

The Goodsyard and the Depot, Tottenham

Local Planning Authority: Haringey

Local Planning Authority reference: HGY/2022/0563

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Full planning application for the residential-led mixed use redevelopment of the site comprising 844 homes (36% affordable housing by habitable room), 2,040 sq.m. of flexible commercial, business, community, retail and service use (in Class E use), together with public open space, landscaping, parking, with building heights ranging from 6 to 31-storeys.

The applicant

The applicant is **Goodsyard Tottenham Ltd** and the architect is **F3**

Strategic issues summary

Land use principles: Further optimisation of the site's potential development capacity over and above the extant planning permission is supported as part of a comprehensive residential-led mixed use scheme.

Housing and affordable housing: 36% affordable housing (by habitable room) comprising 40% low cost rent and 60% intermediate housing is proposed, with provision for the overall quantum of affordable housing to be increased to 40% affordable housing with grant. The proposed tenure split complies with the Tottenham Area Action Plan. The blended affordable housing threshold for the site would be met. The affordability of intermediate housing and phasing of affordable housing should be agreed and secured together with an early stage review mechanism.

Urban design: The layout, landscaping, density and residential quality is supported. Tall buildings are proposed in a location which is identified as suitable for tall buildings. The same number of towers are proposed as the extant permission but with an increase in height and changes to the massing arrangement. The scheme generally complies with the qualitative assessment criteria in Policy D9 in respect of visual, functional, environmental and cumulative impacts.

Heritage: The scheme would cause less than substantial harm to a number of designated heritage assets. As such, the public benefits associated with the application will need to outweigh this harm. This could be the case in this instance, subject to these benefits being secured at Stage 2 and further clarification on a number of issues.

Transport: A £195,000 contribution towards bus service enhancements is required. Stage 1 Road Safety Audits (RSA) should also be undertaken. Further discussion is required in relation to Healthy Streets improvements in the wider area. Cycle parking should be secured in line with the minimum quantitative standard in the London Plan and in line with the London Cycling Design Standards. Further discussion is required in relation to the design of cycle parking stores. A Car Parking Management Plan and car parking permit free obligation should be secured. Delivery and Servicing Plan, Construction Logistics Plan and Travel Plans should be secured.

Climate change and environmental issues: The energy, urban greening and drainage strategies are acceptable. The applicant is proposing to connect the site to the planned Lee Valley District Heat Network. This is strongly supported and should be secured. Details of the proposed noise mitigation measures should be secured via condition.

Recommendation

That Haringey Council be advised that the application does not fully comply with the London Plan for the reasons set out in paragraph 130. However, the possible remedies set out in this report could address these deficiencies.

Context

1. On 22 March 2022 the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following categories of the Schedule to the Order 2008:
 - *Category 1A: "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."*
 - *Category 1B(c): "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - outside Central London and with a total floorspace of more than 15,000 square metres."*
 - *Category 1C(c): "Development which comprises the erection of a building which is more than 30 metres high and is outside the City of London."*
3. Once Haringey Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.
5. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>

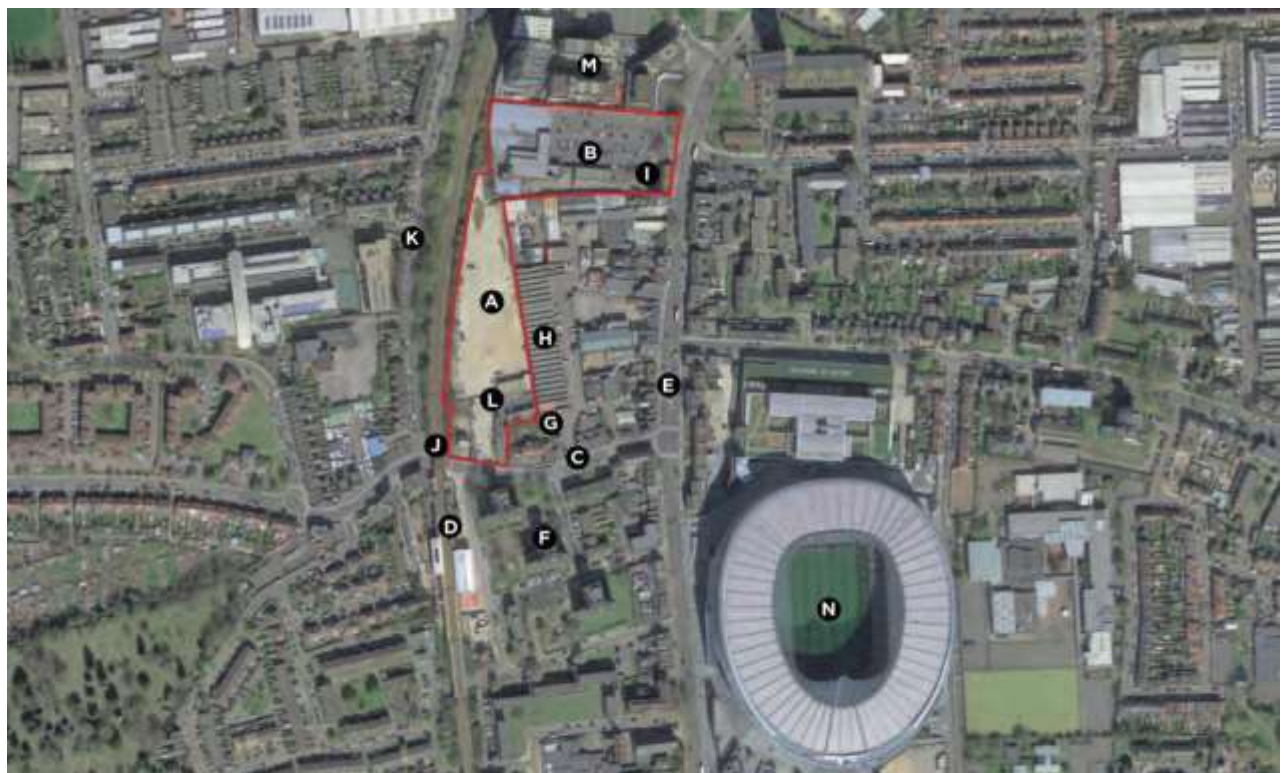
Site description

6. The site is 2.5 hectares in size and is located in Tottenham within the Lee Valley Opportunity Area and Northumberland Park Growth Area. The site comprises two elements: the Goods Yard; and the Depot, which are shown below in Figure 1. Both sites benefit from separate extant planning permissions for residential-led mixed use development and fall within the High Road West Masterplan Area.
7. The Goods Yard is bounded by an elevated railway line and tree-lined embankment to the west; the Peacock Industrial Estate to the east; and White Hart Lane to the south. The majority of the Goods Yard comprises cleared land which was used as a construction compound for the Tottenham Hotspur

Stadium development. The southern part of the Goods Yard site closest to White Hart Lane includes the Carberry Enterprise Park which comprises two-storey light industrial units. In addition, a two-storey Victorian building (Station Master's House) falls within the site boundary and fronts White Hart Lane. This property is locally listed and is currently vacant.

8. The Depot site is to the north of the Goods Yard and is bounded by Tottenham High Road to the east; the Cannon Road Development to the north; the railway embankment to the west; and light industrial buildings to the south. The Depot site comprises a large footprint two-storey retail building which is occupied by B&M Stores (previously Sainsbury's) and a large surface car park. In addition, the site includes five small retail units to the south. The majority of these units are understood to be vacant. To the east, the site includes Nos 867-869 High Road which is a Georgian three-storey Grade II listed property.

Figure 1 – The Goods Yard and The Depot site and surrounding context



KEY

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|--|-----------------------------|---------------------------------|------------------------------------|
| ■ Site Boundary | D Overground Station | H Peacock Ind. Estate | L Carberry Enterprise Park |
| A Goods Yard Site | E High Road | I 867-869 High Road | M Cannon Road Development |
| B The Depot Site | F Love Lane Estate | J Station Master's House | N Tottenham Hotspur Stadium |

9. The Depot site includes the Grade II listed 867-869 High Road and the Goods Yard site includes the locally listed Station Master's House. These areas of the site fall within the North Tottenham Conservation Area. There are a number of heritage assets in the immediate and wider area, as set out in more detail below.

10. The site has a Public Transport Access Level (PTAL) ranging between 3 and 5 (on a scale of PTAL 0 to 6b, where 6b represents the highest level of public transport access). White Hart Lane Station (London Overground and Greater Anglia services) is immediately to the south of the site and has been recently upgraded, with a new station building, entrance and ticket hall and step-free access provided. Northumberland Park station (National Rail services) is approximately 1 kilometre to the east. Seven Sisters station (London Underground Victoria Line and London Overground) is 3 kilometres to the south. The nearest bus stops to the site are located along the High Road, White Hart Lane and Northumberland Park. Six daytime bus routes are served from these bus stops.
11. The A1010 High Road forms part of the Strategic Road Network (SRN) and is adjacent to the site. The nearest points of vehicular access to the Transport for London Road Network (TLRN) is the A10 Bruce Grove / A1010 High Road junction and the A406 North Circular Road / A1010 Fore Street junction, located approximately 1 kilometre to the south and north respectively. Cycleway 1 (from Tottenham to Liverpool Street) is located approximately 400 metres to the south of the site.

Surrounding context

12. The site has a close proximity to a number of listed buildings. The Grade II listed the Grange (34 White Hart Lane) is immediately adjacent to the site to the south. There are a number of other Grade II listed buildings along the western side of High Road, including: 797 and 799 High Road; 819 and 821 High Road; 859-863 High Road. On the opposite (eastern) side of the High Road is the Grade II* listed Dial House, Percy House and 808-810 High Road, together with the Grade II listed Nos. 792-794, 798-802 and 816-822 High Road.
13. The North Tottenham Conservation Area covers the High Road and White Hart Lane. It is one of five conservation areas which make up the wider Tottenham High Road Historic Corridor which from the borough boundary down to Seven Sisters and South Tottenham, including Tottenham Green, Bruce Grove, Scotland Green and Seven Sisters Conservation Areas. Other conservation areas in the wider area include the Tottenham Cemetery Conservation Area, Bruce Castle Conservation Area to the south west. Fore Street Angel and Fore Street South Conservation Areas are to the north of the North Circular, along the High Road and fall within Enfield.
14. The surrounding area is undergoing significant change with a number of completed and approved large-scale mixed use developments. This includes the Northumberland Development Project (NDP) and the new Tottenham Hotspur Stadium which opened in April 2019. The second phase of the NDP will comprise a mix of hotel, residential, sport/leisure and community uses with two 19-storey towers, 27 and 36-storey towers and a 51 metre AOD high sports centre building (LPA ref: HGY/2015/3000).
15. The Cannon Road development to the north of the Depot site has been recently completed and comprises residential blocks ranging in height from 6 to 10, together with a 22-storey tower (Brook House) and a primary school.

16. To the south is the Love Lane Estate which currently comprises residential buildings of between 10 and 4-storeys. The housing estate is currently the subject of an estate regeneration / redevelopment proposals as part of the wider High Road West Masterplan.
17. The area to the west of the railway comprises two to three-storey Victorian terraces, some more recent four-storey blocks and Haringey Sixth Form College.

Case history

18. Two separate extant planning permissions are in place on the site which are summarised below:
 - The Goods Yard site is subject to a hybrid planning permission (part detailed / part outline) which was granted at appeal in June 2019 (LPA ref: HGY/2018/0187). This permission comprised up to 316 homes, employment, retail, leisure and community uses with two residential towers of 18 and 22-storeys with building heights stepping up in height from south to north and maximum heights ranging from 3 to 8-storeys on the remaining blocks. The appeal was lodged under grounds of non-determination. In terms of affordable housing, the permitted Goods Yard scheme proposed 35% (by habitable room), based on a tenure split of 40% affordable rent and 60% intermediate (shared ownership).
 - The Depot is subject to hybrid planning permission (LPA ref: HGY/2019/2929) for up to 330 homes, with retail and cafe use and the northern section of the new public open space. This consent included a 29-storey tower to the west, with a part 7 and part 9-storey building to the north and building heights ranging from 6 to 3-storeys on the remainder of the site, stepping down towards the High Road. The permitted scheme on the Depot secured 35% affordable housing based on a 40:60 tenure mix of social rent / LAR and intermediate, weighted towards intermediate housing provision.
19. In June 2021 the applicant submitted a planning application covering both sites. This proposed residential-led mixed use redevelopment of the site comprising 867 homes (36% affordable housing), 1,878 sq.m. of flexible Class E use, together with public open space, landscaping, parking, with building heights ranging from 6 to 32-storeys (LPA Ref: HGY/2021/1771).
20. On 8 November 2021 Haringey Council Planning Committee resolved to refuse planning permission for the application. This was against the advice of Haringey Council planning officers who recommended that the Planning Committee should grant planning permission, subject to planning conditions and the conclusion of a Section 106 agreement, for the reasons set out in their Planning Committee Report and Addendum. The Council's draft decision notice cites three reasons for refusal relating to tall buildings, heritage and open space. These are summarised in the GLA's Stage 2 report dated 20 December 2021 (Ref: GLA:2021/1229/S2) which can be found [here](#).

21. At Stage 2, the Mayor decided to allow Haringey Council to determine the application and confirmed that he did not therefore wish to take over the determination of the planning application. This applicant has since lodged an appeal which is currently being considered by the Planning Inspectorate with a Public Inquiry expected to take place during this summer.

Details of this proposal

22. Full planning permission is sought for the residential-led mixed use redevelopment of the site comprising:
- 844 homes (36% affordable housing by habitable room);
 - 2,040 sq.m. of flexible commercial, business, community, retail and service use (in Class E use);
 - change of use of the locally listed Station Master's House (52 White Hart Lane) to a flexible retail, food and beverage use (Class E);
 - change of use of the Grade II listed 867-869 High Road to residential;
 - on-site public and private open space, including a new public park within the Depot site;
 - associated parking and hard/soft landscaping; and
 - building heights ranging from 6 to 31-storeys.
23. A summary of the key changes to the previous application submitted in 2021 is provided below:
- A reduction in the number of residential homes from 867 to 844, with a corresponding decrease in density.
 - A reduction in height of the central tower (Goods Yard North Block A) by one storey, reducing this from 32 to 31 storeys.
 - A slight increase in the height of the southern shoulder of the Goods Yard South tower, to improve perception of height and proportion when considered collectively against the other changes.
 - Reconfiguration of the northern tower (within The Depot) with an alternative floor plate geometry, resulting in the tower moving 2 metres to the west and 1.5 metres to the south further away from Rivers Apartments. This creates an oblique offset to Rivers Apartments ranging from 33 metres to 37 metres.
 - Reducing the width of the (central) Goods Yard North tower by circa 3 metres) to increase perception of slenderness and offsets the reduction in height.
 - Reduction in the weight of the three tower 'tops' to reduce mass at high level and increase the sky gap when read across distance views.

- The Goods Yard Block A tower plan is reworked to reduce the north-south length by approximately 3 metres (with all towers now equal at circa. 40 metres wide), in turn this increases spacing to Goods Yard Block B.
- Changes to the vertical core materiality and expression through a reduction of vertical elements and a lighter colour tone applied to all towers. The vertical core materiality and expression is lightened through a reduction of vertical elements to the 'light grey' frame and lighter bronze colour tone infill applied to all the tower tops and cores.
- All tower top sections are reworked to reduce the north-south length by approximately 1.1 metres to 2.5 metres.
- A modest reduction in the total amount of site-wide open space by 20 sq.m., but a greater provision per residential home overall.

Topic	Refused Scheme	Revised Scheme
No. of residential homes	867	844
Density	353 units/ha	346 units/ha
Heights	27/32/29 storeys	27/31/29 storeys
Distance from Rivers Apartments	30m	33-37m
Total open space	15,650 sqm	15,630 sqm
Open space per unit	18.1 sqm	18.5 sqm
No. of family homes	147 (17%)	159 (19%)

Strategic planning issues and relevant policies and guidance

24. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the Development Plan in force for the area comprises the Haringey Strategic Policies DPD (2017); the Haringey Development Management DPD (2017); the Tottenham Area Action Plan (2017); and, the London Plan 2021.
25. The following are also relevant material considerations:
- The National Planning Policy Framework and National Planning Practice Guidance;
 - National Design Guide;
 - The Upper Lee Valley Opportunity Area Planning Framework (OAPF) (2013);
 - Haringey Council - High Road West Masterplan (2014);
 - Haringey Council – North Tottenham Conservation Area Appraisal & Management Plan (2017);

- Haringey Council – Bruce Castle and All Hallows Conservation Area Appraisal and Management Plan (2019);
- Haringey Council – Tottenham Cemetery Conservation Area Appraisal and Management Plan (2019);
- Enfield Council – Church Street and Fore Street Conservation Area Appraisal (2016);
- On 24 May 2021 a Written Ministerial Statement (WMS) was published in relation to First Homes. To the extent that it is relevant to this particular application, the WMS has been taken into account by the Mayor as a material consideration when considering this report and the officer’s recommendation. Further information on the WMS and guidance in relation to how the GLA expect local planning authorities to take the WMS into account in decision making can be found [here](#).

26. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:

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| • Land use principles | <i>London Plan;</i> |
| • Housing, affordable housing and play space | <i>London Plan; Affordable Housing & Viability SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; the London Housing Strategy; Housing Design Standards draft LPG;</i> |
| • Urban design and heritage | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Public London Charter LPG; Housing Design Standards draft LPG; Optimising Site Capacity: A Design-led Approach draft LPG; Fire Safety draft LPG;</i> |
| • Inclusive access | <i>Accessible London: Achieving an Inclusive Environment SPG;</i> |
| • Climate change and sustainable development | <i>London Plan; the London Environment Strategy; The control of dust and emissions in construction SPG; Circular Economy Statements LPG; Whole Life-Cycle Carbon Assessments LPG; ‘Be Seen’ Energy Monitoring LPG; Urban Greening Factor draft LPG; Air Quality Neutral draft LPG; Air Quality Positive draft LPG;</i> |
| • Transport | <i>London Plan; the Mayor’s Transport Strategy; Sustainable Transport, Walking and Cycling draft LPG.</i> |

Land use principles

27. The sites fall within the Lee Valley Opportunity Area and the Northumberland Park Growth Area. It is allocated for residential-led mixed use development as part of the wider site allocation 'NT5 – High Road West'. The two sites are subject to extant planning permissions as detailed above, which establish the acceptability of the residential-led mixed use redevelopment in land use terms.
28. The AAP site allocation NT5 (2017) sets out the Council's aspiration for the wider 11.7 hectare site to be developed in a comprehensive masterplan-led manner, providing a minimum indicative housing capacity of between 1,200 to 1,400 homes, including new public open space and improved community infrastructure. This development capacity figure was informed by the original High Road West Masterplan (2014) prepared by Arup and establishes a baseline minimum development capacity figure for the site.
29. London Plan Policy H1 sets a London wide 10-year housing target for 522,870 net additional homes to be completed by 2029, with Haringey set a 10-year target of 15,920 homes during this period. To meet these targets, Policy H1 requires potential housing capacity on suitable and available brownfield sites to be optimised, especially within PTALs 3 to 6 or within 800 metres of a station or town centre.
30. The London Plan sets an indicative capacity of 21,000 homes and 13,000 jobs across the Lee Valley Opportunity Area. London Plan Policy SD1 sets out how the Mayor will work with boroughs to ensure that opportunity areas realise their growth and regeneration potential, ensuring housing choice, employment opportunities, mixed and inclusive communities and infrastructure provision.
31. The application proposes to increase the permitted number of homes from 646 to 844 (+198 homes). A commensurate increase in the quantum of flexible commercial floorspace, play space and affordable housing over and above the extant planning permission is also proposed. The scheme would therefore make a substantial contribution towards meeting the minimum London Plan housing targets and the benchmarks for the opportunity area. The greater optimisation of the site's development potential is therefore strongly supported.
32. In summary, the further optimisation of the site's development capacity as part of a comprehensive residential-led mixed use redevelopment is strongly supported and accords with the London Plan Policies H1 and SD1.

Housing and affordable housing

33. The Mayor has set a strategic target for 50% of all new homes to be affordable, as set out in Policy H4 of the London Plan. Policy H5 of the London Plan identifies a minimum threshold of 35% affordable housing (by habitable room), with a higher threshold of 50% applied to public sector owned land and industrial sites where the scheme would result in a net loss of industrial capacity.

The Fast Track Route

34. To be eligible for the Mayor's Fast Track Route, applications must meet the applicable affordable housing threshold (by habitable room), in line with the required tenure mix without public subsidy. An early stage review mechanism would need to be secured via a Section 106 agreement. Applications which do not meet these requirements should follow the Viability Tested Route, with a Financial Viability Appraisal (FVA) submitted and schemes subject to both early and late stage review mechanisms.

Tenure split

35. In terms of tenure split, Policy H6 of the London Plan sets out the Mayor's preference for at least 30% low cost rent (social rent or London Affordable Rent) and 30% as intermediate housing products, with the remaining 40% to be determined by the Council (and comprising either low cost rented homes or intermediate based on identified need).
36. In this instance, Policy AAP3 of the Tottenham Area Action Plan (AAP) states that the Council's normal Local Plan tenure mix requirements is altered within the Tottenham AAP area where, in this specific location, the Council will seek 60% intermediate housing and 40% affordable rent accommodation.

Affordable housing threshold

37. The Depot site is in retail use (B&M store), so is subject to the 35% threshold for affordable housing. The Carberry Enterprise Park accounts for 6% of the site area of the application site and comprises non-designated industrial land, providing 1,125 sq.m. (GEA) of light industrial floorspace. This part of the site is therefore subject to the 50% affordable housing threshold. The affordable housing threshold for the remainder of the Goods Yard site was subject to discussion during the course of the previous application submitted in 2021. This part of the site has been used for various temporary purposes since then including a construction compound and car park.
38. The applicant's view is that the remainder of the Goods Yard should not be considered industrial land for the reasons which were considered in the GLA's Stage 1 and Stage 2 reports which can be found [here](#). The applicant's position is that the site should be subject to a blended affordable housing threshold of 36%, with the 50% affordable housing threshold for industrial land only applying to the Carberry Enterprise Park as summarised below.

Table 1 – The applicant's assessment of the affordable housing threshold for the site

Site component	Site area (sq.m.)	Proportion of site	AH Threshold
Carberry Industrial Estate	1,546	6%	50%
Other land	23,479	94%	35%
Total	25,025	100%	36%

Figure 3 – site components



39. In summary, the applicant's view is that the previous industrial use on the Goods Yard site ceased in 2015 and it would not now be possible to re-establish the historic industrial use as this would be contrary to the development plan. The Local Plan site allocation requires the comprehensive residential-led mixed use development of the site. The applicant has sought a legal Counsel Opinion on this specific matter, which is included in its planning submission.
40. Whilst this point is accepted on a practical level, GLA officers raised concerns with this approach on the previous planning application in the Mayor's Stage 1 report. Specifically, GLA officers made the point that temporary planning permissions should not be used to circumvent the policy and noted that the overarching rationale for the different affordable housing threshold on industrial land has to do with differences in land value, as set out in paragraph 4.5.7 of the London Plan.
41. In their 8 November 2021 Planning Committee Report on the previous application, Haringey Council planning officers concluded that the scheme should be subject to the 36% blended affordable housing threshold. In reaching this conclusion, Haringey Council officers took into account the planning history of this part of the site, the current use of the land, the legal view provided and requirements of the Site Allocation (NT5).
42. At Stage 2 GLA officers noted that there are a fairly unique set of circumstances in this case which mean that a degree of planning judgement is required to determine the appropriate affordable housing threshold in this case and in order to conclude whether or not the Goods Yard should be considered industrial land for the purposes of London Plan Policy H5. Furthermore, planning policy and guidance on this matter does not prescribe what a decision maker should do in every possible eventuality. Therefore, on balance, GLA officers do not disagree with the planning judgement taken by the local planning authority in this particular instance.

The applicant's affordable housing proposal

43. The applicant is proposing 36% affordable housing by habitable room (34% by unit). The tenure split would be 60% intermediate housing and 40% low cost rent by habitable room, with a 64:36 tenure split by unit. The proposed tenure split complies with the Tottenham Area Action Plan. The overall percentage and proposed tenure mix is consistent with the previous planning application submitted in 2021, which followed the Fast Track Route. Compared to the extant planning permissions, the application proposes 53 additional affordable homes.
44. As with the previous planning applications, the applicant has agreed that it would increase the overall affordable housing to up to 40% should grant become available. This would mirror the approach secured on the previous extant planning permission. The applicant has stated that it would welcome this being secured via a S106 planning obligation.
45. The low-cost rent tenure homes would be provided as London Affordable Rent (LAR). As with the previous planning permission, the Council would be able to elect up to 61 of the low cost rent homes to be used in association with the Love Lane Estate (with rents set at those comparable to the existing social rent tenants). The applicant has stated that this would also be secured via S106 agreement. Where these units are required by the Council for the estate regeneration decant, they would be provided as social rent tenure. This would need to be secured in the S106 agreement.

Eligibility for the Fast Track Route

46. The affordable housing proposals would meet the threshold for the site, taking into account the particular circumstances and planning history set out above. The tenure split is acceptable and in line with the Local Plan requirements and commitments relating to grant funding are proposed to be secured via S106 agreement. As such, the scheme can follow the Fast Track Route. An early stage viability review mechanism should be secured, in line with the formulas set out in the Mayor's Affordable Housing and Viability SPG.
47. S106 planning obligations should be secured to ensure the timely phasing and delivery of affordable housing linked to the occupation of market homes within the scheme.

Housing affordability

48. The low cost rent units are proposed to be let at either London Affordable Rents or social rent, which would be secured via Section 106 agreement. This is supported. The intermediate housing is proposed as shared ownership.
49. London Shared Ownership units should be affordable to households on incomes up to a maximum of £90,000 a year and a range of affordability levels should be provided below the maximum £90,000 household income cap for an initial marketing period of three months. Furthermore, all intermediate tenure households should not be required to spend more than 40% of their net income

on overall housing costs, including service charges. These requirements should be secured via Section 106 obligations.

Housing choice

50. The proposed housing mix includes a range of unit sizes, including 147 three-bedroom homes and 12 four-bedroom homes. Of the low cost rent tenure housing proposed, 49% would comprise three and four-bedroom units. The intermediate housing is weighted towards 1 and 2-bedroom units to ensure affordability, but with 19% of this tenure proposed as 3-bedroom units. This is supported and accords with the criteria set out in London Plan Policy H10.

Play space provision

51. The play space requirements for the site have been calculated using the GLA's play space calculator. The site wide requirements would be met on-site for each age category. The application proposes 2,900 sq.m. of play space. The majority of this would be provided within the public realm through public open spaces at Peacock Park, Brook House Yard, the northern and southern squares and along Embankment Lane. Additional play provision is also proposed at podium level within the blocks. This overall strategy is supported and would ensure the majority of play space is available to the public and all tenures within the scheme. There does not appear to be any segregation of play space by tenure within courtyard spaces. The application complies with London Plan Policy S4.

Urban design

Architectural and materials quality

52. The design and appearance of the proposed scheme is broadly the same as the previous refused planning application. However, a number of moderate changes to the architecture and materiality and height and massing of the three towers which are summarised earlier and shown below. The other blocks are unchanged.
53. The overall design quality of the scheme as a whole and the architectural quality of the majority of blocks was supported at Stage 1 and GLA officers considered that this would ensure the provision of a visually interesting, cohesive scheme. In relation to the three towers, further architectural and tonal refinement was required to ensure the grey clad 'top hats' and recessed inner skin of these buildings responds appropriately to the surrounding townscape and heritage context and to ensure they have a positive impact on the skyline and townscape views. During the course of the previous planning application, changes were then made to the appearance and materiality of the tower to respond to these comments and concerns raised by the local planning authority.

Figure 2 – May 2021 submission (Stage 1)



Figure 3- October 2021 refused scheme (Planning Committee / Stage 2)



54. Further design amendments have been incorporated within the revised planning application to address some of the design concerns raised by the Council's Planning Committee in their reasons for refusal. These changes are shown below.

Figure 4- March 2022 revised application



55. The towers are well-articulated in terms of their overall angled and slightly off-set plan form, scale and massing and through the differentiation of the materiality and of the tops and inner and outer skin. Whilst the 'top hats' are still an integral feature of the design of the three towers, the inner skin and outer skin has a more integrated and cohesive overall visual appearance. Although the revisions are relatively minor in scale, they would ensure that the central tower has a more slender and vertical massing and design, compared to the refused scheme. This is supported.
56. The medium density blocks would be clad in a variety of brick tones ranging from beige, red and grey, with Block E proposed to be clad in bronze metal. Appropriate levels of detailing, depth and articulation would be incorporated within the proposed elevations through recessed bay window reveals and ground floor openings, decorative brickwork and metalwork details and a variety of bronze cladding panels and balcony balustrades. This would create attractive and varied character and sense of place.
57. As such, the overall architectural and materials quality is supported and would accord with London Plan Policies D3 and D9.

Heritage impact

58. London Plan Policy HC1 states that development proposals affecting heritage assets and their settings should conserve their significance and should avoid harm. Policy HC1 also applies to non-designated heritage assets.
59. GLA officers have reached the following conclusions in respect of the level of harm caused to the significance of nearby heritage assets, as set out in Table 2. This follows a detailed review of the site and surroundings, noting the

existing and permitted development context and a review of the height and massing of the scheme, taking into account the potential visual, heritage townscape and landscape impact as detailed in the applicant's and Townscape and Visual Impact Assessment (TVIA) and noting the significance of the heritage assets in question as set out in the Heritage Statement.

60. GLA officers consider that less than substantial harm would be caused by the development to the significance of heritage assets arising from the height and massing of the scheme, most notably, in the case of the Grade II listed buildings closest to the site on the High Road, White Hart Lane and the North Tottenham Conservation Area. This harm must be given due weight and importance in the planning decision making process and must be outweighed by public benefits associated with the proposal. As harm would be caused to heritage assets, the application does not comply with London Plan Policy HC1.
61. In this case, the application proposes a number of public benefits. This includes the substantial quantum of housing and affordable housing, as well as public open space and publicly accessible play space provision within Peacock Park, new public routes and improved pedestrian and cycle permeability through the site and the proposed public open space. GLA officers consider that these public benefits could potentially outweigh the level of harm caused to the designated heritage assets. However, the proposed public benefits would need to be further clarified at Stage 2 and appropriately secured so these can be given full weight in the balancing exercise.

Table 2 – harm to designated heritage assets

Heritage asset	Level of harm	Scale	TVIA view
Listed buildings			
Grade II Listed 867-869	Less than substantial harm	Moderate	View 10, 11, 12
Grade II listed the Grange, 34 White Hart Lane	Less than substantial harm	Moderate	View 25
Grade II listed 797 & 799 High Road	Less than substantial harm	Moderate	View 5
Grade II listed 819-821 High Road	Less than substantial harm	Moderate	View 6
Grade II* Dial House	Less than substantial harm	Low	View 4
Conservation areas			
North Tottenham Conservation Area	Less than substantial harm	Moderate	Views 4, 5, 5N, 6
Bruce Castle Park Conservation Area	Less than substantial harm	Low	View 16
Tottenham Cemetery Conservation Area	Less than substantial harm	Low	View 18, 19, 20

62. GLA officers have considered the impact of the application on the locally listed Station Master's House which is a non-designated heritage asset. Whilst its setting would be altered, GLA officers consider that the scheme would not harm its overall significance.

Height, massing and tall buildings

63. London Plan Policy D9 states that tall buildings should only be developed in locations identified as suitable in development plans. Policy D9 also states that tall buildings must address their visual, functional, environmental and cumulative impacts and achieve exemplary architectural quality.
64. In this case, the site falls within a location which is identified as being suitable for tall buildings, as set out in the Tottenham Area Action Plan (2014). The AAP does not set out a prescriptive building height policy framework in terms of what heights could be considered suitable or considered a maximum height parameter.
65. The High Road West Masterplan Framework (2014) suggests heights of 10 to 18-storeys. The massing principles set out in the HRWMF are for taller buildings to be placed towards the railway line, following the character established by Brook House to the north. This seeks to avoid adverse impacts on the surroundings in terms of the conservation area and listed buildings, with buildings heights stepped down towards the High Road.
66. The extant planning permissions already exceeded this indicative height at 18, 22 and 29-storeys. The application would increase the height based on the extant planning permission and vary the massing moving south to north (from 18, 22 and 29-storeys in the consent) to 27, 31, 29-storeys.
67. The surrounding existing and emerging context is also relevant. There is a completed 22-storey residential tower (Brook House) immediately to the north on the site within the Cannon Road development. To the east is the new Tottenham Hotspurs Stadium which is of a significant size and scale (59 metres AOD). The wider Northumberland Development Project also includes the provision of towers ranging in height from 19, 27 and 36-storeys.
68. The siting of the three tallest elements is broadly similar to the extant planning permissions. Their location adjacent to the railway line (furthest away from the heritage assets and conservation area) is in accordance with the massing strategy set out in the High Road West Masterplan (2014).
69. A 50-metre distance would be maintained between the development and residential homes fronting Pretoria Road, with a degree of screening provided by the elevated railway and ecological corridor which includes a number of relatively mature trees.
70. The functional impact of the tall buildings has been appropriately considered in terms of their impact on the surrounding public realm in relation to active frontages, ground floor entrances and deliveries and servicing requirements.

The overall layout approach is considered to be acceptable and in line with the principles set out in London Plan Policy D9.

71. The visual impact of the towers is considered to be acceptable, taking into account the applicant's Townscape and Visual Impact Assessment (TVIA). The buildings would contribute positively to the legibility of the area and the emerging character and skyline and would not harm any designated views. Whilst there would be harm to certain heritage assets, GLA officers consider that this could, on balance, be outweighed by the overall public benefits, subject to these being appropriately secured. The architectural and materials quality is of an acceptable standard as set out in more detail above. As required by the London Plan, the design quality has been rigorously assessed through a number of design review meetings.
72. The environmental impacts in terms of daylight, sunlight, overshadowing, glare and wind microclimate have been assessed in detail. In terms of overshadowing impacts on the public realm, the BRE standards would be generally met. The daylight and sunlight levels achieved within the scheme would be acceptable, with approximately 80% of the habitable rooms compliant with the BRE daylight criteria (ADF). The associated wind impacts are considered acceptable, with a suitable pedestrian comfort levels achieved, subject to the proposed mitigation measures and the public realm. The cumulative impacts have been appropriately considered, taking into account other nearby schemes.
73. To conclude, the application complies with the locational requirements set out in Part B of Policy D9. GLA officers have assessed the visual, heritage, environmental, functional and cumulative impacts of the proposal, noting the permitted and Local Plan context as set out above. Overall, GLA officers consider that the height and massing of the scheme would comply with the qualitative assessment criteria set out in Policy D9.

Design, layout, landscaping and public realm

74. Policies D1-D3 and D8 of the London Plan and the Mayor's Housing SPG apply to the design and layout of development and set out a range of urban design principles relating to the quality of public realm, the provision of convenient, welcoming and legible movement routes and the importance of designing out crime by optimising the permeability of sites, maximising the provision of active frontages and minimising inactive frontages.
75. The overall design and layout of the scheme accords with the master planning principles set out in the High Road West Masterplan Framework and would comply with the urban design requirements set out above. The following overarching comments are provided:
 - The permitted scheme for the Goods Yard site included a main public / shared surface route to the rear of blocks running adjacent to the railway embankment to the west of the site. In the current proposal, this area of the site would be revised to comprise 'Goods Yard Walk' – a linear communal green space for residents. The main route through the site would be moved

to the east adjacent to the Peacock Industrial Estate. The proposals would ensure a more legible and better connected public realm, with additional public open space and a clearer route through the site for pedestrians and cyclists, better connecting the proposed Peacock Park with White Hart Lane.

- When entering the site from the south, pedestrians would be led through White Hart Gateway, a new Southern Square, through to Embankment Lane and then on to a Northern Square linking to Peacock Park. The taller buildings would terminate views along these routes to assist wayfinding and legibility, with active ground floor frontages proposed in the form of duplex / maisonette units with front doors, communal residential entrances to mansion blocks and some flexible commercial uses. These design changes create a much better front to back relationship, ensuring a more clearly defined and legible public realm and are therefore strongly supported.
- The ground and first floor level of the scheme would create a strong relationship with the public realm ensuring good levels of overlooking and ownership and activation fronting Peacock Park, the north and south square, the spaces to the rear of the Station Master's House and the proposed pocket square. Bins and cycle stores would be internalised where possible to avoid these having a negative impact on the quality of the public realm. Residential units would also line the Goods Yard walk to the rear of the site, with this route likely to be closed during evening hours, but open during daytime.
- The proposals would also ensure the adjacent Peacock Industrial Estate (which turns its back on the proposed Embankment Lane) can be maintained without its operation or functionality being in any way compromised, whilst also ensuring it can be brought forwards in the future and plug into the proposed street network in a comprehensive manner, in line with the aspirations set out in the HRW Masterplan and Local Plan.
- Existing mature London Plane trees on the High Road at the entrance to the Depot site would be retained, which is strongly supported. This would ensure a mature and well-established landscaped entrance to the site from the High Road into the Depot site.
- The landscaping and public realm proposals for Embankment Lane, Pickford Lane and the first phase of Peacock Park are supported and would ensure a high quality public realm which is generously landscaped and pedestrian and cycle friendly. The scheme ensures footway on both sides of the Embankment Lane at the main entrance from White Hart Lane, which is welcomed.

Residential quality

76. Overall, the scheme proposes approximately 54% dual aspect units. No north facing single aspect units are proposed. There are 19 south facing single aspect units, with the remaining single aspect homes all being east and west facing. The larger units (3 and 4-bedrooms) all appear to be dual aspect which

is welcomed. A number of duplex / maisonettes are proposed over ground and first floor levels. These would have their own front gardens and front door entrances, with private rear gardens provided at podium level. This is strongly supported.

77. Taking into account the particular site circumstances and the proposed density, GLA officers are satisfied that the provision of dual aspect units has been maximised in line with London Plan. Potential noise, air quality, overheating and air quality issues should be addressed and mitigated appropriately. Conditions should be secured to ensure the proposed mitigation measures are incorporated in the completed scheme.
78. The core arrangement and unit to core per floor ratio is acceptable and accords with the Housing SPG benchmark. Private amenity space is proposed for all units in the form of balconies and terraces. Overall, the application complies with London Plan Policy D6 and the residential quality is acceptable.

Optimising development capacity and design review

79. London Plan Policy D3 requires the optimisation of sites by following a design-led approach, having regard to site attributes, local context, design principles, public transport accessibility and the capacity of existing and future transport services. The higher the density of a development, the greater the level of design scrutiny that is required, particularly qualitative aspects of the development design as described in London Plan Policy D4.
80. The Policy D4 requirement for additional design scrutiny is triggered in this instance, as the scheme contains tall buildings and would have a density of 380 dwellings per hectare and comprises a number of tall buildings. A number of design reviews have been undertaken at pre-application stage, as detailed in the applicant's Planning Statement, together with numerous pre-application meetings with Havering Council planning and design officers and the GLA. This design-led approach complies with the above strategic policies.
81. The proposal for comprehensive high density scheme on this site is in line with the principles set out in the London Plan and Local Plan, taking into account the site location, PTAL and noting the overall layout, design quality and residential quality and response to the existing and emerging context. The proposals would optimise the development capacity of the site in accordance with the London Plan.

Fire safety

82. A fire statement has been prepared by a third party suitably qualified assessor and submitted as part of the planning application, as required by London Plan Policy D12. This covers a range of fire safety related matters including: building materials and construction; means of escape and evacuation, including evacuation lifts; fire safety systems (including suppression, detection and alarm systems) and smoke control measures; measures to prevent fire spread in terms of external walls; and fire brigade access and facilities. Sprinkler protection is proposed throughout the

development in all dwellings, car parks, plant and refuse stores and non-residential uses. Compliance with the submitted fire strategy and the provision of fire evacuation lifts in each building core should be secured by condition.

Inclusive design

83. The application complies with the accessible housing standards in the London Plan Policy D7, with a good range of wheelchair accessible unit sizes proposed across the housing tenures and types. This should be secured by condition. The landscape design statement demonstrates that the proposed public realm would be of a high quality in terms of landscaping, materials and inclusive access with appropriate provision of seating spaces and acceptable widths and gradients proposed. This complies with London Plan Policy D5.

Digital connectivity

84. Policy SI6 requires development proposals to ensure sufficient digital connectivity, including full fibre connections and mobile connectivity, and provide space for mobile digital connectivity infrastructure. Development proposals should ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users. This should be secured by condition.

Transport

Site access and delivery and servicing arrangements

85. As with the refused planning application, 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 no through north-south internal route terminating at the northern end of The Goods Yard. The access route to the northern part of the site is proposed to be retained in the same location as the consented scheme, via the western arm of the signal-controlled junction with High Road and Brantwood Road.
86. Whilst the improved public realm and access arrangement along the southern access route, which provides continuous footways on both sides of the route could be supported, a Stage 1 Road Safety Audit (RSA) should be completed at this point of access prior to determination.
87. 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.

88. The internal route comprises a shared surface access route allowing access to accommodate servicing, deliveries, refuse collection and emergency vehicles along a route otherwise only open to pedestrians and cyclists, with limited private vehicles associated with residential car parking. A Stage 1 Road Safety Audit (RSA) along this access route should also be completed prior to determination.

Healthy Streets and Vision Zero

89. 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 of showing how the development will deliver local improvements that support the ten Healthy Streets indicators and Vision Zero approach in the wider area, particularly in relation to connectivity for cyclists within the local area towards the Cycleway 1 (CS1) and the southern section of the masterplan area.
90. The applicant should assess this issue in more detail in consultation with the local highway authority and TfL officers, 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 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

91. 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, officers have some concerns about the quality of the cycle parking. This includes an insufficient number of accessible cycle parking spaces/Sheffield stands, an 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.
92. 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 officer concerns and subsequently the provision should be secured by condition.

Car parking

93. A total of 145 car parking spaces (a ratio of 0.17 spaces per residential unit) would 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.
94. 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.
95. 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

96. The methodology used to assess trip generation, including the cumulative impact assessment, is acceptable. The application is unlikely to have a significant impact on the strategic road network. No mitigation is 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.
97. Bus trip generation figures reveal that the proposals, including the revised uplift and additional trips for the High Road West Masterplan (HRWM) site as a whole will generate a cumulative bus demand of 258 and 251 two-way trips in the AM and PM peak periods respectively. There are existing capacity issues on the local bus network specifically affecting routes W3, 149 and 259 which are important routes providing key east-west and north-south connections tying different parts of Haringey together. As such, a financial contribution towards bus service improvements is required, including but not limited to capacity enhancements, to accommodate the net new demand and mitigate the cumulative impacts of development in the local area.
98. 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 $[(487,500 * 30) / 75]$ towards bus services improvements is therefore sought. Appropriate trigger points should be discussed and agreed to ensure that the timing of payments fits in with the phasing of construction and occupation of this development in relation to the rest of the HRWM site.

London Overground Infrastructure Protection

99. Infrastructure asset protection and operational protection related conditions are likely to be required given the proximity of the site to the railway lines.

Travel plan

100. The applicant has submitted a framework Travel Plan, which sets out specific objectives in support of London Plan policy. The focus on encouraging active modes (walking and cycling) and facilitating opportunities to achieve a healthy lifestyle for all users is welcomed. The final Travel Plan and all agreed measures should be secured, enforced, monitored and reviewed through the Section 106 agreement, in accordance with London Plan Policy T4.

Deliveries and Servicing and Construction Logistics

101. The draft Delivery and Servicing Management Plan (DSMP) and outline Construction Logistic Plan (CLP) are acceptable. However, the applicant should confirm the proposed phasing of construction and occupation in relation to the rest of the masterplan site. The CLP should also be aligned with major stadium events.

Sustainable development

Energy strategy

102. Based on the applicant's energy strategy, the proposed development would achieve a 79% reduction in carbon emissions on the residential element above baseline Building Regulations, with the non-residential element achieving a 54% reduction in carbon emissions. This exceeds the minimum 35% on-site requirement for reductions in carbon emissions which are set out in the London Plan.
103. The proposed efficiency measures would achieve a 7% reduction in carbon emissions on the residential element and a 10% on the non-residential element. This falls short of the minimum on-site energy efficiency targets in the London Plan (which are 10% and 15% respectively). As such, additional energy efficiency measures should be considered and incorporated within the final design of the blocks within the scheme, in accordance with London Plan Policy SI2.
104. The energy strategy is predicated on connection to the wider planned district heat network (DHN) which is under construction at Meridian Water (the Ecopark energy centre, Energetik). Based on the discussions which have been undertaken with the DHN provider Energetik, the applicant has stated that connection to the DHN would be possible from 2023 via connection at Fore Street to the north of the North Circular and confirming that the network could have the capacity to serve the new development. This approach is strongly supported, in accordance with the Policies SI2 and SI3 of the London Plan and should be secured via the S106 agreement or conditions. Further correspondence between the applicant and DHN provider Energetik should be provided to verify the potential to connect the site to the DHN and cater for the site's heat requirements.

105. The potential for solar panels to be incorporated within the available roof space has been assessed which shows that 533 solar panels (944 sq.m.) could be accommodated, with plans provided to demonstrate this. This approach is acceptable and further details should be secured by condition.
106. The risk of overheating within residential units and communal corridor spaces has been assessed. This has needed to take into account the noise constraints associated with the site's close proximity to the elevated railway line and the need for acoustic design mitigation measures. A mechanical ventilation with heat recovery system is proposed and all of the residential units would benefit from openable windows. Ceiling fans are recommended to address extreme heatwave events. This is generally acceptable, subject to further details being secured by condition.
107. London Plan Policy SI2 requires the energy performance of completed developments to be monitored, verified and reported following construction ('Be Seen').
108. The remaining reductions in carbon emissions required to ensure compliance with the London Plan zero carbon target should be secured via a financial contribution / carbon off-set payment. This should cover both the residential and non-residential elements and should be calculated based on the recommended price per tonne, as set out in the London Plan.

Whole Life Carbon

109. In accordance with London Plan Policy SI2 the applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint.
110. A Whole Life Carbon Assessment has been undertaken in accordance with the London Plan. This reviews the embodied carbon emissions associated with the proposed development, taking into account the materials quantities and loads, the operational energy consumption of the built scheme, with total emissions estimated and compared to the GLA benchmarks. The report outlines a range of opportunities which could be undertaken to reduce the carbon associated with the development at detailed design stage. This further review should be secured via pre-commencement condition.
111. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA [website](#)¹.

Circular Economy

112. Policy D3 requires development proposals to integrate circular economy principles as part of the design process. London Plan Policy SI7 requires

¹ <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>

development applications that are referable to the Mayor of London to submit a Circular Economy Statement, following the Circular Economy Statements LPG.

113. A Circular Economy Statement has been submitted which outlines how circular economy principles will be incorporated in the design, construction and management of the proposed development, including through minimising materials use and the sourcing and specification of materials; minimising and designing out waste at various stages; and by promoting reusability, adaptability, flexibility and longevity. This is supported and complies with London Plan Policy SI7.
114. A condition should be secured requiring the applicant to submit a post-construction report. The template and suggested condition wording are available on the GLA [website](#)².

Environmental issues

Urban greening, trees and biodiversity

115. Policy G5 of the London Plan requires new development to contribute towards urban greening. Policy G7 requires development proposals to ensure that, wherever possible, existing trees of value are retained and that the loss of trees as a result of development is mitigated through the provision of replacement trees of an adequate value. Policy G6 states that development proposals should manage the impact on biodiversity and aim to secure net biodiversity gain.
116. A range of urban greening methods are proposed as part of the applicant's landscape strategy. Wetland habitat and open water areas are proposed within the ecological corridor (Goods Yard Walk). Within the public realm a range of street trees, rain gardens, flower rich perennial planting beds, hedges and lawns are proposed, together with permeable paving. Intensive and extensive green roofs are proposed within podium gardens. GLA officers are satisfied that the landscape strategy is well-considered and has generally maximised the potential for urban greening within the site. The applicant has undertaken an Urban Greening Factor (UGF) assessment which demonstrates that the scheme would achieve an overall UGF score of 0.45. This exceeds the London Plan target, which is strongly supported.
117. The vast majority of the existing site comprises hard-standing and buildings. There are existing trees lining the west of the site within the railway embankment, which falls within a locally designated ecological corridor. A large number of these trees fall outside the application site boundary and ownership area. In addition, there are a number of mature London Plane trees located on the High Road at the entrance to the Depot site. All of the mature London Plane trees would be retained, which is strongly supported. This complies with the requirements of London Plan Policy G7.

² <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance>

118. An ecological appraisal has been undertaken. This identifies the existing landscape embankment and woodland area running alongside the railway to the west as being of the highest ecological value. This area would be largely retained and enhanced as an ecological corridor through the introduction of Goods Yard Walk and the proposed landscape and habitat improvements. This is strongly supported.
119. The applicant's ecological report concludes that there would be a net increase in the number of trees and habitat areas within the site, with the proposed new trees and amount of habitat areas proposed exceeding those which are lost as part of the development. The report concludes that the development would enhance the site from the existing baseline conditions in terms of biodiversity, ensuring net biodiversity gains overall.
120. Details of the proposed landscaping and biodiversity improvements should be secured, as well as the recommended mitigation measures. Subject to appropriate conditions being included, the application accords with London Plan Policy G6 in terms of managing the impacts on biodiversity and ensuring net biodiversity gain.

Sustainable drainage and flood risk

121. A range of sustainable urban drainage systems (SuDs) are proposed within the site to attenuate and reduce surface water run-off and contribute to urban greening and biodiversity, in accordance with the London Plan. This includes rain gardens, tree pits, swales, bioretention areas and planting beds, permeable paving and geo-cellular below ground water attenuation tanks (with a total volume of 2,492 cubic metres). This overall strategy is supported and accords with the drainage hierarchy in the London Plan. Details should be secured by condition.

Noise

122. The western part of the site, where GY Blocks A, B, F and Station Master's House and Depot Blocks ABC would be located suffers from railway noise. The eastern and southern parts of the site, where GY Block and the Station Master's House and Depot Blocks E and F would be located, suffers from traffic noise from the High Road. The Peacock Industrial Estate is also to the east.
123. Sound insulation measures are required on these blocks to ensure that the internal noise environment of these blocks meets the relevant WHO and British standards in terms of insulation and glazing. Mechanical ventilation is also recommended to be installed for these blocks, so that windows can be kept closed whilst also ensuring an acceptable temperature during summer months. The assessment also identifies the need for the inclusion of an acoustically attenuated facade louvres on some of the facades to address the risk of overheating. These have been incorporated into the proposed detailed design.
124. This complies with London Plan Policies D13 and D14. Details of the proposed glazing, mechanical ventilation and louvres should be secured by way of a planning condition.

Air quality

125. The application's Air Quality Assessment includes an Air Quality Neutral Assessment and an Air Quality Positive Statement. The risk of exposure to poor air quality has been considered. The Assessment finds that the site, including the High Road and White Hart Lane frontages, would be below air quality objective levels, meaning the site as a whole is considered acceptable for housing and no specific mitigation is required. Homes would also have a Mechanical Ventilation with Heat Recovery (MVHR) system (with the need to open windows limited to purge scenarios), but with the choice to open windows.
126. The proposed scheme would be 'Air Quality Neutral' in terms of emissions associated with transport and buildings. The public realm prioritises pedestrian and cycle movement, with a relatively low car parking level and with electric charging provision in line with the London Plan. The proposed connection to an off-site District Energy Network means that there would be no onsite emissions from boilers. The application therefore complies with London Plan Policy SI1.

Local planning authority's position

127. Haringey Council planning officers are currently assessing the application and are targeting a Planning Committee in due course.

Legal considerations

128. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

129. There are no financial considerations at this stage.

Conclusion

130. London Plan policies on housing, affordable housing, play space, urban design, tall buildings, heritage assets, transport, energy, climate change, urban

greening, biodiversity and trees are relevant to this application. The application does not fully comply with these policies, as summarised below:

- **Land use principles:** Further optimisation of the site's development potential (over and above the extant planning permission) is supported as part of a comprehensive residential-led mixed use scheme.
- **Housing and affordable housing:** 36% affordable housing (by habitable room) comprising 40% low cost rent and 60% intermediate housing is proposed, with provision for the overall quantum of affordable housing to be increased to 40% affordable housing with grant. The proposed tenure split complies with the Tottenham Area Action Plan. The blended affordable housing threshold for the site would be met. The affordability of intermediate housing and phasing of affordable housing should be agreed and secured together with an early stage review mechanism.
- **Urban design:** The layout, landscaping, density and residential quality is supported. Tall buildings are proposed in a location which is identified as suitable for tall buildings. The same number of towers is proposed as the extant permission but with an increase in height and changes to the massing arrangement. The scheme generally complies with the qualitative assessment criteria in Policy D9 in respect of visual, functional, environmental and cumulative impacts.
- **Heritage:** The scheme would cause less than substantial harm to a number of designated heritage assets. As such, the public benefits associated with the application will need to outweigh this harm. This could be the case in this instance, subject to these benefits being secured at Stage 2 and further clarification on a number of issues.
- **Transport:** A £195,000 contribution towards bus service enhancements is required. Stage 1 Road Safety Audits (RSA) should also be undertaken. Further discussion is required in relation to healthy streets improvements in the wider area. Cycle parking should be secured in line with the minimum quantitative standard in the London Plan and in line with the London Cycling Design Standard. Further discussion is required in relation to the design of cycle parking stores. A Car Parking Management Plan and car parking permit free obligation should be secured. Delivery and Servicing Plan, Construction Logistics Plan and Travel Plans should be secured.
- **Climate change and environmental issues:** The energy, urban greening and drainage strategies are acceptable. The applicant is proposing to connect the site to the planned Lee Valley District Heat Network. This is strongly supported and should be secured. Details of the proposed noise mitigation measures should be secured via condition.

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