

## Appendix 2: Internal and External Consultee Representations

Stakeholder	Comment	Response
<b>INTERNAL</b>		
Building Control	I can advise that we have reviewed the revised design (26.08.2022) and can confirm that we view it as current code compliant and confirm that it would be an acceptable solution under the Building Regulations	The scheme has been updated to address the forthcoming changes to building regulations in relation to additional staircases in buildings over 30m in height. The proposed changes are positive and are in line with emerging legislation. The HSE have commented and are content with the proposals.
LBH Carbon Management	<p><b>Carbon Management Response 10/07/2023</b></p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> <li>• Sustainability and Energy Statement prepared by Buro Happold (dated 19 May 2023 February 2022); including BREEAM tracker, Overheating Strategy, Whole Life-Cycle Carbon</li> <li>• Addendum to Sustainability and Energy Statement prepared by Buro Happold (dated 19 May 2023);</li> <li>• Block Compliance summary</li> <li>• Relevant supporting documents.</li> </ul> <p><b>1. Summary</b></p> <p>Changes have been made to the scheme previously submitted under ref. HGY/2021/1771.</p> <p>For the Energy Strategy, Buro Happold has undertaken a remodelling exercise to align with Building Regulations Part L 2021 that has since been published, but not to reflect the design changes as the consultants felt the massing, orientation and façade design had not changed. Results for Block A have been used to reflect the remaining blocks in the proposed development.</p> <p>The residential element of the development now achieves a reduction of 78.7% carbon dioxide emissions on site from a baseline development calculated under Part L 2021. This compares to the design previously achieving a 80% reduction under a Part L 2013 baseline with SAP10 carbon factors, or a 64% reduction under a Part L 2013 baseline with SAP2012 carbon factors assuming the development would</p>	Noted, conditions and obligations attached.

connect to the DEN. The applicant has stated that the small difference in performance is due to the difference in how the DEN is modelled.

The non-residential element of the development now achieves a reduction of 42% carbon dioxide emissions on site from a baseline development calculated under Part L 2021. This compares to the design previously achieving a 58% reduction under a Part L 2013 baseline with SAP10 carbon factors, or a 64% reduction under a Part L 2013 baseline with SAP2012 carbon factors assuming the development would connect to the DEN. The applicant has stated that the small difference in performance is due to the difference in how the DEN is modelled.

Revised calculations were undertaken for the Whole Life-Cycle Assessment, now reporting a footprint of 867 kgCO<sub>2</sub>e/m<sup>2</sup> (excluding Modules B6, B7 and D).

No changes have been made to the Overheating modelling, BREEAM Pre-Assessment or the Circular Economy Strategy.

### 1. Energy Strategy

Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L (2021)). The London Plan (2021) further confirms this in Policy SI2.

The applicant has not set out the Energy Hierarchy in line with GLA guidance, nor have they submitted the required carbon emission spreadsheet to support the addendum. Values below are reported in kgCO<sub>2</sub>/m<sup>2</sup>/year instead of tCO<sub>2</sub>/year and therefore cannot be compared.

<i>Block A only (SAP10.2 emission factors)</i>		
	<b>Total residential regulated emissions (kg CO<sub>2</sub> / year)</b>	<b>Total non-residential regulated emissions (kg CO<sub>2</sub> / year)</b>
<b>Part L 2021 baseline</b>	11.6	24
<b>Be Green</b>	2.5	21
<b>% savings</b>	78.7%	42%

Compliance with Building Regulations:

- 8.56% pass from target to dwelling carbon emission energy rate
- 11.06% pass margin from target to dwelling fabric energy efficiency
- 0.19% pass margin from target to dwelling primary energy rate

Actions:

- Please submit the GLA's Carbon Emission Reporting Spreadsheet.

- Please submit an Energy Strategy for the proposed development (using the GLA's guidance: [https://www.london.gov.uk/sites/default/files/gla\\_energy\\_assessment\\_guidance\\_april\\_2020.pdf](https://www.london.gov.uk/sites/default/files/gla_energy_assessment_guidance_april_2020.pdf))

### **Energy Use Intensity / Space Heating Demand**

Applications are required to report on the total Energy Use Intensity and Space Heating Demand, in line with the GLA Energy Assessment Guidance (June 2022). The Energy Strategy should follow the reporting template set out in Table 5 of the guidance, including what methodology has been used. EUI is a measure of the total energy consumed annually, but should exclude on-site renewable energy generation and energy use from electric vehicle charging.

No calculations have been done to demonstrate compliance with this.

#### Actions:

- What is the calculated Energy Use Intensity (excluding renewable energy)? How does this perform against GLA benchmarks, i.e. at 35 and 55 kWh/m<sup>2</sup>/year? Please submit the information in line with the GLA's reporting template.
- What is the calculated space heating demand? How does this perform against the GLA benchmark of 15 kWh/m<sup>2</sup>/year? Please submit the information in line with the GLA's reporting template.

### **Energy – Lean**

No detail has been submitted to demonstrate how the development performs under Be Lean. It is assumed that no fabric values have been changed.

#### Actions:

- Please submit the performance under Be Lean and demonstrate appropriate compliance.

### **Energy – Clean**

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). Policy DM22 of the Development Management Document supports proposals that contribute to the provision and use of Decentralised Energy Network (DEN) infrastructure. It requires developments incorporating site-wide communal energy systems to examine opportunities to extend these systems beyond the site boundary to supply energy to neighbouring existing and planned future developments. It requires developments to prioritise connection to existing or planned future DENs.

The same principles have been followed for this revised design, including a connection to the Decentralised Energy Network (DEN). Energetik (the DEN provider) has indicated that the network may be available at the development site from 2025. No further detail has been submitted for Be Clean, it is assumed that all approved principles and assumptions will remain the same.

### **Energy – Green**

As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4.

No further detail has been submitted for Be Green, it is assumed that all approved principles and assumptions will remain the same.

### **Energy – Be Seen**

London Plan Policy SI2 requests all developments to 'be seen', to monitor, verify and report on energy performance. The GLA requires all major development proposals to report on their modelled and measured operational energy performance. This will improve transparency on energy usage on sites, reduce the performance gap between modelled and measured energy use, and provide the applicant, building managers and occupants clarity on the performance of the building, equipment and renewable energy technologies.

It is not clear if the revised development has been registered on the Be Seen platform.

### **2. Carbon Offset Contribution**

The residential floorspace across the development has been increased from 74,615 sqm to 77,790 sqm, which will increase the emissions required to offset. The applicant has estimated a carbon offset payment of £547,603 (residential) and £61,087 (non-residential) using the estimated carbon shortfall for Block A to the other blocks. No calculation has been provided so this cannot be verified. The applicant will need to resubmit full energy modelling prior to commencement of development that will take into account the full design changes across the whole development as part of the Energy Plan. The remaining carbon emissions will need to be offset at £95/tCO<sub>2</sub> over 30 years.

### **3. Overheating**

London Plan Policy SI4 requires developments to minimise adverse impacts on the urban heat island, reduce the potential for overheating and reduce reliance on air conditioning systems. Through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.

Building Regulations Part O came into force in June 2021. The applicant confirms that Part O requires some additional acoustic performance standards at night time, however no information has been provided whether any sample of dwellings has been remodelled along areas with higher noise pollution to demonstrate compliance. The applicant states that the façade design remains unchanged, therefore the results remain unchanged. It is the applicant's risk to ensure that their development is compliant with Building Regulations.

In the previous submission the mandatory DSY1 weather file for 2020s was passed, based on:

- Natural ventilation from 22°C, with 100% (bedroom) and 30% (LKD) of openable area at night
- Acoustic louvres for noise attenuated ventilation (30% free area)
- Ceiling fans
- Glazing g-values of 0.35 (low rise) and 0.60 (frosted glass)

- Vertical side fins (not clear where)
- MVHR with summer bypass
- No active cooling
- Heat gains of 350W (communal hallways) and 70W (apartment hallways) based on distribution losses of 10W/m
- Ventilation rate 1ACH (communal hallways)

**Whole Life-Cycle Carbon Assessment**

Policy SI2 requires developments referable to the Mayor of London to submit a Whole Life-Cycle Carbon Assessment and demonstrate actions undertaken to reduce life-cycle emissions.

The revised calculated emissions based on the GIA (without grid decarbonisation) is estimated at:

	<b>Estimated carbon emissions</b>	<b>GLA benchmark RESIDENTIAL</b>	<b>Embodied carbon rating (Industry-wide)</b>
<b>Product &amp; Construction Stages</b> Modules A1-A5 (excl. sequestration)	569 kgCO <sub>2</sub> e/m <sup>2</sup> (increase from 557 kgCO <sub>2</sub> e/m <sup>2</sup> )	Meets GLA benchmark (<850 kgCO <sub>2</sub> e/m <sup>2</sup> ) but misses the aspirational target (<500 kgCO <sub>2</sub> e/m <sup>2</sup> ).	Modules A1-A5 achieve a band rating of 'D, not meeting the LETI 2020 Design Target.
<b>Use and End-Of-Life Stages</b> Modules B-C (excl. B6 and B7)	298 kgCO <sub>2</sub> e/m <sup>2</sup> (decrease from 304 kgCO <sub>2</sub> e/m <sup>2</sup> )	Meets GLA target (<350 kgCO <sub>2</sub> e/m <sup>2</sup> ) and aspirational benchmark (<300 kgCO <sub>2</sub> e/m <sup>2</sup> ).	
Modules A-C (excl B6, B7 and incl. sequestration)	867 kgCO <sub>2</sub> e/m <sup>2</sup>	Meets GLA target (<1200 kgCO <sub>2</sub> e/m <sup>2</sup> ) but not the aspirational benchmark (<800 kgCO <sub>2</sub> e/m <sup>2</sup> ).	Modules A1-B5, C1-4 (incl sequestration) achieve a letter band rating of 'D, not meeting the RIBA 2030 Design Target.
<b>Use and End-Of-Life Stages</b> Modules B6 and B7	1,005 kgCO <sub>2</sub> e/m <sup>2</sup>	N/A	
<b>Reuse, Recovery, Recycling Stages</b> Module D	-167 kgCO <sub>2</sub> e/m <sup>2</sup>	N/A	

Remodelling was undertaken following the design changes which has resulted in revised quantities of materials.

**Circular Economy**

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. 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.

No information has been provided for this, it is assumed the strategy remains unchanged.

**4. Planning Obligations Heads of Terms**

- Be Seen commitment to uploading energy data
- Energy Plan
- Sustainability Review
- Estimated carbon offset contribution (and associated obligations) of £608,690 (indicative), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan and Sustainability stages.
- DEN connection (and associated obligations)
- Heating strategy fall-back option if not connecting to the DEN

**5. Planning Conditions**

The conditions below have been drafted using the list of conditions from HGY/2021/1771, where they require amendments (with text underlined or struck through where the wording has been amended).

**8)BREEAM**

- a) Prior to commencement of any non-residential use with each relevant Phase (as identified in an approved Phasing Plan), a design stage accreditation certificate for that phase must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM “Very Good” outcome (or equivalent) for each non-residential use within that phase, aiming to achieve “Excellent”.
- b) The relevant Phase shall then be constructed in strict accordance with the approved details, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.
- c) Prior to occupation of any non-residential use within each relevant Phase, a post-construction certificate issued by the Building Research Establishment (or equivalent) for each non-residential use in that phase must be submitted to and approved in writing by the Local Planning Authority, confirming this standard has been achieved.
- d) In the event that any non-residential use fails to achieve the agreed rating, a full schedule and costings of remedial works required to achieve this rating shall be submitted to and approved in writing by the Local Planning Authority within 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on-

site within 3 months of the Local Authority's approval of the schedule, or the full costs and management fees given to the Local Planning Authority for off-site remedial actions.

21) **Energy Strategy**

(a) Prior to the commencement of works above ground floor slab level for a Block in a Phase (as identified in an approved Phasing Plan), an updated Energy Strategy for that phase must be submitted with complete Design Stage SAP worksheets based on the Sustainability and Energy Statement and Addendum (HRW-BHE-GD-XX-RP-YS-0001, Revision 00, dated 18 February 2022 and 19 May 2023). The development shall achieve minimum carbon emissions savings of 78% (residential) and 42% (non-residential) over 2013 2021 Building Regulations Part L, with a minimum solar PV array of 168 kWp on the Goods Yard part of the site and minimum 45 kWp on the Depot part of the site. The updated Strategy shall include:

- i. Explanation as to how the Development phase achieves minimum carbon reductions at the Be Lean Stage of 10% for the domestic new build and 15% for the non-domestic new build elements (~~SAP2012 carbon factors~~);
- ii. An air tightness delivery strategy;
- iii. Detailed thermal bridging calculations demonstrating how thermal bridging shall be reduced;
- ~~iv. Detailed design of the heat network within the Blocks and how this complies with CIBSE CoP1 and the LBH Generic Specification. This shall include detailed calculation of distribution losses (based on pipe routes and lengths, pipe sizes, taking account of F&R temperatures and diversification and insulation) to calculate total heat loss from the system expressed in W/dwelling and should demonstrate losses have been minimised;~~
- ~~v. A strategy for the supply of heat to any phases occupied before a connection is made to an off-site District Energy Network;~~
- ~~vi. A strategy that ensures heat can be supplied to the other sites within the High Road West masterplan area via this development site;~~
- ~~vii. Further detail of how the developer shall ensure the performance of the system will be safeguarded through later stages of design, construction and commissioning including provision of key information on system performance required by CoP1; and~~
- ~~viii. A metering strategy.~~

(b) Within six months of first occupation of any dwellings, evidence shall be submitted in writing to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.

(c) The final agreed Energy Strategy shall be operational prior to the first occupation of the

development. The development shall be carried out strictly in accordance with the approved details and shall be operated and maintained as such thereafter.

**22) Overheating (Non-Residential)**

(a) Prior to the occupation of any non-residential floorspace in a relevant Phase (as identified in an approved Phasing Plan), an Overheating Report for that phase must be submitted to and approved in writing by the Local Planning Authority only if that space is to be occupied in accordance with the NCM Activity Database or will accommodate any vulnerable users, such as office/workspace, community, healthcare, or educational uses.

(b) The report shall be based on the current and future weather files for 2020s, 2050s and 2080s for the CIBSE TM49 central London dataset. It shall set out:

- i. The proposed occupancy profiles and heat gains in line with CIBSE TM52.
- ii. The modelled mitigation measures which will be delivered in line with the Cooling Hierarchy to ensure the development complies with DSY1 for the 2020s weather file.
- iii. A retrofit plan that demonstrates which mitigation measures would be required to pass future weather files, with confirmation that the retrofit measures can be integrated within the design.
- iv. The mitigation measures hereby approved shall be implemented prior to occupation and retained thereafter for the lifetime of the development.

**23) Overheating (Residential)**

(a) Prior to the above ground commencement of a Block in a Phase (as identified in an approved Phasing Plan), an updated Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating risk, propose a retrofit plan, and re-consider the feasibility of installing external (movable) shading devices to the east, south and west facades. This assessment shall be based on the methodology following CIBSE TM59 with the London Weather Centre files as set out in the Sustainability and Energy Statement prepared by Buro Happold (HRW-BHE-GD-XX-RP-YS-0001, Revision 00, dated 18 February 2022 and 19 May 2023).

(b) Prior to occupation of a Block in a Phase (as identified in an approved Phasing Plan), the approved dwellings in that Block shall be built in accordance with the approved overheating measures ~~in line with the Sustainability and Energy Statement prepared by Buro Happold (HRW-BHE-GD-XX-RP-YS-0001, Revision 00, dated 18 February 2022 and 19 May 2023)~~ and retained thereafter for the lifetime of the development. This shall include:

- i. Natural ventilation, with 100% (bedroom) and 30% (LKD) of openable area at night;
- ii. Acoustic louvres for noise attenuated ventilation (30% free area);



- iii. Ceiling fans;
- iv. Glazing g-values of 0.35 and 0.30;
- v. Vertical side fins;
- vi. MVHR with summer bypass; ~~and~~
- vii. No active cooling; and
- viii. Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy.

Conditions 19 (living roofs), 24 (Circular Economy), 25 (Whole Life Carbon), 26 (renewable energy), 27 (PV) remain unchanged.

**New condition (in part to replace requirements in Condition 21 (Energy Strategy) and to strengthen requirements for DEN connection):**

**DEN Connection**

Prior to the above ground commencement of construction work, details relating to the future connection to the DEN must be submitted to and approved by the local planning authority.

This shall include:

- Further detail of how the developer will ensure the performance of the DEN system will be safeguarded through later stages of design (e.g. value engineering proposals by installers), construction and commissioning including provision of key information on system performance required by CoP1 (e.g. joint weld and HIU commissioning certificates, CoP1 checklists, etc.);
- A strategy for the supply of heat to any phases occupied before a connection is made to an off-site District Energy Network;
- A strategy that ensures heat can be supplied to the other sites within the High Road West masterplan area via this development site;
- Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification.
- Detail of the pipe design, pipe sizes and lengths (taking account of flow and return temperatures and diversification), insulation and calculated heat loss from the pipes in Watts, demonstrating heat losses have been minimised together with analysis of stress/expansion;
- A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings should cover details of the phasing including any plant

	<p>that needs to be removed or relocated and access routes for installation of the heat substation;</p> <ul style="list-style-type: none"> <li>• Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection is accessible by the area-wide DEN, detailed proposals for installation for the route that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts;</li> <li>• Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals;</li> <li>• Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DEN supply including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue;</li> <li>• Details of a future pipework route from the temporary boiler location to the plant room.</li> </ul> <p>Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.</p>	
<p>Conservation Officer comments</p>	<p><b><u>Introduction</u></b></p> <p>1. This Note is prepared on behalf of the Council in order to assist them in assessing heritage related impacts of the proposed development at The Goods Yard and The Depot 36 &amp; 44-52 White Hart Lane (and land to the rear), and, 867-879, High Road (and land to the rear), London, N17 8EY. They are referred to as ‘the Site’ from here on.</p> <p>2. The current proposal is for: 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.</p> <p>3. The Site benefits from three extant permissions, all of which are material considerations in the assessment of the current proposal, although none of them have been implemented.</p> <p><b><u>The Goods Yard, White Hart Lane: HGY/2018/0187</u></b></p> <p>4. The Planning Inspectorate allowed a hybrid planning application to deliver a residential led mixed-use scheme, delivering 316 homes across the 1.276ha site, with 1450m2 of non-</p>	<p>A low to moderate level of harm would arise to the North Tottenham Conservation Area. And a low level of harm would also arise to The Grange, 34 White Hart Lane, Grade II; Nos 797-799 High Road, Grade II; and, 819-821 High Road, Grade II.</p> <p>As per the NPPF paragraph 199, this harm has been afforded great weight. However, when the public benefits of the scheme are weighed in balance according to paragraph 200, clear and convincing</p>

residential uses. The proposal includes the refurbishment and conversion of the Station Master's House into a restaurant, and new neighbouring commercial building.

justification for the scheme is provided.

5. In their appeal decision notice the Inspector noted that:

*"The height and modern appearance of the towers could appear incongruous in some views given that the area's character owes much to the survival of a rare near continuous frontage of 2 modest 18th and 19th Century buildings of 2-4 storeys. However, the impact would be mitigated by the proposed set back of the taller buildings from the frontages so that they would appear to belong to an area of different character beyond the Conservation Area. A similar effect can already be seen in the Brook House development north of the site. I consider that the impact of the towers proposed in the appeal scheme will be similar. Whilst some harm would still arise to the setting and heritage significance of the Conservation Area that would be less than substantial harm.*

*Parts of the lower buildings on the appeal site could also appear above the rooflines of the frontage listed [The Grange (grade II)] and other buildings [Station Master's House (locally listed)] in some views from outside the Conservation Area including in views across White Hart Lane from Love Lane and William Street. They would be much closer to the buildings in the Conservation Area, but their lower height would result in a less dramatic contrast than would the towers. What effect these may have would depend on their final design, but they are also likely to result in some less than substantial harm to heritage significance by reason of their different bulk, scale and massing when compared to the modestly proportioned historic buildings on the frontage.*

6. He further considered the overall planning and heritage harm balance as required under the Framework and concluded that the public benefits would outweigh the less than substantial harm to the heritage assets.

7. The Appeal scheme was allowed on 28th June 2019.

The Depot (867-879 High Road) HGY/2019/2929

8. Permission has been given for a hybrid planning application to deliver 330 homes and 270m<sup>2</sup> of non-residential uses across the 1.2ha site. The proposal features 5 new buildings framing a central park with a café provided at ground level, and the refurbishment of the Grade-II Listed 867-869 High Road into 6 apartments. The landmark building along the railway line is 29 storeys.

9. At the time, the Council's Conservation Officer concluded that:

*"The proposed erection of new mixed-use block G and D is acceptable in principle depending on detailed design. The outline proposal for mixed-use blocks A, B, C, E does not allow to fully assess the heritage impact of these buildings on the settings of the heritage assets they will affect. From the submitted views, it is however evident that the scale, height and bulk of the proposed taller buildings A and B, especially the tower block B would dominate in the townscape within and around the conservation area.*

*This would affect the character and appearance of the conservation area and its heritage assets. Views of the conservation area's townscape and views of Grade II Listed Block F would be adversely impacted by the anomaly constituted by taller blocks A and B, however the intrinsic form and fabric of the heritage assets would not be affected, and the visually obtrusive new 3 buildings, whilst failing to preserve the settings of North Tottenham Conservation Area and the contributing setting of its heritage assets including Grade II listed properties at 867-869 High Road, would lead to less than substantial harm to their heritage significance.*

*The adverse impacts of the taller blocks on the settings of the heritage assets would be considerably mitigated by the enhancement of these settings through landscape design, laying out of public areas, by sensitively designed buildings G, D, by acceptably scaled block E and by the repairs and enhancements of the listed block F."*

10. Permission was granted on 25th September 2020.

The Good Yard and the Depot [HGY/2021/1771] (Appeal ref: APP/ Y5420/W/21/32896901)

11. An application was submitted combining the two sites, both with extant permissions, for the redevelopment to deliver 867 new homes, 2,040sqm (GEA) of flexible supporting commercial uses and new public and private open spaces. This application was refused by the Council's Planning Committee on 8th November 2021. The refusal was appealed and was subject to a public inquiry during July 2022, after the submission of the current application under consideration. The appeal was allowed on 24th October 2022.

12. The Inspector, in their decision, noted that:

*"I have found that the scheme would cause less than substantial harm to the North Tottenham Conservation Area, The Grange, 797-799 High Road and 819-821 High Road. With the exception of the Conservation Area where there would be a low to moderate level of less than*

*substantial harm, this would, in each case, be at the lower end of the scale.”*

13. He further stated:

*“I consider that the public benefits of the scheme clearly outweigh the above identified harm to designated heritage assets. The scheme complies with Paragraph 202 of the Framework and therefore, heritage does not form a clear reason for refusal for the purposes of Paragraph 11 d) i) of the Framework.”*

14. This extant permission is the most recent one for the Site and is given material consideration in this assessment.

#### High Road West, HGY/2021/3175

15. An application relating to the wider master plan area for High Road West was approved by the Council's Planning Committee on 21st July 2022. This scheme would deliver:

- Up to 2,929 high-quality, sustainable homes, including 60 affordable homes in the detailed and 35% affordable homes, by unit, increasing up to 40% by unit subject to grant funding;
- Between 7,225 sqm (GIA) and 41,300 sqm (GIA) of commercial/ community floor space, including a new library and learning centre creating training, up-skilling and employment
- A new public park measuring at least 5,300 sqm and a new public square measuring at least 3,500 square metres alongside other landscaped public realm and pedestrian/cycle routes equating to at least 33,300 sqm whereby safety and security is prioritised through well overlooked, lit and CCTV covered public realm

16. The scheme incorporates the previous extant permissions on Goods Yard [HGY/2018/0187] and The Depot [HGY/2019/2929].

#### Summary of Historic development

17. The High Road is the successor to Ermine Street, the Roman road from London to Lincoln and York. A settlement is recorded at Tottenham in the Domesday Survey of 1086, and a manor house existed by 1254, on or near the site of Bruce Castle. Known historically as Tottenham Street, the High Road was an important northern route into London, reflected in the number of inns that existed to service travellers. The linear settlement grew along the High Road and the village centre, as such, was marked by the adjacent Green and the High Cross, commemorating the medieval wayside cross that stood there.

18. By the 16th century Tottenham was a favoured rural retreat for city merchants, a number of

whom had mansions along the High Road, including the Black House, on the site of Northumberland Terrace, and Sir Abraham Reynardson's house in The Green. The High Road's development over the next two centuries reflects Tottenham's continuing attraction as a place of residence for wealthy Londoners. It also became noted for its schools, including several private boarding schools, and numerous charitable and religious foundations.

19. By 1844 the frontage from the parish boundary to White Hart Lane was densely built up. Back land developments of low-status terraces were emerging, notably around Love Lane and Church Road, probably housing workers at the lace factory, and Wagon Lane on the east side.

20. The advent of daily coach services to London in 1823, and omnibuses in 1839, made Tottenham attainable for less-affluent sectors of the middle class. A lace factory was built in 1810 in Love Lane, and a silk-factory five years later in Factory Lane to the east, which became a rubber mill in 1837. Brewing was established in the mid-19th century, but subsequent industry was limited and small scale.

21. The Northern & Eastern Railway, opened in 1840, promoted some eastward spread from the High Road, most notably Northumberland Park; by 1864 no fields bordered the High Road north of Tottenham Green. The opening of the Liverpool Street-Edmonton branch of the Great Eastern Railway in 1872, with reduced workmen's fares, instigated a development boom in Tottenham, targeted mainly at the lower-middle and skilled working classes. By 1894 much of the hinterland of the High Road, particularly the west side, was developed with terraced housing, and by 1913 the land between the High Road and Tottenham Hale was extensively developed.

22. From the mid-19th century, the High Road's character was incrementally transformed as dwellings acquired ground-floor shops or were converted to other uses, purpose-built shopping parades appeared, and ancient hostelrys were rebuilt as modern pubs. By 1914 the street boasted the whole range of commercial and public buildings appropriate to a populous London suburb. A significant arrival was Tottenham Hotspur FC, which moved to its present site, a former plant nursery, in 1913. The outward spread of housing continued apace in the inter-war years; by the 1930s the fields, orchards and gardens between Tottenham and Wood Green had all but disappeared.

### **Emerging Context**

23. Tottenham was identified in the London Plan and Haringey's Strategic Policies Local Plan (2013) as a key regeneration area within the capital capable of accommodating significant

growth. The area was identified as one of them most deprived areas of England with several challenges including unemployment, crime and overcrowded housing. The regeneration of the area was to target these socio-economic issues by creating a new world class destination in north London.

### **Heritage and Assets and Summary of Significance**

24. Amongst the heritage assets, following were deemed crucial:

- North Tottenham Conservation Area
- The Grange, 34 White Hart Lane, Grade II
- Nos 797-799 High Road, Grade II
- 819-821 High Road, Grade II
- 867-869 High Road, Grade II
- Station Masters House, No 52 White Hart Lane (Locally Listed)

25. Their summarised significance are discussed in the following paragraphs.

### **North Tottenham Conservation Area**

26. The North Tottenham Conservation Area includes a number of Georgian and Victorian buildings, some of which are listed and front the High Road and parts of White Hart Lane. A principal feature of the Conservation Area is the historic linear continuity of buildings either side of the High Road and the character of the townscape and its sense of spatial sequence highlighted by the mix of Victorian and Georgian buildings that help to give the street its scale and sense of place.

The Grange, 34 White Hart Lane, Grade II

27. This is a group of buildings with Nos 32 and 34a to its either side, and form a prominent group along the north side of White Hart Lane. They represent one of the earliest developments within the area, and have both architectural and historic significance; the former derived from the building's period and detailing, and the later from its period of construction and survival.

28. As a group of buildings, the Grange remains prominent on the north side of White Hart Lane. The homogeneity of the domestic scale and materials form a strong group with other buildings to its east. To the west, however, this sense of uniformity and tight street frontage is entirely lost. Although the western elevation was always open, the ancillary activities to the rear have continued to give visual and functional prominence to the building. This hierarchy in the scale

and function, between front and back, is an important part of the building's setting and contributes positively to its significance.

797-799 High Road, Grade II

29. These constitute an early 18th Century pair of former houses, part of a varied mix of domestic buildings along the northern section of the High Road. These form a group and are representative of the Georgian period of the area's development.

30. The buildings are considered to be of high significance, both pertaining to their own interest and the contribution they make to the conservation area. Like most High Streets (or equivalent) there is a definite hierarchy between activities and uses, with those along the frontage being more prominent and the rear more ancillary.

819-821 High Road, Grade II

31. These are also an early 18th Century pair of houses with alterations with 19th century shop fronts. They form a group with the domestic buildings of same period and architectural features. In particular, the symmetrically arranged pair evidences the slightly higher quality houses displaying the formality, stature, and proportions typical of the Georgian era of the area's development.

32. The building's location at the intersection with Northumberland Park allows them to be viewed and appreciated when approaching from the east. Long distance axial views, terminating at the buildings and the heavily trafficked High Road hint at the approaching abrupt change in the character from a quiet residential street to a busy thoroughfare.

33. The buildings are considered to be of high significance, both pertaining to their own interest and the contribution they make to the conservation area. The buildings' symmetrical façade make them an attractive pair that actually stands out pleasantly within the western part of the High Road. As with No 797-799, their function and appearance follow the established hierarchy of activities along the High Road, with the rear remaining ancillary.

867-869 High Road, Grade II

34. This is a pair of early 18th Century houses, with three storeys and basement. The houses have high pitched roofs making them prominent of the street. As the northernmost buildings on the west of the High Road, Nos. 867 and 869, form an attractive and prominent pair of 18th



century properties of three storeys plus basement.

35. Its position in the High Road, at the northern end, gives it prominence, terminating views of the High Road from south. It is also a key building when viewed from the north, entering into the borough from Enfield. The building alongside the High Road form a harmonious composition and group that provide townscape value of high quality. Overall, it is considered to have high architectural interest. It also has high townscape and group value.

No 52 White Hart Lane, The Station Master's House (locally listed)

36. No. 52, a detached two-storey house built as the Station Master's house following the opening of White Hart Lane station in 1872. The house appears to be in good condition, in yellow stock brick with gauged brick flat arches over the sash windows and a slate roof. The high stock-brick wall on the frontage also appears to be original.

37. The building has architectural and historic significance as a surviving example of railway based domestic development, alongside the wider historic development of Tottenham.

### **Current Proposal**

38. The current proposal is for a similar development, approved by the Planning Inspector in 2022. The main changes pertain to the material palette as raised by the Inspector in the most recent appeal scheme [APP/ Y5420/W/21/32896901], and additional alterations to address concerns of fire safety. These include:

- An increase in building envelope to accommodate the additional stair cores. Where an increase is necessary, this is importantly consistent with (and within) the building envelopes consented by the Appeal Scheme.
- Inclusion of an additional storey (and shoulder storey) to the Goods Yard south tower, to improve overall tower composition.
- Moving The Depot tower further away from Rivers Apartments to its north by c. 1m.
- Reconfiguration and enlargement of basement to accommodate additional lift and stair core requirements. All parking is now provided at basement level.
- Minor changes to the overall residential unit mix, but with the overall number of residential homes remaining unchanged at 844. A fast-track, policy compliant level of affordable housing would continue to be provided as explained further below. 8
- A subtle reworking of the facades including use of a slightly lighter tone of materials, but importantly retaining the design principles of the Appeal Scheme.

- Minor consequential changes to landscaping to align with the above.

### **Heritage Impact Assessment**

39. The heritage impact assessment has been undertaken in accordance with the NPPF policies 189-201 alongside relevant guidance contained within the PPG and Historic England publications. In particular, to assess the impact of the development on the setting of the asset, the following has been applied:

- Historic England Guidance as set out in GPA 3: The Setting of Heritage Assets (2017) requires assessing the effects of the proposed development on significance through generating change within the settings of these heritage assets, in visual, experiential and interpretative terms.

40. The proposal is not considered to materially different from that allowed by the Inspector in October 2022. The overall impact of the proposal is therefore considered to be the same, with minor improvement in terms of the materiality and façade, an issue raised by the Council and accepted by the Inspector.

41. Similar to the previous proposal and as concluded by the Planning Inspector, the towers, by virtue of their height, breadth and massing would result in an abrupt change in scale compared with the prevailing local townscape and that this would have an incongruous effect in a number of views and would diminish the spacious and modest character of the surrounding area. Whilst the minor revision in the palette would help in further articulating the façade, their impact on the identified heritage assets would remain similar.

42. As a result, a low level of less than substantial harm would arise to

- The Grange, 34 White Hart Lane, Grade II
- Nos 797-799 High Road, Grade II
- 819-821 High Road, Grade II

43. A low to moderate level of harm would arise to North Tottenham Conservation Area.

44. Given the improvement to their settings, the proposal will have a neutral impact on Nos 867-869 High Road (Grade II) and the locally listed Station Master's House at 52 White Hart Lane.

45. In accordance with paragraphs 189-190 of the NPPF 2019, the proposal would cause a low level of less than substantial harm to Nos 797- 799 High Road, 819-821 High Road and The

	<p>Grange, 34 White Hart Lane. A low to moderate level of less than substantial harm would to the North Tottenham Conservation Area. In accordance with Paragraph 199 of the framework, great 9 weight should be afforded to this harm. This harm should be weighed against any public benefits as per Paragraph 200 of the framework.</p> <p><b><u>Conclusion</u></b></p> <p>46. The scheme is a revision from a previous scheme, allowed by the Planning Inspector. Most of the alterations are minor and pertain to the latest health and safety requirements, including the need for a second stair core for any building higher than 30m as per Mayor’s policies.</p> <p>47. The proposal has been re-assessed considering the Planning Inspector’s decision and it is concluded that a low to moderate level of harm would arise to North Tottenham Conservation Area. A low level of harm would also arise to The Grange, 34 White Hart Lane, Grade II; Nos 797-799 High Road, Grade II; and, 819-821 High Road, Grade II.</p> <p>48. As per the NPPF paragraph 199, this harm should be afforded great weight and public benefits should be weighed in balance according to paragraph 200.</p>	
<p>LBH Design Officer comments</p>	<p><b><u>Summary</u></b></p> <p>These proposals are refinements of a previous scheme refused by the council and subsequently approved by the government appointed planning inspector at an appeal, itself an elaboration on two previous approved schemes, based on an adopted masterplan. They represent a well thought through and elegantly designed response to a significant site. The masterplan and layout of this proposal represents an improvement on the existing adopted masterplan, with a clear, legible street network and an enlarged park. It also improves on the approved hybrid schemes for each of the individual Goods Yard and Depot sites, particularly the former, and on the earlier version of this combined scheme refused by the council &amp; subsequently approved by government inspectors, on appeal.</p> <p>The proposed street layout is particularly improved over the original Goods Yard scheme, where the single sided street proposed in both adopted masterplan and that 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 development are 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 taller blocks.</p>	<p>Support noted.</p>

The proposed mix of heights include three tall building at 27, 32 and 29 storeys, the same height as the scheme approved at appeal; whilst the northernmost tower, The Depot Tower, is moved to the south and west so that is less close to the neighbouring existing high-rise residential block than the scheme approved on appeal. This is successfully justified in accordance with Haringey policy.

In particular, the detailed design of the three towers represent a tremendous improvement on the illustrative schemes in the previous hybrid approvals and previous combined scheme approved at appeal. They 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, in all cases somewhat more so than the previous scheme. 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.

All the Quality Review Panel (QRP) concerns raised with the proposals have been successfully resolved. Communal entrance doors are all now designed to be clear, legible and inviting, all flats have good aspects, outlooks and private amenity spaces, with balconies or terraces always available off living rooms and designed to provide privacy and hide residents' clutter. The proposals have also been successfully shown to not have any significant detrimental effect on existing neighbours, considering that this has long been planned for major change, with the High Road West Masterplan Framework developed in 2014, and are further off-set than the scheme approved on appeal. Daylight, sunlight and wind assessments show only minor effects compared to the expectation of development previously agreed.

#### **Principal of Development, Masterplanning and Street Layout**

1. Notwithstanding the weight of council policy emphasising that only comprehensive development of the whole of this allocation site is sought, this application builds on three previous approvals; for the Goods Yard site, (what is now known as) The Depot site, which together cover the whole of this application site, and the previous combined scheme approved at appeal. The planning inspector who granted the appeal on the Goods Yard site concluded that as proposals were in accordance with the adopted Masterplan Framework, and the Council took the same view on the subsequent application for the 867-879 High Road, now known in this application as "The Depot".
2. This proposal, therefore, in amending those two earlier previous approvals, like the scheme approved at appeal, takes the proposals closer to the principle of masterplanning, tying the two sites more closely together in street pattern and building form, particularly in the heights of the taller buildings.

3. These proposals, like the appeal scheme, particularly improve on the previous approvals and the existing adopted masterplan in the street layout of the Goods Yard element, by moving the main north-south street of this part of the development away from the western boundary, where it was to run alongside the railway edge, creating a one-sided street lacking the usual animation. This allows the buildings, including the taller blocks, to be moved up to the railway edge, buffering the railway noise more completely from the rest of the wider development site. Being next to the railway and its wooded embankments, the tall buildings have less impact on sensitive neighbours. It also matches the arrangement in both the approval on the Depot site but also the built Cannon Works site immediately to the north with their tallest buildings against the railway edge.
4. The new main north south street of the Goods Yard element is now proposed to run along the eastern edge of the applicants' site, on the western boundary of the Peacock Industrial Estate, in different ownership but also part of the site allocation and adopted masterplan, so therefore also expected to be redeveloped in the short term. To demonstrate this is possible and viable, the applicants include a masterplan showing how the Peacock site could be redeveloped with blocks of similar height. The applicants have committed to permit blocks on the Peacock to open off this new north-south street. Whilst in the short term this development, if built before anything on the Peacock, would have residential and commercial properties on the west side of this street facing the blank back wall of the Peacock, it can be expected soon to become a two-sided street with active frontage and front doors on both sides. This new north-south street also connects better at either end, via small squares to resolve the alignment; at the southern end the small square allows the small dogleg to the west, onto a direct street off White Hart Lane between the two buildings of heritage, The Grange and Station Masters House. At the northern end a second small square allows a short east-west street, hard against the northern boundary of the Peacock, to link into the park proposed in the masterplan and approved layout of The Depot.
5. The street layout of The Depot is essentially unchanged, with its primary connection being to the High Road as a continuation of Brantwood Road, forming a crossroads. Streets continue to connect to the Cannons site to the north at the north-eastern and north-western corners of the park. The masterplan in this application shows the east-west street at the northern edge of the Peacock site could be continued directly eastwards through to the High Road via another part of the site allocation likely to be redeveloped, currently a timber yard, whilst two further east-west streets on their masterplan would connect the southern square and the pocket park / entrance court to their southern tall building with the two existing narrow alleys off the High Road; Percival Court and Brunswick Square. The potential for the park to be directly connected to White Hart Lane via a second north-south street to the east of The Grange remains on the masterplan but is also outside this applicants' ownership.
6. Whilst the key north-south street of the development contains two doglegs, preventing it being the *ideal* direct route, this layout aligns well with land ownership and creates

developable plots both within this applicants' ownership and on the rest of the site allocation. It is also a more direct and less convoluted north-south route than in the adopted masterplan and approved scheme for the Goods Yard. At the northern end, on The Depot, the direct connection of that site's main east-west street with the desired landing point of a footbridge over the railway becomes somewhat less direct, with the applicants' provision for the bridge instead landing in their northern square. The desire for a bridge is only an aspiration, but if delivered within this application's masterplan, the east-west connection would be *marginally* less direct, but the connection south-eastwards would be improved. Until the bridge can be delivered, this layout removes the dead-end element of the east-west street in The Depot. As a whole, this application represents a considerably improved street layout than the two separate schemes, in a logical and coherent masterplan, consistent to the *spirit* of the adopted masterplan.

### **Form, Bulk & Massing**

7. Across the site, bulk and massing increases with height from the smallest, most fine grained and lowest rise buildings on the High Road at the eastern end of the Depot site and the southern end of the Goods Yard site, where in both cases retained existing buildings of significant heritage value face the main existing streets of the High Road and White Hart Lane, to the most dominant bulk of the highest rise blocks, embedded into podia and lower rise shoulder wings tying them into the wider grain, within this application site and the masterplan, of mansion blocks lining the streets and squares of the development. These mansion blocks rise from three and four storeys immediately beside and behind the retained buildings on White Hart Lane and the High Road to five, six and seven storeys, with Depot Block B, which forms a shoulder to the northern tower on the western edge of the park, rising to 9 storeys. This is a very reasonable range of heights for the proposed low to medium rise elements of the proposal.
8. That the tallest lower block, Block B of The Depot, is facing the park, a reasonable proposition, having a large open space in front. It suggests, as is shown in their masterplan, higher buildings on the west side of the park, with 6 storeys on the east side. This suggests the park will have the best sun in the morning and early afternoon but creates more viable potential development on the main remaining neighbouring site, the Peacock Estate, despite the remaining sites not being suitable for tall buildings, 9 storeys being the absolute maximum height accepted anywhere else within the site allocation north of White Hart Lane.
9. In form, these lower rise elements line the proposed streets squares and park, defining street edges and corners, in a block pattern, but avoid continuous walls of buildings by leaving gaps between, creating glimpses into courtyards and podium gardens. This allows better day and sunlight access to streets, squares and courtyards, and allows intriguing glimpses, and breathing space to retained existing buildings, notwithstanding that these gaps are gated where they are not podia, preserving clear definition of public and private space. In

form, bulk and massing of the lower storey elements, the QRP considered the proposals to be broadly acceptable.

**Tall Buildings, especially Height, Form and Composition**

10. Three tall buildings are proposed, of 27, 32 and 29 storeys, the same height as those in the scheme approved on appeal, and are arranged from south to north, along the western (railway) edge of the site. Here the railway sits on an embankment, wooded on both sides, and the building blocks, containing the tall buildings, are set back from the boundary to allow a landscaped strip, so that the nearest existing houses west of the railway are over 40m away and separated by the embankment and its trees.
11. The three tall buildings will form a row, with the existing River Apartments tower just to the north forming a fourth. The plan of each tower is strongly aligned north-south, around 40m wide (north-south), but under 20m deep (east-west), with the formerly widest central tower reduced by a further 3m in plan width compared to the refused scheme. Their plans are also chamfered, to accentuate their slenderness from the north and south, and the north (Depot) tower has been moved 2m west and 1.5m south compared to the appeal scheme, further away from Rivers Apartments. The gaps between each, including to Rivers Apartments, south to north, are 33m, 23m & 33m.
12. The applicants have been able to show this avoids “coalescence”; the effect of views of the towers merging together as they overlap, except in a narrow cone of views from the south-south-west and north-north-east, directions where there happen to be relatively few sensitive viewing points. The main views will be from the High Road to the south and north, Northumberland Park to the east, and from White Hart Lane and Tottenham Cemetery to the west, in all cases from where they will be clearly separated.
13. From the east and west, the row of 4 towers form a “double curve” formed by each tall building having taller and slightly lower elements forming a “top” or crown and “shoulders” of slightly different heights, formed by each tower’s northern and southern “cloaks” where their width expands below their crowns. These curves inscribe a rise from White Hart Lane, through the southern tower (Goods Yard Block B, through the tallest tower (Goods Yard Block A), the slightly lower third tower (Depot Block A), to Rivers Apartments.
14. The crowns in each tower have been made slenderer since the appeal scheme, to reduce the mass at high level and increase the sky gap in distant views. A further subtle change has raised the lower, southern shoulder to improve perception of height and proportion. Changes to vertical core materiality & expression through reduction of vertical elements & lighter colour tone applied to all the core and crowns of all three towers further visibly lighten the tall buildings, especially their crowns.
15. Considering each criterion from Haringey’s tall building policy is set in SP11 of our Strategic Polices DPD (adopted 2013 (with alterations 2017) and DM6 of our Development

Management DPD (adopted 2017), skipping the 3<sup>rd</sup> & 4<sup>th</sup> bullets from the Strategic Policies, that reference the other document and the document used in preparing DM6:

- The site is within the areas of both the adopted Tottenham AAP and the adopted Masterplan Framework. Both support the principle of tall buildings in this location. The adopted Masterplan Framework established in 2014 a principle that it would be acceptable to have a row of five tall and taller buildings alongside the edge of the railway in the High Road West area of North Tottenham, with the height of those towers dropping away to prevailing existing heights two – four storeys) at White Hart Lane and rising in height north and south. The Masterplan Framework suggested the row of towers north of White Hart Lane should rise to a highest tower at the northern end of the redevelopment area the then Canon Rubber Factory site. As it happened, that site was built out first, being completed in 2015, with its highest block, River Apartments, at 22 storeys. Since then, housing targets, density expectations and public transport accessibility have improved and it is therefore suggested heights could increase, and that it would not be out of place for the row of towers to rise higher in the second and third towers and then drop away;
- The council prepared a borough-wide Urban Characterisation Study in 2016, which supported tall buildings in this location, right beside the railway edge, well away from the High Road with its sensitive heritage, dropping in height closer to White Hart Lane. The Characterisation Study recognises that the railway forms a significant barrier and buffer between the two sides, with the west side a much quieter, and therefore lower rise neighbourhood than the east, as well as the railway corridor being at its widest beside this site, giving a much greater distance of 40-70m, with the broad, wooded embankments providing further buffering between the two areas;
- High quality design especially of public realm is considered above in paras. 1-9, the protection of views below in paras. 20-22. Heritage assets and their settings are covered by the Conservation Officer's comments;
- The tall buildings will be capable of being considered "Landmarks" by being wayfinders or markers within the masterplan, closing vistas of the east-west streets, the main north-south street, marking the new development with its new park from the south, west and east, and marking White Hart Lane station from the north;
- They will also be capable of being considered a "Landmark" by being elegant, well-proportioned and visually interesting when viewed from any direction, following improvements to their design since the appeal, as discussed above and below;
- Consideration of impact on ecology and microclimate encompasses daylight, sunlight and wind, examined in detail from para. 28 onwards, which explain the impact is not significant. Impact on ecology could also include impact on the flight of birds and other flying creatures, but this is only likely to be relevant adjacent to open countryside, a large open space or open waterway, which this is not;



- The proposed tall buildings will be in *some* proximity to the built River Apartments, but this is by design to produce an intended effect of a row of tall buildings and has been increased in this proposal compared to the appeal scheme. They will be sufficiently far apart though, at 33m, 23m & 33m, from each other and Rivers Apartments, and are slenderer in width east-west, to avoid detrimental effects of proximity and in any case are a line of aligned, north-south proportioned towers; there would be no canyon effect as their short sides would be the ones facing each other;
- And the urban design analysis and 3d model views of their proposal satisfactorily shows that the towers could be a successful and elegant landmark, creating the planned row of tall buildings.

16. The detailed design of the three towers has undergone extensive revision and refinement, in conjunction with numerous workshops with Officers, during the course of this application and the previous (appealed) application. The principal concept for the composition of the proposed towers was of a core and two cloaks of contrasting materials, colours and fenestration, so that when viewed from the east and west, where they would be at their broadest, each tower would take on the appearance of three slender elements rather than one fat element. The two cloaks would also start higher, only from above the podium and/or shoulder blocks, and finish lower than the core; the core would then form a distinctive base and top, contrasting with the cloaks' middle. Aligning the entrance with the core in some instances further demarcates and celebrates their entrances, and the differences in height, of 2-4 storeys, echoes the single storey difference in height of the different elements of River Apartments in the "curve" mentioned above.

17. For the design to be successfully "read" in more distant views, there has to be a significant contrast between the cloaks and core. However, it would not be desirable for the proposals to consist of too many sharply contrasting, discordantly differently coloured and garish elements. The initial proposal was for each tower to be in a sharply contrasting, different colour; in terracotta orange, a vivid green and rich blue, from south to north, with the cores in each tower white. The colours would come from glazed ceramic cladding, in complex moulded forms creating a finely detailed frame. This could look spectacular close-to, but in the design of tall buildings, more distant views are more relevant, as they are more likely to be experienced.

18. Therefore, the detailed design and colours of the proposed cladding and the patterns of the proposed fenestration have been significantly amended to much better express the intended composition. The ceramic areas of cladding have been simplified and broadened out to create a greater expanse of colour to contrast more with the framed, skeletal form of the core, and the colours have been simplified so each tower has a similar tone of terracotta to contrast with the white-grey core, and the base of the cloaks have been raised slightly above the plinths/shoulders to create a shadow gap. The effect is that they are a family of towers, in complimentary earthy tones, made up of sharply contrasting core and cloaks that

accentuate their slenderness and disguise their broadness, and read clearly in more distant views, with a clearly distinguishable base, middle and top, entrance, body and crown.

19. Therefore, the proposed tall buildings are considered appropriate in this location, legible as landmarks and as part of a wider composition, striking and distinctive in design, in support of meaningful aspects of the design and of high-quality architectural design capable of being seen as beautiful.

#### **Local, Wider & Strategic Views**

20. London and Borough Strategic View Corridors all happen to be distant from this development, and therefore are not considered to be affected by this development.
21. A series of 31 locations for Local and Wider Views of the proposal were agreed between Council Officers and the Applicants team early in the pre-application process. The applicants have included updated images of all the views showing the scene now, the view with just this scheme added, the view also with other approved schemes (the Tottenham Hotspur Stadium and associated developments) and the view also with the adopted masterplan, and even of other neighbouring developments on the drawing board (the Lendlease "High Road West" scheme). These have all been updated with the amendments made in this application compared to the recently appealed application and are clear demonstrating the benefits from the changes in this application compared to the refused scheme.
22. In particular, it also needs to be borne in mind that the three previous applications approved for this site included tall buildings; for the Goods Yard not to this height but to the same height for 867-879, now known as The Depot, and the earlier combined scheme, and these were assessed as part of those applications and found acceptable (in the latter case by the inspector at an appeal). It is therefore relevant to compare the views of this proposal with views of already approved proposals for this site,
23. The views demonstrate that this proposal would not be visible in many sensitive views, and in those where it would be visible, the three new towers would be seen alongside the existing River Apartments tower, and/or the other approved towers would already be visible. In general, their impact would therefore not be detrimental to views where other taller buildings can already be seen, except that it would help turn those into a coherent row of tall buildings, fulfilling the wayfinder or marker function mentioned as one of the advantages of the proposal noted above.

#### **Residential Quality (flat, room & private amenity space shape, size, quality and aspect)**

24. All maisonette, flat and room sizes are designed to comply with or exceed minima defined in the Nationally Described Space Standards. This is as is to be routinely expected.
25. All dwellings (excepting flats converted from the listed nos. 867 & 869 High Road, as previously approved) meet or exceed the private external amenity space in the London Plan,

with private gardens, balconies or roof terraces. Privacy of amenity space is achieved by most balconies being recessed, and those that are not being at least partially solid balustraded. All flats have balconies off their living rooms, although some also have second balconies off a bedroom. Many flats have larger roof terraces, exploiting the design which permits roof terraces in the steps, on the roofs of shoulders or on podia.

26. There are no single aspect north facing flat in the whole proposed development. There would be some single aspect south facing one bedroom flats, but no south facing larger single aspect flats; this is a reasonable outcome for a higher density urban scheme where some of the blocks are inevitably aligned to an east-west street, and they are designed with passive solar shading and natural ventilation showing in the applicants' assessment they would not suffer overheating. All other flats and maisonettes are at least dual aspect, many triple aspect, an exemplary achievement in such a high density urban development.
27. There is also access to doorstep private communal amenity space, including doorstep playspace, within the development. Many blocks benefit from a private roof terrace, set-in from the sides and screened from neighbouring existing dwellings but providing a large area of amenity space, including an area with informal play equipment. The development has access to the central park, which will also contain older childrens' play, large lawns, seating and planting.

#### **Daylight, Sunlight and Wind Microclimate**

28. The applicants provided updated Daylight and Sunlight Reports on levels within their development and the effect of their proposals on relevant neighbouring buildings, prepared in accordance with council policy following the methods explained in the Building Research Establishment's publication "Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice" (Littlefair), known as "The BRE Guide". Since the applicants' previous schemes, a significantly updated BRE Guide has been prepared; the 3<sup>rd</sup> edition (2022), replacing the 2<sup>nd</sup> edition of 2011. For this application the proposals have been assessed using the new methodologies of the new BRE Guide as well as under the old methodologies (where they have changed), to enable comparison.
29. Their assessment finds reasonable levels of daylight and good levels of sunlight achieved throughout the detailed parts of the proposed development. For daylight, the applicants' consultants tested all of the habitable rooms to all of the dwellings on the lowest floor of every proposed block (304 rooms) and a typical floor in the upper parts of the three tall blocks (61 rooms). This found that 192 of the rooms tested (48%) met the definition of good daylight levels in the 2022 BRE Guide; extrapolated for the total dwellings across the development, including the untested majority on upper floors, 68% should receive good daylight. It should be noted that this assumes the strictest criteria of illuminance levels of 200lux for Living-Dining-Kitchens; where the more reasonable recommended level for Living Rooms, 150lux,

often known as “alternative target values”, is applied, 211 rooms (53%) meet the definition of good daylight.

30. When the scheme that was subsequently refused by the council, only to be approved by the inspector on appeal, was assessed, under the now-withdrawn 2011 BRE Guide, 81 and 80% of habitable rooms (177 out of 220 & 176 of 220 rooms) met the daylight levels recommended for average daylight factor (ADF) and daylight distribution respectively. Those that fell short all fell marginally short, by a few fractions of a percent, for instance with all Living/Dining/Kitchens that do not meet the strict 2% recommended ADF for kitchens achieving 1.5% which is the recommendation for living rooms. However, testing this proposal according to the superseded 2011 guide finds that 61% of habitable rooms would pass the strict test and 71% pass the more reasonable one.
31. In the case of higher density developments, it should be noted that the BRE Guide itself states that it is written with low density, suburban patterns of development in mind and should not be slavishly applied to more urban locations; as in London, the Mayor of London’s Housing SPG acknowledges. In particular, commenting on the 2011 Guide, the 27% VSC recommended is based on a low-density suburban housing model and in an urban environment it is recognised that VSC values in excess of 20% are considered as reasonably good, and that VSC values in the mid-teens are deemed acceptable. Paragraph 2.3.29 of the GLA Housing SPD supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city. Therefore, full or near full compliance with the BRE Guide is not to be expected, and for an unavoidably high-density development such as this, in one of Haringey’s most important growth areas, with significant amounts of new outdoor amenity space included along with major new social infrastructure and town centre attractions on the doorstep of the proposed new dwellings, these levels of daylight should be considered acceptable.
32. For sunlight, much better results were achieved, with 103 of 123 dwellings assessed (83%) achieving the 2022 BRE Guide recommended sunlight levels., which can be considered an excellent result given that the scheme was essentially designed before the update to the guide. The main change between the 2011 and 2022 Guides on sunlight is that the latter only asked that living rooms facing within 90° of due south achieve the recommended sunlight levels, whereas the new version asks for that for one habitable room in all dwellings. Previously, 89% of living rooms (57 out of 64) met sunlight levels, before these latest and neighbouring design changes.
33. There is no assessment on neighbours as there is no change likely to existing residential neighbours that will be different to the approved schemes. This is because the only close neighbours are the housing on the former Canon Rubber Factory site, including Rivers Apartments, which are immediately to the north of the parts of The Depot site that are only better than the approved scheme.

	<p>34. To assess the impact of the proposals on wind microclimate, the applicants carried out wind tunnel testing of a physical model and measured the findings against long term wind statistics applicable to the site, in accordance with the industry standard “Lawson” criteria. Their assessment finds that the proposed towers will cause significant downdrafts and tunnelling of wind along the ground at the northern square, the north-west corner of the park and close to Rivers Apartments. The applicants have therefore designed their landscaping plans to include a substantial area of landscaping at these locations, that would mitigate this downdraft effect, and allow safe conditions in building entrances and pedestrian areas.</p>	
<p>LBH Carbon Management - Pollution</p>	<p><b><u>Re: Planning Application HGY/2022/0563 at The Goods Yard and The Depot 36 &amp; 44-52 White Hart Lane and 867-879 High Road N17 8EY</u></b></p> <p>Thanks for contacting the Carbon Management Team (Pollution) regarding the above planning application for the 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 and I will like to comment as follows.</p> <p>Having considered all the supportive information especially the Site Construction Management Plan prepared by Arcadis dated February 2022, Environmental Statement Volume 1 prepared by Quod with reference Q200705 dated February 2022, Environmental Statement: Non – Technical Summary prepared by Quod dated February 2022, Design and Access Statement dated February 2022, Land Contamination Assessment (Phase I) with reference HRW-BHE-GD-XX-RP-CG-002 Revision P00 prepared by Buro Happold Ltd dated 18<sup>th</sup> February 2022 taken note of sections 6 (Preliminary Geo-environmental Risk Assessment) and 7 (Conclusions &amp; Recommendations), Sustainability and Energy Statement with reference HRW – BHE – GD – XX – RP – YS – 0001 Revision P00 dated 18<sup>th</sup> February 2022 taken note of the proposed installation of PV, Air Quality Positive Statement with reference HRW – BHE – GD – XX – RP – YI – 0001 prepared by Buro Happold Ltd dated 17<sup>th</sup> February 2022, the Air Quality Assessment Report with reference HRW – BHE – GD – XX – RP – YI – 002 prepared by Buro Happold Ltd dated 17<sup>th</sup> February 2022 taken note of sections 6 (Mitigation Measures) and 7 (Conclusions), Environmental Statement Addendum Addendum with reference Q200705 prepared by Quod dated May 2023 which explained assessment of potential implications of the ‘amended scheme’ and an additional cumulative assessment of the amended scheme as well as the update to Land Contamination Assessment (Phase I) with reference HRW-BHE-GD-XX-RP-CG-002 prepared</p>	<p>Conditions and heads of terms recommended.</p>

by Buro Happold Ltd dated 18<sup>th</sup> May 2023 taken note of sections 6 (Preliminary Geo-environmental Risk Assessment) and 7 (Conclusions and Recommendations) which stated there is no changes to February 2022 report, **please be advise that we have no objection to the proposed amended development scheme but the following planning conditions are recommend should planning permission be granted.**

### **1. Land Contamination**

Before development commences other than for investigative work:

- a. Using the information already submitted in update to Land Contamination Assessment (Phase I) with reference HRW-BHE-GD-XX-RP-CG-002 prepared by Buro Happold Ltd dated 18<sup>th</sup> May 2023, an intrusive site investigation shall be conducted for the site using information obtained from the desktop study and Conceptual Model. The site investigation must be comprehensive enough to enable; a risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing the remediation requirements.
- b. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.
- c. Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and;
- d. A report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied.

**Reason:** To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.

### **2. Unexpected Contamination**

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

**Reasons:** To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination

sources at the development site in line with paragraph 109 of the National Planning Policy Framework.

**3. NRMM**

- a. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at <http://nrmm.london/>. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.
- b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.

**Reason:** To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ

**4. Demolition/Construction Environmental Management Plans**

- a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst
- b. Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority.

The following applies to both Parts a and b above:

a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).

b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include:

- i. A construction method statement which identifies the stages and details how works will be undertaken;
- ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority

shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays;

- iii. Details of plant and machinery to be used during demolition/construction works;
- iv. Details of an Unexploded Ordnance Survey;
- v. Details of the waste management strategy;
- vi. Details of community engagement arrangements;
- vii. Details of any acoustic hoarding;
- viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance);
- ix. Details of external lighting; and,
- x. Details of any other standard environmental management and control measures to be implemented.

c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on:

- i. Monitoring and joint working arrangements, where appropriate;
- ii. Site access and car parking arrangements;
- iii. Delivery booking systems;
- iv. Agreed routes to/from the Plot;
- v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and
- vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the Plot during the demolition/construction phase; and
- vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching.

d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:

- i. Mitigation measures to manage and minimise demolition/construction dust emissions during works;
- ii. Details confirming the Plot has been registered at <http://nrmm.london>;
- iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection;
- iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection);
- v. A Dust Risk Assessment for the works; and
- vi. Lorry Parking, in joint arrangement where appropriate.

**The development shall be carried out in accordance with the submitted Site Construction Management Plan which can form part of the information to be consider for the discharge**



**of the attached Demolition/Construction Environmental Management Plans condition.**

**Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out.**

**Reason:** To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality.”

**Informative:**

1. Prior to demolition or any construction work of the existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.

Stakeholder	Comment	Response
Lead Local Flood Authority (LLFA) / Principal Engineer - Flood & Water Management	<p>Thank you for re-consulting us on the above FULL planning application reference number HGY/2022/0563 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 at the Goods Yard and The Depot 36 &amp; 44-52 White Hart Lane (and land to the rear), and 867-879 High Road (and land to the rear) N17 8EY.</p> <p>It is understood that the proposals and associated supporting documents have been amended to reflect the scheme resubmitted on 22 May 2023. Having reviewed the applicant's submitted documents outlined below:</p> <p>1) Flood Risk Assessment document reference number HRW-BHE-GD-XX-RP-CW-0003, 0049225 Revision P01 dated 12 April 2022  2) Drainage Strategy document reference number HCC-BHE-XX0XX-RP-C-000001, 0044501 Revision 02 dated 15 March 2023  3) Drainage Strategy document reference number HRW-BHE-GD-XX-RP-CI-0001, 0049225 Revision 00 dated 18 February 2022</p> <p>Prepared by Buro Happold Consultant, we are content with the re-submission, and we have no further comments to make on the above planning application. If the scheme is to build as per the above submitted documents, the impact of surface water drainage will be addressed.</p>	Noted.
School Place Planning Lead	As with my last response for HGY/2022/3175 I don't have any particular comments from a place planning perspective at this stage. We have 5 primary schools in close proximity to Northumberland Park with large surpluses and our annual place planning projections from the GLA take into account future housing trajectories.	Noted.
LBH Transportation	<p><u>Overview</u></p> <p>Transportation have reviewed this application. Since the previous planning application (reference HGY/2021/1771), a number of changes and additions have been incorporated, namely:</p> <ul style="list-style-type: none"> <li>• A small reduction in the number of residential units, from 867 to 844</li> <li>• A small reduction in cycle parking provision for residents (but no reduction in visitor and</li> </ul>	Conditions and heads of terms recommended.

commercial cycle parking provisions)

- Additional cumulative impact analysis as per comments on HGY/2021/1771 in Section 6.8 of the revised Transport Assessment
- Additional vehicle swept path drawings as per comments on HGY/2021/1771
- Inclusion of footways on both sides of the access road from White Hart Lane as per comments on HGY/2021/1771

In addition to the changes referenced above, the applicant has also very recently updated aspects of their design and application documentation to accommodate recently introduced fire safety policy requirements which now necessitate a second staircase for buildings over 30m tall.

The applicant has rearranged the layouts within the proposed buildings and by doing so revised layouts and locations of the cycle stores, and redesigned the basement with a larger footprint to accommodate changes. Conditions referenced later in this response for access arrangements and cycle parking/car parking will require the applicant to provide full details prior to commencement of the development.

#### Proposed Development

The development will provide 844 new homes and approximately 2,040sqm GEA of commercial floorspace (land use class E) with associated plant, loading facilities and ancillary infrastructure. A total of 139 car parking spaces would be provided on the Site, the majority of which will be at the basement level.

#### Proposed Residential Car Parking

Residential car parking would be provided at a ratio of 0.16 spaces per home, in line with the ratio used for the consented Depot planning application (the most recent of two approved schemes). The Goods Yard site would have 50 wheelchair-accessible and 30 standard spaces for residents whereas the Depot site would have 37 wheelchair-accessible and 22 standard spaces for residents. An additional two wheelchair-accessible spaces would be provided on the Goods Yard site for visitors to the residential units.

#### Proposed Commercial Car Parking

Commercial parking would consist of 10 operational spaces on the Goods Yard site which are understood to be a re-provision for the Carbery Enterprise Park, anticipated to occupy a proportion of commercial floorspace provided on site. Tying operational parking to a specific tenant is generally not supported, as Carbery Enterprise Park may end up not moving back in. However, the proposed 10 operational parking spaces are in line with Part F of Policy 6.2 of

the London Plan (2021) that states that “*Operational parking requirements should be considered on a case-by-case basis. All operational parking must provide infrastructure of electric or other Ultra Low Emission vehicles...*”. However, the proposed parking provision should be managed through the Car Parking Management Plan. One of these 10 spaces should be wheelchair accessible.

We therefore recommend that a clause be added which oversees commercial car parking and enables spaces to be decommissioned when they are not needed by commercial occupiers and brought back into use when they effectively are (individual business needs would have to be assessed for prospective occupiers prior to occupation, allocated spaces formalised in commercial lease documents and reviews undertaken regularly; any surplus parking would be rendered unavailable until the next round of reviews or new occupiers moving in).

It is suggested that the mechanism to bring into use and decommission commercial car parking spaces (capped at maximum of 10) would be dealt with through specific clauses in the Car Parking Management Plan which would also be secured by S.106 planning obligation.

#### Proposed Car Club Provision

On each site, it is proposed to provide two car club spaces for the use of residents and commercial occupiers, i.e. a total of four car club spaces. The direct re-provision of the approved number of car club bays cannot be accepted for the present application without any further justification or new evidence. The GLA suggests allocating five spaces to car clubs. We are of the view that the proposed quantum should be informed by discussions between the applicant and the prospective car club provider(s) who are able to determine what the likely demand for the site would be. As such, a S.106 clause will see that the Car Parking Management Plan include a mechanism whereby demand for car club bays will be reviewed on a regular basis and any additional demand be satisfied through the reallocation of other car parking spaces at ground-floor level.

#### Proposed Electric Vehicle Charging Infrastructure

No details of electric vehicle charging points were initially given in the Transport Assessment, the applicant has subsequently confirmed that charging points will be provided in line with the London Plan (2021) standards.

It is recommended that the provision and infrastructure be secured through a clause in the Car Parking Management Plan (S.106 planning obligation).

#### Car-Free/Car-Capped Agreement

Overall, WebCAT indicates that the site mostly lies in areas of PTAL 4, with the northwestern corner having a slightly lower PTAL (3). The site is also located in the Tottenham North CPZ. The proposed development would also make provision for wheelchair-accessible car parking, in line with the relevant standards. In accordance with Policy DM32: Parking of the Development Management DPD, the proposed development would qualify for a car-free status (the part of the site with lower connectivity is immediately adjacent to areas of PTAL 4; London Plan paragraph 10.6.4 also states that *“the starting point for discussions should be the highest existing or planned PTAL at the site”*).

The Council will not issue any occupiers with on-street resident/business parking permits due to its car-free nature. The Council will use legal agreements to require the landowners to advise all occupiers of the car-free status of the proposed development.

#### Proposed Basement Car Park Access

Swept path analysis was provided showing vehicles using the proposed basement car park one-way ramp access arrangements, as well as manoeuvring in and out of spaces. Scaled drawings with appropriate dimensions were also provided and reviewed to the Council's satisfaction.

As the basement arrangements have now been altered, a pre commencement condition to provide dimensioned layout drawings and appropriate swept path plots along with vehicular access control arrangements is required to demonstrate acceptability of the revised arrangements.

#### Car Parking Management Plan

An outline Car Parking Management Plan has been provided as part of the Transport Assessment. A more detailed and refined plan will be required by planning condition. In addition to the allocation and enforcement strategies, the pre-occupation updated plan should include details of the proposed signal control and give-way systems used to manage vehicular movements in and out of the basement car parks via the proposed ramps.

Estimates of vehicle movements at peak hours should be included to demonstrate how the proposed control systems would effectively manage peak arrivals and departures (see reference to a planning condition for basement vehicular access control arrangements above). Any potential queues on either side of the ramps should be identified and discussed in the

context of the proposed measures.

The detailed Car Parking Management Plan should also include details of how the number of parking spaces progressively made available would correspond to the phased number of dwellings constructed, so as to maintain the ratio of 0.16 spaces per dwelling throughout the whole duration of the construction works as buildings become operational and occupied.

The detailed Car Parking Management Plan may also consider mechanisms whereby particular spaces for which no demand arises are re-assigned temporarily to other eligible user categories (using the priority system) by means of short leases, so that they can revert back to their primary function when leases are up and there is specific demand for it. In particular, this can apply to wheelchair-accessible car parking spaces if a number of them do not find disabled resident lessees requiring access to them. Such spaces can be reassigned to a secondary function as standard spaces for residents of larger units (or anybody else identified in the list in a specific order of priority) on a short-term basis.

#### Proposed Cycle Parking

Cycle parking is proposed in line with the relevant London Plan (2021) standards and the London Cycling Design Standards.

The adequacy of the long-stay and short-stay cycle parking and access arrangements will be secured by planning condition. This would involve the provision of full details showing the parking systems to be used, access to them, the layout and space around the cycle parking spaces with all dimensions marked up on plans.

The revised arrangements following the recent safety related design changes will need to demonstrate adherence to the London Cycles Design Standards as produced by TfL, and also include the manufacturer's installation specifications for the cycle parking design systems to be used.

#### ATZ Assessment

An Active Travel Zone assessment has been undertaken as part of the Healthy Streets approach. The following findings have been highlighted:

##### *Route 1: from the Site to Angel Edmonton Shopping Centre*

- Consider reducing on footway car parking provision to reduce vehicle dominance and increase the pavement widths.

*Route 2: from the Site to Northumberland Park Rail Station*

- Consider replacing parking provision with wider pavements or street furniture where possible.

*Route 3: from the Site to Bruce Castle Park*

- Consider minor improvements to Beaufoy Road as a walking route to Bruce Castle Park (condition of the pavement and crossing surfacing, as well as existing traffic filter).
- Consider improving wayfinding signage considering it is a convenient link between High Road High Street and Cycleway 1.

*Route 4: from the Site to St Paul's Church on Park Lane*

- Consider undertaking an assessment of the footway configuration on Park Lane, assess whether the provision of bollards hinders or aids pedestrian movement.

*Route 5: from the Site to Lordship Lane*

- Consider wider pavements providing opportunity for street gardens and al fresco dining outside cafés and restaurants.

*Route 6: from the Site to North Middlesex University Hospital*

- Consider reducing on footway car parking provision to reduce vehicle dominance, given what is likely a high level of footfall around this area.
- Consider wayfinding signing to the nearby hospital.
- Consider replacing parking provision with wider pavements or street furniture where possible.

The recommendations have been reviewed and we will seek transport contributions based on them and the priorities set by the adopted Walking and Cycling Action Plan. Of the aforementioned recommendations, the following are further considered:

- Consider reducing pavement parking
- Consider wayfinding signage to nearby stations and amenities
- Consider improving leisure walking routes
- Consider improving walking zones for town centres

Vision Zero Analysis

The Transport Assessment has not identified any patterns of accidents relating to the highway layout or public realm. Therefore, no changes to the highway network are considered necessary to address the accident clusters.

### Trip Generation Assessment

The net trip generation has been calculated directly by applying the latest trip rates derived from TRICS to the uplift in floorspace and number of residential units (additional to the two consented schemes). The total trip generation has then been established by adding the net trips to the trips associated with both consented schemes. At the Council's request, sensitivity testing has been carried out: the total multi-modal trip generation has been assessed first by using the whole proposed floorspace and number of residential units, then the net trip generation has been derived by subtracting the consented trip generation from the extant Goods Yard and Depot permissions. Both sets of net multi-modal trips have then been compared and, for each mode of transport, the higher of the two forecast impacts has been utilised for the transport network impact assessment.

The same comparison has been undertaken for delivery and servicing trips. The loading bay requirement, based on the peak delivery and servicing trip generation, has been reviewed accordingly to ensure that the proposed number of loading bays remains adequate.

The revised delivery and servicing trip generation shows that twice as many vehicles would be expected during the peak hour (11:00-12:00), with a maximum of 32 LGVs and 5 OGVs or 28 LGVs and 9 OGVs. Seven loading bays are proposed, with a maximum theoretical capacity of 36 LGVs (assuming an average dwell time of 15 minutes) or 21 OGVs (assuming an average dwell time of 20 minutes) across an hour.

Whilst it is recognised that effective dwell times may be shorter (hence increased available capacity), it is predicted that the proposed loading bay capacity will suffice to cater for all the demand arising from the proposed development. It is also suggested that other vehicles (particularly LGVs) would have to rely upon short-term parking on street in the unlikely event that additional demand arose.

### Transport Impact and Cumulative Impact Assessments

An assessment of the impact upon the local transport networks of the scheme considered in isolation and with local committed schemes has been provided via two different methodologies and found the impact on the walking, cycling and highway networks not to be significant in either case.

Of particular interest is the impact upon the rail and bus networks. The analysis has considered the maximum cumulative directional increases. TfL requested additional public transport impact analysis to be undertaken at more granular level, also taking account of the



wider High Road West Masterplan trips (including an estimate of the Lendlease residential trips).

The applicant has carried this out and it is understood TfL are supportive of the outcomes from this analysis and have also proposed Section 106 contributions towards bus service improvements.

The extended cumulative impact assessment undertaken by Arup at TfL's request for the previous application aimed to include the impact of the wider High Road West masterplan (HRWM). At the time of writing, the HRWM application had neither been submitted nor been reviewed yet, therefore Arup undertook an estimate of the total trip generation generated by the wider scheme, based upon up to 2,612 homes (including the delivery of the extant permission for the Goods Yard and the Depot comprising up to 646 homes). The assessment was therefore undertaken for approximately 2,000 additional homes as a result of the HRWM, using the same methodology as in the Transport Assessment for HGY/2021/1771. The additional trips generated by 2,000 homes have been compared with the residential trip generation assessment undertaken by Steer.

**Total Residential Person Trip Generation Uplift (approximately 2,000 homes)**

	AM Peak Hour		PM Peak Hour	
	In	Out	In	Out
Arup	168	1,137	619	360
Steer	108	860	510	262
Ratio (Steer/Arup)	64%	76%	82%	73%

The difference is not marginal and shows that the cumulative impact assessment including the wider HRMW as undertaken by Arup remains very robust.

*It was noted in the planning committee report that "The overall public transport impact analysis undertaken at TfL's request is satisfactory. The cumulative bus trip impact assessment would benefit from a more granular approach to consider the impact upon relevant bus services for each direction of travel to identify the impact upon individual routes and bus capacities. TfL's views on the rail and bus impact analysis at a Stage II referral stage would be welcome."*

Overall, the cumulative impact assessment included in the revised Transport Assessment is in line with the response to TfL's and our comments on planning application HGY/2021/1771 during its determination phase. They were and are still acceptable as they have not changed. TfL are seeking a contribution of £195,000 towards bus service improvements, and the

applicant has agreed to this.

#### Framework Travel Plan

The cycling mode share target for commercial land uses should be revised upwards from the baseline in future versions of the Commercial Travel Plan. A 7% target at the Year 5 horizon seems very unambitious. Although the end use class of the commercial space is unknown (as land use class E spans a wide range of uses), assuming an employment density of 1 employee per 15sqm NIA (based on  $2,040 \times 95\% \times 70\% = 1,357$ sqm NIA, i.e. 90 employees), a 7% mode share would equate to 6 employees cycling, which is roughly 40% of the long-stay cycle parking provision of 15 spaces.

Future versions of the Travel Plan should have regard to the adopted Walking and Cycling Action Plan to ensure walking and cycling targets and measures align with the Borough's aspirations.

#### Outline Construction Logistics Plan

A pre commencement Detailed Construction Logistics Plan (CLP) would be secured by planning condition. In the Outline CLP there is no mention of staff travel planning measures promoting on-site cycle parking. This should be picked up in the Detailed CLP.

#### **Recommended Planning Conditions**

##### Basement car park layout and vehicular Access Control Arrangements

The applicant is to provide prior to commencement of the development, full dimensional and layout details for the revised basement car park layout and accesses including the access control arrangements, with swept path plots as appropriate.

Reason – to ensure a safe and workable arrangement to access the basement and associated car parking that is convenient for all occupiers and users

##### Safety Audit requirements

- Combined Stage 1/2 Road Safety Audit – White Hart Lane
- Combined Stage 1/2 Road Safety Audit – Embankment Lane

Prior to the first occupation of the development, the developer shall enter into an agreement with the Council as the Local Highway Authority under Section 278 of the Highways Act 1980 to undertake highway works as appropriate.

The applicant will be required to provide details designs for all associated works including a Stage 1 and Stage 2 Road Safety Audits being carried.

Reason: To ensure the highway works are undertaken to high-level standards and in accordance with the Council's requirements. To enable the amendment of the Traffic Management Order enabling the reinstatement of on-street parking outside the site, as well as lining and signing works.

#### Cycle parking details

The applicant will be required to provide long and short-stay cycle parking provision, for both residential and non-residential elements of the development, in line with the London Plan (2021), cycle parking is to be design and implemented in line with the London Cycle Design Standards and full layout and dimensioned details will be required for review. These details are required prior to commencement of the development.

Reason: To promote travel by sustainable modes of transport and to comply with the London Plan (2021) standards and the London Cycle Design Standards.

#### Delivery and Servicing Plan

The applicant shall be required to submit a Delivery and Servicing Plan (DSP) for the local authority's approval. The DSP must be in place prior to occupation of the development. The delivery and servicing plan must also include a waste management plan which includes details of how refuse is to be collected from the site.

Reason: To ensure that the development does not prejudice the free flow of traffic or public safety along the neighbouring highway.

#### Construction Logistics Plan

The applicant / developer is required to submit a Construction Logistics and Management Plan, 6 months (six months) prior to the commencement of development and approved in writing by the local planning authority.

The applicant will be required to contribute, by way of a Section 106 agreement, a sum of £10,000 (ten thousand pounds) to cover officer time required to administer and oversee the temporary arrangements and ensure highways impacts are managed to minimise nuisance for other highways users, local residents and businesses. The plan shall include the following matters, but not limited to, and the development shall be undertaken in accordance with the details as approved:

- a) Routing of excavation and construction vehicles, including a response to existing or known projected major building works at other sites in the vicinity and local works on the highway;
- b) The estimated number and type of vehicles per day/week;
- c) Estimates for the number and type of parking suspensions that will be required; and
- d) Details of measures to protect pedestrians and other highway users from construction activities on the highway.
- e) A construction phase travel plan for the duration of the works to ensure sufficient cycle parking for workers at the site and to ensure active and sustainable modes are used

Reason: To provide the framework for understanding and managing construction vehicle activity into and out of a proposed development in combination with other sites in the locality of the site and to encourage modal shift and reducing overall vehicle numbers. To give the Council an overview of the expected logistics activity during the construction programme. To protect of the amenity of neighbour properties and to main traffic safety.

Public Highway Condition survey pre and post works

The applicant, in conjunction with the Highway Authority, is to carry out and document a condition survey of the public highway used to access the development site, prior to commencement of any construction works, to record the existing condition of the public highway, and upon completion carryout another survey, and then liaise with the Highway Authority to ensure the condition of the highway is acceptable post completion of the works.

Reason – to ensure that the public highway is in a serviceable condition post development without deterioration for Highway users

**Recommended Section 106 Heads of Terms / Planning Obligations**

- Car-Capping – both residential and commercial, including £5,000 towards the amendment of the local Traffic Management Order, excluding Council housing residents
- Car Club:
  - Car club provision (4No. on-site spaces) subject to monitoring and revision if additional demand arises (to be managed through the Travel Plans and Car Parking Management Plan)
  - Establishment or operation of a car club scheme
  - Contributions from developer to residents - two years' free membership for all residents and £50 (fifty pounds in credit) per year for the first 2 years and an

enhanced car club membership for the residents of the family-sized units (3+ bedrooms) including 3 years' free membership and £100 (one hundred pounds in credit) per year for the first 3 years

- Car Parking Management Plan:
  - Commercial car parking management (commissioning and decommissioning)
  - Provision of electric vehicle charging points – both active and passive
  - Space allocation strategy and priority order (wheelchair-accessible users, family dwelling residents etc)
  - Basement vehicular access control arrangements
  - Car club bay management
- Residential Travel Plan (including Interim and Full documents, monitoring reports and a £10,000 monitoring contribution) including:
  - 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
  - Car club demand monitoring
- Commercial Travel Plan (including Interim and Full documents, monitoring reports and a £10,000 monitoring contribution) including:
  - 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 tenant/organisation
  - Cyclist facilities (lockers, changing rooms, showers, drying rooms for the non-residential uses)
  - Car club demand monitoring
- Future Connectivity and Access Plan
- CPZ contribution to the ongoing review and expansion of existing Controlled Parking Zones – £20,000
- Enfield CPZ contribution - £20,000 (indicatively, based on past applications)
- Section 278 Highway Works – scope and extent of works to be defined after obtaining a

	<p>detailed Section 278 drawing for costing purposes</p> <ul style="list-style-type: none"> <li>• TfL contribution towards bus service enhancements – £195,000 (as per the GLA’s planning report GLA/2022/0228/S1/01)</li> <li>• Transport Contributions towards the funding of scheme development and implementation of the following Walking and Cycling Action Plan measures: <ul style="list-style-type: none"> <li>○ Feasibility towards feasibility and design of the High Road (A1010) protected cycle track – £90,000</li> <li>○ Footway improvements along Pretoria Road North (pavement parking) – £20,000</li> <li>○ Wayfinding and Legible London type signage, to link in with borough-wide signage to Tottenham Hale – £50,000 White Hart Lane protected cycle track – £50,000 –</li> <li>○ Strategic cycle link to the Lea Valley (including a range of public realm enhancements, traffic calming and greening) – <i>amount to be agreed with the Council’s Regeneration team</i></li> <li>○ Accident reduction strategy (covering clusters at the following locations: High Road/Roebuck Close, High Road/White Hart Lane, High Road/Lansdowne Road, White Hart Lane/Pretoria Road, Creighton Road/White Hart Lane, Northumberland Park/Willoughby Lane)- £50,000</li> <li>○ Leisure walking routes (improved accessibility and permeability to leisure routes) – £30,000 Walking zones for town centres – £30,000</li> </ul> </li> </ul>	
<p>LBH Tree Officer</p>	<p>No objection - The proposal has been supplied with an Arboricultural Tree Survey and Impact Assessment. The document has been carried out by Julian Forbes-Laird Arboricultural Consultancy Limited and is dated February 2022. The report has been carried out to British Standard 5837: 2012 Trees in relation to design, demolition, and construction.</p> <p>I concur with the findings within the report, and the quality assessment of the trees and the categorisation. The railway cutting provides a screen and green corridor of the majority of the trees. The London Plane trees 3001- 3004 (four of these are off site and adjacent) are the largest trees and as such the greatest assets. They are category A1 trees.</p> <p>Providing the root protection areas (RPAs) are carried out as the tree protection plan on the</p>	<p>Noted – Conditions recommended</p>

	<p>remaining trees there are no issues. We will require to see a specification of the protecting fencing.</p> <p>Several illustrative Landscape Plans have been supplied including 0862-RFM-HRW-xx-DR-L-002 Revision P01. There is a net gain overall of trees and plantings. These plans will need to be finalised with size, specifications for planting, species, and an aftercare plan.</p> <p>Any proposed works or access within the RPAs will require an Arboricultural Method Statement to show no disturbance or damage will occur in these areas.</p>	
<p>LBH Waste and Street Cleansing</p>	<p>Comments were not provided under this application. Comments under the allowed appeal scheme HGY/2021/1771 were as follows:</p> <p>It is proposed there will be 867 residential units and commercial space across the development.</p> <p>Following the current LBH waste guidance provision the following will be required across the whole development.</p> <ul style="list-style-type: none"> <li>• 144x 1100L refuse containers.</li> <li>• 86x 1100L recycling containers.</li> <li>• 26x 240L food waste containers.</li> <li>• 867x food waste kitchen caddies.</li> </ul> <p>Commercial waste must be stored and collected separately from residential waste.</p> <p>Any Commercial enterprise must arrange for a scheduled waste collection with a Commercial Waste Contractor.</p> <p>The business owner will need to ensure that they have a cleansing schedule in place and that all waste is always contained.</p> <p>Commercial Business must ensure all waste produced on site are disposed of responsibly under their duty of care within Environmental Protection Act 1990. It is for the business to arrange a properly documented process for waste collection from a licensed contractor of their choice. Documentation must be kept by the business and be produced on request of an authorised Council Official under section 34 of the Act. Failure to do so may result in a fixed penalty fine or prosecution through the criminal Court system.</p> <p>There is very little detail provided with the application and waste containers for each block must</p>	<p>Residential waste would be collected weekly. Space has also been provided for bulky/non-standard waste items. 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.</p> <p>The proposed scheme is not significantly different from the allowed appeal scheme in terms of waste and recycling arrangements and is therefore acceptable.</p>

	<p>follow the guidance provided in the bulk container advice below. All guidance above and below should be followed, and confirmation provided.</p>	
--	---	--

	<p>The above planning application has been given a RAG traffic light status of AMBER for waste storage and collection.</p>	
--	--	--



EXTERNAL		
Stakeholder	Comment	Response
NHS North Central London Clinical Commissioning Group now ICB (Integrated Care Board)	<p>We understand that the new application is for development of a similar scale and description to the earlier application which was refused by the Council in December 2021 (HGY/2021/1771). An appeal against the Council's refusal has been submitted to the Planning Inspectorate. The new application includes design amendments which respond to the reasons for refusal, notably building height and density, and consequently reduce the number of residential units from 867 to 844.</p> <p>As such, the CCG's response to HGY/2021/1771 is still relevant and is attached for information. Paragraph 7.7.15 of the submitted Environmental Statement (February 2022) confirms the previous assessment (June 2021) that the development would have a moderate adverse (significant) effect on primary healthcare.</p> <p>As the quantum and mix of housing has changed, the HUDU Planning Contributions Model has been used to recalculate a s106 contribution. Using the proposed housing mix stated in the Planning Statement (Tables 8.1 and 8.2), the model calculates a primary healthcare capital s106 requirement of £442,020.</p> <p>We note that paragraph 6.7.17 of the Planning Sub Committee report which considered the previous application (HGY/2021/1771) stated officer's views 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 rather than a s106 contribution.</p> <p>The CCG reiterates its view that whilst health and wellbeing facilities are included on the Strategic CIL Infrastructure List, the list is indicative and there is no guarantee that CIL receipts will be allocated towards health infrastructure in north Tottenham to mitigate the impact of development.</p> <p>To date, no CIL receipts have been allocated towards healthcare infrastructure. The s106 requirement would meet the CIL Regulation 122 tests as it is considered necessary, reasonable, and directly related to the development. There is a site-specific impact from this development proposal which cannot be directly mitigated using a CIL payment. CIL funding is not a material consideration in the determination of a planning application and cannot be used to make the development acceptable in planning terms. Therefore, a s106 contribution is considered necessary.</p>	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.

Asset Protection - National Grid	Regarding planning application HGY/2022/0563, there are no National Gas Transmission assets affected in this area.	Noted.
Environment Agency	<p>Thank you for re-consulting us on the above application on 22nd May 2023, following the submission of a revised scheme.</p> <p>We have previously reviewed this planning application with amended FRA titled “The Goods Yard and The Depot, High Road West” (document ref: HRW-BHE-GD-XX-RPCW-0003, dated 12 April 2022) on 11th May 2022 and considered it satisfactory with addressing our earlier concerns.</p> <p>We have now reviewed the amended landscaping plans in the revised scheme (0862- RFM-GY-00-DR-L-0101-S2-P03-Level 00 Illustrative GA - Goods Yard) and it does not appear to change the proximity of the proposed development to the Moselle Brook Culvert, south of the site as illustrated in the FRA submitted (document ref: HRW-BHEGD-XX-RP-CW-0003, dated 12 April 2022). As such, the amended plans do not change our position and we have no objection to this planning application</p> <p><b>Advice to applicant</b></p> <p><b>Water Resources</b> Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills. We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.</p> <p><u>Residential developments</u> All new residential developments are required to achieve a water consumption limit of a maximum of 125 litres per person per day as set out within the Building Regulations &amp;c. (Amendment) Regulations 2015.</p> <p>However, we recommend that in areas of serious water stress (as identified in our report <u>Water stressed areas - final classification</u>) a higher standard of a maximum of 110 litres per person per day is applied. This standard or higher may already be a requirement of the local planning authority.</p>	No objection noted.

	<p><u>Commercial/Industrial developments</u></p> <p>We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.</p> <p>We also recommend you contact your local planning authority for more information.</p> <p><b>Final comments</b></p> <p>Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be appreciated.</p>	
<p>Health and Safety Executive (HSE)</p>	<p>1.1 The above planning application relates to a development comprising two sites; 'The Depot' and 'The Goods Yard'.</p> <p>1.2 Section 6 of the fire statement (dated 12/05/2023) states that the sites contain the following;</p> <ul style="list-style-type: none"> <li>• 'The Depot' block A: comprises 29-storeys above ground level (plus one basement level) with a block height of 85m and is served by two staircases (FF stair?)</li> <li>• 'The Depot' block B: comprises 10-storeys above ground level (plus one basement level) with a block height of 28m and is served by a single staircase that constitutes the only means of escape and only firefighting staircase serving residential accommodation on every upper floor level.</li> <li>• 'The Depot' block C: comprises 6-storeys above ground level (plus one basement level) with a block height of 16m and is served by a single staircase.</li> <li>• 'The Depot' blocks D and E: comprise residential accommodation located over 6- storeys, all above ground level, both with a block height of 15.5m.</li> <li>• 'The Depot' block F: comprises residential accommodation located over 3-storeys, all above ground level, with a block height of 7m.</li> <li>• 'The Depot' block G: comprises residential accommodation located over 6-storeys, all above ground level, with a block height of 16.25m.</li> </ul> <p>1.3 'The Depot' blocks A, B and C have a covered car park and ancillary accommodation located within the shared basement level, ancillary accommodation, residential and non-residential space at ground floor level, residential accommodation on every upper floor level (1st to 29th), and there are shared private amenity spaces on the roofs of blocks B and C.</p> <p>1.4 Blocks C, D, E, F and G are all under 18m in height and are therefore not relevant buildings, however, they fall within the curtilage of a relevant building (both blocks A and B) and have</p>	<p>Noted that the HSE are content with the proposals from a fire safety perspective.</p>

therefore been considered as part of this assessment.

- 'The Goods Yard' block A: comprises 33-storeys above ground level (plus one basement level) with a block height of 97m.
- 'The Goods Yard' block B: comprises 27-storeys above ground level (plus one basement level) with a block height of 79m.
- 'The Goods Yard' block C, D and F1: comprise 6-storeys above ground level (plus one basement level) with a block height of 16m.
- 'The Goods Yard' block E: comprises 7-storeys above ground level (plus one basement level) with a block height of 19m.
- 'The Goods Yard' block F2: comprises 4-storeys above ground level (plus one basement level) with a block height of 10m.
- 'The Goods Yard' block G: comprises 5-storeys above ground level (plus one basement level) with a block height of 13m.
- 'The Goods Yard' block H: comprises 3-storeys all above ground level with a block height of 7.2m.

1.5 'The Goods Yard' blocks A to G have a shared basement level containing a covered car park and ancillary accommodation (plant, cycle and waste rooms) and a non-residential area (car parking and cycle store). Ground floor level contains ancillary and residential accommodation, residential accommodation is located on every upper floor level from the 1st floor.

1.6 Blocks C, D1, D2, E, F1, F2 and G are all under 18m in height and are therefore not relevant buildings, however, they fall within the curtilage of a relevant building (both blocks A and B) and have therefore been considered as part of this assessment.

1.7 Section 6 (building schedule) of the fire statement confirms that the residential accommodation has been designed using British Standard 9991 ('BS9991') and all non-residential areas have been designed using British Standard 9999 ('BS9999'). HSE has assessed the application accordingly.

### **Previous consultation**

1.8 HSE received a consultation request on 23/03/2022 for the aforementioned planning application and responded on 11/04/2022, under the HSE reference pgo-1076, with the headline: 'Significant Concern'.

	<p>1.9 HSE received a consultation request on 12/05/2022 for the aforementioned planning application and responded on 09/06/2022, under the HSE reference pgo-1297, with the headline: 'Significant Concern'.</p> <p>1.10 HSE received a consultation request on 31/08/2022 for the aforementioned planning application and responded on 09/06/2022, under the HSE reference pgo-1868, with the headline: 'Significant Concern'.</p> <p>1.11 The applicant held a meeting with HSE to discuss the outstanding fire safety concerns relating to the means of escape, including single staircases made vulnerable due to connection with ancillary accommodation. The meeting took place on 17/03/2023.</p> <p><b>Current consultation</b></p> <p>1.12 A subsequent email was received from the LPA on 22/05/2023 requesting further consultation. The advice to the applicant below and the substantive response headline are based on the information in the current application including the fire statement (dated 12/05/2023) and revised plan drawings for the development, which are available on the planning register.</p> <p>1.13 For the avoidance of doubt, this substantive response is in relation to the applicant's response. 1.14 Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations.</p>	
Historic England	<p>Thank you for your letter of 22 May 2023 regarding the above application for planning permission.</p> <p>Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.</p> <p>We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at <a href="https://historicengland.org.uk/advice/find/">https://historicengland.org.uk/advice/find/</a></p> <p>It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.</p>	The views of specialist conservation and archaeological advisers has been sought and are included in the assessment within the report.

	<p>Please note that this response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.</p>	
<p>Historic England (GLAAS)</p>	<p>The planning application lies in an area of archaeological interest.</p> <p>If you grant planning consent, paragraph 205 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.</p> <p>The submitted ES and DBA appear to have been revised in February 2022 following their previous submission in May 2021 for planning application HGY/2021/1771. This office provided comments for the previous application in July 2021 but those comments do not appear to have been incorporated into the revised documents.</p> <p>Figures 3 and 4 of the DBA appear to have the location of the site in the wrong place-the Moselle River/White Hart Lane forms the southern boundary of the site.</p> <p>The application site lies on the projected line of the Roman road of Ermine Street and remains of the road and contemporary roadside activity can therefore be expected. This potential is illustrated by the Roman finds at Snell Park made immediately to the north of the application site in 1956. Later remains of roadside settlement on the site or in the close vicinity are present in historical records from the fourteenth century and mapped from the seventeenth century.</p> <p>The masterplan layout offers some theoretical scope to preserve important remains through design on the High Road frontage.</p> <p>Topographically and geologically, the site occupies the River Lea's low terrace. The Leyton gravels here (often mapped as Kempton Park) are often capped by brickearth and as a result have potential for early and later prehistoric remains.</p> <p>The Corcoran Lea Valley monograph puts prehistoric archaeological potential in this zone as moderate - disagreeing with the applicants' consultants who describe it as low - and it also puts Roman potential as being much higher than the applicants' ES does.</p> <p>Roman burials can be reasonably expected given the established pattern of funerary activity</p>	<p>Conditions attached as recommended.</p>

close to the headwaters of the Lea's tributary valleys, in this case the Moselle to the south and Pymme's Brook to the north, and the already mentioned presence of the Roman road.

Alongside prehistoric and Roman potential at the site suggested by its geography, hydrology and geology, there are also possible medieval and post-medieval remains connected with Tottenham vicarage in the south of the site. This building is proposed for demolition but as a former high status local building would normally merit consideration for retention in a consented scheme.

As well as its pessimistic assessment of potential, the ES archaeology chapter is disappointing in its mitigation proposals which all involve destructive investigation and no detailed public benefits or protection of key remains. There are a number of missed opportunities for such an extensive development to reflect and celebrate local heritage and address policy aims in that area.

I have looked at this proposal and at the Greater London Historic Environment Record. I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

NPPF paragraphs 190 and 197 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

Recommended conditions:

**Written Scheme Of Investigation**

No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the

local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

- A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination, and deposition of resulting material. this part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.
- C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

Informative: Written schemes of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

**Foundation Design**

No development shall take place until details of the foundation design and construction method to protect archaeological remains have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

Reason: The planning authority wishes to secure physical preservation of the site's archaeological interest in accordance with the NPPF.



Stakeholder	Comment	Response
London Fire Brigade	<p>The London Fire Brigade (LFB) has been consulted with regard to the above-mentioned premises and have no further observations to make. It should be ensured that if any material amendments to this consultation is proposed, a further consultation may be required.</p>	<p>The HSE are content with the proposals and the scheme would be required to go through further gateways and meet building regulations in terms of fire safety.</p>
Natural England	<p>Natural England has previously commented on this proposal and made comments to the authority in our letter dated 21 March 2022 Reference number 385814.</p> <p>The advice provided in our previous response applies equally to this amendment although we made no objection to the original proposal.</p> <p>The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.</p> <p>Should the proposal be amended in a way which <b>significantly</b> affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.</p>	<p>No objection noted.</p>
Network Rail	<p>Thank you for consulting Network Rail (NR) regarding the above planning application. Please see below the informative suggested by our Asset protection Team (ASPRO);</p> <p><b>Item 1. Concerns</b> - Encroachment on the boundary fence, interference with sensitive equipment, space for inspection and maintenance of the railway infrastructure.  <b>Reasons/Mitigations:</b>  The developer / designer must ensure that the development line is set back from the Network Rail boundary and structure to achieve sufficient gap / space to inspect and maintain Network Rail viaduct structure and boundary assets and provide an access for inspection and maintenance of the proposed development or other assets in the future without imposing any risks to the operational railway. This would normally be 3-5m from the boundary fence depending on the adjacent NR assets or boundary fence.</p> <p><b>Item 2. Concerns</b> - Stability of railway infrastructure and potential impact on the services.  <b>Reasons/Mitigations:</b>  Existing railway infrastructures including viaduct, embankment should not be loaded with</p>	<p>Noted</p>

additional surcharge from the proposed development unless the agreement is reached with Network Rail. Increased surcharge on railway embankment imports a risk of instability of the ground which can cause the settlement on Network Rail infrastructure (Overhead Line Equipment / gantries, track, embankment etc.).

**Item 3. Concerns** - Potential buried services crossing under the railway tracks. Some of the services may be owned by Network Rail or Statutory Utilities that may have entered into a contract with Network Rail.

**Reasons/Mitigations:**

The developer is responsible for a detailed services survey to locate the position, type of services, including buried services, in the vicinity of railway and development site. Any utility services identified shall be brought to the attention of Senior Asset Protection Engineer (SAPE) in Network Rail if they belong to railway assets. The SAPE will ascertain and specify what measures, including possible re-location and cost, along with any other asset protection measures shall be implemented by the developer.

**Item 4. Concerns** - Proximity of the development to the Network Rail infrastructure and boundary fence and adequate space for future maintenance of the development.

**Reasons/Mitigations:**

The developer must ensure any future maintenance does not import the risks to the operational railway. The applicant must ensure that the construction and subsequent maintenance of their development can be carried out without adversely affecting the safety of operational railway.

**Item 5. Concerns** - Collapse of lifting equipment adjacent to the boundary fence/line.

**Reasons/Mitigations:**

Operation of mobile cranes should comply with CPA Good Practice Guide 'Requirements for Mobile Cranes Alongside Railways Controlled by Network Rail'. Operation of Tower Crane should also comply with CPA Good Practice Guide 'Requirements for Tower Cranes Alongside Railways Controlled by Network Rail'. Operation of Piling Rig should comply with Network Rail standard 'NR-L3-INI-CP0063 - Piling adjacent to the running line'. Collapse radius of the cranes should not fall within 4m from the railway boundary unless possession and isolation on NR lines have been arranged or agreed with Network Rail.

**Item 6. Concerns** - Collapse of temporary structure near the railway boundary and infrastructure.

**Reasons/Mitigations:**

Any temporary structures which are to be constructed adjacent to the railway boundary fence (if required) must be erected in such a manner that at no time will any item fall within 3 metres from the live OHLE and running rail or other live assets. Suitable protection on temporary works (for example: Protective netting around scaffold) must be installed.

**Item 7. Concerns** - Piling adjacent to the railway infrastructure if any. Concerns with ground movement affecting the track geometry and surrounding ground and structure stability.

**Reasons/Mitigations:**

The developer must ensure that any piling work near or adjacent to the railway does not cause an operational hazard to Network Rail's infrastructure. Impact/Driven piling scheme for a development near or adjacent to Network Rail's operational infrastructure needs to be avoided, due to the risk of a major track fault occurring. No vibro-compaction/displacement piling plant shall be used in development.

**Item 8. Concerns** - Trespasses and unauthorised access through an insecure or damaged boundary fence.

**Reasons/Mitigations:**

Where required, the developer should provide (at their own expense) and thereafter maintain a substantial, trespass proof fence along the development side of the existing boundary fence, to a minimum height of 1.8 metres. Network Rail's existing fencing / wall must not be removed until it is agreed with Network Rail.

**Item 9. Concerns** - Interference with the Train Drivers' vision from artificial lighting and human factor effects from glare.

**Reasons/Mitigations:**

Any lighting associated with the development (including vehicle lights) must not interfere with the sighting of signalling apparatus and/or train drivers' vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signalling arrangements on the railway. The developers should obtain Network Rail's Asset Protection Engineer's approval of their detailed proposals regarding lighting.

**Item 10. Concerns** - Errant vehicle onto the railway land.

**Reasons/Mitigations:**

If there is hard standing area / parking of vehicles area near the property boundary with the operational railway, Network Rail would recommend the installation of vehicle incursion barrier or structure designed for vehicular impact to prevent vehicles accidentally driving or rolling onto the railway or damaging the railway lineside fencing.

**Item 11. Concerns** - Potential impact on the adjacent railway infrastructure from the construction activities.

**Reasons/Mitigations:**

The applicant shall provide all construction methodologies relating to works that may import risks onto the operational railway and potential disruption to railway services, the assets and the infrastructure for acceptance prior to commencing the works. All works must also be risk assessed to avoid disruptions to the operational railway.

**Item 12. Concerns** - Structural stability and movement of Network Rail Assets.

**Reasons/Mitigations:**

Network Rail's infrastructures should be monitored for movement, settlement, cant, twist, vibration etc if there are risks from the proposed development (if there the proposed development import these risks in the operational railway) to mitigate the risk of adverse impact to the operational railway in accordance with Network Rail standard 'NR/L2/CIV/177 - Monitoring track over or adjacent to building or civil engineering works'.

**Item 13. Concerns** - Invasive or crawling plants near the railway.

**Reasons/Mitigations:**

The developer must ensure that the locations and extent of invasive plant (if any, for example: Japanese Knotweed) are identified and treated in accordance with the current code of practice and regulations if exists on site. Any asbestos identified on site should be dealt in accordance with current standard, Health and Safety Guideline and regulations by the developer.

**Item 14. Concerns** - Interference with the Train Drivers' vision from sunlight and human factor effects from glare.

**Reasons/Mitigations:**

Glint and Sunlight glare assessment should be carried out (if there is a risk) to demonstrate the proposed development does not import risk of glare to the train drivers which can obstruct in the visibility of the signals.

**Item 15. Concerns** - Effects due to electromagnetic compatibility on the users and the development located within proximity of a high voltage overhead electrification lines. Any Outside Party projects that will be within 20m and/or any transmitter within 100m of the operational railway will be required to undertake an Electromagnetic Compatibility assessment to be carried out in accordance with Network Rail standards 'NR/L1/RSE/30040 & 'NR/L1/RSE/30041' and NR/L2/TEL/30066'

**Reasons/Mitigations:**

The developer will be required to undertake a full Electro Magnetic Interference (EMC) risk assessment on the impact the project will have upon NR.

**Item 16. Concerns** - Risk of electrocution and EMC interference to human health due to 25kV live OHLE on railway:

**Reasons/Mitigations:**

- Electrocution Clearance - within 3m of the overhead cable. Distance within which any works will require the overhead cable to be isolated.
- Electromagnetic interference – within 5.2m. Distance within which the effect on human health should be considered.
- Dewirement zone – within 5.2m. Distance within which the overhead cable could reach in the event of a failure.
- Electromagnetic compatibility – within 7m. Distance within which the affect of the

building on the cable function needs to be considered in the design.

**Item 17. Concerns** - Environmental pollution (Dust, noise etc.) on operational railway.

**Reasons/Mitigations:**

Contractors are expected to use the 'best practical means' for controlling pollution and environmental nuisance complying all current standards and regulations. The design and construction methodologies should consider mitigation measures to minimise the generation of airborne dust, noise and vibration in regard to the operational railway.

**Item 18. Concerns** - Tree species alongside the railway boundary.

**Reasons/Mitigations:**

Contractors are expected to use Network Rail recommended tree species only if required alongside the railway boundary. List of recommended tree species can be made available when requested.

**Item 19. Concerns** - Disruption of access to operational railway.

**Reasons/Mitigations:**

If there are any access points / gates to the railway, it's contractor's responsibility to maintain 24/7 unobstructed access to the railway for maintenance purposes.

**Item 20. Concerns** - Flying objects on operational railway from the playground if any adjacent to the operational railway.

**Reasons/Mitigations:**

If there are playgrounds next to the operational railway, the developer shall consider a barrier / fence to hold the objects (for example: balls).

**Item 21. Concerns** - There is a risk of obstruction to the visibilities of railway signals due to the development, railway alignment is in a curve.

**Reasons/Mitigations:**

Project shall engage signal sighting chair and carry out full signal sighting assessment to confirm the railway signals are visible to the train drivers.

**Item 22. Concerns** - Drainage.

**Reasons/Mitigations:**

Drainage from the shall be taken away from the railway infrastructure. There shall not be any attenuation tank or soakaways within 10-20m from the railway boundary.

Network Rail strongly recommends the developer contacts the Asset Protection Team [AssetProtectionAnglia@networkrail.co.uk](mailto:AssetProtectionAnglia@networkrail.co.uk) prior to any works commencing on site, and also to agree an Asset Protection Agreement with us to enable approval of detailed works. More information can also be obtained from our website <https://www.networkrail.co.uk/running-the-railway/looking-after-the-railway/asset-protection-and-optimisation/>

<p>London Overground Infrastructure Management</p>	<p>Pasted below are the London Overground Infrastructure Protection comments against HRGY/21/49. However, looking at HGY/2022/0563 and the site plan (copy attached), from an Infrastructure Protection perspective LO would not have any comments as its far enough away from the Station. I think when LO responded to HRGY/21/49, LO was mindful of the wider master plan (next to the Station) against which there will be comments.</p> <p><i>London Borough of Haringay Ref: HRGY/21/49</i></p> <p><i>Rail for London (RfL) has no objection in principle to the above refenced planning application subject to a number of potential constraints on the development of the site situated close to RfL Infrastructure. Therefore, it will need to be demonstrated to the satisfaction of RfL that:</i></p> <ul style="list-style-type: none"> <li>• <i>the development will not have any detrimental effect on RfL Infrastructure &amp; Operations in the short or long term</i></li> <li>• <i>the design must be such that the loading imposed on RfL Assets is not increased or removed</i></li> <li>• <i>we offer no right of support to the development or land</i></li> </ul> <p><i>RfL requests that the grant of planning permission be subject to conditions to secure the following:</i></p> <p><i>The development hereby permitted shall not be commenced until detailed design, method statements &amp; risk assessments for each stage of the development covering demolition, substructure and superstructure and all temporary works have been submitted to and approved in writing by the local planning authority (in consultation with RfL) which:</i></p> <ul style="list-style-type: none"> <li>• <i>provide details on all structures</i></li> <li>• <i>provide details on the use of plant</i></li> <li>• <i>accommodate the location of the existing RfL Assets / Infrastructure</i></li> <li>• <i>accommodate RfL Operational and Maintenance requirements</i></li> <li>• <i>accommodate ground movement arising from the construction thereof</i></li> <li>• <i>mitigate the effects of noise, vibration &amp; distractions arising from the adjoining operations to the RfL Infrastructure &amp; Operations</i></li> </ul> <p><i>In addition,</i></p>	<p>Condition attached.</p>

	<ul style="list-style-type: none"> <li>• <i>RfL requires that the applicant enters into an Asset protection Agreement with RfL to ensure that the development is carried out safely and in accordance with RfL’s requirements.</i></li> <li>• <i>No maintenance regime for the proposed development elevations facing the railway should be permitted which compromises the safe, efficient and economic operation of the railway.</i></li> <li>• <i>For all new developments adjacent to operational lines RfL accepts no liability in respect of noise and vibration. Developers should undertake their own investigations to establish any level of noise and vibration likely to originate from the operation of the railway, and design their mitigation measures accordingly.</i></li> <li>• <i>Any additional fencing required on the railway boundary, for example for screening purposes, must be independent of RfL’s fencing and allow room for maintenance of both fences.</i></li> <li>• <i>RfL would be opposed to balconies and fully openable windows on the elevations facing the railway (applicable to those in close proximity of the station/ railway).</i></li> </ul> <p><i>The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.</i></p> <p><b>Reason:</b> <i>To ensure that the development does not impact on existing or proposed Rail for London transport infrastructure &amp; operations, in accordance with London Plan 2015 Table 6.1, draft London Plan policy T3 and ‘Land for Industry and Transport’ Supplementary Planning Guidance 2012.</i></p> <p><i>This response is made as Rail for London Infrastructure Manager under the “Town and Country Planning (Development Management Procedure) Order 2015”. It therefore relates only to railway engineering, operational and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.</i></p>	
Sport England	<p>Although there is floorspace proposed for uses falling within Use Class E it is not clear whether any of these would actually be sport facilities and, if there were to be sport facilities, then it is not clear what sport facilities would be provided. As a result, it would be unknown if any sport facilities would meet the sporting demands arising from the development.</p>	<p>Officers consider that the sporting demands arising from the proposed scheme are best addressed by way of the proposed ‘community</p>

	<p>Changes to CIL Regulations in 2019 has resulted in the Council having the opportunity to seek contributions through CIL or via a S. 106 Agreement however it is not clear how, or if, the Council intends to mitigate the impact of the increase of sporting demand on local sport facilities.</p> <p>If provision for sports facilities is to be made by the CIL charge, it is acknowledged that there is no requirement to identify where those CIL monies will be directed as part of the determination of any application. That said, Sport England would encourage the Council to consider the sporting needs arising from the development as well as the needs identified in its Playing Pitch Strategy and/or any other robust borough wide sport facility strategy and direct those funds to deliver new and improved facilities for sport based on the priorities identified in those documents.</p> <p>In the event that the Council decides to seek provision for sports facility provision through a S.106 agreement rather than the CIL charge then Sport England would be happy to provide further advice. To assist the Council, an estimate of the demand generated for outdoor sports provision can be provided by Sport England's Playing Pitch Calculator strategic planning tool. Team data from the Council's Playing Pitch Strategy can be applied to the Playing Pitch Calculator which can then assess the demand generated in pitch equivalents (and the associated costs of delivery) by the population generated in a new residential development. It can also calculate changing room demand to support the use of this pitch demand.</p> <p>In relation to built sport facilities, Sport England's established Sports Facilities Calculator (SFC) can help to provide an indication of the likely demand that will be generated by a development for certain sports facility types. The SFC indicates that a population of 2,026 (calculated by multiplying the number of residential units by the average occupation rate of 2.4) in the London Borough of Haringey would generate a demand for 0.15 sports halls (£499,235), 0.11 swimming pools (£532,374), 0.07 artificial grass pitches (£88,063 if 3G or £80,098 if sand) and 0.02 rinks of an indoor bowls centres (£9,560). Consideration should be given by the Council to using the figures from the Sports Facility Calculator for informing the level of any financial contribution if indoor sports provision was to be made through a S.106 agreement.</p> <p><u>Active Design</u> Sport England, in conjunction with Public Health England, has produced Active Design (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities</p>	<p>space,' and potentially through Strategic CIL (with the Annual Infrastructure Funding Statement explicitly identifying sports and leisure facilities as eligible).</p>
--	--	---



	<p>for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments.</p>	
<p>Metropolitan Police (Designing Out Crime Officer)</p>	<p>Comments were not provided under this application. Comments under the allowed appeal scheme HGY/2021/1771 were as follows:</p> <p>Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions and an informative that highlights the key aspect of the condition and any major concerns that have been noted during the review of the files within the planning application. The comments made can be easily mitigated early if the Architects were to re-engage and discuss this project prior to commencement, throughout its build and by following the advice given.</p> <p>This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.</p> <p><b>Section 2 - Secured by Design Conditions and Informative:</b></p> <p>In light of the information provided, we request the following Conditions and Informative:</p> <p><b>Conditions:</b></p> <p>(1) Prior to the first occupation of each building or part of a building or use, a 'Secured by Design' accreditation shall be obtained for such building or part of such building or use and thereafter all features are to be permanently retained.</p> <p>(2) Accreditation must be achieved according to current and relevant Secured by Design guide lines at the time of above grade works of each building or phase of said development.</p> <p><b>Informative:</b></p> <p>The applicant must seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.</p>	<p>Secured by Design condition recommended.</p>

<p>Thames Water</p>	<p>Waste Comments</p> <p>The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. “No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.” Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure.</p> <p>Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.</p> <p>Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>Water Comments</p> <p>There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.</p> <p>The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the</p>	<p>Conditions and informatives recommended</p>
---------------------	--	--

	<p>development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planningyour-development/Working-near-or-diverting-our-pipes">https://developers.thameswater.co.uk/Developing-a-large-site/Planningyour-development/Working-near-or-diverting-our-pipes</a>. Should you require further information please contact Thames Water. Email: <a href="mailto:developer.services@thameswater.co.uk">developer.services@thameswater.co.uk</a>.</p> <p>Thames Water are currently working with the developer of application HGY/2022/0563 to identify and deliver the off site water infrastructure needs to serve the development. Thames Water have identified that some capacity exists within the water network to serve 99 dwellings but beyond that upgrades to the water network will be required. Works are on going to understand this in more detail and as such Thames Water feel it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development doesn't outpace the delivery of essential infrastructure. There shall be no occupation beyond the 99th dwelling until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or- a development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to low / no water pressures and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues.</p>	
<p>Transport for London</p>	<p><b>Access, Delivery and Servicing Arrangements</b></p> <p>As per earlier proposals at the same application site, the primary point of access by all modes to the southern part of the site is provided from White Hart Lane approximately at the same location of the existing crossover into The Goods Yard. This access route leads into a north-south internal route terminating at the northern end of The Goods Yard. Conversely, the access route to the northern part of the site is essentially retained in the same location as the consented scheme, via the western arm of the signal-controlled junction with High Road and Brantwood Road.</p> <p>Whilst TfL welcomes the improved public realm and access arrangement along the southern access route, which is set to provide continuous footways on both sides of the route, a Stage 1 Road Safety Audit (RSA) should be completed at this point of access prior to determination. Full consideration of the implications of the proposed traffic arrangement, including the</p>	<p>The proposed scheme improves connectivity between the Cannon Road area and the High Road and White Hart Lane for pedestrians and cyclists and includes a safe environment and cycle parking and facilities that encourage walking and cycling.</p> <p>The scheme would result</p>

proposed parallel loading bay situated to the south of Neighbourhood Square, should be incorporated. Design outcomes should address any problems/points of concern raised by the RSA, specifically road safety problems related to walking and cycle connectivity between the development and areas to the south of White Hart Lane, including White Hart Lane Station.

The internal route will provide direct access to a number of individual cycle stores via the dedicated building cores. The proposal seeks to accommodate basement parking facilities through ramp arrangements access via a signal control system to manage movements (The Goods Yard) and give way arrangements / convex mirrors for intervisibility (The Depot) in order to control turning movements. As previously alluded to, the entrance points should not impact safety or impede vehicle or pedestrian flow in any way. Whilst the internal route is likely to be lightly trafficked, a 3.7m kerb to kerb shared surface access route is provided, allowing access to accommodate servicing, deliveries, refuse collection and emergency vehicles along a route otherwise only open to pedestrians and cyclists. A Stage 1 RSA along this access route should also be completed prior to determination.

### **Healthy Streets and Vision Zero**

The Transport Assessment (TA) includes an Active Travel Zone (ATZ) assessment and a Healthy Streets Check for Designers (HSCD) for highway works. The proposal and revised uplift above the extant planning permissions will see an increase in pedestrian and cycle trips to/from the site and the local area. Whilst the improved design outcome for pedestrians at the southern end of The Goods Yard and integration of the future park space to the east and the High Road are welcomed, the TA falls short to indicate how the development will deliver local improvements that support the ten Healthy Streets indicators and Vision Zero approach in the wider area. This is of particular concern for permeability and connectivity for cyclists, including users of larger cycles, within the adjacent local area towards the Cycleway 1 (CS1) and the southern section of the masterplan area. Given that 'Beaufoy Road is [identified as] a convenient link between High Road High Street and CS1', as well as some recommendations from the ATZ, new and improved routes and connections for future residents should be provided within a local environment that meets their needs and those of people already in the area. Consistent to the recommendations for Route 3, improvements could consider signage and on street cycling facilities capable of accommodating larger cycles (e.g. a reconfigured traffic filter and improve wayfinding signage).

TfL recommends that the applicant look at this issue in more detail, particularly the need to mitigate development impacts by upgrading, filling gaps in and/or increasing permeability and connectivity by cycling at the southern end of the site and adjacent local area, and to commit to providing enhanced cycle environments/on street cycling facilities. An action plan with the

in a relatively small and manageable increase in vehicular trips, which subject to the recommended planning conditions and s106 planning obligations, would be manageable.

An assessment of likely cumulative effects (including taking account of likely public transport trips associated with the Lendlease scheme (HGY/2021/3175) 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.

The transport arrangements for the proposed scheme are similar to those for the extant schemes, with similar connectivity and permeability across the combined sites. As with the consented schemes,

local planning and highway authority should be agreed to ensure the development enhances cyclists experience and make the wider area more attractive for cycling and better connect the site. This should be secured through condition and/or an appropriate legal agreement.

### **Cycle Parking**

A total of 1,661 cycle parking spaces are proposed, including long and short stay spaces for residential units, as well as non-residential parking spaces. This is in line with the London Plan standards. However, TfL has some concerns about the quality of the cycle parking. This includes insufficient number of accessible cycle parking spaces/Sheffield stands, excessive number of proposed internal doors which need to be negotiated by users and spacing between stands/racks and walls, particularly within blocks D and E of the Goods Yard site. Push-button controls to assist with door opening should be provided. TfL understands that the applicant's team is already looking into these concerns and there seems to be a workable way forward. All cycle parking is required to be designed and laid out in accordance with the London Cycling Design Standards (LCDS), including at least 20% Sheffield stands and further 5% wider spaces for non-standard bicycles. Provision of showers, lockers and changing facilities for cyclists associated to non-residential uses should be provided. Further work is required to address TfL's concerns and subsequently the provision secured by condition.

### **Car Parking**

A total of 145 car parking spaces (a ratio of 0.17 spaces per residential unit) will be provided off/on street. This car parking provision includes 87 disabled persons' parking bays and four car club spaces. This is in line with extant permissions and complies with London Plan policy T6.1.

The London Plan requires 20% of parking to be fitted with active electric vehicle charging infrastructure, with passive provision for all remaining spaces. This should be applied and secured by condition.

A Car Parking Management Plan (CPMP) will support the parking, which is strongly supported. Control Parking Zone (CPZ) permit free agreement should also be secured as part of the S106 agreement.

### **Trip Generation and Highway and Public Transport Impact Assessment**

The methodology used to assess trip generation, including the cumulative impact assessment, is reasonable. Whilst TfL is satisfied that the proposal/proposed uplift above the extant

associated impacts on highway and public transport are considered acceptable. The 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.

planning permissions is unlikely to have a significant impact on the strategic road network and that no mitigation will be required at White Hart Lane station, given the effect of the recent congestion relief project that was completed at this station, bus trip generation figures have been reviewed by TfL to determine where bus service improvements are expected to be required in the future.

Bus trip generation figures reveal that the proposals, including the revised uplift and additional trips for the HRWM site, will generate a cumulative bus demand of 258 and 251 two-way trips in the AM and PM peak periods respectively. Given that there are capacity issues on the local bus network, specifically affecting routes W3, 149 and 259 and the importance of these routes in terms of providing key east-west and north-south connection tying different parts of Haringey together, TfL requires a contribution towards bus service improvements, including but not limited to capacity enhancements, to accommodate the net new demand and mitigate the cumulative impacts of development in the local area. Consistent with other developments, this contribution is calculated based on the additional net demand generated by the development, and the proportion of the overall capacity of a double-decker bus (75 passengers) that this additional demand represents; and the total cost to provide an additional bus over a period of 5 years (£487,500). Based on the forecasted net demand (30), a contribution of £195,000  $[(487,500 \times 30) / 75]$  towards bus services improvements is therefore sought. Required contributions should not be made route specific, as TfL is continuing to review the network and route numbers may be subject to change. TfL is open to discuss appropriate trigger points that fit with the phasing of construction and occupation of this development in relation to the rest of the HRWM site.

### **TfL Technical Approval and Infrastructure Protection**

Whilst TfL have no objection in principle to the proposed development in relation to the site's adjacency to the railway lines, the future planning consent should include appropriate infrastructure and operational protection measures. TfL requires that the applicant enters into an Asset protection Agreement with Rail for London. Travel Plan, Deliveries and Servicing and Construction Logistics As with the planning application submitted in 2021, a framework Travel Plan (TP), which sets out specific objectives in support of London policy has been submitted. The focus on encouraging active modes (walking and cycling) and facilitating opportunities to achieve a healthy lifestyle for all users are welcomed. This is reflective of the expected shift from car travel to active travel, as set out in the London Plan. The use of car club bays will be monitored through the TP. An additional bay should be accommodated, if there is sufficient demand. The final TP and all agreed measures should be secured, enforced, monitored and reviewed through the S106 agreement, in accordance with London Plan Policy T4. The draft Delivery and Servicing Management Plan (DSMP) and outline Construction Logistic Plan

	<p>(CLP) appear acceptable. The CLP should include infrastructure protection measures in respect of the adjacent railway lines and safeguard bus operation on nearby routes. The CLP should also be aligned with major stadium events.</p>	
--	--	--