiers of future development to the east and south; (iii) access to and use of the proposed Pickford Yard Gardens by residents of future housing to the south; and (iv) safeguarding the possibility of an east-west pedestrian/ cycle bridge between the site and Pretoria Road to the west.

Principle of the Development – Summary

6.3.31 The provision of a residential-led mixed-use scheme comprising housing and commercial uses is acceptable in principle. The incremental development of Site Allocation NT5 is acceptable in principle, providing that the proposed development does not prejudice the future development of other parts of the Site, Allocation, or frustrate the delivery of Site Allocation NT5 or wider area outcomes sought by the site allocation. It would also be necessary to use s106 planning obligations to secure a satisfactory access to the Cannon Road area to the north and future development plots to the east and the safeguarding of a potential future pedestrian/cycle bridge.

6.3.32 The applicant has requested that any planning permission is given a 5-year life, rather than the standard 3-years. The Goods Yard and Depot extant consents allow for an implementation period of between 4 and 5-years and a 5-year life for any new permission would give more time for the applicant to work constructively with the Council's development partner Lendlease over development of land to the north of White Hart Lane.

6.3.33 Fall-back Position. The extant schemes would similarly safeguard the development potential of adjoining land and allow for the comprehensive regeneration of Site Allocation NT5 over time.

6.3.34 The proposed scheme would result in the same loss of existing uses as with the extant schemes (namely retail and education use at Nos. 867-869 High Road, vacant housing at the Station Master's House and industrial units at the Carbery Enterprise Park).

6.3.35 The amount of proposed non-residential commercial uses in the proposed scheme (2,040 sqm GIA) is slightly more than in the previous consents (up to 1,887sqm GIA) and, subject to a planning condition, the same minimum 400sqm industrial uses would be secured.

6.3.36 Although there would 23 less dwellings that the extant permission in-principle support remains for additional housing, with new London Plan housing targets, Housing Delivery Test measures and changes to the NPPF all strengthening the policy requirement for additional homes.

Development Density

6.3.37 London Plan Policies H1 and D3 make clear that development must make the best use of land by following a design-led approach that optimises the capacity of sites (which no longer refers to a density matrix as a guide). The policy states that a design-led approach requires consideration of design options to determine the most appropriate form of development that responds at a site's context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in Policy D2). In doing so it identifies a number of requirements in relation to form and layout, experience and quality and character.

6.3.38 A key principle of the HRWMF is to achieve appropriate residential densities corresponding to guidelines set out by the Mayor in relation to public transport accessibility levels. The extant the Goods Yard and Depot Appeal Scheme has a density of 1,116 rooms/ha (353 units/ha).

6.3.39 The proposed scheme would have a density 346 units/ha. This just below the definition of 'higher density' development in the London Plan (350 units/ha). The following issues are assessed in different sections of this report:

- Form and Layout – Development Design;
- Experience – (safety, security, inclusive design, housing quality and residential amenity) – Development Design, Residential Quality, Impact on Amenity of Adjoining Occupiers and Fire Safety & Security;
- Quality and character – Development Design;
- Neighbour amenity – Impact on Amenity of Adjoining Occupiers;
- Transport infrastructure – Transportation & Parking;
- Green infrastructure– Trees and Urban Greening & Ecology; and
- Social infrastructure – Social & Community Infrastructure.

6.3.40 In summary, the assessment in the above sections finds the proposed scheme to be acceptable, subject to securing necessary mitigation and officers are satisfied that the proposed amount of development does optimise the site's potential to deliver new homes and jobs as part of a new higher density neighbourhood.

6.3.41 Fall-back Position. The extant Goods Yard and Depot appeal scheme has a density of (353 units/hectare). The schemes were considered acceptable in relation to the density factors listed above.

Dwelling Unit Mix

6.3.42 London Plan Policy H10 requires new residential developments to offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of evidence of housing need, the requirement to deliver mixed and inclusive neighbourhoods, the need to deliver a range of unit types at different price points and the mix of uses and range of tenures in the scheme. Strategic Policy SP2 and Policy DM11 of the Council's Development Management DPD adopt a similar approach.

6.3.43 Policy DM11 states that the Council will not support proposals which result in an overconcentration of 1 or 2 bed units overall unless they are part of larger developments or located within neighbourhoods where such provision would deliver a better mix of unit sizes. A key principle around homes set out in the HRWMF is provision for a mix of housing sizes, types and tenures.

6.3.44 The overall proposed dwelling mix is set out in Table 05 below.

Table 05: Proposed dwelling mix

Bedroom Size	**No. of Units**	**% by unit**
1 bed 2 person	243	29
2 bed (3 & 4person)	426	50
3 bed (4, 5 & 6 person	165	20
4 bed (6 person)	10	1
Total	**844**	**100%**

6.3.45 The proposed dwelling mix is 79% 1 and 2 bed units and 21% family sized housing. However, the proposed mix is not considered to represent an unacceptable over-concentration of 1- and 2-bedroom units given the site location and is generally consistent with the AAP approach to deliver smaller units in close proximity to public transportation and HRWMF principles. An assessment of the suitability of the dwelling mix as it relates to affordable housing is contained in the section below.

6.3.46 Fall-back Position. Whilst the proposed development would deliver less homes than the approved Goods Yard and Depot Appeal Scheme, it would deliver a greater proportion of family sized homes.

6.4 **Affordable Housing**

Policy Background

6.4.1 London Plan Policy H5 and the Mayor's Affordable Housing and Viability SPG set a strategic target of 50% affordable housing. Policy H5 identifies a minimum threshold of 35% (by habitable room) affordable housing, whereby applications providing that level of affordable housing, with an appropriate tenure split, without public subsidy, and meeting other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor, can follow the 'fast track route' set out in the SPG; this means that they are not required to submit a viability assessment or be subject to a late stage viability review. The minimum required affordable housing in order to take advantage of the threshold approach increases to 50% for 'industrial land.'

6.4.2 London Plan Policy H7 and the Mayor's Affordable Housing and Viability SPG sets out a preferred tenure split of at least 30% low cost rent, with London Affordable Rent as the default level of rent, at least 30% intermediate (with London Living Rent and share ownership being the default tenures), and the remaining 40% to be determined in partnership with the Local Planning Authority and the GLA.

6.4.3 Policy SP2 of the Local Plan requires developments of more than 10 units to provide a proportion of affordable housing subject to viability to meet an overall borough target of 40%.

6.4.4 Policy AAP3 sets out the affordable tenure split (DM13 A[b]) in the Tottenham AAP area should be provided at 60% intermediate accommodation and 40% affordable rented accommodation.

6.4.5 Site Allocation NT5 includes the requirement to create a new residential neighbourhood through increased housing choice and supply, with a minimum 1,400 new homes (1,178 net given the built Cannon Road scheme) of a mix of tenure, type and unit size (including the re-provision of existing social rented council homes, the offer of alternative accommodation for secure tenants, and assistance in remaining within the area for resident leaseholders from the Love Lane Estate).

Amount, type, location and phasing of Affordable Housing

6.4.6 It was accepted on the appeal scheme that the only 'industrial land' (for the purposes of London Plan Policy H5) within the site is the Carbery Enterprise Park taking account of the planning history of this part of the site, the current use of the land.

6.4.7 The application adopts a blended approach to affordable housing provision to benefit from the fast track approach enabled by London Plan Policy H5 (C): 35% for the Depot site, 50% for that part of the Goods Yard site occupied by the Carbery Enterprise Park ('industrial land') and 35% for the remainder of the Goods Yard site as set out in Table 06 below. This amounts to the need for 36% affordable housing (by habitable rooms).

Table 06: Calculation of Fast Track Target

Site Component	Use	Site Area (sqm)	Site %	Policy H6 Threshold	Affordable Hab Room Target %
Carbery Enterprise Park	Industrial	1,546	6%	50%	3.09%
All other land	Non-Industrial	23,479	94%	35%	32.84%
		25,025	100%		35.93%

6.4.8 Other requirements of London Plan Policy H5 (C) are met as follows:

- The proposed tenure split meets the required relevant tenure split (see below);
- The proposed scheme would meet other relevant policy requirements and obligations – including financial contributions towards community facilities and social infrastructure (Community Space, Library and Public Realm) as called for in the Site Requirements of Site Allocation NT5; and
- The applicant has committed to increase the amount of affordable housing to 40% (by habitable room) if grant is made available - taking account of the Mayor's strategic target.

6.4.9 Overall residential component. The overall residential component of the proposed scheme is set out in Table 07 below

Table 07: Proposed residential component

Tenure	Units	Hab Rooms	% Hab Rooms
Private	552		65%
Affordable	292		35%
Total	844		100%

6.4.10 Tenure Split: The scheme proposes 40% Low-Cost Rent and 60% Intermediate by habitable room as set out in Table 08 below.

Table 08: Proposed Affordable Housing Tenure Split

Tenure	Units	Hab Rooms	% Hab Rooms
Low-Cost Rent	99	359	40%
Intermediate	193	540	60%
Total	292	899	

6.4.11 Unit Size Mix: The scheme proposes a mix of affordable housing unit sizes including 49% family sized (3 bed+) Low-Cost Rent homes, as set out in Table 09 below.

Table 09: Proposed Affordable Housing Dwelling Mix

	1-bed	2-bed	3-bed	4-bed	Total
Low-Cost Rent	13	43	33	10	99
	13.1%	43.4%	33.3%	10.1%	100%
Intermediate	73	87	33	0	193
	38%	45%	17%	0%	100%

6.4.12 Wheelchair accessible homes: The proposals include 10% of homes designed to meet Building Regulation M4 (3) ('Wheelchair User Dwellings'). These proposed homes are distributed across tenures as set out in Table 10 below.

Table 10: Proposed Wheelchair User Dwellings by tenure

	1-bed	2-bed	3-bed	4-bed	Total
Market	16	10	10	0	36
Low-Cost Rent	3	5	3	0	11
Intermediate	12	17	9	0	38
	31	32	22	0	84 (10%)

6.4.13 Distribution: The affordable housing would be distributed across the site in various buildings, as outlined in Table 11 below. Low-Cost Rent homes would either be independently accessed from the street or would have their own discreet stair/lift cores. Some proposed Intermediate homes would share common stair/lift cores with Market homes.

Table 11: Proposed Tenure Distribution

Building*	Market	Affordable	Total
Goods Yard			
Block A	198	0	198
Block B	123	71	194
Block C	0	14	14
Block D	0	8	8
Block E	24	0	24
Block F	0	19	32
Block G	143	17	17
The Depot			
Block A	143	50	193
Block B	0	43	43
Block C	16	0	16
Block D	0	32	32
Block E	20	0	20
Block F	4	0	4
Block G	22	0	22
Total	552	292	844

6.4.14 Design & Management: All proposed homes have been designed so they are 'tenure blind' and there would be no discernible difference in external appearance of homes in different tenures. The proposed affordable homes would be managed by a Registered Provider of Affordable Housing and be able to access the same amenities and open space and the scheme has been designed to ensure estate service charges are as affordable as possible, whilst allowing all residents the right to access on-site amenities.

6.4.15 Grant Funding: If grant becomes available, the provision of affordable housing on-site would be increased to up to 40% Affordable Housing, again consistent with the extant planning permissions. The exact amount, location, tenure and unit mix of any additional affordable housing to be provided on-site would need to be agreed with the LPA.

Affordability

6.4.16 The proposed Low Cost Rent homes would be London Affordable Rent or Social Rent (if required by the Council). Where it did so, the first 61 Council purchased homes would be at Social Rent, if required by the Council to support its estate renewal objectives. In that scenario, the remainder would be at London Affordable Rent.

6.4.17 London Affordable Rent is a form of Affordable Rent, for legal and regulatory purposes, but whereas nationally the cap on Affordable Rent is no more than 80% of market rent, the Mayor does not consider 80 per cent of market rent to be genuinely affordable in most parts of London.

6.4.18 Once let, London Affordable Rent homes would be subject to rent-setting guidance issued by the Social Housing Regulator and will be subject to the annual one per cent rent reductions. Providers will be able to re-let at up to the applicable benchmark level, uprated annually, or at an otherwise agreed level, as appropriate and in line with legislation and Regulator guidance. The benchmark rents do not include service charges, which may be charged in addition. Rents for London Affordable Rent homes have to be set in accordance with the Social Housing Regulator's Affordable Rent guidance. The landlord of these homes must be registered with the Social Housing Regulator.

6.4.19 The proposed Intermediate homes would be Shared Ownership. The units would be sold at the minimum 25% share of equity and rental on the unsold equity up to 2.75%. In line with the current London AMR the income threshold would not exceed £90,000. It is proposed that units would target a range of incomes dependent on the unit size and will prioritise those who live and/or work in the borough. If planning permission were granted, it would be appropriate to use s106 planning obligations to ensure that marketing of the proposed Shared Ownership homes prioritises households living or working in Haringey with maximum annual incomes lower than the maximum £90,000.

6.4.20 The applicant's affordable housing offer is in accordance with the Tottenham Area Action Plan. However, while the proposed marketing of the London Living Rent units conforms to the Mayor of London's Plan and Housing Strategy, it is not strictly in accordance with the Haringey Intermediate Housing Policy marketing targets.

Viability Review

6.4.21 In accordance with London Plan Policy H5, it is recommended that s106 planning obligations secure an Early-Stage Viability Review. and it is also recommended that these secure a Development Break Review – requiring a review if an approved scheme were implemented, but then stalled for 30 months or more. These reviews would enable the provision of affordable housing to increase up to 40% (by habitable room) subject to future market conditions and delivery timescales.

Contribution towards regeneration

6.4.22 London Plan Policy H8 makes clear that demolition of affordable housing, including where it is part of an estate redevelopment programme, should not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace.

6.4.23 A key NT5 site requirement is the re-provision of existing Social Rented Council homes arising from the demolition of the Love Lane Estate. The Love Lane Estate contains 297 homes and lies to the south of White Hart Lane, within the NT5 Site Allocation. The Estate was built in the 1960's and includes three 10-storey 'Y' shaped blocks and several four storey slab blocks. The HRWMF calls for the demolition of the Love Lane Estate as part of the delivery of the wider NT5 site and the approved masterplan.

6.4.24 The requirements of NT5 in respect of the form of affordable housing are therefore different from those in other parts of the Borough. In order to facilitate the comprehensive redevelopment of the NT5 site and facilitate estate renewal, and taking account of the phasing proposed in the HRWMF which identifies the application site as forming the vast majority of Phase 3, the application site will need to provide a proportionate quantum of Social Rented housing to address the loss on the Love Lane Estate.

6.4.25 In order to make a positive contribution towards the renewal of the Love Lane Estate, the applicant has agreed that the Council would be offered the first right to purchase up to 61 of the proposed 99 Low Cost Rent homes. This offer is on the basis that the Council would purchase these homes at an agreed price (per square foot, index linked) and that whilst the first 61 of any purchased homes could be at Social Rent, any additional purchased homes would be at London Affordable Rent. Officers consider this to be an acceptable contribution towards estate renewal.

Affordable Housing - Summary

6.4.26 Officers consider that both the amount and type of proposed affordable accommodation are acceptable, subject to approval of details and Early and Development Break Reviews.

6.4.27 Fall-back Position. Compared with the two extant consents for the site (HGY2018/0187 and HGY/2019/2929), the proposed scheme would deliver:

- 52 more affordable homes;
- 16 more Low-Cost Rent homes;
- The Council to have first right to purchase on 61 of the proposed Low Cost Rent homes

6.4.28 Fall-back Position. Compared to the Goods Yard and Depot Appeal Scheme (HGY/2021/1771)

- 18 less affordable homes;
- 4 less Low-Cost Rented homes
- 14 less Intermediate homes
- The council have first right to purchase the same number of homes

6.5 **Development Design**

Policy Background

6.5.1 The NPPF (July 2021) makes beauty and placemaking a strategic national policy, includes an expectation that new streets are tree-lined and places an emphasis on granting permission for well-designed development and for refusing it for poor quality schemes, especially where it fails to reflect local design policies and government guidance contained in the National Design Guide (January 2021) and, where relevant, National Model Design Code (July 2021).

6.5.2 London Plan Policy D4 encourages the use of masterplans and design codes and 3D virtual modelling and thorough scrutiny by officers and the design review process to help ensure high quality development (particularly, as in this case, the proposed residential component would exceed 350 units per hectare or include a tall building).

6.5.3 Local Plan Strategic Policies DM1 and DM6 and Local Plan Policy DM1 states that all development must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. Further, developments should respect their surroundings by being sympathetic to the prevailing form, scale, materials and architectural detailing. Local Plan Policy SP11 states 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.

6.5.4 SP11 goes on to say applications for tall buildings will be assessed against the following criteria (summarised): adopted Area Action Plan (AAP) or masterplan framework, assessment supporting tall buildings in a Characterisation Study compliance with DM policies and all the relevant recommendations in the CABE / English Heritage "Guidance on Tall Buildings" 2007 (since superseded in 2015). DM6 part C sets out detailed policy requirements for tall buildings; being in an area identified as suitable, represent a landmark by which its distinctiveness acts as a wayfinder or marker, is elegant and well proportioned, visually interesting when viewed from any direction, positively engage with the street environment, consider impact on ecology and microclimate, going onto requiring where tall buildings are in close proximity to each other they avoid a canyon effect, consider their cumulative impact, avoid coalescence and collectively contribute to the vision and strategic objectives for their area.

6.5.5 London Plan Policy D9 requires that tall buildings are only developed in locations that are identified as suitable in Development Plans. It goes on to set out a number of visual, functional and environmental impacts of tall buildings that should be considered in planning decisions.

6.5.6 The Upper Lee Valley Opportunity Area Framework proposes that future tall buildings will generally be in well-defined clusters in identified urban growth centres. Strategic Policy SP11 requires all new development to 'enhance and enrich Haringey's built environment and create places and buildings of high quality'. Policy AAP6 states that, in line with DM6, Tottenham Hale and North Tottenham as growth areas have been identified as being potentially suitable for the delivery of tall buildings.

6.5.7 The HRWMF sets out the principle that tall buildings will only be considered in parts of the masterplan area where existing character would not be affected adversely by the scale, mass or bulk of a tall building. The HRWMF envisages a "legible tall building spine" that descends from Brook House to create an appropriate heritage setting for statutorily listed and locally listed assets.

6.5.8 The HRWMF also sets the principles that tall buildings should be located to minimise overshadowing of adjacent development and used as part of a way finding and movement strategy (for example located towards the end of east-west routes). Key views of the stadium should be considered and maintained in the profile of buildings.

Site Layout

6.5.9 The HRWMF sets out the following relevant layout principles:

- Create a legible network of east-west streets that connect into the surrounding area, existing lanes off the High Road, pocket parks and other open spaces;
- Create attractive north-south links behind the High Road which connect public parks and squares, key public buildings and the station;
- Complement the scale of the proposed street layout with appropriate building heights;
- stablish clear building frontages along White Hart Lane with a high street type character integrating existing listed buildings;
- Incorporate a range of residential typologies including courtyard blocks of varying heights and terraced housing;
- Any tall buildings should be placed along the railway corridor to create a legible tall building spine. The buildings should use the existing Brook House (Rivers Apartments) as a reference point and descend in height;
- Demonstrate clear definition of fronts and back of buildings, public and private open spaces and active street frontages;
- Establish a simple palette of high-quality building materials for the Masterplan that includes significant use of brick; and
- Enhance the heritage value contribution of the High Road, reinforcing its fine grain and diversity of retail offer alongside improvements High Road frontages.

6.5.10 Figure 38 in the HRWMF sets out an overall indicative masterplan and also identifies the opportunity to create an east-west route across the site and the railway lines, between Brantwood Road in the east and Durban Road in the west.

6.5.11 In response, the proposed scheme for the Goods Yard-Depot site can be seen to comply with the following relevant HRWMF principles by:

- Retaining, refurbishing and enhancing the immediate setting of Nos. 867-869 High Road (Grade II Listed) and No.34 White Hart Lane (The Station Master's House (a locally listed building;
- Providing an east-west street and a north-south street running across the site to

connect into the wider masterplan phases – both including a clear distinction between vehicular and pedestrian spaces creating threshold spaces between this route and homes that would front it;

- Including a commercial unit in the north west corner of the proposed Northern Square, connecting through to the east to also front the proposed Peacock Park in a location consistent with the HRWMF;
- Providing three tall buildings along the west of the site to create a spine of tall buildings alongside the railway (although these are not in the location envisaged and do not descend in height from the existing River Apartments building as envisaged – see discussion below);
- Providing a new public park, Peacock Park (capable of being extended southwards) at the heart of the Depot part of the site, with a north-south street

and other public spaces creating links through the site to access White Hart Lane Station;

- Providing a range of housing typologies with a mix of courtyard and other blocks, including ground and first floor maisonettes with many of the characteristics of townhouses, with the tallest buildings located along the railway corridor;
- Buildings fronting onto public spaces and main roads, with the backs of the buildings and private spaces provided within courtyards;
- Providing defined public and private open spaces and active street frontages along the key routes; and
- Allowing for partial courtyard blocks created by Depot Block G and further mixed-use/residential buildings on the Peacock Industrial Estate land to the south. See discussion below.

6.5.12 The proposed layout is based on a 'streets and squares' approach, with active ground floor frontages in the form of flexible commercial units, duplex/ maisonettes with front doors on the streets and communal residential entrances to a series of lower mansion block and three tall buildings. There would be a good, clear, front to back relationship and proposed refuse stores and cycle parking would generally be internalised to avoid these having a negative effect on the street environment. This should all help ensure a safe and secure development and an active public realm.

6.5.13 However, the proposed layout would differ from the HRWMF's relevant principles and indicative masterplan in three ways, discussed below:

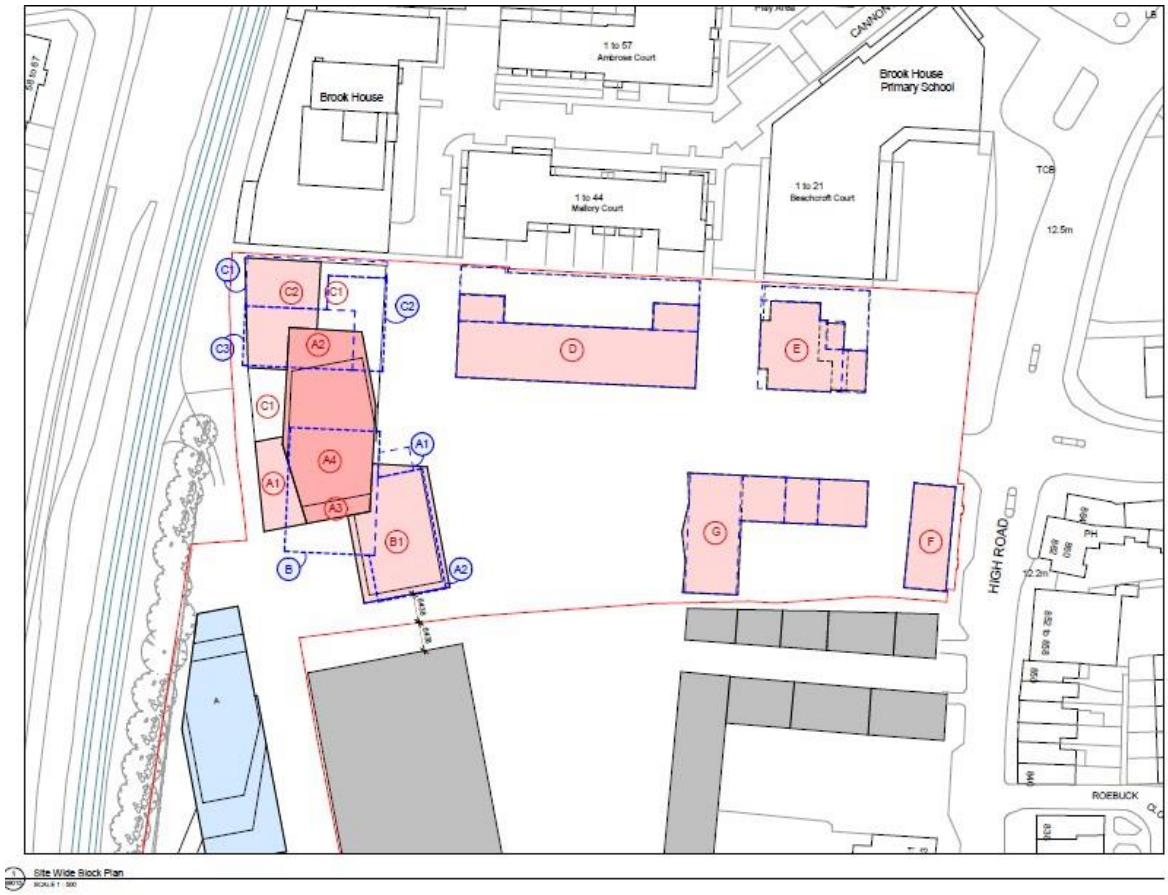
i. <u>The western edge</u>. The HRWMF envisages a north-south street running along the western boundary of the Goods Yard part of site, next to the railway. The proposed scheme moves this proposed street to the east and proposes a private communal garden along this edge, with proposed tall buildings (Goods Yard Blocks A and B) and Goods Yard Block closer to this edge. The proposed scheme also proposes three tall buildings that are more evenly spaced than shown in the HRWMF and approved in the extant Goods Yard and Depot schemes, which would mean that these buildings would be more closely aligned with the east-west routes envisaged for the remaining part of the High Road West site. A similar arrangement was previously approved, at appeal (application reference HGY/2021/1771).

Officers welcome the proposed location of a north-south street away from this boundary as this would allow for a safer and more attractive two-sided street in the future, and that would be more legible and better connected into wider street networks from the start. Furthermore, the proposed private communal Walkway on the western boundary would bring welcome gains in urban greening and biodiversity.

This would result in some homes being closer to the railway than originally envisaged/ previously approved. However, amenity issues for future residents are considered acceptable (see Impact on Amenity on Adjoining Occupiers). The proposed more even spacing of the proposed tall buildings is also considered acceptable in principle and would better align these buildings with longer-term proposed east-west routes linking with the High Road (to and from Brunswick Square, a new route on the current timber yard and the proposed Pickford Lane), helping to terminate street views and assist wayfinding and legibility.

ii. Location of proposed Depot Block A. The site does not include as much Network Rail land along its western edge as envisaged in the HRWMF. This has resulted in the proposed tall building (Depot Block A) being located further to the east than envisaged in the guidance – although proposed Block A is a similar distance away from the railway as the approved tower in the extant consents. This, and the location of proposed Goods Yard Blocks A and B closer to the railway, as discussed above, means that the proposed scheme would not result in such a clear 'spine of tall buildings' envisaged by the HRWMF. The 'evening out' of the proposed three towers also means that proposed Depot Block A would be closer to the existing Rivers Apartments building than envisaged in the HRWMF and approved by the extant Depot consent. However, the proposed Depot Block C immediately to the south of Rivers Apartments would be lower than the approved Block C in the extant Depot consent. The block has been set back a further 3-7 metres from the shared boundary with the Rivers Apartments building when compared to the scheme allowed at appeal (reference HGY/2021/1771). See Figure 02 below.

Figure 02: approved and proposed tower relative to River Apartments



The Cannon Road Residents Association and a number of individual residents of Rivers Apartments have objected to both the proposed alignment and closer proximity of proposed Block ABC to their homes.

- The tower has been set 3 – 7 meters further back from Riverside Apartments than the Depot and Goods Yard Scheme approved at appeal (reference HGY/2021/1771)
- The floor plan geometry of the proposed tower has been faceted to present its most slender face to the north and south façades, enabling oblique views looking south passed the proposed east and west facades;
- The proposed stepped ‘top’ of the tower has been biased to the south, so that the upper storeys, to be further away from Rivers Apartments. The terrace formed by the proposed stepped

'top' would be similar to the top most storey of Rivers Apartments;

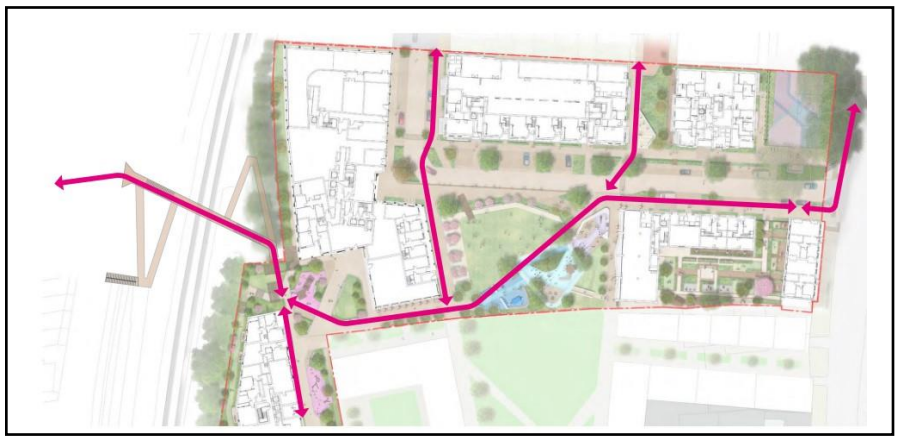
- The lower portion of the proposed tower base and shoulder blocks are 5-stories (reducing the amount of mass and façade immediately facing the lower 7 floors of Rivers Apartments, than compared to consented Depot Scheme (HGY/2021/3175)

The amenity issues for residents of Rivers Apartments are addressed under Impact on Amenity of Adjoining Occupiers below and, in summary, are considered to be acceptable. Taking all these considerations in to account, officers consider that the proposed location of Depot Block A is acceptable.

iii. Location of proposed Goods Yard Block B. The proposed 27-storey Goods Yard Block B would be approx. 105m north-west of The Grange Listed Building (Grade II), in a similar location as the scheme allowed at appeal (reference HGY/2021/3175).The approved 18-storey Goods Yard Block C in the previously permitted scheme (HGY/2018/1087) would be approx. 86.5m to the north-west of the listed building.

iv. Potential future bridge. The HRWMF identifies the opportunity to create an east-west pedestrian/cycle route across the site and the railway lines, between Brantwood Road in the east and Durban Road in the west – as an extension of a proposed east-west street (the proposed Pickford Lane). The extant Depot consent allows for a bridge on this alignment (subject to technical feasibility work, approval of Network Rail, funding etc.). However, the location of the previously proposed (HGY/2021/3175) conjoined Depot Blocks A,B and C would prevent a potential future bridge on this direct east-west alignment. As an alternative, the applicant's submitted Design and Access Statement (DAS) shows how it might be possible to provide a future bridge from the proposed northern square (to the south of proposed Blocks A,B and C) that would provide an east-west pedestrian/cycle connection across the site (See Figure 03 below). This arrangement was accepted as part of the scheme that was allowed on appeal (reference HGY/2021/1771). This would not provide such a direct or useful east west connection than envisaged in the HRWMF. However, officers consider that this would provide an acceptable alternative.

Figure 03: Extract from DAS showing potential future bridge across the rail line.

 ..

Relationship with existing and future development

6.5.14 The proposed re-location of Embankment Lane away from the western edge of the Goods Yard part of the site means that the eastern side of the proposed street would form the boundary with the existing Peacock Industrial Estate. Given the applicant's intended programme, this would result in the proposed GY Blocks facing/looking over existing 2-storey industrial/warehousing buildings in the interim period. In the longer term, as and when plots on the wider part of the High Road West site come forward for development (or the Peacock Industrial Estate was also redeveloped independently), this would result in the proposed GY Blocks facing/looking over mixed-use buildings with housing on upper floors. The separation distances between the existing industrial units and future mixed-use buildings would be as follows:

- GY Block A – approx. 15.5m;
- GY Block B – approx. 34m;
- GY Block C – approx. 15m;
- GY Block D – approx. 16m;
- GY Block E – approx. 15.5m;
- GY Block F – approx. 41m; and
- GY Block G – approx. 3m (the eastern flank, with fixed obscure glazing) and 19m.

6.5.15 Similarly, in the interim period, the proposed layout of the Depot part of the site, with Peacock Lane and Peacock Park and proposed adjoining buildings would result in the proposed Depot Blocks facing/looking over existing 2-storey industrial/warehousing buildings and the homes at Nos. 865 High Road. In the longer term, as and when plots on the wider part of the High Road West site come forward for development, this would result in the proposed Depot Blocks facing/looking over mixed-use buildings with housing on upper floors. The

separation distances between the existing industrial units/homes and future mixed-use buildings would be as follows:

- Depot Block A – approx. 23m;
- Depot Block B – approx. 5-7m (commercial unit on ground floor with dual-aspect homes above facing east-south and west-south);
- Depot Block D – approx. 48-54m;
- Depot Block G – approx. 1-2 and 15-17m (the southern flank would be 1-2m away, but contain only 'blind windows'); and
- Depot Peacock Park - adjacent.

6.5.16 The adjacent blocks within Lendlease's Scheme (HGY/2021/3175) are in the outline part of the application whereby their detailed design and siting is subject to future reserved matters approval. Notwithstanding this, Officer are satisfied that the proposed scheme would not adversely impact deliverability of the adjoining blocks, within the approved parameters.

6.5.17 The Agent of Change principle set out in London Plan Policy D13 places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. In other words, the onus is on the applicant to demonstrate that its proposed development would not prejudice the continued operation of the existing nearby industrial and warehousing uses. This principle can be extended to other matters – such as outlook, privacy and daylight and sunlight.

6.5.18 This noise issue is addressed in detail under Residential Quality below. In summary, the noise environment for the proposed homes in the interim condition is considered acceptable. Officers are also satisfied that the location, use and layout of the proposed buildings (together with proposed interim boundary treatments, discussed below) would result in an acceptable relationship between proposed new homes and existing industrial warehousing and ensure an acceptable level of residential amenity for new residents which should not prejudice to continued operation of the existing uses.

6.5.19 In the longer term, with future high-density development on adjoining plots noise becomes less of an issue and privacy/overlooking and daylight and sunlight become more important matters. Officers consider that the proposed separation distances, layout and design of the proposed Goods Yard and Depot Blocks would enable mixed-use/residential buildings on plots to the east and south of the site to be developed in the future. However, proposed Depot Blocks B and G warrant further discussion.

6.5.20 Proposed Depot Block B would between 6 and 7 metres from northern boundary with the existing Peacock Industrial Estate, to enable a one-sided narrow route in the interim condition (with the proposed building being in a similar position to an approved building in the extant consent for the Depot). The

applicant's illustrative masterplan shows a new building on a redeveloped Peacock Industrial Estate being off-set by a similar amount, giving a separation distance of between 6 and 14 metres. Given the use and layout of proposed Block B (commercial use on the ground floor and dual aspect flats with primary living room windows looking east and west above), the proposed northern square and Peacock Park and its likely extension further south, this proposed future relationship is considered acceptable. This proposed relationship, which is exactly the same as allowed for in appeal permission HGY/2021/3175).

Proposed Depot Block G (together with the retained listed buildings at Nos. 867-869 High Road) would form a courtyard (Pickford Yard Gardens) to the north of the existing adjoining timber yard and homes at Nos. 865 High Road. This proposed relationship, which is exactly the same as allowed for in appeal permission HGY/2021/3175) would result in an acceptable relationship in terms of outlook, privacy and daylight. The applicant's illustrative masterplan shows how future development of these existing buildings to the south could create a residential southern edge to a courtyard. To ensure the proposed scheme does not prejudice future development of the NT5 Site Allocation, it is recommended that s106 planning obligations ensure that occupiers of any future building that adjoins Pickford Yard Gardens have access to this amenity space.

6.5.21 The proposed interim boundary treatment for the southern edge of the proposed Peacock Park on the Depot part of the site (discussed under Boundary Treatments below), is considered acceptable. The applicant's illustrative masterplan also shows how the proposed Park could be satisfactorily extended further south. As such, the proposed relationship should not prejudice the development of the wider High Road West site allocation in accordance with the key relevant HRWMF principles.

6.5.22 The proposed scheme includes proposed north-south routes both sides of Depot Block D and, if permission was granted, s106 planning obligations could require the approval of a connectivity plan to ensure acceptable detailed arrangements for connecting with the Cannon Road area to the north.

Amount, location and type of Open Space

6.5.23 A development guideline in Site Allocation Policy NT5 and a key principle of the HRWMF is the production of a net increase in the amount and the quality of public open space. The HRWMF identifies broad building typologies to frame open space, and the Site Allocation calls for the creation of open space in addition to the creation of a legible network of east-west streets that connect into the surrounding area and the existing lanes off the High Road. The HRWMF proposes 39,400sqm of open space in total (including publicly accessible open space, children's play space, five-a-side playing pitch and allotments), compared to 21,000 sqm of open space in the NT5 site area currently (an increase of 80%).

6.5.24 Policy DM20, seeks to ensure that sites over 1ha in size which are located in identified areas of open space deficiency (as the majority of the site is), should create new publicly accessible open space on the site, in accordance with the open space standards set out in the Haringey Open Space and Biodiversity Study (2013), subject to viability. The Study calls for 1.64 hectares per 1000 people.

6.5.25 The proposed scheme includes provision for 15,630sqm of open space, comprising publicly accessible open space, communal residential courtyards and podium gardens and public realm (neighbourhood streets and lanes). This excludes private amenity space in the form of private balconies and terraces for individual homes. The site measures 2.5ha, or 21.3% of the Site Allocation NT5 area (11.69ha). The proposed provision of 15,630sqm of open space amounts to 39.5% of the overall area called for in the HRWMF and so would provide nearly twice as much open space as is proportionate to its size.

6.5.26 In terms of publicly accessible open space, the proposed scheme includes provision of 8,870sqm (including public realm areas). This includes the following 6 x distinct open spaces which total approx. 4,473sqm:

- White Hart Lane Gateway – approx. 300sqm
- Southern Square – approx. approx. 490sqm;
- Central Court and Trim Trail – approx. 830sqm;
- Northern Square – approx. 630sqm;
- Peacock Park – approx. 1,950sqm; and
- Brook House Yard - 430sqm outside of the school day (subject to management & maintenance agreement).

6.5.27 Based on the estimated on-site population of 1,780 people, there is a policy target for 2.97 hectares (29,684sqm) of publicly accessible open space. This reduces to approx. 18,000sqm (1.8 hectares) if 60% of the likely population is used to assess need (consistent with approx. 60% of the site being within an area of open space deficiency). The proposed 0.89ha (8,870sqm) is approx. 30% of the amount of publicly accessible open space that policy calls for (approx. 50% if the lower need is applied). Officers consider that, given the generous on-site provision of communal residential amenity space (see Residential Quality) and the overall benefits of the scheme, the amount of proposed on-site publicly accessible open space is optimised. Given this, officers consider that there would be a shortfall in the provision of publicly accessible open space.

6.5.28 The ES (Chapter 7) reports on an assessment of the likely significant socio-economic effects of the proposed scheme, including on open space and play space. It considers open space as a whole (publicly accessible open space, communal residential amenity space and public realm) and finds that the proposed scheme would result in a Minor Beneficial effect at site and local level and a Negligible effect at all other spatial levels. There is no publicly accessible open space on site at present and officers accept that the proposed provision would be beneficial. There by making a positive contribution to improving open space access in accordance with policy NT5.

6.5.29 As discussed in more detail under the Social and Community Infrastructure heading below, CIL contributions could be used towards the delivery of additional publicly accessible open space on the wider High Road West Site (including an extension to Peacock Park immediately to the south of the site).

6.5.30 If permission were to be granted, it would also be appropriate to use s106 planning obligations also secure the implementation of an approved Public Open Space Access and Management Plan (to be in accordance with the Mayor of London's adopted Public London Charter) (October 2021).

Public Realm, Landscaping and Boundary Treatments

6.5.31 London Plan Policies D1-D3 and D8 calls for high-quality public realm that takes account of environmental issues, including climate change, and provides convenient, welcoming and legible movement routes and stresses the importance of designing out crime by optimising the permeability of sites, maximising the provision of active frontages and minimising inactive frontages. Policies DM2 and DM3 reflect this approach at the local level.

6.5.32 The proposed Peacock Park would be shielded from road traffic and railway noise by proposed buildings. The applicant has clarified that the noise environment of this space should be below the upper "desirable" noise level recommended for open spaces in the relevant British Standard, which is good for an urban park. However, other open spaces near the railway and High Road would be noisier.

6.5.33 The applicant's Daylight and Sunlight Assessment finds that the proposed publicly accessible Station Master's House forecourt, Embankment Lane play spaces, Northern Square, Peacock Park and Brook House Yard would all receive the recommended minimum levels of sunlight (2 hours over at least 50% of the area on March 21), including in the future cumulative scenario). The exception is the proposed Southern Square, which would fall just short at 47% and a seating area to the south of Southern Square (A11) immediately to the north of GY Block G (A12), which would receive just 2-hours sun on just 1% of its area). Given the very small size of the proposed seating area and its proximity to the proposed Southern Square, this is considered acceptable.

6.5.34 The landscaping of the public realm is based on creating different character areas for a Neighbourhood Street (the proposed Peacock Lane and the southern part of the proposed Embankment Lane), a Neighbourhood Lane (the northern part Embankment Lane), a park and squares. The proposed spaces incorporate measures to calm traffic and include opportunities to play and sit and rest. They also include high-quality hard surfaces, trees and linear rain gardens to help provide shade, a net increase in biodiversity and sustainable drainage. These

spaces would also incorporate lighting and other street furniture (including litter bins) to help ensure that spaces are safe and attractive. Officers consider that the proposed detailed landscaping would ensure attractive, uncluttered and inclusive spaces that would be safe to use by all. The inclusion of a free drinking water fountain in the proposed park would help ensure this space is attractive to use, but this and other details would be capable of being secured by planning condition.

6.5.35 The applicant intends that the proposed publicly accessible spaces (including the park) would be privately owned, managed and maintained. If permission was granted, it would be possible to use s106 planning obligations to secure the subsequent approval of an Open Space Management and Access Plan to secure public access and appropriate management and maintenance arrangements. It would also be appropriate to agree the implementation of an approved specific management plan with Brook House Primary School to secure appropriate management and maintenance of the proposed dual-use Brook House Yard space as per the extant consent for the Depot.

6.5.36 The applicant's DAS sets out proposals for a number of permanent and interim boundary treatments for different boundaries around the site, to help ensure satisfactory security, safety, amenity and appearance. This includes interim treatments that would need to be in place until such times as adjoining areas of Site Allocation NT5 were developed. These are considered acceptable in principle. It would be possible to reserve approval of the detailed design and implementation of these various treatments by way of planning condition.

Building Scale, Form and Massing

6.5.37 London Plan Policy D9 (A) calls on development plans to define what is considered a tall building for specific localities, based on local context (although this should not be less than 6-storeys or 18 metres above ground to the floor level of the uppermost storey). The Local Plan (Strategic Policies 2013-2026) included a borough-wide definition of 'tall building' as being those which are substantially taller than their neighbours, have a significant impact on the skyline, or are of 10-storeys and over (or otherwise larger than the threshold sizes set for referral to the Mayor of London).

6.5.38 The strategic requirement of London Plan Policy D9 (Part B) is for a plan-led approach to be taken for the development of tall buildings by boroughs and makes clear that tall buildings should only be developed in locations that are identified in development plans. The Upper Lee Valley Opportunity Area Framework proposes that future tall buildings will generally be in well-defined clusters in identified urban growth centres.

6.5.39 London Plan Policy D9 (Part C) sets out a comprehensive set of criteria for assessing the impacts of proposed tall buildings and these are discussed in detail below. Part D calls for free publicly-accessible areas to be incorporated

into tall buildings where appropriate, but officers do not consider it appropriate for residential towers.

6.5.40 Strategic Policy SP11 requires all new development to enhance and enrich Haringey's built environment and create places and buildings of high quality. It makes clear that applications for tall buildings will be assessed against a number of criteria, including the following: an adopted Area Action Plan or masterplan framework for a site (i.e. the Tottenham Area Action Plan and the HRWMF in this case); assessment supporting tall buildings in a Characterisation Study; compliance with the Development Management Policies; and compliance with all relevant recommendations as set out in the CABE/English Heritage "Guidance on Tall Buildings" (2007 since superseded in 2015).

6.5.41 Policy DM6 provides further criteria for the design of tall buildings, including to conserve and enhance the significance of heritage assets, their setting and the wider historic environment that would be sensitive to taller buildings. The policy also seeks to protect and preserve existing locally important and London-wide strategy views in accordance with Policy DM5 (with Figure 2.1 confirming that the site does not directly interact with any locally significant views and vistas). An urban design analysis is required to be submitted with applications for tall buildings assessing the proposal in relation to the surrounding context.

6.5.42 Policy AAP6 states that, in line with Policy DM6 (Figure 2.2), the North Tottenham Growth Area has been identified as being potentially suitable for the delivery of tall buildings.

6.5.43 The HRWMF massing principles seek to locate tall buildings towards the railway line, to create an edge to the development and build on the character established by the 22-storey River Apartments tower (81.5m AOD) at Cannon Road. Figure 52 of the HRWMF shows buildings reducing in height from this tower towards the High Road/White Hart Lane to create an appropriate heritage setting for statutory listed and locally listed buildings and Figure 53 sets out indicative proposed building heights. The building heights proposed by this application are set out in the table below, alongside the approved heights in the extant consents and the indicative HRWMF heights.

Table 13: Proposed and consented building heights

Proposed		Fall back Position – Extant Consented Appeal Scheme (HGY/2021/1771)		Fall-back Position – Extant Consented Schemes (HGY/2018/0187 &HGY/2019/2929		
New Block	**Heights** (‘full’ details)	**New Block**	**Heights** (‘full’ details)	**New Block**	**Heights** (‘Full’ details & ‘Outline’ maximums)	HRWMF Indicative heights
Goods Yard						
A	26 to 32-storeys (97.33 to 114.23m AOD)	A	26 to 32-storeys (97.33 to 114.23m AOD)	A1/A2 /B1	Part 8, 6 & 21-storeys (41.5/35.5/84.5m AOD)	10-18-storeys
B	21 to 27-storeys (79.33 to 98.03m AOD)	B	21 to 27-storeys (79.33 to 98.03m AOD)	B2/C1/ C2	Part 7/18/7-storeys (39/75.5/40m AOD)	10-18-storeys

Proposed		Fall back Position – Extant Consented Appeal Scheme (HGY/2021/1771)		Fall-back Position – Extant Consented Schemes		
New Block	**Heights** (‘full’ details)	**New Block**	**Heights** (‘full’ details)	**New Block**	**Heights** (‘Full’ details & ‘Outline’ maximums)	**HRWMF Indicative heights**
C	6-storeys (34.33m AOD)	C	6-storeys (34.33 m AOD)	B3	3-storey (33m AOD)	2-3 & 5-8-storeys
D	6-storeys (34.33m AOD)	D	6-storeys (34.33 m AOD)	C4	5-storey (34m AOD)	3-5-storeys
E	7-storeys (37.63m AOD)	E	7-storeys (37.63m AOD)	C3	5-storey (34m AOD)	3-5-storeys
F	4 to 7-storeys (28.33 to 36.43m AOD)	F	4 to 7-storeys (28.33 to 36.43m AOD)	C3/D1/ D2	Part 5/4/3-storeys (34/28.55/25.55m AOD)	3-5-storeys
G	4 to 5-storeys (32.72m to 39.64m AOD)	G	4 to 5-storeys (32.72m to 39.64m AOD)	E1	5-storey (31.5m AOD)	3-5-storeys
H	3-storeys (24.23m AOD)	H	3-storeys (24.23m AOD)	F1/F2	2-storey (20.15/22.75m AOD)	3-5-storeys
The Depot						
A	23 to 29-storeys (84.60 to 104.00m AOD)	A	23 to 29-storeys (84.60 to 104.00m AOD)	B	29-storeys (106m AOD)	10-18-storeys

B	9-storeys (42.60m AOD)	B	9-storeys (42.60m AOD)	A2	3 to 9-storeys (22m to 43m AOD)	5-8-storeys
C	5-storeys (32.50m AOD)	C	5-storeys (32.50m AOD)	C	Part 1, 7 & 9-storeys (19/37/43m AOD)	5-8-storeys
D	Part 5 to 6-storeys (32.70m AOD)	D	Part 5 to 6-storeys (32.70m AOD)	D	Part 5 to 6-storeys (29.65m to 32.70m AOD)	5-8-storeys
E	4 to 6-storeys (26.70 to 32.60m AOD)	E	4 to 6-storeys (26.70 to 32.60m AOD)	E	Part 1, 4 & 6-storeys (19/28/34m AOD)	5-8-storeys
G	3 to 6-storeys (24.71 to 35.19m AOD)	G	3 to 6-storeys (24.71 to 35.19m AOD)	G	Part 3/4/5 & 6-storeys (24.70m/27.36m/30.25m AOD)	3-5 & 5-8-storeys

6.5.44 The proposed scheme accords with the HRWMF principles of tall buildings being located next to the railway. Whilst the proposed tall buildings would be significantly taller than envisaged and would not reduce in height as much or as quickly towards the White Hart Lane, this has been accepted in the appeal consent and was considered to generally accord with guidance in the HRWMF.

Proposed Tall Buildings

6.5.45 Based on the Local Plan definition, officers consider that just the proposed three towers (GY Blocks A and B and Depot Block A) would constitute 'tall buildings.'

6.5.46 The application scheme proposes buildings of the same height as the allowed appeal scheme (reference HGY/2021/1771) but taller than those approved in the extant consents for the Goods Yard (HGY/2018/0187) and Depot (HGY/2019/2929) (this application proposes 27, 32 and 29-storeys south to north along the western edge of the site, as opposed to the approved 18, 21 and 29-storeys in the extant Depot/ Goods Yard hybrid consents). They would also be in broadly the same locations as approved in the appeal scheme HGY/2021/1771 and HGY/2019/2929) and largely the same architectural design.

6.5.47 Given that London Plan Policy D9 is the most up-to-date development plan policy on tall buildings and includes the most comprehensive set of impact criteria, and covers nearly all the criteria covered in Haringey's own tall buildings policies, this has been used as a basis of an assessment. It incorporates most of the relevant criteria set out in Local Plan Policy DM6, although specific criteria from this policy are also addressed below.

6.5.48 Location - As stated above, there is clear and specific policy support for the principle of tall buildings in the Tottenham Growth Area, although the proposed heights are taller than the indicative heights in the HRWMF.

6.5.49 Visual impacts – Part C (1) of London Plan Policy D9 sets out the following relevant criteria that are addressed in turn.

(a) (i) long-range views – the top of proposed tall buildings should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views.

(a) (ii) mid-range views - the form and proportions of tall buildings should make a positive contribution to the local townscape in terms of legibility, proportions and materiality.

Officers consider that the scheme would meet these criteria (see more detailed discussion below in terms of local and strategic views).

(a) (iii) immediate views from the surrounding streets – the base of tall buildings should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.

The proposed towers relate well with the street and the lower buildings that they would spring from.

(b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding.

The proposed towers form a spine of buildings along the western edge of the site (in general accordance with the HRWMF, although they are significantly taller than anticipated) and this spine would be extended further south around White Hart Lane Station as and when wider proposals for Site Allocation NT5 come forward. The towers would be aligned with east-west routes to and from the High Road that are expected to come forward across as part of these wider proposals.

(c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan.

The architectural expression is considered to be acceptable. The faceted design, terracotta jacket and light grey cores and tops together with the fenestration and balcony pattern provides high levels of articulation, with a vertical emphasis, which successfully breaks up the massing and provides visual interest for the proposed towers. The Appeal Inspector and associated assessor for application HGY/2021/3175 found *"the proposed buildings would have highly articulated facades with a range of materials, textures, colours, tones and layers of depth that would be set out in well-proportioned bays that would result in an exemplary standard of architectural quality".* High quality materials will be secured by planning condition.

(d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm.

The proposed buildings by virtue of their scale would depart from the character of the area. However, will form part of an emerging character area on an allocated site. The potential impacts on above ground heritage assets is addressed under Heritage Conservation below. In summary, officers consider that the proposed tall buildings would cause 'less than substantial harm' to a number of heritage assets, but that this would be outweighed by the public benefits that the scheme would provide.

(g) buildings should not cause adverse reflected glare.

Potential solar glare impacts are addressed under Impacts on Amenity of Adjoining Occupiers below and are considered to be acceptable.

(h) buildings should be designed to minimise light pollution from internal and external lighting.

Light Pollution was scoped out at the informal EIA Scoping stage. There are no proposals to externally illuminate the proposed tall buildings and officers do not consider that there would be any significant adverse effects from internal

lighting for this site.

6.5.50 Functional impacts – Part C (2) of London Plan Policy D9 sets out the following relevant criteria that are addressed in turn

- *(a) the internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants.*

  Fire safety is addressed below and is considered acceptable subject to ensuring compliance with the Fire Strategy in the submitted Fire Statement (which could be secured by a planning condition).

- *(b) buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process*.

  Vehicular servicing is discussed under Transportation & Parking below and is considered acceptable subject to a Delivery and Servicing Plan (which could be reserved by planning condition). The applicant's DAS summarises the proposed cleaning and maintenance strategy and this is also considered acceptable. The applicant's Affordable Housing Statement makes it clear that the proposed scheme has been designed to ensure that estate service charges are as affordable as possible, whilst allowing all residents the right to access on-site amenities. Affordable housing would be managed by a Registered Provider. If planning permission were granted, it would be appropriate to use s106 planning obligations to clarify access to facilities, rents and service charges.

- (*c) entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas*.

  The proposed tall buildings would be accessed from generously sized double height lobby areas directly from the proposed Embankment and Peacock Lanes. The entrances are framed in feature cladding and brickwork, which is considered acceptable.

- *(d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building*.

The capacity of the transport network is addressed under Transportation & Parking below. In summary, this is considered to be acceptable.

- *(e) jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area*.

- The proposed ground floor commercial units and associated economic activity/job opportunities have been clustered around the proposed southern and northern squares and Embankment Lane and would have a satisfactory relationship with the proposed tall buildings. These would make a positive contribution towards the regeneration of the area.

- *(f) buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings*.

  The site is not within an 'aerodrome safeguarding' zone and subject to the inclusion of aircraft warning lights (on construction cranes and completed buildings) required by regulations, the proposed tall buildings are considered acceptable. It would be possible to use s106 planning obligations to ensure ultrafast broadband connectivity is designed in to the development, ensuring high-quality digital connectivity for new residents (without the need for external dishes/antenna). Proposed roof-top PV arrays are addressed under Energy, Climate Change & Sustainability below and are considered acceptable (there are no existing PV arrays on buildings in the Cannon Road area to the north that would be adversely affected).

6.5.51 Environmental impacts – Part C (3) of London Plan Policy D9 sets out the following relevant criteria that are addressed in turn:

- *(a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces around the building*.

  These issues are addressed under Residential Quality below. In summary, officers consider that the proposed towers would result in acceptable conditions for future residents and occupiers of neighbouring properties.

- *(b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions*.

  Potential air quality impacts are addressed under Air Quality below and are considered to be acceptable.

- *(c) noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building*.

  Potential noise and vibration impacts are addressed under Residential Quality and Neighbour Amenity below and are considered to be acceptable, subject to approval of glazing details (which could be reserved by planning condition).

6.5.52 Cumulative impacts – Part C (4) of London Plan Policy D9 requires the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area to be considered when assessing tall building proposals.

6.5.53 The ES and associated addendum reports on an assessment of the potential cumulative effects of a number of consented and proposed schemes, including the Northumberland Development Project (which permits a 40m high 'sky walk' a 22-storey hotel, a 51m high sports centre and residential blocks up to 36-storeys in height – 131m AOD). The Townscape and Visual Impact Assessment (TVIA) (that forms part of the ES) takes account of subsequent permissions, the application scheme, the Lendlease scheme and the Printworks application scheme. It also takes account of the masterplan and massing guidance in the HRWMF for the rest of Site Allocation NT5 - as modified by the masterplan set out in the applicant's DAS and DAS Addendum.

6.5.54 As outlined above, London Plan Policy D9 identifies most of the relevant criteria in Local Plan Policy DM6. However, a number of specific Local Plan criteria are addressed below:

- *Policy DM6 requires proposals for tall buildings to have regard to the Council's Tall Buildings and Views SPD.*

  The Council has not prepared such an SPD (the former Supplementary Planning Guidance 1c on Strategic Views was withdrawn in July 2014).

- *Policy DM6 (D) (a) requires tall buildings within close proximity to each other to avoid a canyon effect.*

  The proposed tall buildings would essentially be in a line approx. 30-35m apart and there should be no canyon effect in a north-south direction. Looking east-west, the proposed Goods Yard Block A would rise from a lower building fronting Embankment Lane and proposed Goods Yard Block B would be set behind the 6-storey Blocks C and D that would front Embankment Lane, which would be between approx. 15 - 16m wide at this point. Given this, officers do not consider that there would be a canyon-like arrangement in either in the existing condition with Peacock Industrial Estate in place or, taking account of

guidance in the HRWMF, as and when the Estate comes forward for development.

- *Policy DM6 (D) (c) requires tall buildings to avoid coalescence between individual buildings.*

  Given the proposed form of the towers, this is a particular issue looking when viewing the towers from the north or south. However, the location, of the proposed tall buildings mean that incidences of coalesce would be limited. The applicant's DAS includes an assessment which demonstrates that there would be no overlap of the proposed towers for 58% of directions around the site, with 2 x towers overlapping in 19.5% of locations (north-west, north-east, south-west and south-east) and 3 x towers overlapping in 22.5% of locations (north-east and south-west). Where overlapping does occur, officers consider that the proposed different detailed design and colour tones of each tower should reduce coalescence, and the places where a coalescence would be observed, are generally less sensitive, including very few parts of the busiest streets in the vicinity, The High Road / Fore Street, Northumberland Park or White Hart Lane (which would pass through a short bit of coalescence around the railway bridge, but nor for the longer view from further west), or major parks and public spaces such as those around the stadium, Tottenham Cemetery, Bull Lane Playing Fields, Florence Hayes Rec, Tottenham marshes or the proposed Peacock Park (although there would be some coalescence in some views from Bruce Castle Park).

- *Policy DM6 (D) (d) requires applications for tall buildings to demonstrate how they collectively contribute to the delivery of the vision and strategic objectives for the area*.

  The submitted DAS and DAS Addendum do this and officers have taken account this assessment when considering the proposals;

- *Policy DM6 (E) – requires the submission of a digital 3D model to assist assessment*.

  3D modeling was used in the assessment of the appeal scheme. .

Townscape and Visual Effects

6.5.55 London Plan Policies D9 and HC4 make clear that development should not harm Strategic Views, with further detail provided in the Mayor's London View Management Framework (LVMF) SPG. At the local level, Policy DM5 designates local views and the criteria for development impacting local view corridors.

6.5.56 The Townscape and Visual Impact Assessment (TVIA) which forms part of the ES considers likely significant townscape and visual effects across a study area (1 km radius from the proposed tall buildings, including parts of Enfield to the north). This has also helped inform the assessment of likely significant effects on built heritage, which is addressed below. The TVIA draws on Accurate Visual Representations (AVRs) of the proposed scheme from 31 representative views (from 29 viewpoints plus 2 night-time variations) in the surrounding area, including beyond the 1km study area, that were agreed with officers. In addition, the TVIA also draws on 14 additional non-verified views. A TVIA Addendum includes updated rendered AVRs for 4 views (6, 12, 24 and 27) to show the proposed revised tower architecture.

6.5.57 The site does not fall within any Strategic Views identified in the Mayor's LVMF. It does not fall directly within any Locally Significant Views as identified in Policy DM5, although it does fall in the background of Townscape View No. 28 (along Tottenham High Road from High Cross Monument to Bruce Grove Station) – which is tested by View 1. The stadium means that the proposed towers would not be visible from Linear and Townscape View No. 33b (To White Hart Lane Stadium). The HRWMF shows key views from the High Road looking westwards along new streets towards two landmark buildings on the western boundary (the now built Riverside Apartments at the end of Cannon Road and a tower in the approximate location of proposed Depot Block A).

6.5.58 The ES identifies three Character Areas (based on Haringey and Enfield characterisation studies, land use/built form/layout/vegetation and conservation area boundaries). These are: (1) North Tottenham/Angel Edmonton; (2) High Road/Fore Street and (3) Bruce Castle/Tottenham Cemetery. The ES concludes that the permanent residual effect on Character Areas 1 and 2 would be 'Moderate Beneficial) and therefore significant, whereas for Character Area 3 the permanent residual effect would be 'Minor Beneficial.' However, officers are not convinced that the proposed towers would, in all cases, have significant beneficial effects. This is particularly the case where these Character Areas relate to Conservation Areas and other heritage assets, as discussed below.

6.5.59 The ES concludes that the permanent effect of the proposed scheme on the majority of the 29 visual receptors (viewpoints) would be beneficial, with only five views being identified as likely to experience a neutral or balanced effect. These are views from the High Road, north of Lampden Lane and north of Brettenham Road (Views 2 and 8); views from the footpath within the Tottenham Cemetery (Views 18 and 19); and View 15 from Tottenham Marshes. In terms of cumulative effects, four views were found to be neutral or balanced (Views 2, 8, 15, and 19) and no adverse cumulative effects were identified.

6.5.60 Set out below in Table 14 is a summary of the findings of the ES – which summarises findings based on detailed narrative assessments for each of the assessed views.

Table 14: ES Summary of effects on Visual Receptors (verified views)

Visual Receptors- Verified views	**Residual permanent effect**	**Cumulative permanent effect**
View 1 –High Road at High Cross Monument	No change	No change
View 2 – High Road, north of Hampden Lane	Minor; Neutral	Minor; Neutral
View 3 – High Road at Park Lane	Minor; Beneficial	No change
View 4 – High Road, near Whitehall Street	Moderate; Beneficial	Moderate; Beneficial
View 5 – High Road, next to Percy House	Moderate; Beneficial	Moderate; Beneficial
View 5N – High Road, next to Percy House (night-time)	Minor; Beneficial	N/A
View 6 - Northumberland Park, east of High Road	Major; Beneficial	Major; Beneficial
View 7 - Northumberland Park, at No.70B	Minor; Beneficial	Minor; Beneficial
View 8 – High Road, north of Brettenham Road	Minor; Neutral	Minor; Neutral
View 9 – Eastern pavement of the Fore Street (near no.76-82 Fore Street) Looking south-west	Minor; Beneficial	Minor; Beneficial
View 10 – Eastern pavement of the High Road (near Stellar House) looking south- west to No.867-879 High Road	Moderate; Beneficial	Moderate; Beneficial
View 11 – High Road at Brantwood Road	Moderate; Beneficial	Moderate; Beneficial
View 12 – Northern pavement of Brantwood Road taking in Nos.867-879 High Road	Moderate; Beneficial	No cumulative effect
View 13 – Brantwood Road by Grange Road, centre island	Moderate; Beneficial	Moderate; Beneficial
View 14 – Eastern pavement of Dyson Road at its junction with Middleham Road, looking west	Minor; Beneficial	No cumulative effect

Visual Receptors- Verified views	Residual permanent effect	Cumulative permanent effect
View 15 – Footpath within Tottenham Marshes	Negligible; Neutral	Negligible; Neutral
View 16 – Bruce Castle Park	Moderate; Beneficial	Moderate; Beneficial
View 17 – Tottenham Cemetery south entrance off Church Road	No change	No change
View 18 – Footpath within Tottenham Cemetery, looking north-east	Minor; Balanced	No cumulative effect
View 19 – Tottenham Cemetery, north-east path	Minor; Balanced	Minor; Balanced
View 20 – Tottenham Cemetery	Minor; Beneficial	No cumulative effect
View 21 – White Hart Lane, opposite No.302	Minor; Beneficial	No cumulative effect
View 22 – Beaufoy Road	Minor; Beneficial	Minor; Beneficial
View 23 – White Hart Lane at Beaufoy Road	Major; Beneficial	No cumulative effect
View 23N - White Hart Lane at Beaufoy Road (night-time)	Minor; Beneficial	N/A
View 24 – Western pavement of Love Lane, outside White Hart Lane Train Station, looking north	Major; Beneficial	No cumulative effect
View 25 – William Street, by White Hart Lane	Major; Beneficial	Major; Beneficial
View 26 – White Hart Lane at Selby Road	Minor; Beneficial	Minor; Beneficial
View 27 – Durban Road	Moderate; Beneficial	No cumulative effect
View 28 – Pretoria Road and Commercial Road junction	Major; Beneficial	No cumulative effect
View 29 – Northern pavement of Bridport Road at its junction with Pretoria Road, looking south	Minor; Beneficial	No cumulative effect

6.5.61 Officers generally agree with the assessment in the ES. However, they do not consider that the beneficial effects on those views highlighted in Table 14 above would be as great as identified in the ES TVIA.

6.5.62 London Plan Policy D9 calls for tall buildings to make positive townscape and visual contributions when seen from long, mid and immediate views. The ES considers that the following views are long, mid (or medium) and immediate (or close):

- Long - Views 1, 2, 3, 8, 9, 14, 15, 16, 17, 18, 19, 20, 21, and 29;
- Medium/mid – Views 4, 5, 5N, 6, 7, 10, 12, 13, 17, 22, 23, 23N, 26, and 27; and
- Close/Immediate – Views 11, 24, 25 and 28.

6.5.63 Long-distance views. London Plan Policy D9 calls for the top of proposed tall buildings should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views.

6.5.64 Officers consider that the application scheme would read well in long- distance views and provide positive additions to the skyline when viewed with the existing River Apartments. The proposed ceramic jackets enveloping the grey cores create a slender profile within the building. The colour of the ceramic cladding draws on prevalent brick tones in the locality. The grey tops help blend the height with the skyline. The regularity of the fenestration and balcony placement emphasise verticality. They will also contribute positively to wayfinding in the wider area.

6.5.65 Medium/Mid-range views. London Plan Policy DM9 calls for the form and proportions of tall buildings to make a positive contribution to the local townscape in terms of legibility, proportions and materiality.

6.5.66 Likewise, officers consider that the application scheme as revised would read well in mid-range views, with the verified views in the TVIA demonstrating that the proposed proportions and materiality would be acceptable when seen from locations up and down the High Road and residential streets to the east and from Durban Road and other residential streets to the west. The proposed towers would also form terminations of medium-distance views from The High Road down planned east-west streets across the High Road West site and in their illustrative masterplan, from Brunswick Square, Percival Court and across the timber yard.

6.5.67 Close/Immediate views from the surrounding streets. London Plan Policy D9 calls for the base of tall buildings to have a direct relationship with the street and maintain the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.

6.5.68 The proposed towers, with their rich detailing, use of terracotta tiles and accentuated entrance points, would be most characterful in close/immediate views. Officers consider that the application scheme would have a good relationship with the proposed lower buildings and Embankment Lane on the site and from locations on the High Road, White Hart Lane, William Street (to the south of White Hart Lane), River Apartment and Pretoria Road.

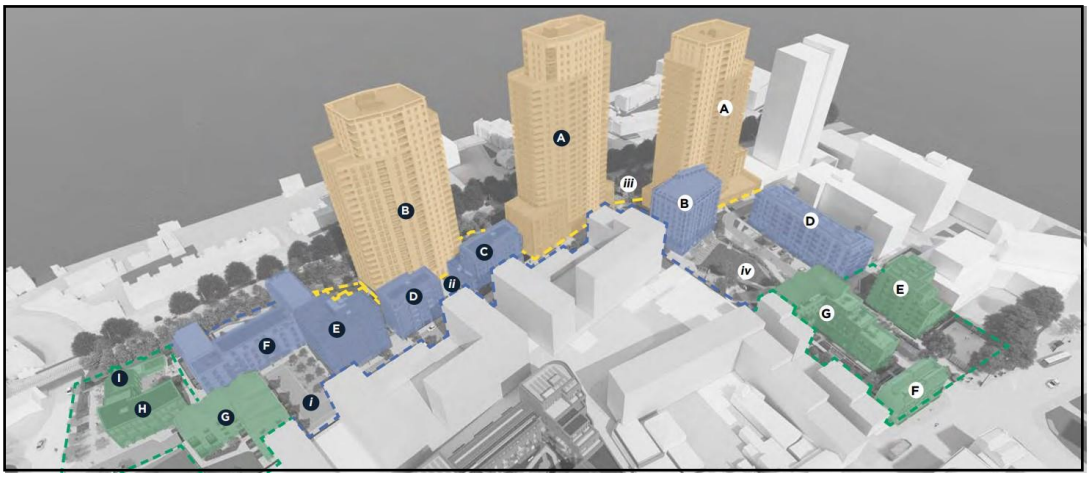
6.5.69 An assessment of the likely effects of the proposed scheme on neighbour amenity is set out below.

6.5.70 A number of verified views of the proposed scheme are contained in **Appendix 1.** Overall, officers consider that the proposed scheme is generally in accordance with the HRWMF and that it would have an acceptable overall effect on the wider townscape and visual receptors, including strategic and local views.

The proposed lower buildings

6.5.71 As summarised in Table 13 above, the proposed lower buildings range in height between 3 and 9-storeys. To respect the setting of the heritage assets at the High Road and White Hart Lane frontages the blocks in the 'heritage interface' areas (shown in green in Figure 04 below) would be lower scale and distinct. The scale of development would increase fronting the proposed streets and squares within the site (shown in blue), stepping up incrementally from 3 to 4-storeys and up to 5 to 6-storeys - opening up to larger linear mansion blocks with similarities in form and articulation around the proposed Embankment Lane and Peacock Park. All of these would provide contextual buildings for the proposed tall buildings (shown in brown). Images of proposed Goods Yard Block F are set out in **Appendix 1** as an example of a lower building.

Figure 04: The proposed lower buildings



6.5.72 The Depot part of the site. Starting from the High Road and working back in to the site, the proposed buildings can be briefly summarised as follows:

- Block F - Existing 2-storey Listed Buildings at Nos. 867-869, which would be converted in to 6 x 2-bedroom flats. The proposed refurbishment/alteration works benefit from an extant Listed Building Consent;

- Block G - This is identical to what was approved by the extant planning permission (HGY/2018/0187). It would be a part 3, 4, 5 and 6-storey varied brick-clad building, framing the proposed Pickford Yard Gardens to the rear. A commercial unit fronts Peacock Park, service, cycle storage and residential uses occupy the ground floor with residential with associated balconies and terraces above;

- Block E – 6-storey residential building, simply designed and detailed brick building with external balconies on three of its corners, relating carefully to the proposed Brook House Yard open space;

- Block D - This is identical to what was approved by the extant planning permission (HGY/2018/0187). The block would be a six-storey light-coloured brick clad building with a terrace at first floor level backing on to the existing Mallory Court. Parking, bin storage and cycle parking is proposed at ground floor level with ground/ first floor duplexes to the front and residential flats with balconies above.

- Block B – 9-storey block which would for a southern wing of the co-joined Block ABC, with the tall building Block A rising up from it. This block would have inset balconies and a roof top terrace; and

- Block C – 3-storey northern wing of the co-joined Block ABC, this would be next to the existing River Apartments building and have a roof-top terrace.

6.5.73 The Goods Yard part of the site. Starting from White Hart Lane and working back in to the site, the proposed buildings can be briefly summarised as follows:

- Block I - Proposed conversion and extension of the Station Master's House. The proposal here is different from that which was approved in 'outline' by the extant planning permission for the Goods Yard (HGY/2018/0187). The extant permission allows for a rear single-storey extension (approx. 65sqm) to provide space for future kitchen and bar facilities as part of its change of use to a restaurant. This 'full' application scheme proposes a smaller rear single-storey flat-roofed extension (approx. 49sqm), a separate small refuse storage building and alterations to the building's elevations to provide a dining space as part of the change of proposed use of the building to flexible 'Class E' use

(with the drawings indicating a restaurant/café);

- Block H - Part 2/part 3-storey, commercial, 'L' shaped mid-grey brick building, with red brick detailing around windows and arched ground floor windows to

- Block G – Part 4/part 5-storey mixed-use (commercial and residential) 'L' shaped building, with echoes of a Victorian factory/warehouse. It would be a single mixed buff/yellow brick blend building with strong projecting balconies and a pitched roof. At ground floor level is commercial units, bin storage and cycle storage with residential flats with balconies above;

- Block F – Part 4/Part 5/Part 6 courtyard building in contrasting brick, with prominent external balconies and a bronze coloured upper-storey – this would step up from the two White Hart Lane frontage buildings (Blocks H and I). The building includes commercial, residential and servicing uses at ground floor level with residential uses above.

- Block E – 7-storey, mixed use commercial and residential, lightweight frame building, including expressed external columns and expressed floor plates with a bronze coloured metal finish. The building has commercial floorspace and service rooms at ground floor level with residential flats above.

- Blocks C and D – A pair of 6-storey residential buildings either side of the proposed pocket square and entrance to the 27-storey Block B. These would be flat-roofed, simple red brick buildings that would help provide a 'plinth' along Embankment Lane to the tall buildings beyond.

6.5.74 Overall, officers are satisfied that the proposed lower buildings represent a family of different predominantly brick and fairly 'calm' buildings that relate well with the heritage buildings and spaces on the High Road and White Hart Lane and provide a foil for the proposed dramatic tall buildings.

Inclusive Design

6.5.75 London Plan Policies GG1, D5 and D8 call for the highest standards of accessible and inclusive design, people focused spaces, barrier-free environment without undue effort, separation or special treatment.

6.5.76 The applicant's DAS explains how the proposed scheme has been designed to meet inclusive design principles and good practice. All external routes, footway widths, gradients and surfacing would respect the access needs of different people. The proposed landscaping and play spaces are designed to be safe (as discussed above), child-friendly and provide sensory interest (changing colours and scent) at different times of the year – with no separation based on housing tenure. Building access, internal corridors and vertical access would meet Building Regulations. As discussed under Transportation and Parking below, car

parking provision would be focused on the needs of wheelchair users and others that may have a particular need to access a car and proposed cycle parking includes spaces for 'adaptive' and large bikes. Overall, officers are satisfied that he proposed scheme would be accessible and inclusive. The particular requirements in relation to wheelchair accessible housing are discussed under Residential Quality below.

6.5.77 *Secured by Design*London Plan Policies D1-D3 and D8 stress the importance of designing out crime by optimising the permeability of sites, maximising the provision of active frontages and minimising inactive frontages.

6.5.78 As discussed above, the proposed layout incorporates a good front to back relationship and includes active ground floor frontages in the form of flexible commercial units, duplex/ maisonettes with front doors on the streets and communal residential entrances. This should all help ensure a safe and secure development and an active public realm. The detailed design of the public realm, including proposed landscaping and lighting, are also considered acceptable. The proposed Goods Yard Walk and podium and roof top private communal amenity spaces have been suitably designed to safeguard safety and security.

6.5.79 The applicant's DAS sets out a number of detailed access features and gates that are intended to be incorporated in to the scheme. If planning permission were to be granted, it would be possible to use a planning condition to require Secured by Design accreditation and ensure the DOCO's continued involvement in detailed design issues and to require the implementation of a Management and Maintenance Plan for the proposed dual use Brook House Yard open space.

Development Design – Summary

6.5.80 The NPPF (July 2021) makes beauty and placemaking a strategic policy and places an emphasis on granting permission for well-designed development and for refusing it for poor quality schemes, especially where it fails to reflect local design policies and government guidance contained in, amongst other things, the National Design Guide (January 2021). London Plan and Local Plan policies require high-quality design and the HRWMF provides local guidance on place-making and design for Site Allocation NT5.

6.5.81 Officers consider that the proposed scheme is a well thought through and elegantly designed response to a significant site. The proposed masterplan and layout represent an improvement on the existing adopted masterplan, with a clear, legible street network and an enlarged park, and improvements on the approved hybrid schemes for each of the individual Goods Yard and Depot sites and the scheme allowed at appeal. The proposed street layout is particularly improved on the Goods Yard site, where the single sided street proposed in both adopted masterplan and previous approval to run alongside the railway edge is moved into the site, with a more legible, direct and welcoming entrance off White Hart Lane and the potential for active frontage along both sides. Streets within the proposed development would generally be lined with good quality, well-designed low and medium rise mansion blocks providing an appropriate transition from the retained existing buildings along the High Road and White

Hart Lane to the proposed taller blocks.

6.5.82 Set out above is a detailed assessment of the proposed tall buildings against London Plan Policy D9, Local Plan Policies SP11, AAP6 and DM6 and the HRWMF. Officers consider that, overall, the proposed mix of heights (including three tall building at 27, 32 and 29 storeys) is successfully justified in accordance with this policy and guidance. In particular, whilst they are taller than the indicative heights in the HRWMF, the detailed design of the three proposed towers are legible and sculpturally interesting in longer views, connect well to the ground and their entrances whilst having clear separate base, middle and top and enclose good quality homes. Views of the development show it would generally not be any more detrimental than the existing and previously approved tall buildings, and by completing the intended row of tall buildings along the railway edge, be in accordance with the previously approved masterplan.

6.5.83 The proposed public realm, including the proposed Peacock Park, and detailed landscaping to ground, podium and roof levels would be suitably high-quality and acceptable. The proposed layout, distribution of uses and design would provide an accessible, safe and secure environment for future residents and the general public and the proposed permanent and interim boundary treatments are also considered acceptable. It is recommended that s106 planning obligations secure public access to the proposed publicly accessible spaces, access in use for future developments on neighbouring sites, and ensure that management and maintenance of streets and publicly accessible spaces is in accordance with the Mayor of London's Public London Charter (October 2021). It is also recommended that that landscaping details are reserved by way of planning conditions.

6.5.84 Fall-back Position. Compared with the two extant consents (HGY/2018/0187 and HGY/2019/2929) for the site, the proposed scheme would:

- Layout - Locate the proposed north-south street (Embankment Lane) away from the western boundary and include a private communal green space (Goods Yard Walk) next to the railway. Officers consider this to be a significant improvement on the approved layout, allowing, as it does for a two-sided street;
- Layout & location of proposed towers - Change the location of the proposed three tall buildings along the western edge of the site (including moving the southern-most building further away from The Grange, approx. 100m as opposed to approx. 89m, and the northern-most building closer to the existing Riverside Apartments, between approx. 30 and 35m as opposed to approx. 51.4m);

- Layout & location of proposed towers – Proposed location of Depot Block ABC would result in a different potential pedestrian bridge landing point – ruling-out a direct east-west alignment between Brantwood Road and Durban Road;
- Relationship with existing & future development – Have a similar relationship with most of Cannon Road, although a different/closer relationship with River Apartments and a different/better relationship with Peacock Industrial Estate/future development Plots;
- Amount, location & type of open space - Provide additional open space (15,650sqm compared with 11,180sqm, approx. 18.1sqm per home compared with approx. 17.3sqm per home, with the proposed Peacock Park being 300sqm larger than the illustrative scheme in the approved Depot consent);
- Public Realm, Landscape & Boundary Treatments – Provide similar sunlight conditions for the proposed Peacock Park and public realm management arrangements;
- Tall buildings - Increase the height of the proposed tall buildings (south to north) from 18, 21 and 29-storeys to 27, 32 and 29-storeys. A change in the proportions of the proposed towers, making them slenderer in north-south views, but broader in east-west views. Detailed design (rather than in 'outline' only);
- Tall buildings - Result in less coalescence of the proposed towers – with no overlap for 65.5% of directions around the site (as opposed to 58% for the extant schemes), with 2 x towers overlapping in 17% of locations (north-west, north-east, south-west and south-east) (as opposed to 19.5% for the extant schemes) and 3 x towers overlapping in 17.5% of locations (north-east and south-west) (as opposed to 22.5% in the extant schemes);

- Townscape & Visual Effects – Be more prominent in some Close/immediate (including from River Apartments) Medium/mid and Long views. Officers consider that the proposed detailed designs represent a significant improvement on the indicative designs for the towers that were approved in 'outline' in the Goods Yard and Depot consents; and
- Inclusive Design & Secured by Design – Provide similarly good quality design, with a proportionate increase in the number of proposed 'wheelchair accessible homes' (87 as opposed to 65 in the combined extant schemes).

6.5.85 <u>Fall-back Position: Compared to the existing consent for the site (HGY/2021/1771)</u>

- Layout and location of towers
- Relationship with existing and proposed development
- Location, amount and type of open space
- Tall buildings
- Townscape and visual effects
- Inclusive Design and Secured by design

6.5.86 Officers support the different layout to what has been approved previously and consider that the proposed increase in height and scale of the proposed tall buildings is acceptable. In addition, the proposed lower buildings are similar in

scale to those approved in ‘full’ or ‘outline’ as part of the extant consents for the Goods Yard and Depot parts of the site.

6.6 Residential Quality

6.6.1 London Plan Policy D6 sets out housing quality, space, and amenity standards, with further detail guidance and standards provided in the Mayor’s Housing SPG. Strategic Policy SP2 and Policy DM12 reinforce this approach at the local level.

6.6.2 The majority of proposed homes would be single level flats. However, a number of independently accessed duplex/maisonettes would be included on the ground and first floors of blocks fronting the proposed streets and squares to maximise ‘doors on the street’, introduce variety and increase housing choice.

Accessible Housing

6.6.3 London Plan Policy D7 and Local Plan Policy SP2 require that all housing units are built with a minimum of 10% wheelchair accessible housing or be easily adaptable to be wheelchair accessible housing. London Plan Policy D5 requires safe and dignified emergency evacuation facilities, including suitably sized fire evacuation lifts.

6.6.4 The proposed scheme includes 10% of homes designed to meet Building Regulation M4 (3) (‘Wheelchair User Dwellings’). These proposed homes are distributed across tenures and dwelling sizes as set out in Table 15 below.

Table 15: Proposed Wheelchair User Dwellings by tenure and size

	1-bed	**2-bed**	**3-bed**	**4-bed**	**Total**
Market	4	34	14	0	52 (10%)
Low-Cost Rent	4	4	3	0	11 (10%)
Intermediate	7	13	4	0	24 (11%)
	15	50	21	0	87 (10%)

6.6.5 The proposed wheelchair accessible dwellings are also distributed physically across the site in a variety of building types and levels, offering good choice for potential purchasers/renters. All three proposed towers would include 3 x lifts. Overall, the majority of accessible homes on upper floors would be served by two or more lifts, in line with good practice, with direct access to ground floor or basement car parking. Proposed emergency evacuation provision is addressed under Fire Safety & Security below (and is considered acceptable).

6.6.6 In order to demonstrate that provision of up to 10% accessible car parking spaces in line with London Plan Policy T6.1, the proposed basement areas for GY Blocks A, B, C and F and Depot Blocks ABC would include 86 accessible spaces. Depot Block D would also include four accessible car parking spaces at ground level. If planning permission were granted, it would be appropriate to ensure that a Car Parking Management Plan prioritises and manages access to these proposed spaces.

Indoor and Outdoor Space Standards

6.6.7 All of the proposed homes would meet the minimum internal space and floor to ceiling heights (2.5m) standards called for in London Plan Policy D6. Proposed layouts are generally good, although some rooms on the ground floor of the GY Blocks facing the railway are rather deep and respond to the challenges posed by railway noise and potential overheating – including ventilation panels to facilitate comfort without noise nuisance. The number of homes per core would be no more than 8, in line with adopted and emerging Mayoral guidance.

6.6.8 All flats would have private amenity space in the form of private balconies/terraces or patio spaces. In addition, most homes would also have direct access to communal open space, in the form of ground floor courtyards, podium level gardens, roof top and (for the proposed western Goods Yard Blocks, the proposed Goods Yard Walk).

Unit Aspect, outlook and privacy

6.6.9 Most of the proposed homes (54%) would be at least dual aspect. The majority of single aspect homes would be east and west facing, with no north facing. There would be a small number (22) of south-facing homes, but these have been designed to avoid overheating (see Energy, Climate Change & Sustainability). A number of proposed single aspect homes (including Market, Low Cost Rent and Intermediate tenures) at lower levels would face the railways lines, which is not ideal. However, none of these would be family-sized units and they would all have an acceptable outlook, daylight and internal noise environment (as discussed below).

6.6.10 The proposed disposition of blocks and layout and design of the proposed homes and outdoor spaces means that all proposed homes would have an acceptable outlook and there should be no unacceptable overlooking. The proposed homes at ground and podium level would all have a 1-2m threshold space between residential windows and the public realm/communal open space.

Daylight/Sunlight/overshadowing – Future Occupiers

6.6.11 The NPPF (paragraph 125c) sets out that that daylight/sunlight guidance should be interpreted flexibly where they would otherwise inhibit making efficient use of a site, as long as the resulting scheme would provide acceptable living standards.

6.6.12 The applicant's Daylight and Sunlight Report (May 2023) reports on 123 dwellings and there 401 habitable rooms, including all proposed homes on the lowest two residential floor levels of each of the proposed Blocks with an additional floor level, comprising 61 dwellings, assessed for the proposed tower Blocks (Depot ABC and Goods Yard A and B). This includes a range of dwelling and room types and is considered to represent the properties and habitable rooms that would likely receive the lowest levels of natural light in the development.

6.6.13 The 2011 BRE guidance has been replaced by the 2022 guidance, resulting in

the omission of the average daylight factor test and the introduction of an illuminance test that requires minimum target lux levels to be achieved for at least 50% of the habitable room being tested. The is a higher target to hit than the 2011 guidance average daylight factor test. Previous applications on the site have been considered under the 2011 BRE guidance.

6.6.14 The report shows that 192/401 habitable rooms assessed (48%) would satisfy the daylight illuminance test (at least 50% of the Kitchen/Living/Dinning Rooms achieving at least 200 lux) and 211/401 (52%) would satisfy the lower target test (KLD receiving at least 150 lux for at least 50% of the room). The results were extrapolated, in the assessment, to give a representative sample of low level and high level habitable rooms in the development. This found that 438/680 KLD (68%) would meet the BRE target illuminance and 486/680 (71%) would meet the lower target illuminance level. BRE guidance was updated in 2022, omitting the average daylight factor test.

6.6.15 In terms of sunlight, 103/123 flats tested had at least 1 habitable room that received at least 1.5 hours of sunlight on the 21st of March.

6.6.16 Given the proposal is for dense mixed used development, on an allocated site, in an urban area, it is considered that the proposed daylight/ sunlight levels to habitable rooms offer an acceptable living environment for future occupants.

6.6.17 The applicant's assessment also tested likely Sun on Ground for the proposed communal podium level amenity spaces against the BRE guidelines that spaces should receive 2 hours sun over at least 50% of the area on March 21. This found that 7 of the 8 above ground amenity spaces would meet the BRE guidelines. The exception being the proposed terrace on the north side of proposed Block D for the Depot part of the site (which is overshadowed by the proposed building), where the figure would be 0%. It should be noted that the scale of proposed Block D is the same as Block D that was approved in September 2020 (HGY2019/2929) and the overshadowing of its proposed amenity space has been considered acceptable.

Wind and microclimate – Future Occupiers

6.6.18 This issue is addressed under the Wind and Microclimate heading below. In summary, subject to ensuring that all necessary mitigation measures are incorporated into the proposed scheme and that landscaping is managed and maintained, the likely resultant wind environment for future residents is considered acceptable.

Noise and vibration – Future Occupiers

6.6.19 The western part of the site, where GY Blocks A, B, F and Station Master's House and Depot Blocks ABC would be located suffers from railway noise. The eastern and southern parts of the site, where GY Block H and the Station Master's House and Depot Blocks E and F would be located, suffers from traffic noise from the High Road/ White Hart Lane. Noise from the Peacock Industrial Estate and crowd/concert noise from the Tottenham Hotspur stadium is not

expected to contribute to the overall noise climate of the proposed homes as this would be less than the ambient noise level associated with trains and road traffic.

6.6.20 The applicant's Noise Impact Assessment sets out sound insulation requirements to ensure that the internal noise environment of these Blocks meets the relevant standards and recommends that mechanical ventilation and enhanced glazing be installed for these blocks. The assessment also considers overheating and identifies the need for the inclusion of an acoustically attenuated façade louvre that could be opened or closed by occupiers on facades that are considered 'medium' or 'high' risk of overheating and these have been incorporated in to the proposed detailed design. It would be possible to secure further details of the proposed glazing, mechanical ventilation and louvres by way of a planning

6.6.21 It would be possible to control mechanical plant noise by way of a standard planning condition (calibrated to reflect the site-specific noise environment). It would also be possible to use planning conditions to secure adequate mitigation to prevent undue noise transmission between the proposed ground floor commercial units and the proposed homes above and to limit the hours of use of any café/restaurant to 07.00 to 23.00 (Monday to Saturday) and 08.00 to 23.00 (Sundays and Public Holidays).

Residential Quality - Summary

6.6.22 The number of proposed wheelchair accessible homes and quality of these homes would meet requirements. The proposed homes and associated private and communal open space would generally be high quality and officers are satisfied that future residents would enjoy an acceptable residential amenity in terms of outlook and privacy, daylight and sunlight, wind/microclimate, noise and vibration and overheating.

6.6.23 Fall-back Position. The consented and proposed schemes would provide high-quality housing, meeting London Plan indoor and outdoor standards and benefitting from acceptable aspect, outlook and privacy, sufficient daylight and sunlight and acceptable microclimate and internal noise and vibration environment.

Infrastructure

Policy Background

6.6.24 The NPPF (Para. 57) makes clear that planning obligations must only be sought where they meet the tests of necessity, direct relatability and are fairly and reasonably related in scale and kind to the development. This is reflected in Community Infrastructure Levy (CIL) Regulation 122.

6.6.25 London Plan Policy S1 states adequate provision for social infrastructure is important in areas of major new development and regeneration. This policy is supported by a number of London Plan infrastructure related-policies concerning health, education and open space. London Plan Policy DF1 sets out an overview of delivering the Plan and the use of planning obligations.

6.6.26 Strategic Policy SP16 sets out Haringey's approach to ensuring a wide range of services and facilities to meet community needs are provided in the borough. Strategic Policy SP17 is clear that the infrastructure needed to make development work and support local communities is vital, particularly in the parts of the borough that will experience the most growth. This approach is reflected in the Tottenham Area Action Plan in Policies AAP1 and AAP11. DPD Policy DM48 notes that planning obligations are subject to viability and sets a list of areas where the Council may seek contributions. The Planning Obligations SPD provides further detail on the local approach to obligations and their relationship to CIL.

6.6.27 The Council expects developers to contribute to the reasonable costs of new infrastructure made necessary by their development proposals through the use of planning obligations addressing relevant adverse impacts and through CIL, which is required to be paid by law. The Council's Annual Infrastructure Funding Statement (December 2020) sets out what Strategic CIL can be used for (infrastructure list) and how it will be allocated (spending criteria)

Site Allocation NT5 Infrastructure Requirements and the HRWMF

6.6.28 The NT5 Site Allocation envisages large scale redevelopment giving rise to infrastructure obligations above those that may be required on smaller and less complex sites addressed. The overarching vision for the High Road West area is for a significant increase in the provision of community facilities and envisages that the local community will have the best possible access to services and infrastructure. Key to the AAP site delivery for NT5 is the creation of new leisure, sports and cultural uses that provide 7 day a week activity. The infrastructure requirements for the wider NT5 site are broadly identified in the NT5 Site Allocation, including:

- A new Learning Centre including library and community centre;
- Provision of a range of leisure uses that support 7 day a week activity and visitation; and

- Provision of a new and enhanced public open space, including a large new community park and high-quality public square along with a defined hierarchy of interconnected pedestrian routes.

6.6.29 Haringey's Infrastructure Delivery Plan (IDP) Update (2016) draws on the HRWMF and sets out an indicative list of infrastructure with associated costings to deliver the NT5 Site Allocation (amounting to £57.33m). The IDP Update notes these items and costs may be subject to change as feasibility studies continue to be developed. The North Tottenham Infrastructure list sets out the costed obligations into 7 areas that accord with the vision and principles of the HRWMF. The Council expects the applicant to make a proportionate contribution to these costs.

6.6.30 The AAP is clear that the Council will monitor government and London-wide policy and changes in legislation to make sure that the AAP continues to be consistent with relevant national, regional and local planning policies, and identify the need to review or reassess the approach taken in the Plan. Since the IDP Update (2016) the cost of infrastructure has increased when considered against inflation and other appropriate pricing indices.

Proposed site-specific infrastructure provision

6.6.31 The ES (Chapter 7) and associated addendum reports on an assessment of the likely significant socio- economic effects of the proposed scheme, including primary and secondary school places and primary health care. This finds that the proposed scheme would have a Negligible effect on all of these forms of infrastructure, taking account of planned future provision and CIL payments. This is also the finding when considering the likely significant effects of the proposed scheme and the cumulative schemes.

6.6.32 Library, community space and highways/public realm. The need for and proposed provision of overall open space, public realm and publicly accessible open space is addressed under Development Design above. In summary, this finds that there would be a shortfall of publicly accessible open space provision.

6.6.33 An approach to s106 financial contributions to address the AAP site-specific infrastructure requirements was considered as part of the appeal in to what is now the extant Goods Yard consent (HGY/2018/0187), however the increase CIL rate will now secure equivalent contributions to local infrastructure.

6.6.34

6.6.35 School Places. The proposed scheme is estimated to result in approx. 137 x school-aged children (87 x primary and 50 x secondary). The site is immediately next to the two-form entry Brook House Primary School and is proposing to make available a games area (Brook House Yard) to the school during term times. The site is within School Place Planning Area 4 and the Council's School Place Planning Lead notes that given that the proposed development has been included within the annual development trajectory (which forms part of the Council's school roll projections) that there should be sufficient primary and

secondary school capacity. Strategic CIL contributions could be used to fund additional school places in the future, should this prove necessary. Given this, officers agree with the ES assessment that the proposed scheme would have a Negligible effect on school provision.

6.6.36 Child care. The Childcare Act 2006 places a duty on local authorities to make sure that there are enough childcare places within its locality. The council is currently updating its Childcare Sufficiency Assessment. However, the 2015 Assessment and the sufficiency score cards (2016) do not identify a need to create more childcare places for the Northumberland Park Ward. In any event, the proposed scheme includes flexible commercial space (Use Class E), some of which could be used to provide space for children nurseries should this situation change.

6.6.37 Primary healthcare. The proposed scheme is estimated to result in the need for 1 x additional GP (based on 1,800 patients per GP). The partly implemented Northumberland Development Project scheme, one of the cumulative schemes, includes provision for a new health centre. The Lendlease proposals also include the provision of a healthcare centre in the event that the aforementioned centre is not delivered. The CCG have requested a financial contribution of £442,020 towards primary healthcare provision. However, in accordance with Haringey's Planning Obligations SPD and Annual Infrastructure Funding Statement, officers consider that the need for additional primary health care provision would be most appropriately addressed by considering the use of Strategic CIL at a later date. Subject to using CIL in this way, officers agree with the ES assessment that the proposed scheme would have a Negligible effect on school provision.

6.6.38 Sports provision. Sport England has encouraged the LPA to consider the sporting demands arising from the proposed schemes and to address these by either CIL or s106 financial contributions. The HRWMF considered likely indoor sports halls, swimming pool and playing pitch requirements as part of considering 'open space' needs arising from the Site Allocation. It assumed that the proposed Community Centre would include provision for a five-a-side pitch and indoor sports facilities and that facility and that additional swimming pool capacity was not required. As such, officers consider that the sporting demands arising from the proposed scheme are best addressed by way of the proposed 'community space,' discussed above, and potentially through Strategic CIL (with the Annual Infrastructure Funding Statement explicitly identifying sports and leisure facilities as eligible).

Proposed site-specific infrastructure provision - Summary

6.6.39 Given the changed development context and the proposed in-kind provision of a park, officers consider that the proposed financial contributions towards a new library, community space and public realm are fairly and reasonably related in scale and kind to the proposed scheme. The proposed commercial space could accommodate children nurseries should commercial child-care providers seek to satisfy a demand and additional need. No particular need for additional school places in the area has been identified but, in any event, should a need arise, these, together with additional health care and sports provision for the area could be part funded by strategic CIL.

6.6.40 Fall-back position. The proposed park on the Depot part of the site is approx. 300sqm larger than the park in illustrative scheme for the extant Depot consent (HGY/2018/0187).The development context has changed since planning permission was granted for the Goods Yard and Depot schemes, with Lendlease's scheme for approx. 2,615 new homes across Site Allocation NT5 having been granted planning permission (HGY/2021/3175).

6.7 Child Play Space

6.7.1 London Plan Policy S4 seeks to ensure that development proposals include suitable provision for play and recreation. Local Plan Policy SP2 requires residential development proposals to adopt the GLA Child Play Space Standards and Policy SP13 underlines the need to make provision for children's informal or formal play space. The Mayor's SPG indicates at least 10 sqm per child should be provided.

6.7.2 The ES (Chapter 7) and associated addendum reports on an assessment of the likely significant socio- economic effects of the proposed scheme, including open space and play space. It finds that the proposed scheme would have a Moderate beneficial effect on play space at site level and a Negligible effect at all other spatial levels. When the proposed scheme is considered alongside the cumulative schemes, a Minor beneficial effect at local level and a negligible impact at other spatial levels is identified.

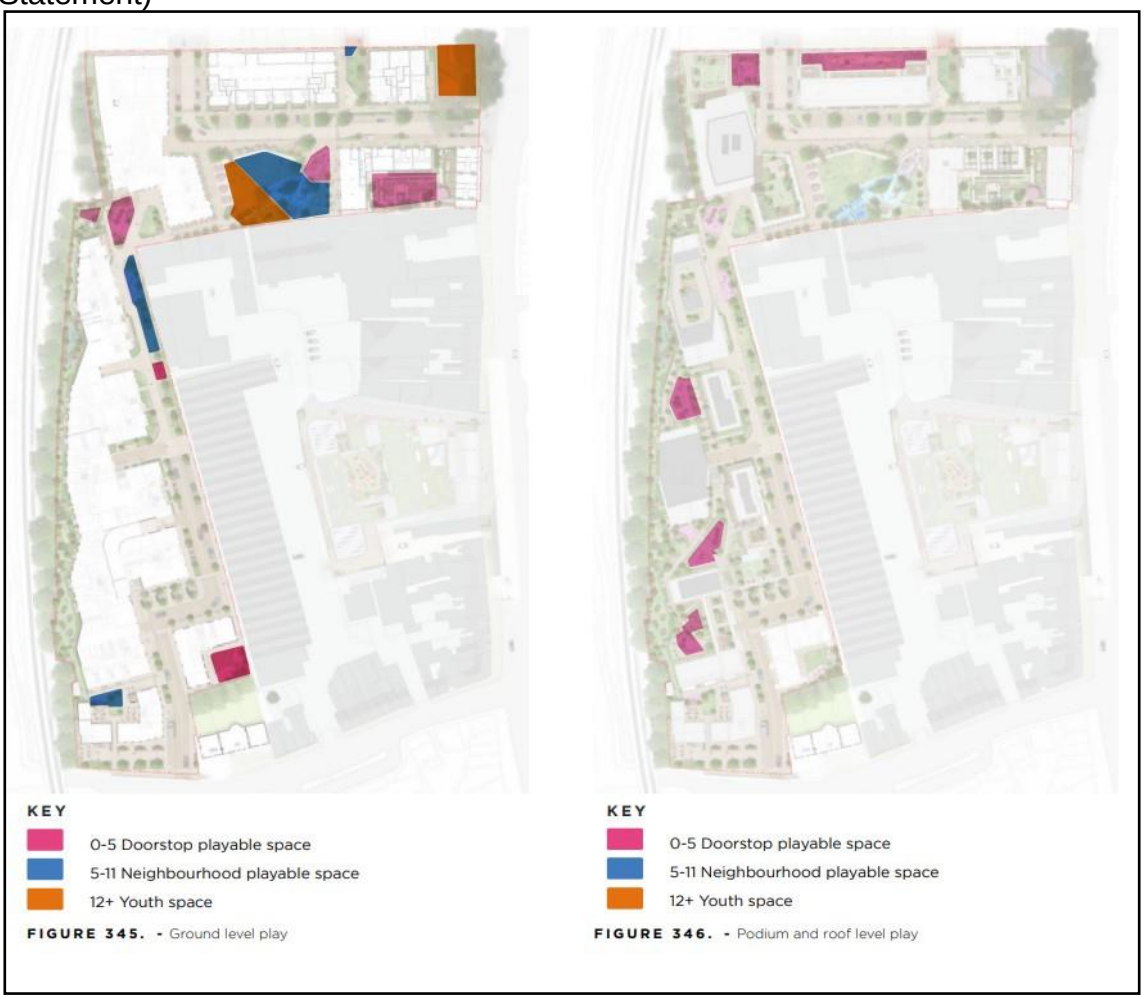
6.7.3 Using the GLA's Population Yield Calculator (v.3.2) (October 2019), the proposed scheme estimates an on-site child population of 261 (113 x 0-4-year olds, 87 x 5-11-year-olds and 61 x 12+ year-olds). This generates an overall need for 2,601sqm of play space. The GLA find the play space quantum proposed (2,900 sqm) to be in accordance with London Plan Policy S4.

Table 16: Play Space Requirements

Age Group	Requirement (sqm)	Provision (sqm)
0-4	1,133	1,300
5 to11	866	880
12+	602	720
	2,616	2,900

6.7.4 The proposed play space would be provided at ground and podium level as set out in Figure 05 below.

Figure 05: Ground and Podium Level Play Areas (Extracts from Design & Access Statement)



6.7.5 The space in the proposed Peacock Park, Northern Square and Brook House Yard, would be publicly accessible. Overall, officers consider that the proposed quantity and quality of play space is acceptable and agree with the finding of the ES that it would have a Moderate/Minor beneficial effect. If the proposed scheme were to be granted permission, it would be possible to reserve details of proposed play space by way of planning conditions.

6.7.6 The proposed Brook House Yard space (approx. 350sqm) for 12+ year-olds would be shared with Brook House Primary School, with it being used by the school Monday-Friday 08.00 to 17.00 during school term-time and it being available for wider use outside of these hours. Residential amenity would be safeguarded by the proposed detailed boundary treatment and timer controls for the proposed external lighting. Such a dual use was accepted in principle in relation to the extant permissions (HGY/2019/2929 & HGY/2021/1771), subject to a planning condition requiring the implementation of an approved management and maintenance plan. Officers recommend the imposition of a similar condition. The proposed layout, scale and massing and design of Block E has been designed to safeguard the wellbeing of children using the existing school playground and proposed shared play area.

6.7.7 Fall-back Position. The proposed scheme and the Goods Yard and Depot schemes approved by the extant consents would deliver similarly acceptable provision for children's play and meet relevant quantitative and qualitative standards.

6.8 Heritage Conservation

6.8.1 Paragraph 196 of the revised NPPF sets out that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

6.8.2 London Plan Policy HC1 is clear that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail and places emphasis on integrating heritage considerations early on in the design process.

6.8.3 Policy SP12 of the Local Plan seeks to maintain the status and character of the borough's conservation areas. Policy DM6 continues this approach and requires proposals affecting conservation areas and statutory listed buildings, to preserve or enhance their historic qualities, recognise and respect their character and appearance and protect their special interest.

6.8.4 Policy AAP5 speaks to an approach to Heritage Conservation that delivers "well managed change", balancing continuity and the preservation of local distinctiveness and character, with the need for historic environments to be active living spaces, which can respond to the needs of local communities.

6.8.5 Policy NT5 requires consistency with the AAP's approach to the management of heritage assets. The High Road West Master Plan Framework's approach to managing change and transition in the historic environment seeks to retain a

traditional scale of development as the built form moves from the High Road to inward to the Master Plan area.

6.8.6 The HRWMF promotes the adaptable reuse of heritage assets with appropriate future uses identifying how various individual buildings will be used, what works they will require including restoration and refurbishment works to adapt to the proposed use.

Legal Context

6.8.7 The Legal Position on the impact of 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”.

6.8.8 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.”

6.8.9 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.”

6.8.10 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.

6.8.11 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.

6.8.12 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.

6.8.13 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.

Assessment of Significance

6.8.14 The Tottenham High Road Historic Corridor consists of a sequence of five conservation areas. The North Tottenham neighbourhood is at the northern end of the historic corridor; it is, therefore, a threshold or point of entry to the historic corridor as a whole. The whole North Tottenham Conservation Area is in a fragile condition and it is currently designated a “Conservation Area at Risk” by Historic England.

6.8.15 Part of the High Road frontage and all of the White Hart Lane frontage of the site are within the North Tottenham Conservation Area. However, in its current condition, other than the local listed Station Master’s House (52 White Hart Lane), the Grade II Listed Buildings at Nos. 867-869 High Road and the nearby mature London Plane trees, the site neither contributes to the quality and character of the Conservation Area nor the special interest and significance of the heritage assets in the surrounding area. The existing 22/23 storey tall Rivers Apartments tower located immediately to the north of the site also forms part of this context.

6.8.16 The proposed scheme locates tall buildings close to the western edge of the site (away from the High Road) and GY Block B would be approx. 100m to the north- west of The Grange on White Hart Lane. As such, they would be set back from the North Tottenham Conservation Area frontages. However, they would form part of the immediate surroundings of designated and undesignated heritage assets included Sub Area A (northern part of the High Road between Brantwood Road and White Hart Lane) and Sub Area B (White Hart Lane) of North

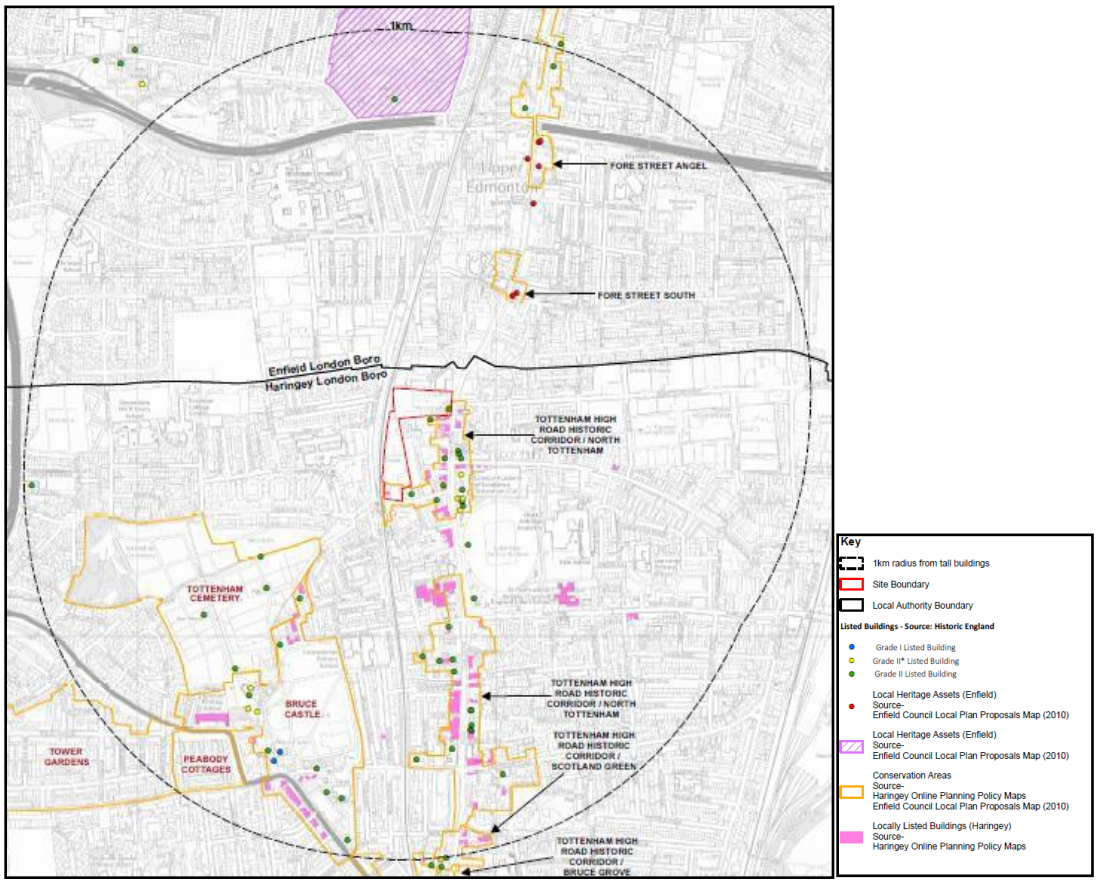
Tottenham Conservation Area. The Conservation Area Appraisal and Management Plan (2017) considers the collection of Georgian buildings, including the Grade II Listed Grange and locally listed Station Master's House to be good examples of early railway buildings, which were key to the transportation developments in the area during the 19th Century. It is significant in that it has retained buildings representative of each period from Georgian through mid to late Victorian up to post war housing. The Grange and its two later flank wings are early to mid-19th century and form an impressive Georgian group but its setting is marred by the projecting blank end wall of the Victorian terrace on one side and the open yard entrance with security fencing. The Appraisal identifies the existing vehicular entrance area to the Goods Yard part of the site as a 'negative contributor' to the Conservation Area.

6.8.17 The built and visual context of the listed and locally listed buildings characterising the west side of the High Road has been progressively changing with the erection of some high-rise buildings such as the Rivers Apartment tower locate to the north of the conservation area. This context can be expected to further change when other parts of Site Allocation NT5 are developed in accordance with the HRWMF, which aims to transform the poor quality industrial and commercial sites into a mixed- use commercial and residential areas complemented by high quality public spaces.

6.8.18 Following officer comments as part of the pre-application informal EIA scoping exercise, built heritage was scoped in for EIA purposes and Chapter 11 of the ES presents an assessment of the likely significant effects of the proposed scheme on built heritage. This draws on the images in the Townscape and Visual Impact Assessment (TVIA) and its Addendum and a separate Heritage Statement.

6.8.19 The ES assessment started with the identification of built heritage assets within a 1km search area of proposed tall residential towers Goods Yard Blocks A and B and the Depot Block A). The 50 x Listed Buildings, 4 x Conservation Areas and non-designated heritage assets are identified in Figure 06 below.

Figure 06: ES Appendix 11.1 (Heritage Assets Plan)



6.8.20 Following desk-based research and site visits and taking account of the 'heritage significance' and sensitivity of the identified assets, the ES reports on an assessment of the likely significant effects on the following ones:

- 34 White Hart Lane (The Grange) (Grade II Listed);
- Nos 797-799 High Road (Grade II Listed); and
- Nos. 819-821 High Road (Grade II Listed);
- Nos. 867-869 High Road (Grade II Listed);
- North Tottenham Conservation Area;
- Bruce Castle and All Hallows Conservation Area
- Station Master's House (52 White Hart Lane) (Locally Listed);

6.8.21 Officers agree that the above built heritage assets are those worthy of assessment but also considers that, given the proposed height and form of the proposed towers and the comments in the Mayor of London Stage 1 Report, the following also need to be considered:

- Nos. 790 High Road (Dial House) (Grade II* Listed);

6.8.22 The officer assessment below draws on the findings of the ES.

6.8.23 The Grange. The ES identifies that the presence of the tall proposed buildings behind The Grange would be harmful to its 'heritage significance' by reason of the sense of distraction due to their different bulk, scale and massing when compared to the modestly proportioned historic building. However, it goes on to

find that the Grange would still stand out as a striking Georgian building and there is unlikely to be any considerable effect on its significance and a low degree of harm is identified. The ES goes on to identify a positive effect of the knitting together of the street scene on White Hart Lane to bring a coherence and sense of enclosure and enhancement of the character and quality of the townscape immediately to the west and north of The Grange and to the street frontage, giving rise to a beneficial effect. The ES balances the enhancements to the setting of The Grange with the harm that would be caused by the proposed towers and concludes that there would be a Negligible effect.

6.8.24 Officers agree that the proposed sensitively designed and traditionally proportioned new building next to the Grange would result in an improvement in its immediate setting, However, they believe that the proposed tall towers would dominate in views of the listed building and would generate an overwhelmingly tall and uncharacteristic built context surrounding the listed building and the established scale of the historic town thus diminishing their primacy and legibility. The towers would have a negative impact on the wider setting of the Listed Building and would reduce the positive effects of retaining traditional built proportions along White Hart Lane. The harm that would be caused to its wider setting by the proposed towers would outweigh the positive effects derived by the improvement to the immediate setting of the building and that, overall, the proposals would cause 'less than substantial harm' to the setting and significance of this Listed Building.

6.8.25 Nos 797-799 High Road. The ES notes that these buildings are already experienced in the context of modern development, including Rivers Apartments, and that whilst the proposed towers would have a greater presence compared with this existing tower, they would, like the existing tower, be distant and separate from Nos. 797-799. The ES concludes that there would be a Negligible effect.

6.8.26 The proposed Goods Yard towers (in particular) would be significantly taller and more prominent than the existing River Apartments tall building and draw attention away from it. Officers consider that they would have a negative effect on the setting of these Listed Buildings. As such, they consider that the proposal, would cause 'less than substantial harm' to the setting and significance of these Listed Buildings.

6.8.27 Nos. 819-821 High Road (Listed Grade II). The ES notes that the building is already experienced in the context of taller buildings and that the proposed towers, which would visibly represent a new quarter beyond the High Road, would not materially change the way in which the listed pair is experienced. It concludes the proposed scheme would cause a Minor-Negligible adverse effect on these buildings. The ES also reports on a cumulative assessment, taking account of the proposed scheme for the Printworks (HGY/2021/2283). It finds that if this scheme were to also go ahead, there would be a Minor- Adverse effect on these buildings.

6.8.28 Officers consider that (as demonstrated by View 6 in the TVIA), the height and

scale of the proposed towers would stand out in the background of heritage assets as prominent, contemporary structures in juxtaposition to the architectural and urban qualities of the Listed Buildings and also of the locally listed buildings at Nos. 823 to 829. As such, they consider that the proposed towers would cause 'less than substantial harm' to the setting and significance of these designated and non-designated assets.

6.8.29 Nos. 867-869 High Road (Listed Grade II). The ES does not report on an assessment of proposed works to the building themselves that would enable their conversion to 6 x residential flats (which are assumed to be part of a future baseline). However, officers consider that the approved repair and conversion of these two Listed Georgian townhouses into residential use would enhance the character special architectural and historic interest and significance of these buildings. Officers also consider that proposed Depot Block G and the creation of a communal garden area (to be shared with residents of Nos. 867-869) would improve the immediate setting of the Listed Buildings.

6.8.30 In terms of the wider setting, the ES notes that the Listed Buildings are experienced in a townscape that already includes tall buildings, including Rivers Apartments to the west and Stellar House to the north east on the High Road. It finds that the visibility of the proposed additional towers in views from Brantwood Road and the High Road would not affect the significance or the ability to appreciate the significance of these Listed Buildings and identifies a Minor Negligible effect.

6.8.31 Officers consider that (as demonstrated by Views 10, 11 and 12 in the TVIA), the height and scale of the proposed towers would stand out in the background of heritage assets as prominent, contemporary structures in juxtaposition to the architectural and urban qualities of the Listed Buildings, distracting from their prominence in the streetscape. Overall it is considered that the enhancements to 867-869 and its immediate setting balance the harm associated with the distraction the tall towers provide in the wider setting of the building. In line with the Appeal Inspectors findings on application HGY/2021/3175, the proposal is not considered to harm the significance of no.867 – 869 High Road.

6.8.32 North Tottenham Conservation Area. The site includes Nos. 867-869 High Road High Road, which forms part of Sub Area A of the Conservation Area and marks the entrance to the Conservation Area from the north. It also includes the adjoining surface level car park and mature London Plane trees (as well as other mature London Plane trees in the High Road footway) which fall outside of the Conservation Area). Officers consider that the proposed conversion and refurbishment of Nos 867-869, the improvement of the existing road junction and the creation of a new high-quality street (Peacock Lane) and adjoining fenced open space (Brook House Yard), together with the retention of the existing mature trees would enhance this part of the Conservation Area and have a positive effect.

6.8.33 The site includes the Station Master's House and adjoining frontage between it and the Grange that is identified as being a detractor from the Conservation Area. Officers consider that the proposed retention and refurbishment of the Station Master's House, the proposed new high-quality Block H and significantly improved access in to the site would enhance this part of the Conservation Area

and have a positive effect.

6.8.34 However, whilst the proposed scheme would directly enhance parts of the High Road Conservation Area, due consideration needs to be given to the overall effects of the proposed scheme on the significance of this Area and other heritage assets. Whilst the proposed tall buildings are well designed and articulated ahd would be set back and somewhat remote from the High Road and White Hart Lane frontages (and arguably signal the existence of another character area), they would be very tall and wide in east-west views (much more so than the tall buildings approved as part of the extant Goods Yard permission). The ES concludes that the proposed tall buildings would have a Negligible effect on the Conservation Area.

6.8.35 Proposed tall buildings along the western edge of the site would be in line with the vision established by the HRWMF. However, the proposed towers would be significantly taller than the guidance envisages. Officers consider that, as demonstrated by TVIA Views 4, 5, 5N, 6, 10, 11, 12 and 25), the height and scale of the proposed towers would stand out in the background of heritage assets as prominent, contemporary structures and would cause 'less than substantial harm' to the setting and significance of the Conservation Area.

6.8.36 Bruce Castle and All Hallows Conservation Area. This has considerable historic and architectural significance and includes three important historic buildings – Bruce Castel (Listed Grade I), All Hallows Church (Listed Grade II*) and The Priory (Listed Grade II*). The ES finds that the Rivers Apartments tower is already seen from the park and that the proposed scheme would not bring about a particularly noticeable change to the perception of the urban setting of the park. The ES concludes that the proposals would have a Negligible effect.

6.8.37 Officers disagree with the assessment in the ES. Officers consider that the proposed Goods Yard towers (in particular), would be prominent features when viewed from the open spaces in the Conservation Area, which is characterized by its openness, landscaping in the park and small-scale development in long views. As such, officers consider that these proposed tall buildings would cause 'less than substantial harm' to the setting and significance of this Conservation Area.

6.8.38 Station Master's House. The proposed scheme also includes the proposed conversion and extension of the Station Master's House. However, the proposal here is different from that which was approved in 'outline' by the extant planning permission for the Goods Yard (HGY/2018/0187). The extant permission allows for a rear single-storey extension (approx. 65sqm) to provide space for future kitchen and bar facilities as part of its change of use to a restaurant. This 'full' application scheme proposes a smaller rear single-storey extension, a separate small refuse storage building and alterations to the building's elevations to provide a dining space as part of the change of proposed use of the building to flexible 'Class E' use (with the drawings indicating a restaurant/café). As with the consented scheme, officers consider that the proposed scheme would have a beneficial effect on this non-designated heritage asset and allow for the reuse of this building. The LPA would be capable of reserving the approval of details of the proposed works by use of a planning condition.

6.8.39 The ES does not report on an assessment of proposed works to the building themselves (which are assumed to be part of a future baseline). However, it concludes that the significance of the building and its appreciation would not be materially affected by the proposed tall buildings and identifies a Negligible effect.

6.8.40 Officers agree with the assessment in the ES. The proposed works to the building would have a beneficial effect on the significance of this asset and help bring it back into beneficial use. In addition, whilst the proposed Goods Yard towers are significantly taller than those granted at appeal (HGY/2018/0187) as part of the extant consent, they would be set further to the north. Overall, officers consider that, on balance, the 'less than substantial harm' that would be caused to the setting of this building would be outweighed by the benefits associated with the proposed change of use and works to the building itself.

6.8.41 No. 790 High Road (Dial House) (Grade II* Listed). The ES does not provide an assessment of the impact of the proposed development on Dial House. Officers consider that the proposed Goods Yard towers (in particular), would be uncharacteristically tall features when viewed from this Grade II* Listed Building and adversely affect the setting of this important building. As such, officers consider that these proposed tall buildings would cause 'less than substantial harm' to its setting and significance.

6.8.42 Summary. Having carefully considered the proposals, including the findings in the applicant's ES and Heritage Statement, the Conservation Officer considers that the proposed towers would cause 'less than substantial harm' to the setting and significance of the following designated and non-designated heritage assets considered together and that, having considered the specific impact of the proposed development on each relevant heritage asset, the average level of harm would be at the mid-low range of 'less than substantial':

- 34 White Hart Lane (The Grange) (Grade II Listed);
- Nos 797-799 High Road (Grade II Listed);
- Nos. 819-821 High Road (Grade II Listed);
- Nos. 867-869 High Road (Grade II Listed);
- North Tottenham Conservation Area;
- Nos. 790 High Road (Dial House) (Grade II* Listed); and

6.8.43 As such, taking full account of the Council's statutory duty under sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, paras 202 and 203 of the NPPF this harm has been given significant weight and requires a balancing exercise against public benefit.

6.8.44 The applicant's Planning and Regeneration Statements set out what the applicant considers to be the benefits of the proposed scheme. Taking account of this and their own assessment, officers summarise the public benefits as follows:

- Securing the future of the Listed Buildings at Nos. 867-869 High Road and improving their immediate setting;
- Securing the future of the locally listed Station Masters House and improves its immediate setting;

- Making a positive contribution towards the regeneration of Tottenham and acting as a catalyst for further regeneration and inward investment;
- Helping to deliver the HRWMF, including a positive contribution to place-making, provision of publicly accessible open space, new play space and public realm and the dual use of the proposed Brook House Yard amenity space with Brook House Primary School;
- Improving connectivity and permeability by providing new high-quality pedestrian and cycle routes and improving the streetscape of the High Road and White Hart Lane.
- Delivering 844 new high-quality homes, including affordable homes (between 35.9% and 40% by habitable room);
- Depending on phasing and timing, providing potential opportunities to decant existing residents from the Love Lane Estate to high-quality housing, to facilitate its regeneration as called for in Site Allocation NT5;
- Achieving ecological and biodiversity enhancements, including an overall net gain in biodiversity;
- Making a financial contribution towards social infrastructure;
- Making a positive contribution to reducing carbon dioxide emissions and surface water run-off;
- Creation of 270 FTE jobs during the construction phase with opportunities for local recruitment, skills development and sustainable careers.
- Creation of between 30 to 160 FTE new jobs (a net loss of between 30 and 160);
- Generation of a total New Homes Bonus of c. £1.7m alongside c. £1.5m a year in council tax revenue (of which nearly 75% would be retained by the LBH);
- Annual household spending of £12.7m on goods and services in the area; and
- Approx. £100,000 per year in business rates.

6.8.45 Having carefully considered issues, officers consider that the public benefits of the proposals, as summarised above, outweigh the less than substantial harm that would be caused to the designated and non-designated heritage assets. This is consistent with the findings of the Planning Inspector on the HGY/2021/1771 appeal.

Heritage Conclusion

6.8.46 Historic England makes no comment on the proposals, but advises that the LPA should seek the views of its specialist conservation advisers. The Mayor of London (Stage 1 Report) considers that 'less than substantial harm' would be caused to the significance of heritage assets arising from the proposed height and massing of the scheme to all of the heritage assets assessed above.

6.8.47 Officers are bound to consider this strong presumption in line with the legal context set out above. The proposed scheme would retain, preserve and enhance the heritage assets within the site – returning the Listed Buildings at Nos. 867-869 High Road to residential use and providing gardens to the rear, enhancing their immediate setting and the converting and restoring the Station Master's House). However, officers consider that the proposed tall buildings would cause some 'less than substantial harm' to the setting and significance of a number of assets. This harm has been given significant weight and is

considered to be outweighed by substantial public benefits including the provision of much needed housing and affordable housing and publicly accessible open space. Given this, officers conclude that, the proposals would preserve and enhance historic qualities of the relevant heritage assets and comprise well managed change in accordance with Policies SP12, DM6, AAP5 and Site Allocation NT5 and guidance in the HRWMF.

6.8.48 Fall-back Position. The application scheme proposes significantly taller buildings on the Goods Yard part of the site than were approved as part of the Goods Yard extant consent (HGY/2018/0187), albeit these are of a different form and design (being in 'full' rather than in 'outline') and would be located further to the north (with proposed GY Block B being approx. 100m north west of the Grange, as opposed to 86.5m (based on the maximum footprint of the approved 'outline' parameter plans in the extant Goods Yard scheme) . The tall building proposed on the Depot part of the site is of a similar height, although again of a different form and design (being in 'full' rather than in 'outline') and would also be located further to the north.

6.8.49 Fall-back Position. HGY/2021/371

6.8.50 Taking account of these and all other differences between the application scheme and the extant consents (HGY/2018/0187, HGY/2019/2929 and HGY/2021/3175), officers consider that the application scheme would result in some additional harm (where none has been identified in relation to the extant consents) to the setting and significance of Nos. 819-821 High Road (Grade II Listed). In addition, officers consider that the application scheme would result in increased harm (over and above what has been identified in relation to the extant schemes) to the setting and significance of The Grange (Grade II Listed), Nos. 797-799 High Road and the North Tottenham Conservation Area.

6.8.51 However, whilst officers consider that the proposed scheme would result in some additional and increased harm, it would deliver the following additional public benefits over and above those identified for the extant Goods Yard and Depot schemes (HGY/2018/0187 and HGY/2019/2929):

- Providing an additional 221 homes – making a greater contribution to meeting Haringey's London Plan housing target;
- Delivering more family homes (148 or 17.4% compared to 79 or 12%);
- An additional 22 'wheelchair accessible' homes;
- 70 more affordable homes (+31%);
- 20 more Low-Cost Rent homes (+25%);
- 16 more Low-Cost Rent family homes (+49%) (with better alignment with the Council's Housing Strategy);

- Delivering a greater quantum of on-site open space (15,650sqm) compared to the extant consents (11,180sqm) resulting in 18.1sqm of open space per home as opposed to 17.3sqm - with the proposed Peacock Park being 300sqm larger than the illustrative scheme in the approved Depot consent;
- Providing a greener and more biodiversity rich scheme; and
- Proportionately delivering additional economic benefits, including further Council tax receipts, New Homes Bonus payments, additional expenditure from additional residents and further S106/CIL contributions.

6.8.52 Having given significant weight to the less than substantial harm identified above, officers consider that this would be outweighed by the likely additional public benefits identified above.

6.9 Impact on Amenity of Adjoining Occupiers

6.9.1 London Plan Policy D6 notes that development proposals should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space. The Mayor's Housing SPG (2016) reinforces the need for privacy, but cautions against adhering rigidly to minimum distance requirements and also calls for the BRE guidance on daylighting and sunlighting to be applied flexibly and sensitively to proposed higher density development, especially in town centres – taking account of local circumstances, the need to optimise housing capacity and the scope for the character and form of an area to change over time.

Daylight/Sunlight, overshadowing and solar glare Assessment - Methodology

6.9.2 The impacts of daylight provision to adjoining properties arising from proposed development is considered in the planning process using advisory Building Research Establishment (BRE) criteria. A key measure of the impacts is the Vertical Sky Component (VSC) test. In conjunction with the VSC tests, the BRE guidelines and British Standards indicate that the distribution of daylight should be assessed using the No Sky Line (NSL) test. This test separates those areas of a 'working plane' that can receive direct skylight and those that cannot.

6.9.3 If following construction of a new development, the no sky line moves so that the area of the existing room, which does receive direct skylight, is reduced to less than 0.8 times its former value, this will be noticeable to the occupants and more of the room will appear poorly lit.

6.9.4 The BRE Guidelines recommend that a room with 27% VSC will usually be adequately lit without any special measures, based on a low-density suburban model. This may not be appropriate for higher density, urban London locations. The NPPF advises that substantial weight should be given to the use of 'suitable brownfield land within settlements for homes…'and that LPAs should take 'a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site'. Paragraph 2.3.47 of the Mayor's Housing SPG supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city.

6.9.5 The acceptable level of sunlight to adjoining properties is calculated using the Annual Probable Sunlight Hours (APSH) test. In terms of sunlight, the acceptability criteria are greater than 25% for the whole year or more than 5% between 21st September and 21st March.

6.9.6 The ES identifies the following definitions for the predicted impacts on receptors, which are used by a number of boroughs and which officers consider acceptable:

- Major (high) – less than 0.60 times former value (greater than 40% loss);
- Moderate (Medium) – 0.60-0.69 times former value (31% to 40% loss);
- Minor (Low) – 0.70-0.79 times former value (21% to 30% loss); and
- Negligible – Typically greater than or equal to 0.80 times former value.

6.9.7 A Sun Hours on Ground (SHOG) assessment considers if existing amenity spaces will receive the levels of sunlight as recommended within the BRE guidelines – which recommend that at least half of a space should receive at least two hours of sunlight on 21 March (Spring Equinox), or that the area that receives two hours of direct sunlight should not be reduced to less than 0.8 times its former value (i.e. there should be no more than a 20% reduction).

6.9.8 In terms of solar glare, separate BRE guidance sets out a method involving plotting the geometry of the proposed reflective facades relative to the receptor location onto a sunlight availability protractor and determining the times of day and year at which reflected sunlight could occur.

6.9.9 Chapter 9 of the ES along with associated addendum reports on an assessment of the likely significant effects of the proposals on 103 neighbouring residential properties (1,619 windows serving 1,092 rooms – 990 rooms for sunlight) immediately to the north in the Cannon Road housing area, to the east and south on the High Road, to the south along White Hart Lane and to the west along Pretoria Road. It also assessed the likely impacts on Brook House Primary School immediately to the north. The ES also includes an assessment comparing the likely significant daylight and sunlight effects of the proposed development with those of the extant consented Goods Yard and Depot schemes and the Lendlease Scheme.

6.9.10 The ES makes the point that, uncommonly for an urban area, the site is largely clear of buildings – with the exceptions being the relatively low-rise supermarket building and small retail units, Nos 867-869 High Road, the Carbery Enterprise Park buildings and the Station Master's House. The BRE Guidelines acknowledges that standards need to be applied particularly flexibly in such situations and that alternative baseline and/or standards may be appropriate. Proposed Depot Block D is effectively a mirror image of the existing Mallory Court to the north – as advocated in the HRWMF. A "mirror massing" daylight assessment was carried out in relation to the extant Depot consent. However, as the position and massing of proposed Depot Block D has not changed, such an assessment was not repeated for the ES (although the principles remain the same).

Daylighting and Sunlight Assessment

6.9.11 The assessment reported in the ES finds that windows and rooms in 57 of the 103 buildings assessed would meet the VSC and NSL numerical guidelines set out in the BRE Guidelines and. As such, the ES identifies the likely effects to be Negligible and not significant. The situation for sunlight is similar, although in this case rooms in 54 of the 103 buildings assessed would meet the annual and winter APSH numerical guidelines.

6.9.12 Receptors (mainly homes, but including Brook House Primary School) in the remaining 46 buildings were found to be likely to experience a noticeable impact on daylight and/or sunlight. Table 17 below identifies these and sets out the likely significance of the adverse effect identified in the ES.

Table 17: Daylight and Sunlight effects

Receptor	**Daylight (Adverse)**	**Sunlight (Adverse)**
River Apartments	Minor	-
Ambrose Court	Moderate	Minor
Mallory Court	Major	Moderate to Major
Brook House Primary School	Minor to Moderate	-
Beachroft House	Minor	Minor
2-7 Pretoria Rd	Minor	-
8-10 Pretoria Rd	Minor	-
11,12/15-17 Pretoria Rd	Minor	-
Lorenco House	Moderate to Major	-
36 & 37 Pretoria Rd	Moderate	-
36,40,41 & 44 Pretoria Rd		Minor
38 & 39 Pretoria Rd	Moderate	Minor
40-45 Pretoria Rd	Moderate	-
46-48 Pretoria Rd	Moderate	Minor
49-51 Pretoria Rd	Moderate	-
49-55 & 57 Pretoria Rd		Minor

Receptor	Daylight (Adverse)	Sunlight (Adverse)
52-57 Pretoria Rd	Minor	-
55 Petoria Rd	-	Minor
58-67 Pretoria Rd	Minor	Minor
865 High Road	Minor	-
849 High Road	Minor	-
841-843 High Road	Minor	-
837 High Road	Minor	-
813-817 High Road		Minor
831-833 High Road	Minor	-
6-6a White Hart Lane	Minor	
30 White Hart Lane	Minor	

6.9.13 The ES reports that with the cumulative schemes also in place, the properties in Table 18 below would be likely to experience the following effects.

Table 18: Cumulative Daylight and Sunlight effects

Receptor	Daylight (Adverse)	Sunlight (Adverse)
Ambrose Court	Moderate	Minor
Lorenco House	Moderate - Major	
Mallory Court	Major	Moderate-Major
Beachcroft Court	-	Minor
2-8 Collage Road, 4 Collage Park Road and 1 & 17 Durban Road	Negligible -Minor	-
1-12, 15-17 & 57-67 Pretoria Road	Minor	-
15 Pretoria Road	-	Negligible - Minor
34 and 35 Pretoria Road	Negligible - Minor	-
36-45 & 46-48 Pretoria Road	Moderate	Negligible - Minor
49-50 & 52-56 Pretoria Road	Minor -Moderate	
58-67 Pretoria Road	-	Minor
Brook House Primary School	Minor - Moderate	Negligible - Minor
867 & 869 High Road	Moderate	-
865 High Road	Major	-
849- 853 High Road	Major	-
841 High Road	Major	Minor
843 High Road	Minor	-
835 - 839 High Road	Moderate	-
831-833 High Road	Major	Minor
819-829 High Road	Major	Major
809-817 High Road	Major	Moderate
807 High Road	Minor	Minor
793-807 High Road	Minor	-
803-805 High Road	Minor - Moderate	
811a High Road	Major	
811a, 803-805 & 797 High	-	Moderate

Road		
820 & 824-828 High Road	Minor	-
818.822.830 & 832-838 High Road	Negligible - Minor	-
840-850 High Road	Minor	-
841 High Road	-	Minor
47-65 White Hart Lane	Minor	-
2-4 & 3-7 White Hart Lane	Minor	-
6-6a White Hart Lane	Minor	-

6.9.14 Officers have scrutinised the detailed results of the assessment in the ES (including Appendix 9.5) and associated addendum (including Appendix 5.1), which take account of the use of existing rooms, balconies/self-shading and whether rooms are lit by more than one window. Residual VSC values in excess of 20% are reasonably good and appeal decisions for schemes in London have found that VSC values in the mid-teens are deemed acceptable. The vast majority of residential windows tested for daylight would be left with such levels and those that would be left with less would tend to experience only small absolute reductions. Overall, officers consider that, the levels of daylight and sunlight conditions would be acceptable – particularly as other residential amenity factors are also considered acceptable (see Overlooking/Privacy, Wind and Noise below).

Overshadowing Assessment

6.9.15 Chapter 9 of the ES and the Eddendum reports on an assessment of the likely significant effects of overshadowing on 14 surrounding main back gardens and amenity spaces (including 7 x back gardens and 3 x garden terraces that adjoin the northern boundary with the Cannon Road area, 2 x school Brook House School playground areas and 2 x grassed amenity areas close to Altair Close, to the northeast of the site). The ES also reports on an assessment of transient overshadowing of existing nearby gardens/amenity spaces for 21 March for the existing, extant consents, proposed and cumulative scenarios.

6.9.16 This BRE standard is met for 6 out of the 14 spaces. The 7 private gardens for Mallory Court and one of the 2 school playground areas would not meet the standard. However, it should be noted that the gardens are already partly overshadowed by the existing boundary wall and none currently receive two hours of sunlight on half of their area and the effects would be no worse than the extant Depot, Lendlease and Depot and Goods Yard consents (with approved and proposed both effectively representing a “mirror massing” baseline that is allowed for by BRE Guidelines. The ES identifies a Major Adverse effect for these gardens, a Major adverse effect for the garden of 841 High Road and a Moderate Adverse effect for the school playground.

6.9.17 The proposed tall buildings would cast long shadows throughout the day on 21 March (particularly in the early morning and late afternoon). However, the proposed towers would be relatively slender when viewed from the south and would be well spaced. Given this, the transient overshadowing assessment shows that the ‘fingers’ of shadow that would be cast by the proposed tall buildings would sweep around the surrounding area and with the exception of

Mallory Court gardens and 841 High Road, the lack of a lingering shadow leads to the ES identifying a Minor to Moderate Adverse effect.

6.9.18 The supplementary assessment in the ES (Appendix 9.7) and Addendum (Appendix 5.1) comparing the shadowing of the extant Depot and Goods Yard consents and the Lendlease Scheme with the proposed scheme at 12.00 on 21 March shows a similar Minor to Moderate Adverse overshadowing effect.

Glare

6.9.19 Chapter 9 of the ES and the Addendum reports on an assessment of the likely significant effects of solar glare from the proposed towers on 4 x locations along the adjoining Overground railway tracks where sunlight reflected by the proposed buildings could cause glare for train drivers. Four locations on adjoining streets that face the site (approaching traffic junctions) were also assessed. The impacts identified in the ES are as follows:

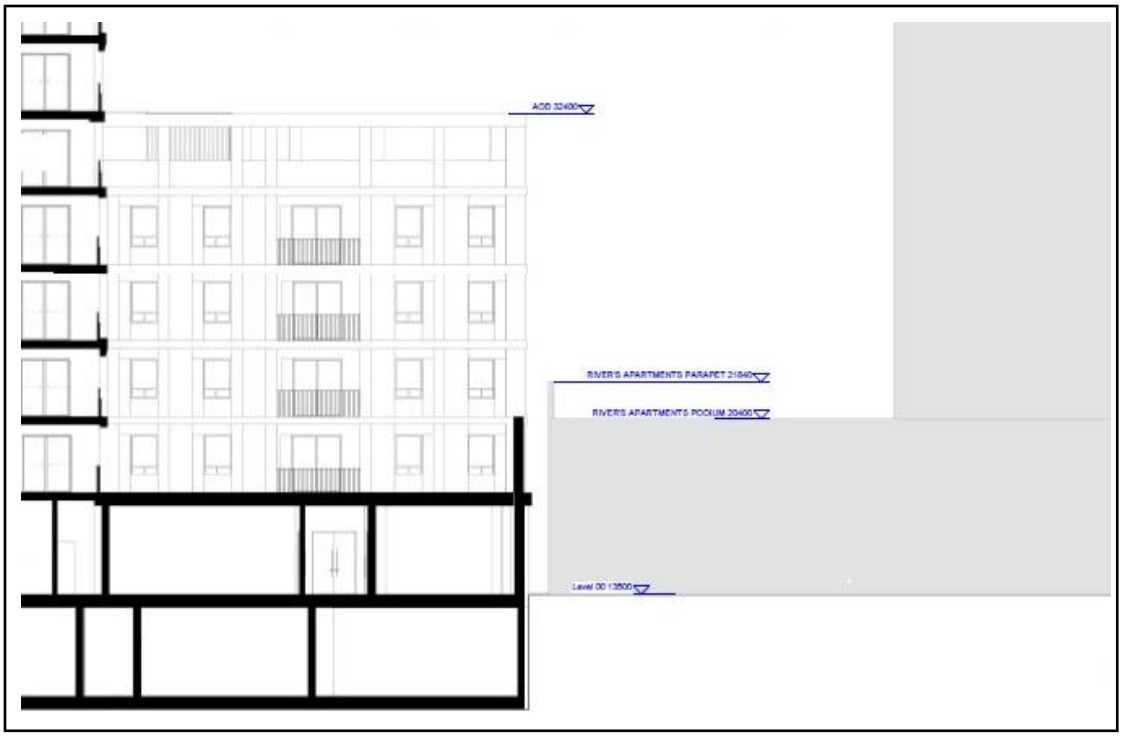
- GLR_001A – Railway travelling north – Minor Adverse;
- GLR_002A – Railway travelling north – Minor Adverse;
- GLR_003A – Railway travelling south – Minor Adverse;
- GLR_004A – Railway travelling south – Minor Adverse;
- GLR_005A – High Road travelling southwest – Minor Adverse;
- GLR_006A– Brantwood Road travelling west – Minor Adverse with retention of landscaping mitigation;
- GLR_007A – Northumberland Park travelling west – Minor Adverse; and
- GLR_008A – White Hart Lane travelling northwest – Minor Adverse

Boundary treatment/security

6.9.20 The existing brick wall that runs along the northern boundary of the site with the Cannon Road area would be demolished. The future boundary would be largely set by the building lines formed by Depot Blocks C, D and E, which would extend up to the boundary.

6.9.21 Where it meets the northern boundary, proposed Depot Block ABC would comprise a tall single-storey void space above a ramp down to proposed basement car parking (with shared amenity space on top of its eastern side) and four storeys of housing on the western side (with shared amenity space on top this). This would adjoin River Apartment' terrace. This River Apartments terrace (20.40m AOD, with a parapet at 21.84m AOD) would be approx. 2.9m above the proposed lower shared amenity space, but approx. 9.1m below the proposed higher shared amenity space (approx. 15.1m below the colonnade around the proposed higher space).

Figure 07: Depot Block ABC boundary with River Apartments



6.9.22 Proposed Depot Block D would result in a building of 17.6m AOD (4.6m above ground) immediately to the south of gardens to Mallory Court. This is approx. 2.5m above the height of the existing wall at the western end of Mallory Court and 0.88m below the height of the existing wall at the eastern end of Mallory Court. The proposals also provide for the provision of a timber fence at the rear of the Mallory Court gardens, hard against proposed Block D.

6.9.23 Block E would be single-storey on the northern boundary, before stepping back and up to five-storeys. The single-storey element would be between 16.8 and 17.7m AOD (between 3.8 and 4.7m above ground). Block E would be between approx. 2.4m and 2.7m away from a two-storey flank wall of the Brook House Primary School.

6.9.24 Officers consider that the proposed boundary treatments would safeguard security. It is recommended that a planning condition reserves details of the ground floor building elevation or boundary fence for Block D, to enable further consultation with residents at a discharge of condition stage over the boundary treatment they would find most acceptable.

Overlooking/privacy

6.9.25 The proposed shared amenity space for proposed Depot Block ABC would be approx. 16m from homes in the existing River Apartments building to the north – which itself has a terrace at its first-floor level. The space would have a parapet and colonnade around it, which would help reduce the perception of being overlooked.

6.9.26 The proposed northern Depot residential tower (Block A) would rise out of Blocks B and C and its north facing windows would be approx. 30m away from existing secondary living room windows in River Apartments. It would be approx. 60m away from the existing two to four-storey residential buildings on the west side of Pretoria Road that face the site (across the railway lines).

6.9.27 Bedroom and living windows in proposed Depot Block D, would generally be 20m away from similar widows in Mallory Court, which is within the 18-21 metres yardstick separation distance referred to in the Mayor of London's Housing SPG, although the two wings to the building would be only 10m away. However, proposed Block D has been designed such that north facing widows in the two proposed Wings would be obscure glazed and comprise secondary windows to living rooms and bedrooms and bathrooms. Main living room and bedroom windows are proposed east and west facing. Officers consider that this proposed detailed arrangement would safeguard privacy. It is also proposed to include planting for the proposed first floor level communal garden space to safeguard privacy and it is recommended that landscaping details are reserved by condition.

6.9.28 Proposed Depot Block E would present a largely imperforate northern flank wall to Beachcoft Court (two floors of housing that sits above the Brook House Primary School), with only bathroom windows in it. These would be approx. 9.5m away secondary living room/kitchen windows in Beachcroft Court – with these rooms primarily looking east and west. There would be north-facing secondary bedrooms and living rooms in Block E, which would be approx. 13.5 and 19.5m away respectively. Officers consider this proposed relationship to be satisfactory.

6.9.29 Proposed Depot Block G would be at 17/18m away from existing homes in the rear part of No. 865 High Road, which is considered satisfactory.

6.9.30 The proposed GY Blocks raise fewer issues in terms of overlooking and privacy of exiting residential neighbours. Proposed GY Blocks A, B and F would be approx. 43 to 53m away from the existing two to four-storey residential buildings on the west side of Pretoria Road that face the site (across the railway lines). Homes in proposed GY Block F would be further away. Proposed GY Block G would have windows facing south towards the Grange (non-residential) and housing on the upper floors of No. 18 White Hart Lane, but the separation distance of approx. 38m would safeguard privacy

Wind and Microclimate

6.9.31 This is addressed below, under the Wind and Microclimate heading. In summary, no likely significant residual wind effects are predicted.

Noise

6.9.32 The mainly residential nature of the proposed scheme means that, subject to using planning conditions to limit hours of use in the proposed commercial units and to control noise from mechanical plant, it should not cause undue disturbance to neighbouring residents. The applicant's Site Construction Management Plan also sets out minimum standards and procedures for managing and minimising noise during construction (which could be secured by planning condition).

Amenity Impacts – Summary

6.9.33 Amenity impacts must be considered in the overall planning balance, with any harm weighed against expected benefit. There would be some adverse impacts on amenity, as outlined above. However, officers consider that the level of amenity that would continue to be enjoyed by neighbouring residents is acceptable, given the benefits that the proposed scheme would deliver.

6.9.34 Fall-back Position. The ES reports that the daylight and sunlight effects of the proposed scheme is generally similar to the extant schemes. Table 19 below summarises these differences.

Table 19: Daylight and Sunlight effects – difference between the proposed and extant consented schemes

Receptor	**Daylight – Residual VSC levels**	**Sunlight – Residual APSH levels**
River Apartments	2% better to 0.8% worse/ average 0.2% worse.	Within BRE guidelines.
Ambrose Court	0.3% better to 0.5% worse/average 0 difference.	Very similar.
Mallory Court	0.9% better to 0.8% worse/average 0 difference.	Very similar.
Brook House School	5.1% better to 1.9% worse/average 0.2% better.	Within BRE guidelines.
Beachroft House	1.5% better to 0.7% worse/average 0.1% worse.	Very similar.
2-7 Pretoria Rd	0.2% better to 0.1% worse/average 0.1% better.	Within BRE guidelines.
8-10 Pretoria Rd	0 difference to 0.1% worse/average 0 difference.	Within BRE guidelines.
11 Pretoria Rd	1.1% better to 0.2% worse/average 0 difference	
12 Pretoria Rd	1.2% better to 0.3% worse/average 0 difference	
15 Pretoria Rd	0.9% better to 1.6% worse/average 0.3% worse.	

Receptor	Daylight – Residual VSC levels	Sunlight – Residual APSH levels
16 Pretoria Rd	0.6% better to 2.0% worse/average 0.9% worse.	
17 Pretoria Rd	0.2% better to 2.3% worse/average 1.4% worse.	
Lorenco House	0.5% better to 2.9% worse/average 1.2% worse.	
36 & 37 Pretoria Rd	2.9% worse to 3.2% worse/average 3.0% worse.	Lower overall APSH values, but very similar winter APSH values.
38 & 39 Pretoria Rd	2.9% worse to 3.1% worse/average 3.0% worse.	
40-45 Pretoria Rd	2.6% worse to 3.2% worse/average 2.8% worse.	
46-48 Pretoria Rd	0 difference to 2.1% worse/average 1.3% worse.	
49-51 Pretoria Rd	1.3% worse to 1.6% worse/average 1.4% worse.	slightly lower overall APSH values, but very similar winter APSH values.
52-57 Pretoria Rd	0.5% worse to 1.2% worse/average 0.8% worse.	
58-67 Pretoria Rd	0.2% better to 0.2% worse/average 0.3% worse.	Very similar.
865 HR	0.3% better to 1.4% worse/average 0.1% worse.	Within BRE guidelines.
849 HR	Very similar.	
841-843 HR	Very similar.	
837 HR	Very similar.	
813-817 HR	Very similar.	Very similar.
831-833 HR	Very similar.	Within BRE guidelines.
6-6a WHL	Very similar.	
30 WHL	Very similar.	

6.9.35 The ES includes an overshadowing assessment for the extant schemes, demonstrating that the shadows cast by the approved towers would be shorter, but also broader, with narrower shafts of sunlight penetrating between them. Overall, the ES concludes that the significance of effect of the proposed scheme would be similar to the schemes with extant consent (as discussed above).

6.9.36 The northern boundary treatment with the Cannon Road area in the proposed scheme would be no different from that previously approved and there would be no different effect in terms of property security. Likewise, subject to the use of planning conditions, there should be no significant differences in noise effects (dung both the operational and construction phases).

6.9.37 There would be a very similar relationship between proposed Depot Blocks D and E and Malory Court and Beachcroft Court respectively as with the previously approved schemes and so no significant differences in overlooking or privacy are anticipated. Likewise, no significant differences in overlooking/privacy conditions are expected between proposed GY Block G and homes along the High Road than in the approved Goods Yard scheme.

6.9.38 The proposed relationship between proposed Depot Block and C with River Apartments should improve relative to the approved Depot scheme with proposed Block C presenting an imperforate wall towards River Apartments, whereas the approved Depot Block C has windows that face River Apartments at a distance of approx. 17-25m. However, windows in proposed Block A would closer, with separation distances of between approx. 30-35m, as opposed to approx. 51.4m in the approved Depot scheme.

6.9.39 The likely wind/microclimate effects on neighbours from the proposed scheme are generally expected to be similar to those associated with the approved schemes.

6.10 **Transportation and Parking**

6.10.1 The NPPF (Para. 110) makes clear that in assessing applications, decision makers should ensure that appropriate opportunities to promote sustainable transport modes have been taken up and that the design of streets and other transport elements reflects national guidance (including the National Design Guide).

6.10.2 London Plan Policy T1 sets a strategic target of 80% of all trips in London to be by foot, cycle or public transport by 2041 and requires all development to make the most effective use of land. Policy T5 encourages cycling and sets out cycle parking standards and Policies T6 and T6.1 to T6.5 set out car parking standards.

9.8.2 Other key relevant London Plan policies include Policy T2 – which sets out a ‘healthy streets’ approach to new development and requires proposals to demonstrate how it will deliver improvements that support the 10 Healthy Street Indicators and Policy T7 – which makes clear that development should facilitate safe, clean and efficient deliveries and servicing and requires Construction Logistics Plans and Delivery and servicing Plans.

6.10.3 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 approach is continued in DM Policies DM31 and DM32.

6.10.4 DM Policy (2017) DM32 states that the Council will support proposals for new development with limited or no on-site parking where there are alternative and accessible means of transport available, public transport accessibility is at least 4 as defined in the Public Transport Accessibility Index, a Controlled Parking Zone (CPZ) exists or will be provided prior to the occupation of the development and parking is provided for disabled people; and parking is designated for occupiers of developments specified as car capped.

6.10.5 A key principle of the High Road West Master Plan Framework (HRWMF) is to create a legible network of east-west streets that connect into the surrounding area, existing lanes off the High Road pocket parks and other open spaces.

Transport Assessment

6.10.6 The majority of the site has a PTAL 4, with the north western corner having a lower PTAL of 3). The site is also located in the Tottenham North CPZ. The application is supported by a Transport Assessment (TA), which incorporates a draft Delivery and Servicing Management Plan, Framework Travel Plan and Outline Construction Logistics Plan.

Trip Generation

6.10.7 The applicant's TA estimates the likely trip generation for the main modes of transport based on applying trip rates derived from TRICS to the proposed uplift in number of homes and commercial floorspace from the two extant consented schemes. The expected total development trips and the expected net increase in trips over and above the consented schemes are set out in Table 20 below.

Table 20: Total trips and net increase in person trips (over and above consented schemes HGY/2018/0187 and HGY/2019/2929)

Mode	**AM Peak Hour**		**PM Peak Hour**	
	In	**Out**	**In**	**Out**
Total people	279 (23)	594 (113)	538 (66)	443 (45)
Vehicles	39 (12)	98 (30)	74 (23)	54 (14)
Pedestrians	100 (6)	260 (34)	258 (17)	224 (11)
Cycles	7 (1)	11 (2)	11 (1)	11 (2)
Rail	71 (5)	98 (20)	89 (13)	71 (9)
Bus	68 (6)	103 (24)	86 (13)	71 (10)

6.10.8 The cumulative impact assesses the likely impacts associated with the proposed scheme and key consented nearby schemes (HGY/20/20/1584 & HGY2021/2283). The expected trips are set out in Table 22 below.

Table 22: Cumulative committed and proposed development total multi-modal trip generation

Mode	AM Peak Hour		PM Peak Hour	
	In	Out	In	Out
Rail	239	130	277	226
Bus	128	130	157	94
Cycle	20	49	60	36
Walk	153	395	431	325
Private Vehicle	102	175	190	129
Total	642	879	1,115	810

Public transport capacity and protection

6.10.9 The TA distributes the expected net change in public transport trips from the proposed scheme in isolation (set out in Table 22 above) and distributes these to the public transport network using 2011 Census origin-destination data for journeys to work. In summary, the proposed scheme is expected to result in a net increase in trips over and above the consented schemes (in and out/all directions) as follows: Rail (White Hart Lane Station): + 25 (AM Peak) and + 22 PM Peak and Bus (Various): + 30 (AM Peak) and + 23 PM Peak.

6.10.10 The Transport Assessment also considers the cumulative impact of the Lendlease permission (HGY2021/3175). In summary, this demonstrates that:

- No significant impact on London Overground line capacity (with the utilisation rate estimated to increase from 72% to up to 79% of maximum capacity between Bruce Grove and Seven Sisters in the AM Peak and from 20% to up to 24% of maximum capacity between Seven Sisters and Bruce Grove in the PM Peak);
- No significant impact on bus services (528 additional two-way trips in the AM Peak hour and 431 additional trips in the PM Peak. Approx. 43 buses per hour in each direction use. The worse impact, 200 additional trips heading south in the AM Peak hour would add four to five trips per bus); and
- No discernible impact on loadings on the Victoria Line.

6.10.11 Network Rail and the Mayor's Stage 1 Report raises the need for protection of the adjoining London Overground railway line. It is recommended that a planning condition requires protection works to be in place during the demolition/construction phase. The Mayors Stage 1 report also highlights capacity

issues on bus routes W3, 149 and 259 and have recommended that a £195,000 financial contribution is secured towards bus service improvements.

Site Access

6.10.12 Vehicular access to the Depot part of the site would be as approved as part of the extant consents– i.e. from the High Road, with the existing signalised junction being modified and 'tightened up' (narrower carriageway and wider footways) and a secondary vehicular access connecting with Cannon Road to the north. The proposed two-way east to west access route (Pickford Lane) would be a residential street (5.5m carriageway and footway space either side) which prioritises people over traffic, removes clutter from the pavement and encourages slower vehicle speeds through narrowing of vehicle areas. Two new routes would punch through from the two cul-de-sacs on the Cannon Road housing area to the north. The western one would be an extension of Pickford Lane and would be a vehicular route. The eastern one would be pedestrian and cycle only.

6.10.13 Vehicular access to the Goods Yard part of the site would be from a priority junction on White Hart Lane, at a similar location to the existing crossover/access and to that of appeal scheme HGY/2021/1771). This would include a footway on both sides of a 5.5m wide carriageway at this point. This would serve the proposed north-south street (Embankment Lane) which would have a carriageway of 5.5m initially, but reducing to 3.7m as it moves north – with alternate way working refuse collection, loading/unloading and emergency access.

6.10.14 The Mayor of London Stage 1 Report calls for a Stage 1 Road Safety Audit of the proposed junction with White Hart Lane and of the narrower section of the proposed Embankment Lane to consider potential conflicts between vehicles and vulnerable road users. It is recommended that combined Stage 1 and 2 Audits are reserved by condition.

Future Access Points

6.10.15 Proposals for the Depot part of the site include vehicular routes either side of the proposed Peacock Park (to the front of Blocks B and G) and the applicant's indicative masterplan for the remainder of the High Road West Site (north of White Hart Lane) shows these routes continuing south, either side of an extended park, allowing for future connection to a further phase of the masterplan to the south, in accordance with the HRWMF. Similarly, proposals for the Goods Yard part of the site make provision for two vehicular accesses to be provided on the east side of the proposed Embankment Lane and the indicative masterplan shows streets running east from these accesses, serving future development plots on the existing Peacock Industrial Estate. To enable satisfactory future connections with adjoining land, it is recommended that s106 planning obligations require a Future Connectivity and Access Plan to be approved by the Council.

6.10.16 The applicant anticipates that, as and when other land is developed, the primary point of access from White Hart Lane would move from the location proposed in this application eastwards to about where the vehicular access to the existing Peacock Industrial Estate is. This would enable the access and north-south 'Embankment Lane' proposed in this application to assume a reduced

vehicular function, catering for the proposed commercial uses in the southern part of the site with a commensurate reduction in vehicular flows.

Legal Highway Agreements

6.10.17 The proposed on-site vehicular, cycle and pedestrian routes are not designed to be adopted by the Council and would be managed and maintained by a private company. Works to the existing signalised junction on the High Road and works to create the access from White Hart Lan would need to be the subject of a legal agreement under Section 278 of the Highways Act 1980. This would secure details of how the proposed new streets tie in with the existing highway and junctions. It is recommended that a planning condition requires pre- and post-development highway condition surveys.

Pedestrian and cycle movement

6.10.18 All the proposed routes across the site would be accessible for pedestrians and cyclists. The TA includes an Active Travel Zone (ATZ) assessment. This identifies a number of key destinations within a 20-minute cycle of the site – highlighting that the proposed schemes would be well connected to the public transport network as well as nearby leisure, educational, cultural and commercial activities. Th ATZ finds that the proposed public realm improvements and increased permeability that the proposed schemes would deliver would improve the site's connectivity with the surrounding existing walking and cycling routes as well as these public transport networks and activities.

Car Parking

6.10.19 The proposal scheme includes the following car parking provision:

- 49 x standard residential spaces;
- 85 x accessible residential spaces (each of the proposed wheelchair accessible homes having a space);
- 10 x commercial spaces;
- 4 x Car Club spaces; and
- 2 x accessible visitor spaces.

6.10.20 Residential car parking. The proposed overall residential parking would be a provision of 16:1. This proposed level of provision is acceptable and the proposal to deliver 1:1 accessible car parking space for the proposed wheelchair accessible homes from the outset is welcome. This is in line with consented schemes.

6.10.21 The residential car parking would be located partly 'on-street' (along the proposed 'Peacock Lane' on the Depot part of the site), partly in a ground floor under croft space (Depot Block D), but mainly in 2 x single-level basement areas under GY Blocks A to F and Depot Blocks ABC.

6.10.22 Commercial car parking. The proposed commercial spaces would be located the basement located under GY Blocks A-F. The Transport Assessment makes clear that this would be for the a re-provided Carbery Enterprise Park. The existing Carbery Enterprise Park comprises 11 x general industrial/light industrial/office units, amounting to approx. 1,012sqm, with about 10 car parking spaces. There is no explicit 're-provision of the Estate within the proposed scheme. The proposed overall commercial floorspace amounts to 2,068sqm (GEA) and officers consider that 400sqm of this space should be specifically for office/R&D/ light industry (Use Class E(g) (i) (ii) & (iii)), as approved as part of the extant Goods Yard scheme. It is recommended that the proposed Car Parking Management Plan manages the commercial car parking, enabling spaces to be decommissioned when they are not needed by commercial occupiers and brought back in to use when they are needed (based on needs of individual prospective business tenants prior to occupation).

6.10.23 Management and mitigation. If planning permission were granted, it would be appropriate to secure the following by planning condition/s106 planning obligation:

- Car-capped agreement– Prohibiting residents (other than Blue Badge holders) from obtaining a permit to park in the CPZ, plus £4,000 (tbc) for revising Traffic Management Order;
- Car Club - Establishment or operation of a car club scheme, which includes the provision of at least 4 Car Club bays and four cars (with actual number to be approved following discussion with prospective Car Club operators) with, two years' free membership for all units and £50.00 per year credit for the first 2 years; and
- Car Parking Design & Management Plan - To cover: Location and design of any temporary car parking spaces, Location and design of car parking spaces, Provision of Electric Vehicle Charging Points (direct provision for 20% of spaces, with passive provision for the remaining 80%), Allocation and management of residential car parking spaces (prioritising disabled people, then families with children then others); Allocation and management of commercial car parking spaces, Provision and management of disabled car

parking spaces to allow for the required number of such spaces (up to 87 overall) and all car parking spaces to be leased, not sold outright.

6.10.24 In addition, although no comments have been received from LB Enfield on this application, the neighbouring authority did raise concerns over the potential for overspill car parking in relation to what is now the extant consent for The Depot part of the site. In response to these concerns, s106 planning obligations in relation to that consent secured a baseline car parking survey, monitoring and if monitoring shows a problem, a financial contribution of up to £20,000 for LB Enfield towards consultation and possible implementation of a CPZ. It is recommended that similar planning obligations are secured in relation to any permission.

Cycle Parking

6.10.25 The proposed scheme makes provision for 1,660 cycle parking spaces, including long (1,569 residential and 15 commercial) and short-stay (76) parking. This is in accordance with London Plan Policy T5 and is acceptable. However, there is insufficient detail on the location and detailed provision of these spaces to ascertain that this meets guidance in the London Cycling Design Standards (including the need for at least 20% Sheffield stands and 5% wider spaces for non-standard bikes. There is also a lack of provision of locker and changing facilities for the proposed commercial space. It is recommended that a planning condition reserves approval of these details.

Travel Planning

6.10.26 The applicant's Framework Travel Plan sets out objectives of reducing the number of car trips made by residents, increasing the number of trips by walking and cycling and ensuring that development does not add pressure on the public transport system and sets out a strategy and process for setting and achieving specific targets. It is recommended that s106 planning obligations secure the implementation and monitoring of an approved Travel Plan.

Delivery and Servicing

6.10.27 The applicant's Draft Delivery and Servicing Plan estimates that there would be around 14 delivery and servicing trips in the AM Peak hour, 10 in the PM Peak hour and 34 in the delivery and servicing peak hour, which has been identified at being between 11.00 AM and 12.00 Noon. It is proposed to accommodate these trips at 8 x on-street loading and unloading bays across the site. The proposed arrangements and draft Plan are considered acceptable. It is recommended that such a Plan is secured by a planning condition and thats106 planning obligations ensure that Travel Plan Co- Ordinators are responsible for monitoring the Plan.

Construction Activities

6.10.28 The applicant's Construction Management Plan (CMP) and Construction Logistics Plan (CLP) takes account of the EIA cumulative schemes and sets out vehicular routing and access parameters and identifies strategies to reduce potential impacts. As identified in the Mayor's Stage 1 Report, does not address the proposed phasing of construction in relationship to the remainder of Site Allocation NT5 or with events at the stadium. It is recommended that a planning condition secures the approval of a detailed CLP, which could address these issues.

Transportation - Summary

6.10.29 The proposed scheme improves connectivity between the Cannon Road area and the High Road and White Hart Lane for pedestrians and cyclists and include a safe environment and cycle parking and facilities that encourages walking and cycling. The scheme would result in a relatively small and manageable increase in vehicular trips, which subject to the recommended planning conditions and s106 planning obligations referred to above, would be manageable. An assessment of likely cumulative effects (including taking account of likely public transport trips associated with the Lendlease scheme for adjoining land within Site Allocation NT5) show that, subject to the Mayor of London's confirmation at Stage II, impacts should be manageable. There would be some adverse impacts during construction, but this can be satisfactorily managed by the recommended conditions.

6.10.30 Fall-back Position. The transport arrangements for the proposed scheme are similar to those for the extant Goods Yard and Depot schemes, with similar connectivity and permeability across the combined sites. As with the consented schemes, associated impacts on highway and public transport is considered acceptable. Proposed car parking would be at a ratio of 0.16:1, which is the same as was approved in relation to the extant Depot scheme and less than the 0.25:1 that was approved for the extant Goods Yard scheme (so a lower ratio overall). Cycle parking would meet the more generous cycle parking standards in the 2021 London Plan.

6.11 **Energy, Climate Change and Sustainability**

6.11.1 London Plan Policy SI2 sets out the Mayor of London's energy hierarchy: Use Less Energy (Be Lean); Supply Energy Efficiently (Be Clean); Use Renewable Energy (Be Green) and (Be Seen). It also sets a target for all development to achieve net zero carbon, by reducing CO2 emissions by a minimum of 35% on-site, of which at least 10% should be achieved through energy efficiency measures for residential development (or 15% for commercial development) and calls on boroughs to establish an offset fund (with justifying text referring to a £95/tonne cost of carbon). London Plan Policy SI2 requires developments referable to the

Mayor of London to demonstrate actions undertaken to reduce life-cycle emissions.

6.11.2 London Plan Policy SI3 calls for major development in Heat Network Priority Areas to have a communal low-temperature heating system, with the heat source selected from a hierarchy of options (with connecting to a local existing or planned heat network at the top).

6.11.3 London Plan Policy SI4 calls for development to minimise overheating through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.

6.11.4 London Plan Policy SI5 calls for the use of planning conditions to minimise the use of mains water in line with the Operational Requirement of the Buildings Regulations (residential development) and achieve at least BREEAM 'Excellent' standard for 'Wat 01' water category or equivalent (commercial development).

6.11.5 London Plan Policy SI7 requires applications referable to the Mayor of London to submit a Circular Economy Statement demonstrating how it promotes a circular economy within the design and aim to be net zero waste.

6.11.6 Local Plan Strategic Policy SP4 requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L of the 2013 Building Regulations) and a minimum reduction of 20% from on-site renewable energy generation. It also requires all non-residential developments to achieve a BREEAM rating 'Very good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable.

6.11.7 Haringey Policy SP6 requires developments to seek to minimise waste creation and increase recycling rates, address waste as a resource and requires major applications to submit Site Waste Management Plans.

6.11.8 Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The Sustainability section in the report sets out the proposed measures to improve the overall sustainability of the wider scheme, including transport, health and wellbeing, materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy and CO2 emissions and landscape design.

Energy

6.11.9 The principal target is to achieve a reduction in regulated CO2 emissions over Part L 2021 Building Regulations. The London Plan requires the 'lean', 'clean', 'green' and 'seen' stages of the Mayor of London's Energy Hierarchy to be followed to achieve a 'Zero Carbon' Standard targeting a minimum onsite reduction of 35%, with 10% domestic and 15% non-domestic carbon reductions to be met by energy

efficiency. All surplus regulated CO2 emissions must be offset at a rate of £95 for every tonne of CO2 emitted per year over a minimum period of 30 years. As this development is proposing to connect to a Decentralised Energy Network, this officer assessment reports on carbon emissions with SAP2012/ SAP 10 carbon factors.

6.11.10 'Be Lean.' The proposed scheme adopts a 'fabric first' approach, including façade configuration and specification that balances the desire to have winter passive solar gains but avoid summer overheating; high performance glazing, reduced air permeability and good insulating fabric, use of high-efficiency mechanical ventilation and heat recovery, use of LED lighting and efficient cooling for the proposed commercial units. Following revisions to the elevations of the proposed towers, these proposed measures are expected to save 90.3 tonnes of carbon dioxide per year (a site-wide 11% saving above the Building Regulations 2013). The minimum carbon reduction of 15% is met by the non-domestic floorspace. The residential fabric minimum reduction of 10%, called for in London Plan Policy SI 2 is also met.

6.11.11 'Be Clean.' The applicant is intending to connect directly to the Energetik Heat Network, using heat generated at an Energy Centre located to the north east of the site on the Edmonton Eco-Park close the North London Waste Authority Energy Recovery Facility (ERF). The ERF is currently under construction, and will provide low carbon heat when it comes on stream in 2025/26. This is advance of the proposed ERF becoming operational, so initially heat would be supplied back-up gas boilers at the Energetik Energy Centre, with the energy source being switched from gas to lower carbon heat from waste as soon as the ERF is operational. Connection to the proposed DEN is expected to save 635 tonnes of carbon dioxide per year (a 74% saving above the Building Regulations 2013).

6.11.12 The Council has committed plans to deliver a North Tottenham District Energy Network (DEN) to connect to the Energetik Heat Network.

6.11.13 'Be Green.' Photovoltaic (PV) arrays are proposed for the majority of new buildings across the site with a capacity of 228 kWp, amounting to approx. 1,005 sqm. The proposed PV panels are anticipated to save 83.7 tonnes of carbon dioxide per year (an 8% saving above the Building Regulations 2013).

6.11.14 Overall – 'Lean', 'Clean' and 'Green'. Table 22 below set out the overall carbon emission savings

Table 22: Site-wide regulated carbon dioxide emissions savings (based on SAP2012 emission factors)

	Total regulated emissions (Tonnes CO2/year	**CO2 savings (Tonnes CO2/year)**	**Percentage savings**
Part L 2013 baseline	855.1		
Be lean	764.8.	90.3	11%
Be clean	220.1	544.8	64%
Be green	179.9	40.2	5%
Total savings		675.2	79%
		CO2 savings off-set (tonnes CO2)	
Off-set		6,420	

6.11.15 'Be Seen.' An energy monitoring system is proposed and sub-metering/energy display devices in each home would allow residents to monitor and reduce their energy use. It is recommended that a planning condition requires the development owner to submit monitoring results to the GLA (in accordance with the Mayor of London's draft guidance).

6.11.16 Carbon Offsetting. Despite the adoption of the 'Lean', 'Clean' and 'Green' measures outlined above, the expected carbon dioxide savings fall short of the zero-carbon policy target for proposed domestic and non-domestic uses. Overall, the amount of carbon to be offset (once connected to the proposed DEN) would be 214 tonnes per year. Based on 30-years of annual carbon dioxide emissions costed at £95 per tonne, this amounts to £608,690 (or £669,559 including a 10% management fee). It is recommended that s106 planning obligations secure this sum (including 10% monitoring fee), subject to any additional carbon savings that arise from more detailed design agreed with the LPA, by way of s106 planning obligations.

6.11.17 Whole Life-cycle Emissions. The applicant's Sustainability and Energy Statement includes a Whole-life Carbon Assessment has been undertaken in accordance with the latest published GLA guidance (October 2020). This assessment accounts for the whole life-cycle carbon emissions of the proposed development and outlines the actions taken to reduce life-cycle carbon emissions. It aims to fully capture the development's carbon impact: unregulated and embodied emissions as well as emissions associated with maintenance, repair and end of life scenarios. This finds that the total emissions for Modules A1-A5 were

569 kgCO2e/m2 (between the GLA's 'aspirational' and 'standard' benchmarks were 247 kgCO2e/m2 in modules B1-B5,1005 kgCO2e/m2 in modules B6-B7, 51 kgCO2e/m2 in modules C1-C4 and – 167 kgCO2e/m2 in module D.The highest embodied carbon in Modules A1-A5 is attributed to the superstructure (61%) and substructure (27%). In the other Modules, the highest contributors in embodied carbon are the services (39%), superstructure (29%) and finishes (18%). A number of areas have been identified to calculate more accurately and to reduce the embodied carbon of the buildings through the detailed design process. It is recommended that this is required by way of a planning condition.

6.11.18 Energy conclusion. The overall anticipated on-site carbon emission reductions over Building Regulations (2013) of 79% and associated offsetting payments would meet London Plan Policy SI2. The proposed connection to an off-site DEN would also meet London Plan Policy SI4.

6.11.19 The proposed '5% 'Green' savings would be below the 20% called for by Local Plan Strategic Policy SP4. However, officers are satisfied that the amount of proposed roof top PV arrays have been optimised, given other demands for roof-top space.

Overheating

6.11.20 The applicant's Sustainability and Energy Statement includes overheating and cooling analysis. The proposed scheme mitigates against the risk of overheating through the passive design measures set out below and active cooling measures are only proposed for the proposed commercial units:

- Solar gain control (Façade shading elements, rationalised glazing ratios and low solar transmittance glazing);
- Natural ventilation (openable windows and acoustic louvres); and
- Additional mechanical ventilation (mechanical ventilation systems with heat recovery and summer bypass and ceiling fans where necessary).

6.11.21 The applicant's assessment using the London Weather Centre files for the 2020s show full compliance with the relevant CIBSE TM59 overheating risk criteria (with ceiling fans in place for the highest risk homes). The application generally meets London Plan Policy SI4, and demonstrates that ceiling fans would help to mitigate future overheating risk.It is recommended that a planning condition requires an updated Overheating Report for Blocks to be submitted and approved (to include a retrofit plan, including ceiling fans).

Environmental sustainability

6.11.22 Circular Economy. The applicant's Circular Economy Statement identifies the following five key steering approaches to designing for the circular economy:

- All areas are to be designed for longevity and disassembly;
- Open spaces and commercial spaces in particular will be designed with flexibility and adaptability in mind;
- Two buildings are to be retained and refurbished;
- All other buildings to be demolished will aim to recycle / re-use / recover 95% of the material and achieve 95% beneficial use of excavation wastes where possible; and
- During operation, all commercial and residential waste be allocated adequate space for recycling, organic waste and bulky waste segregation.

6.11.23 The Statement sets out the Key Commitments (Table 4-1), Bill of materials (Table 4-2) and Recycling and waste reporting form (Table 4-3). The Statement proposes that as the scheme is developed beyond planning and into detailed design it is reviewed and updated with further detail, providing clear targets and guidance for the procurement, construction and operation process of the scheme. If planning permission were to be granted this could be secured by planning condition.

6.11.24 Construction waste. The applicant's Site Construction Management Plan states that a Site Waste Management Plan (SWMP) is developed to reduce and manage/re-use waste during demolition and construction. It is recommended that this is secured by a planning condition.

6.11.25 Water consumption. In order to ensure compliance with London Plan Policy SI5, it is recommended to use a planning condition to minimise the use of mains water in line with the Operational Requirement of the Buildings Regulations (residential development) to achieve mains water consumption of 105 litres or less per head per day and achieve BREEAM 'Excellent' standard for 'Wat 01' water category or equivalent (commercial development).

6.11.26 Thames Water has raised concerns over the ability of the water network infrastructure to accommodate the needs of the proposed development. It is recommended to require appropriate studies by way of pre-commencement planning conditions.

6.11.27 Building Performance. The applicant's Sustainability and Energy Statement includes a BREEAM pre-planning assessment (BREEAM 2018 New Construction, Shell Only Retail) which demonstrates that the proposed new commercial units could achieve an 'Very Good' rating, meeting the minimum requirement of Local

Plan Policy SP4. It is recommended that this is secured by use of a planning condition.

6.11.28 Considerate Constructors Scheme. The applicant's Site Construction Management Plan states that the principal contractor would be required to manage sites and achieve formal certification under the Considerate Constructors Scheme. It is recommended that this is secured by a s106 planning obligation

6.11.29 Other environmental sustainability issues. Movement and transport, Landscape and ecology, air quality, noise, daylight and sunlight, flood risk and drainage are addressed in detail in other sections of this report.

6.11.30 Fall-back Position. The proposed scheme is similar to the Goods Yard and Depot schemes approved by the extant consents in terms of energy strategy (communal heating, connection to the proposed North Tottenham DEN and incorporation of PVs). The estimated overall carbon savings for the proposed scheme of 79% over Building Regulations (2013) (SAP2012 carbon factors) compares favorably with those achieved for the consented Goods Yard and Depot scheme, although direct comparison is not straight forward due to differences in SAP calculations. It is not possible to meaningfully compare overheating outcomes for proposed and consented schemes.

6.11.31 Subject to the use of appropriate conditions and s106 obligations, other environmental outcomes (construction waste, water consumption and Considerate Constructors Scheme) would be similar across the proposed and consented schemes. Given London Plan policy development, the proposed scheme would also be subject to Circular Economy and Whole Life Carbon Cycle controls that were not required by policy that was in force when permission was granted for the extant consented schemes.

6.12 **Flood Risk, Drainage and Water Infrastructure**

6.12.1 Development proposals must comply with the NPPF and its associated technical guidance around flood risk management. London Plan Policy SI12 requires development proposals to ensure that flood risk is minimised and mitigated and that residual risk is addressed.

6.12.2 London Plan Policy SI13 and Local Policy SP5 expect development to utilise Sustainable Urban Drainage Systems (SUDS).

6.12.3 Policies DM24, 25, and 29 continue the NPPF and London Plan approach to flood risk management and SUDS to ensure that all proposals do not increase the risk of flooding. DM27 seeks to protect and improve the quality of groundwater.

6.12.4 London Plan Policy SI5 requires proposals to ensure adequate wastewater infrastructure capacity is available.

Flood Risk

6.12.5 The majority of site is in Flood Zone 1 and has a low probability of flooding from tidal and fluvial sources. The southernmost part of the Goods Yard part of the site is located in Flood Zone 2, due to its proximity to the Moselle River (classified as a Main River), which is culverted below White Hart Lane approx. 30m to the south of the site. The site is within a Critical Drainage Area.

6.12.6 The submitted Flood Risk Assessment (FRA) considers flooding from pluvial and groundwater sources and from sewers also to be low. It finds that all of the proposed land uses are appropriate for Flood Zone 1 and that landscaping (a Less Vulnerable use) that is proposed for the small part of the site that is within Flood Zone 2 is appropriate.

6.12.7 There is a small area between the Goods Yard and The Depot with a 'medium' to 'high' risk of surface water flooding. This corresponds to localised depressions in the topography but represents only a small part of the overall site area. Surface water is proposed to be discharged by gravity to the Thames Water surface water sewers in High Road and White Hart Lane at a restricted rate equal to the calculated greenfield runoff rate for the site in accordance with Policy SI13 of the London Plan. Proposed Sustainable urban Drainage Systems (SuDS) features would limit the surface water discharge rate from the site to 14.16l/s (the 1;100-year greenfield runoff rate). This attenuation represents a significant reduction in the peak rate of surface water runoff entering the Thames Water sewer. With the proposed measures in place, the risk of flooding from surface water and the surcharge of combined sewers is considered to be low. Since the proposed surface water drainage strategy represents an improvement in surface water flood risk, officers agree that this meets the requirements for development within Critical Drainage Areas within Policy DM26.

6.12.8 Foul water from the proposed development is proposed to be discharged to the existing Thame Water foul sewers at a peak rate of 39.15l/s, which would represent a significant increase from the estimated foul water discharge from the existing site. Since all surface water is proposed to be discharged to a dedicated surface water sewer and there are no known issues associated with lack of capacity of the existing foul water sewer network, the risk of flooding from the foul sewers is considered to be low.

Drainage

6.12.9 The proposed surface water drainage strategy takes account of likely increased rain fall as a result of climate change, factoring in a 40% increase in peak rainfall

intensity. A variety of SuDS features are proposed to be incorporated, in accordance with the London Plan drainage hierarchy.

6.12.10 Rainwater harvesting and rainwater infiltration have been considered but discounted. So too have green and brown roofs – other than podium level gardens on the Goods Yard part of the site. A series of rain gardens, below ground attenuation around tree pits and permeable paving (focused around the proposed Embankment Lane and Southern Square) are proposed to attenuate water in order to reduce the peak flow rate of surface water discharge. The Goods Yard part of the site would discharge to the culverted watercourse (Moselle River) via attenuation and a flow restriction device to the Moselle River watercourse and local sewer network. The Depot part of the site would discharge to the existing Thames Water sewer located under the High Road via attenuation and a flow restriction device. As outlined when considering flood risk above, the proposed measures would limit water runoff to the 1;100-year greenfield runoff rate.

6.12.11 The Council as Lead Local Flood Authority has confirmed the proposed surface water drainage arrangements are acceptable. Consent would be needed from the Environment Agency for any connection to the Moselle culvert and from Thames Water for connection to its network. The Environment Agency has no comments to make. Thames water has identified water infrastructure capacity for 99 dwellings. To ensure adequate capacity exists, it is recommended that a Grampian condition is imposed that ensures adequate capacity exists/ can be provided prior to commencement of development.

6.12.12 It is proposed that the SUDS features are privately managed and maintained and the applicant's Drainage Strategy includes a SuDS Maintenance Plan that is acceptable to the Council as Lead Local Flood Authority. It is recommended that this is secured by way of a planning condition. Conditions are also recommended to safeguard water mains and other underground water assets, as requested by Thames Water.

6.12.13 Fall-back Position. The proposed scheme is similar to the Goods Yard and Depot schemes approved by the extant consents in terms of drainage strategy and the use of SuDS and, with appropriate conditions in place, provide similarly acceptable flood risk and drainage solutions.

6.13 **Air Quality**

6.13.1 London Plan Policy SI 1 requires development proposals to not worsen air quality and be at least Air Quality Neutral and calls for large-scale EIA development to consider how local air quality could be improved. The London Plan is supported by the Construction Dust SPG.

6.13.2 Policies DM4 and DM23 require development proposals to consider air quality and be designed to improve or mitigate the impact on air quality in the Borough and improve or mitigate the impact on air quality for the occupiers of the building or users of development. Air Quality Assessments will be required for all major developments where appropriate. Where adequate mitigation is not provided planning permission will be refused. Haringey is an Air Quality Management Area (AQMA).

6.13.3 The application is supported by an Air Quality Assessment, which includes an Air Quality Neutral Assessment, and an Air Quality Positive Statement. The applicant's Site Construction Management Plan also sets out minimum standards and procedures for managing and minimising dust and air quality impacts.

6.13.4 The applicant's Assessment considers the exposure of future residents to poor air quality and finds that the site, including the High Road and White Hart Lane frontages, would be below air quality objective levels for in the 2028 scenario, meaning the site as a whole is considered acceptable for housing.

6.13.5 The proposed scheme would be 'Air Quality Neutral' (with expected emissions associated with transport and buildings falling below air quality benchmark values) and has been designed to minimise potential adverse air quality effects:

- The proposed site layout would avoid creating a street canyon where pollutants could be trapped and the proposed streets and spaces follows TfL's Healthy Streets approach encourages walking and cycling;
- The scheme would include a relatively low level of car parking (with 0.16 residential car parking spaces per home and 10 x commercial spaces) with 20% active Electric Vehicle Charging Points (EVCPs) and passive provision for remaining spaces to have EVCPs;
- Homes would have a Mechanical Ventilation with Heat Recovery (MVHR) system (with the need to open windows limited to purge scenarios), but with the choice to open windows; and
- The proposed connection to an off-site District Energy Network means that there would be no onsite emissions from boilers.

6.13.6 The applicant's Assessment does identify likely adverse effects from dust during the demolition and construction. It is recommended to use planning conditions to manage and minimise such impacts, in line with the applicant's Site Construction Management Plan and the measures highlighted by LBH Pollution.

6.13.7 Fall-back Position. The proposed scheme is similar to the Goods Yard and Depot schemes approved by the extant consents in terms of energy (communal heating, connection to the proposed North Tottenham DEN and incorporation of PVs) and transport ('car-lite, generous cycle parking, travel planning to encourage walking and cycling and provision of Electric Vehicle Charging Points

etc.) strategies. Subject to conditions and s106 planning obligations to secure these strategies and mitigate adverse construction effects, the proposed and extant schemes would be 'Air Quality Neutral' and provide similarly acceptable environments for future residents and neighbours.

6.14 Wind and Microclimate

6.14.1 London Plan Policy D8 seeks to ensure that public realm areas are well-designed, including, ensuring that microclimate considerations such as wind is taken into account to encourage people to spend time in a place. London Plan Policy D9 calls for proposed tall buildings to carefully consider wind and other microclimate issues. Policy DM6 states that proposals for tall buildings should consider the impact on microclimate and Policy AAP6 requires a high-quality public realm for developments in Tottenham.

6.14.2 Chapter 10 of the ES reports on an assessment of the likely significant effects of wind. This is based on both Computer Fluid Dynamics (CFD) and, at the request of officers at the informal EIA scoping stage, wind tunnel testing. The ES adopts significance criteria that are based on the Lawson Comfort Criteria for 'sitting', 'standing', 'walking (leisure)', 'walking (business)' and 'uncomfortable' and 'safety.' It goes on to report on an iterative process of testing and adapting assumed integrated mitigation features, before identifying likely significant residual effects. As with other topics, the assessment in the ES takes account of subsequent permissions, the application scheme and the Printworks application scheme. It also takes account of the masterplan and massing guidance in the HRWMF for the rest of Site Allocation NT5 - as modified by the masterplan set out in the applicant's DAS.

6.14.3 Chapter 10 of the ES has been reviewed by an independent specialist consultancy appointed by the Council. Likely significant wind effects are assessed in the ES by a computation fluid dynamics (CFD) led approach, validated by wind tunnel testing. Initial validation work between DFD and the wind tunnel tests showed good correlation on wind comfort, but the wind tunnel flagged up some safety issues not identified by the CFD. The source of the discrepancies was investigated and the assessment approach has been validated. A further refined CFD model was used to reduce windiness and a number of revisions to proposed buildings and landscaping have captured the revised mitigation in to the scheme. Whilst account has been taken of the likely significant temporary effects during construction, the officer summary below focuses on permanent effects.

6.14.4 With identified mitigation in place (including trees and soft landscaping, canopies, vertical screens/balustrades, pergolas etc), the residual effects identified in the ES have been agreed and are set out in table 23 below.

Table 23: Residual wind effects

Effect	Mitigation & monitoring	Residual effect
Safety for pedestrian access to and passage through / past the Site	Screening and Landscaping measures planned and discussed	'Negligible'
Comfort for pedestrian access to and passage through / past the Site	Screening and Landscaping measures planned and discussed Ongoing: Maintenance of trees	'Negligible'
Comfort for recreational use of amenity spaces	Balustrades, Landscaping Measures	'Negligible'
Comfort for existing activities within surrounding area	None required	'Negligible'
Cumulative – pedestrian safety and comfort	No additional measures above those discussed for the completed development	'Negligible'

6.14.5 The recommended conditions would ensure that the embedded mitigation is delivered as an integral part of the scheme. Subject to this, officers consider that the proposed scheme would result in an acceptable wind environment.

6.14.6 Fall-back Position. The proposed scheme is significantly different from the Goods Yard and Depot schemes approved by the extant consents (HGY/2018/0187 & HGY/2019/2929) in terms of layout, building form, articulation, materials etc. and no direct comparison can be made. However, subject to conditions referred to above, the predicted resultant pedestrian environment for the proposed and extant schemes would be similarly acceptable. The proposed Depot Block C (which would be lower than the consented Block C) has been modelled to improve wind speed conditions for the existing River Apartments amenity space and the proposed Depot Block ABC amenity space. The scale and massing of the proposed buildings is similar to that of Goods Yard and Depot Scheme (HGY/2021/3175).

6.15 **Trees**

6.15.1 The NPPF (Para. 131) stresses the importance of trees and makes clear that planning decisions should ensure that new streets are tree-lined. London Plan Policy G7 makes clear that development should seek to retain and protect trees of value and replace these where lost.

6.15.2 The Applicant's Tree Survey records 131 trees on and immediately adjacent to the site, the majority located around the western boundary. Of these trees, 4 are Category A (the highest quality), 102 are Category B, 20 are Category C and 5

are Category U (unsuitable for retention). The Council's records do not indicate there are any trees on the site subject to a Tree Protection Order (TPO).

6.15.3 The Proposals proposal result in the loss of 20 trees. This includes 4 x Category B, 15 x Category C and 1 x Category U. Four mature prominent Category A London Plane trees (Nos. 3001, 3002, 3003 and 3004) – two on the site near the High Road footway and two in the footway itself – would be retained. The existing 4 x Category B sycamore and acacia trees in the rear garden of the Grange (Nos. 32-34A White Hart Lane) would not be affected.

6.15.4 It is recommended that a planning condition requires the protection of trees to be retained during the demolition and construction phases in accordance with relevant British Standards. The proposed scheme includes the provision of approx. 335 trees (195 at ground level and a further 140 across the proposed podium and roof gardens) and would see a significant net increase in trees on the site, including along the proposed streets.

6.15.5 Fall-back Position. The Goods Yard and Depot schemes approved by the extant consents (HGY/2018/0187 & HGY/2019/2929) would (in combination) and the consented Goods Yard and Depot Scheme (HGY/2021/1771) also result in the loss of 20 trees. However, they would also retain the high-quality London Plane trees near the High Road frontage on the Depot part of the site and similarly not affect the trees in the garden of The Grange. The mainly 'outline' nature of the HGY/2018/0187 & HGY/2019/2929 consented schemes means that the number of proposed trees for those schemes are unknown, making direct comparison impossible. The Consented Goods Yard and Depot Scheme (HGY/2021/1771) would deliver the same quantum of additional tree planting.

6.16 **Urban Greening and Ecology**

Urban Greening

6.16.1 London Plan Policy G5 sets out the concept and defines Urban Greening Factor (UGF) as a tool used to evaluate and quantify the quality of urban greening provided by a development and aims to accelerate greening of the built environment, ensuring a greener London as it grows. It calls on boroughs to develop their own UGF targets, tailored to local circumstances, but recommends an interim target score of 0.40 for proposed development that is predominantly residential.

6.16.2 The applicant's Design and Access Statement includes a calculation of the Urban Greening Factor (UGF) for the proposed scheme, based on the Mayor of London's March 2021 pre-consultation draft London Plan Guidance. This demonstrates that the scheme would have a UGF of 0.45, thus exceeding the relevant London Plan proposed interim target score. This is achievable by way of including a range of green infrastructure, extensive tree planting, including approx. 1,525sqm intensive green roof (with a substrate depth of 150mm), approx. 95sqm of extensive green roof (with a substrate of 80mm), approx. 1,048sqm rain gardens, approx. 50sqm water feature and extensive planting. Officers consider that the proposed green roof depths are too shallow and it is recommended that a planning condition secures details of these features for further consideration.

Ecology

6.16.3 London Plan Policy G6 calls for development proposals to manage impacts on biodiversity and to aim to secure net biodiversity gain.

6.16.4 Local Plan Policy SP13 states that all development must protect and improve sites of biodiversity and nature conservation. In addition, Policy DM19 makes clear that development on sites adjacent to internationally designated sites should protect and enhance their ecological value and Policy DM20 supports the implementation of the All London Green Grid. AAP Policy AAP6 states that proposals for tall buildings that fall within 500m of a SPA/Ramsar area need to ensure no adverse effects.

6.16.5 The applicant's Ecological Appraisal Report sets out the findings of a phase 1 habitat survey, which concludes that the site is dominated by hardstanding and buildings, offering limited ecological value. However, the west boundary is fringed by the railway embankment which is an important ecological corridor (and designated as a Green Corridor in the Local Plan). No bats or evidence of bats was identified during the ground level assessment of the site and building and emergence surveys found no evidence of roosting bats within the buildings and no incidental bat activity on the site, although bat activity along the adjacent railway embankment is considered likely.

6.16.6 The proposed landscaping would mitigate the loss of the limited extent of semi-natural habitats and include planting along the proposed Embankment Gardens, comprising a mixture of native and non-native species which would help to buffer the ecological corridor from the proposed scheme and proposed tree and understorey planting in this location is considered to be provide the greatest ecological enhancement. Elsewhere, the number of proposed trees and areas of proposed planting would exceed the number of trees and semi-natural habitats that would be lost, proposed understory planting of pollinator and woodland species, a mixture of ornamental and rain garden planting, an area of standing water and/or seasonally wet ground would introduce a new habitat to the site. All in all, the Report concludes that the proposed soft landscaping would enhance the site from the existing baseline conditions for biodiversity, providing habitat opportunities for a range of bird, bat and invertebrate species and result in a Biodiversity Net Gain.

6.16.7 If planning permission were granted, it would be possible to use planning conditions to require provision of bird and bat boxes in trees and buildings across

the site (particularly along the western boundary facing the railway), bee bricks within walls and other additional features to encourage biodiversity.

Habitats Regulation

6.16.8 Given the proximity of the application site to two designed European sites of nature conservation, it is necessary for Haringey as the competent authority to consider whether there are any likely significant effects on relevant sites pursuant to Section 63(1) of the Conservation of Habitats and Species Regulations 2017 ("the Habitats Regulations").

6.16.9 The application site is approx. 0.96km west of the Lea Valley Special Protection Area (SPA) at its closest point. The Lea Valley area qualifies as a SPA under Article 4.1 of the Birds Directive on account of supporting nationally important numbers of species. This area is also a Ramsar site. The Lee Valley SPA/Ramsar comprises four underpinning Sites of Special Scientific Interest (SSSIs).

6.16.10 The application site lies approx. 4.9 km west of the Epping Forrest Special Area of Conservation (SAC) at its closest point. However, it is within the Zone of Influence (ZOI) of 6.2km as defined by Natural England in their Interim Guidance. The Epping Forest SAC is one of only a few remaining large-scale examples of ancient wood-pasture in lowland Britain and has retained habitats of high nature conservation value. Epping Forest SAC is also underpinned by a SSSI designation.

6.16.11 The Lea Valley SPA site is carefully managed to avoid impacts, with only limited access allowed to the wetland itself, with access closed seasonally to avoid impacts to wintering bird populations. As such, adverse effects as a result of increased recreational pressure are not considered likely. Likewise, the proposed scheme, with its limited car parking provision and promotion of use of electric vehicles by providing Electric Vehicle Charging Points is not expected to result in an adverse air quality effect.

6.16.12 The applicant's assessment also notes that the Habitat Regulations Assessments (HRA) for alterations to the Strategic Polices and The Tottenham Area Action Plan both conclude that there will be no likely significant effect on Epping Forest SAC through increased recreational pressure as nowhere within the Borough lies within the core recreational catchment for the site. The applicant's assessment concludes that potential risks to the SAC are further reduced by the proposed integration of greenspace within the proposed scheme, providing a link between residents and nature and that no direct or indirect significant adverse effects on Epping Forest SAC are expected as a result of the proposed scheme.

6.16.13 Natural England has reviewed the application and has raised no comment. Given the applicant's assessment and Natural England's response, officers consider the development would not give rise to likely significant effects on

European designated sites (Lee Valley SPA and Epping Forest SAC) pursuant to Section 63(1) of the Conservation of Habitats and Species Regulations 2017 ("the Habitats Regulations"). An integrity test is therefore not required and the proposal is in accordance with Policies SP13 and DM19. The site is greater than 500m from the Lee Valley SPA, so Policy AAP6 does not apply.

6.16.14 Fall-back Position. The Urban Greening Factor (UGF) metric was introduced by London Plan Policy G5 since the extant schemes (HGY/2018/0187 and HGY/2019/2929) were granted planning permission. As such, with the information available, it is not possible to compare the UGF for the proposed and extant schemes. However, by comparing application drawings and documents, officers consider that there would be a greater amount of green infrastructure in the proposed scheme than the combined extant schemes. Officers also consider that the proposed greater green infrastructure and inclusion of the proposed Embankment Gardens communal green space along the western railway embankment in the proposed scheme would be likely is likely to result in the proposed scheme having a greater Biodiversity Net Gain than extant schemes (HGY/2018/0187 and HGY/2019/2929). Given the layout and landscaping similarities to extant scheme (HGY/2021/177), it is considered that the proposal would result in a similar biodiversity net gain.

6.17 Waste and Recycling

6.17.1 London Plan Policy SI7 calls for development to have adequate, flexible, and easily accessible storage space and collection systems that support the separate collection of dry recyclables and food. Local Plan Policy SP6 and Policy DM4 require development proposals make adequate provision for waste and recycling storage and collection.

6.17.2 The applicant's revised Waste Management Plan, has been developed in accordance with guidance provided by Waste officers and BS 5906:2005 Waste management in buildings – a code of practice. The key principles include:

- Commercial and residential waste would be collected separately;
- The waste collector would not be required to pull full containers more than 10m to the collection vehicle;
- A minimum clear space of 150mm would be allowed between containers;
- Waste rooms would be designed and fitted out so they could be washed down and fire resistant;
- Waste collection vehicles would not be required to reverse more than 12m;
- Access roads for waste vehicles would have a minimum clear width of 5.0m and a maximum gradient of 1:12; and
- Storage and loading areas would be level, smooth, hard surfaced and provide drop kerbs and have a maximum gradient of 1:14 if the ground slopes down towards the collection vehicle.

6.17.3 Residential waste, recycling and food waste would be collected weekly and storage space has been provided in accordance with the generation rates provided by waste officers. Space has also been provided for bulky/non-standard waste items. Residents would not be required to walk further than 30m (horizontal distance) between their home and their allocated waste store. Most waste stores would be externally accessible and within 10m of the proposed stopping point for the waste collection vehicle. Any waste stores further than 10m from a collection point would have the waste brought to a suitable collection point within 10m of the collection vehicle on the day of collection by the on-site management team. It is recommended that a planning condition to reserve the detailed management and maintenance arrangements.

6.17.4 The proposed commercial waste rooms have been sized for two days' worth of waste storage, although collections are anticipated to be daily. Each proposed block has a commercial waste store sized to accommodate the anticipated amount of waste generated by the commercial tenants in that block. Waste would be taken to the stores by the tenants and collected directly from the stores by the appointed commercial waste contractor. Commercial tenants would collect residual, mixed dry recyclable, glass and food waste separately.

6.17.5 Based on previous comments, LBH Waste officers are content with the proposed storage arrangements and make clear that commercial occupiers must arrange for scheduled waste collection and give the proposals a RAG traffic light status of AMBER.

6.17.6 Fall-back Position. The proposed scheme is significantly different from the Goods Yard and Depot schemes approved by extant consents (HGY/2018/0187 & HGY/2021/3175) in terms of waste and recycling arrangements and no direct comparison can be made. The proposed waste storage and collection principles are the same as extant consent (HGY/2021/1771).

6.18 **Land Contamination**

6.18.1 Policy DM32 require development proposals on potentially contaminated land to follow a risk management-based protocol to ensure contamination is properly addressed and carry out investigations to remove or mitigate any risks to local receptors.

6.18.2 The applicant's Land Contamination Assessment (Phase 1) reports on an initial Conceptual Site Model and a Preliminary Risk Assessment – taking account of ground conditions and the current and previous uses of the site (including, for the Goods Yard part of the site, as a scrap yard). It concludes by identifying Low to Moderate potential risks to a range of receptors, including construction workers and potential resident and recommends that an in intrusive ground investigation is carried out to appraise the extent of Made Ground, the gas regime and the groundwater regime. It also recommends that an Unexploded Ordnance survey is undertaken.

6.18.3 LBH Pollution officers raise no objection, subject to standard conditions on Land Contamination and Unexpected Contamination.

6.18.4 Fall-back Position. If planning permission were granted, it would be possible to secure similar mitigation by way of planning conditions. No material difference in effects between the proposed scheme and the extant schemes have been identified.

6.18.5 **Basement Development**

6.18.6 Policy DM18 relates to new Basement development and sets out criteria for where basements can be permitted. Basement development must be addressed through a Basement Impact Assessment (BIA).

6.18.7 The proposed scheme includes two single-level basement car parking areas – one under Depot Blocks ABC and one under GY Blocks A to F. The maximum proposed depth is expected to be approx. 5.4m (The Depot) and 5.3m (the Goods Yard). Both basements would be approx. 13m - 14m away from the existing railway track, which are on an embankment approx. 3m high. The proposed Depot Basement would be next to Rivers Apartments and close to Mallory Court. The proposed Goods Yard basement would be close to the Peacock Industrial Estate (within 2.5 metres at the closest point).

6.18.8 The BIA anticipates that construction would be formed with excavation support measures in place which are also likely to form a groundwater cut-off for temporary dewatering purposes. In advance of detailed design of basement excavation support measures, two viable retaining systems are analysed. The resulting settlements at the adjacent railway tracks are estimated to less than 3mm and are considered likely to be negligible. The River Apartments building is identified as being likely to be founded on piles and would therefore be less affected by any ground movement. Nevertheless, the BIA recommends that a relatively stiff system of excavation support (e.g. including temporary propping) would need to be adopted for basement excavation in this area to minimise resulting excavation induced ground movements. The BIA expects that adopting such a system should ensure that any resulting building damage would be between negligible and slight.

6.18.9 In respect the basement in the Goods Yard Part of the site, it is envisaged that with a resulting settlements adjacent to the railway tracks are estimated to be less than 2mm for both retaining systems tested. Owing to the close proximity of the basement with the shared boundary with Peacock Industrial Estate and the existing buildings fronting White Hart Lane, the BIA also recommends a relatively stiff system of excavation support (e.g. including temporary propping) to minimise associated excavation induced ground movements. Adopted such a system is envisaged to result in building damage of no more than slight.

6.18.10 Fall-back Position. The extant Goods Yard and Depot schemes (HGY/2018/0187, HGY/2019/2929 and HGY/2021/1771) include smaller sized separate single-level car parking basements, although the northern basement in the proposed scheme would be closer to the existing River Apartments, Mallory

House and the shared boundary with Peacock Industrial Estate and the southern basement will be closer to Peacock Industrial Estate. However, if planning permission were granted, it would be possible to secure similar mitigation in the form of detailed BIAs by way of planning conditions and no material difference in effects between the proposed scheme and the two extant schemes have been identified.

6.19 **Archaeology**

6.19.1 The NPPF (para. 194) states that applicants should submit desk-based assessments, and where appropriate undertake field evaluation, to describe the significance of heritage assets and how they would be affected by the proposed development.

6.19.2 London Policy HC1 states that applications should identify assets of archaeological significance and avoid harm or minimise it through design and appropriate mitigation. This approach is reflected at the local level in Policy DM9.

6.19.3 Chapter 8 of the ES (which is supported by an Archaeological Desk Based Assessment) reports on an assessment of the likely significant effects on archaeology. The White Hart Lane and High Road frontage parts of the form part of an Archaeological Priority Area, due to evidence of a Medieval settlement with possible Anglo-Saxon roots and the presence of a former Roman road (Roman Ermine Street). Following mitigation, in the form of archaeological investigation, the ES identifies a Minor Adverse residual effect.

6.19.4 The Greater London Archaeological Advisory Service (GLASS) has assessed the proposal (identifying that the layout of the proposed scheme presents theoretical scope to preserve any important finds along the High Road frontage) and indicates the need for field evaluation to determine any further appropriate mitigation. GLASS call for a two-stage process of archaeological investigation comprising evaluation to clarify the nature and extent of any surviving remains, followed, if necessary, by a full investigation. It is recommended that planning conditions similar to those attached to the extant Goods Yard and Depot permissions are attached to any permission.

6.19.5 Fall-back Position. The proposed scheme would be expected to have a similar impact on buried archaeology as the extant Goods Yard and Depot schemes. If planning permission were granted, it would be possible to use a planning condition similar to those attached to the extant Goods Yard and Depot consents to mitigate potential negative effects by requiring Written Schemes of Investigation.

6.20 **Fire Safety and Security**

6.20.1 London Plan Policy D12 makes clear that all development proposals must achieve the highest standards of fire safety and requires all major proposals to be supported by a Fire Statement. The Mayor of London has published guidance

On Fire Safety (Policy D12(A), Evacuation lifts (Policy D5(B5) and Fire Statements (Policy D12(B).

6.20.2 The scheme has been altered in direct response to Health and Safety Executive concerns regarding fire safety. This resulted in second stair cores being added to the tower blocks (buildings over 30 meters), independent lifts to basement level amongst other internal layout changes which resulted in small increase to the built envelope. The buildings and layouts have been designed to meet the requirements of London Plan Policy D5 and D12, associated guidance and latest Building Regulation Requirements relating to fire safety. As part of the Building Regulations plan checking process a consultation with the London Fire Brigade would be carried out. On completion of work, the relevant Building Control Body would issue a Completion Certificate to confirm that the works comply with the requirement of the Building Regulations.

6.20.3 Fall-back Position. The proposed scheme is significantly different from the Goods Yard and Depot schemes approved by the extant consents (HGY/2018/0187 & HGY/2019/2929 in terms of these issues (layout, vehicular access, height materials etc.) and no direct comparison can be made. Whilst the scale and layout of buildings is similar to consent HGY/2021/1771, the permission pre-dates latest guidance and regulations on fire safety. The proposed development therefore has improved fire safety measures compared to the previously consented schemes.

6.21 **Equalities**

6.21.1 In determining this planning application, the Council is required to have regard to its obligations under equalities legislation including obligations under the Equality Act 2010. In carrying out the Council's functions due regard must be had, firstly to the need to eliminate unlawful discrimination, advance equality of opportunity between people who share those protected characteristics and people who do not and to the need to promote equality of opportunity and to foster good relations between persons who share a protected characteristic and persons who do not share it. The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status apply to the first part of the duty. Members must have regard to these duties in taking a decision on this application.

6.21.2 As discussed in the Design section, officers consider that, subject to planning conditions and s106 planning obligations to reserve design details, landscaping and secure satisfactory management and maintenance, the proposed scheme would provide an accessible and safe environment.

6.21.3 Furthermore, as noted in the various sections in this report, the proposed development provides a range of positive socio-economic and regeneration outcomes for the Tottenham area including additional publicly accessible open space and the provision of new housing. A substantial amount of the proposed housing would be affordable housing, a proportion of which could be Council homes at Social Rents. This overall provision would add to Haringey's stock of market and affordable homes.

6.21.4 It is recommended that an employment skills and training plan that ensures a target percentage of local labour is utilised during construction is secured by way of a s106 planning obligation. This would benefit priority groups that experience difficulties in accessing employment. It is also recommended that obligations secure relocation assistance for existing businesses on site and assistance for local tenders and employment skills and training and a financial contribution towards apprenticeships.

6.21.5 The proposed scheme would add to the stock of wheelchair accessible and adaptable dwellings in the locality and planning conditions could help ensure that the proposed layout and landscaping would help ensure that inclusive design principles are followed, in accordance with London Plan and local planning policy requirements.

6.21.6 Fall-back Position (Goods Yard Consent HGY/2018/0187 &HGY/2019/2929). If permission were to be granted, it would be possible to use planning conditions and s106 planning obligations to ensure the following:

- A similarly accessible and safe environment (with the proposed re-location of the previously approved access road off the western boundary to potentially provide a two-sided street providing a safer space);
- 16 more Low-Cost Rent homes (with more family sized homes and better alignment with the Council's Housing Strategy);
- The Council to have first right to purchase on 61 of the proposed Low Cost Rent homes (the same as the extant schemes);
- Similar employment training arrangements; and

6.21.7 Fall-back Position Goods Yard and Depot Appeal Consent (HGY/2021/3175)

- Similarly accessible and safe environment;
- Similar business relocation assistance;
- Improved basement parking access arrangement for the Goods Yard Part of the site;
- 23 fewer dwellings including 5 fewer affordable dwellings but same percentage provision of affordable housing;
- Higher proportion of family sized dwellings (175 (29.5%) as opposed to 147 (17%));
- Improved fire safety arrangements
- Increased commercial floorspace provision (+198sqm)

6.22 **Conclusion**

6.22.1 The proposed scheme would result in a residential-led mixed-use development of approx. 20% of the High Road West NT5 Site Allocation. The incremental development of the Site Allocation is acceptable in principle and the proposed scheme would satisfactorily (i) safeguard the continued operation of industrial uses on the Peacock Industrial Estate in the existing context and (ii) not prejudice the ability of the adjoining land to be developed in general accordance with Policy NT5 requirements and guidelines and the adopted High Road West Masterplan Framework in the longer term.

6.22.2 The site has a complex planning history. As made clear under Fall-back Position above, officers consider that there is a 'real prospect' that one or both of the extant THFC consents (the Goods Yard - HGY/2018/0187 and/or The Depot – HGY/2019/2929) could be implemented and built out or consent HGY/2021/1771). Case law has determined that such a fall-back position is a material planning consideration. As such, the merits of the application need to be considered against development plan policies and other material considerations in the following ways:

- Firstly, by considering the application as a stand-alone scheme; and
- Secondly, by considering the application against the fall-back position established by the extant consents – including the likely additional benefits and dis-benefits/harm that would result from the application scheme over and above those associated with the two extant consents.

The proposed application scheme

6.22.3 The loss of existing uses would be acceptable, subject to a planning condition securing a minimum provision of 400sqm (GIA) of office/light industrial uses and a s106 planning obligation requiring relocation assistance for existing businesses on the Carbery Enterprise Park. The proposed net gain of 843 homes would make a significant contribution to meeting Haringey's London Plan housing target and the proposed flexible non-residential units would help mitigate loss of existing employment, enliven street frontages and offer opportunities for a range of commercial/ service uses.

6.22.4 Officers welcome the proposed site layout, which locates buildings along the western edge and the proposed north-south street (Embankment Lane) in from the boundary, so that it can become a two-sided street as and when other adjoining land comes forward for development. The scheme would also connect with and generally relate well with existing homes in the Cannon Road area and create a safe and accessible public realm.

The affordable housing offer is based on a Fast Track approach (not supported by a Financial Viability Appraisal) of 35.93% affordable homes (by habitable rooms, raising to 40% with grant), split 60:40 Low Cost Rent and Shared Ownership. The proposed dwelling mix meets the Housing Strategy preferred target and affordable homes would

be satisfactorily integrated with Market housing across the site. The Council would also have the option of purchasing 61of the proposed Low Cost Rent homes to provide at Social Rent levels to assist the redevelopment of Love Lane Estate. Officers consider that the offer would be acceptable, subject to s106 planning obligations securing viability reviews and ensuring affordability.

6.22.5 The proposed scheme would provide a small park (Peacock Park), which could be enlarged as and when development to the south comes forward, and other publicly accessible open space. Section 106 planning obligations would secure financial contributions towards providing the other social infrastructure (replacement library, community space and public realm) that is identified in Policy NT5 as being necessary. The proposed scheme is not expected to have a significant adverse effect on school places or primary health care provision and, in any event, CIL payments could help fund planned additional provision to meet the demands from the expected 1,810 new residents.

6.22.6 The overall dwelling mix, at 21.5% 3 and 4-bed homes is considered acceptable and 10% of homes of various sizes would be 'wheelchair accessible'. The proposed homes would generally be high- quality and future residents would enjoy an acceptable level of amenity (in terms of aspect, size of homes, open space, play space, outlook/privacy, daylight and sunlight, noise, wind conditions, air quality and overheating). The proposed fire strategy set out in the submitted Fire Statement is also considered to be acceptable.

6.22.7 The design and materiality of the proposed tower façades creates articulation and constitutes high quality design. The tower bocks related well to the buildings at their base, with legible entrance points. The proposed buildings have been designed to achieve high levels of energy efficiency through both active and passive measures.

6.22.8 Tall buildings are acceptable in principle in this Growth area and the proposed tall buildings would be located on the western edge of the site, where the HRWMF encourages them to be located (although they would be significantly taller than the guidance suggests). The likely functional and environmental impacts of the proposed buildings are considered acceptable. Officers are satisfied that the architectural quality of the proposed tall buildings is of a sufficiently high-quality to justify their proposed height and form and their likely effects on surrounding townscape. As such, it is considered that the proposed tall buildings would meet the policy tests established by the NPPF, London Plan Policy D9, Strategic Policy SP11, AAP Policy AAP6 and DPD Policies DM1 and DM6).

6.22.9 As set out in under Heritage Conservation, whilst officers consider that the proposed scheme would result in 'less than substantial harm' to the wider setting and significance of a number of heritage assets, they consider that the proposed scheme would result in the following significant public benefits that would outweigh this harm:

- Securing the future of the Listed Buildings at Nos. 867-869 High Road and improving their immediate setting;
- Securing the future of the locally listed Station Masters House and improves its immediate setting;
- Making a positive contribution towards the regeneration of Tottenham and acting as a catalyst for further regeneration and inward investment;
- Helping to deliver the HRWMF, including a positive contribution to place-making, provision of publicly accessible open space, new play space and public realm and the dual use of the proposed Brook House Yard amenity space with Brook House Primary School;
- Improving connectivity and permeability by providing new high-quality pedestrian and cycle routes and improving the streetscape of the High Road and White Hart Lane;
- Delivering 844 new high-quality homes, including affordable homes (between 35.9% and 40% by habitable room);
- Depending on phasing and timing, providing potential opportunities to decant existing residents from the Love Lane Estate to high-quality housing, to facilitate its regeneration as called for in Site Allocation NT5;
- Achieving ecological and biodiversity enhancements, including an overall net gain in biodiversity;
- Making a financial contribution towards social infrastructure;
- Making a positive contribution to reducing carbon dioxide emissions and surface water run-off;

- Creation of 270 FTE jobs during the construction phase with opportunities for local recruitment, skills development and sustainable careers.
- Creation of between 30 to 160 FTE new jobs (a net loss of between 30 and 160);
- Generation of a total New Homes Bonus of c. £1.7m alongside c. £1.5m a year in council tax revenue (of which nearly 75% would be retained by the LBH);
- Annual household spending of £12.7m on goods and services in the area; and
- Approx. £100,000 per year in business rates.

6.22.10 Amenity impacts must be considered in the overall planning balance, with any harm weighed against expected benefit. There would be some adverse impacts on amenity, as outlined above. However, officers consider that the level of amenity that would continue to be enjoyed by neighbouring residents is acceptable, given the benefits that the proposed scheme would deliver.

6.22.11 The proposed scheme would improve connectivity and permeability between the existing Cannon Road area and High Road and White Hart Lane, without creating a rat-run for motor traffic. The scheme would have relatively limited car parking (0.16:1) and generous cycle parking, in line with policy requirements, and additional road traffic would be relatively small (particularly given the proposed loss of the existing supermarket and large surface car park). Assessment by the applicant demonstrates that (when taking account of the proposed scheme and committed development), there is unlikely to be significant impacts on London Overground line capacity or bus capacity and no discernible impact on the Victoria Line. Planning conditions and s106 planning obligations could help manage on and off-site car parking and ensure that Car Club provision, travel planning, delivery and servicing and construction activities are satisfactory.

6.22.12 The proposed buildings, open space, landscaping and sustainable drainage features have generally been designed to take account of climate change and to reduce carbon emissions. Planning conditions could secure commitments in relation to water usage, BREEAM ‘Very Good’ for the commercial units and measures to further the Circular Economy agenda. Subject to s106 planning obligations, the scheme would be connected to the proposed District Heat Network and include some roof level PVs to help deliver 79% carbon emissions savings (SAP2012 carbon factors) (with offsetting financial contributions making up the shortfall).

6.22.13 The proposed scheme would safeguard and incorporate mature London Plane trees along the High Road frontage and incorporate a good level of green infrastructure, exceeding the relevant London Plan Urban Greening Factor interim score of 0.45. The proposed greening would deliver a significant Biodiversity Net Gain and officers do not consider that the scheme would give rise to significant effects (recreational pressure or air quality) on the Lee Valley or Epping Forest important European nature conservation sites.

6.22.14 Flood risk is low and likely environmental impacts, including noise, air quality, wind and microclimate, waste and recycling and land contamination, basement impact and archaeology could be made acceptable by use of planning conditions.

6.22.15 Officers have taken full account of the findings of the submitted Environmental Statement and associated addendum and taken into account the responses to consultation and other relevant information in accordance with EIA Regulations, and other relevant legislation and guidance. The findings of the ES are referred to, where relevant, throughout the report. If planning permission were to be granted, satisfactory mitigation measures identified in this report, could be secured by planning conditions and/or s106 planning obligations.

6.22.16 The proposed scheme would provide an accessible and safe environment and significant additional affordable homes. Subject to securing the delivery of various features and provisions identified in this report, officers consider that the proposed scheme would have a positive equalities impact.

Overall

6.22.17 Subject to the recommended planning conditions and s106 planning obligations to secure necessary mitigation and policy objectives, officers consider that the proposed scheme is acceptable on its own merits, when considered against the development plan and all other material considerations. Taking account of the fall-back position established by the four extant consents, it is considered that the benefits that would be delivered from the application scheme would outweigh additional dis-benefits/harm that the proposed scheme would result in.

7 COMMUNITY INFRASTRUCTURE LEVY (CIL)

7.1.1 Based on the information given on the plans, the Mayoral CIL would £3,965,235 and, based on the current Haringey CIL charge rate for the Eastern Zone of £15 per square metre, the Haringey CIL charge would be £3,039,400, giving a total

of £3,039,400. These are net figures and take into account social housing relief and based on the following additional assumptions:

- Phasing - indicative phasing set out in the Construction Management Plan.

- The proposed flexible commercial uses do not come forward as a ‘supermarket’ and proposed basements serve residential development only; and
- Affordable housing satisfies the criteria of Regulation 49 of the CIL Regulations (2010, as amended) and relief is granted before commencement.

7.1.2 If planning permission were granted, the CIL would be collected by Haringey after/should the scheme is/be commenced 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. An informative should be attached to any planning permission advising the applicant of this charge and advising them that the scheme is judged to be phased for CIL purposes.

8 RECOMMENDATIONS

8.1 GRANT planning permission for the reasons set out in 1.2 above.