

High Road West, Tottenham

Local Planning Authority: Haringey

Local Planning Authority reference: HGY/2021/3175

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

Comprehensive phased mixed use redevelopment of the site, including the regeneration of the Love Lane Estate and the provision of up to 2,929 homes, together with commercial, community, employment and industrial uses, a new public park and civic square, with buildings ranging in height from 4 to 29-storeys.

The applicant

The applicant is **Lendlease** and the architect is **Studio Egret West and PTE**

Strategic issues summary

Estate regeneration: The scheme would ensure the like for like replacement of existing affordable housing and the right to return for all social rent households. The approach to leaseholders and public consultation complies with the Mayor's key principles on estate regeneration. Therefore, the comprehensive redevelopment of the estate can be supported (paragraph 20 to 29).

Land use principles: The comprehensive residential-led mixed use redevelopment of the site accords with the expectations set out in the Local Plan site allocation and is supported in strategic planning terms, subject to further discussion and clarification regarding the provision of employment and social infrastructure use and means of securing this (paragraph 30 to 46).

Housing and affordable housing: The applicant's Financial Viability Assessment (FVA) is being scrutinised to ensure the scheme is providing the maximum viable level of affordable housing. Early, mid and late stage viability review mechanisms will be required. Affordability levels on intermediate housing should be secured (paragraph 47 to 60).

Urban design: The design and layout is strongly supported and is aligned with the High Road West Masterplan Framework. The density is supported, noting the design-led approach undertaken. The residential quality is acceptable (paragraph 61 to 95).

Tall buildings: The height and massing proposed can be supported in this plan-led location and the scheme would overall comply with the qualitative criteria set out in London Plan Policy D9 in respect of visual, heritage, functional, environmental and cumulative impacts. The architectural and materials quality of tall buildings should be of an exemplary standard (paragraph 73 to 83).

Heritage: The harm to heritage assets would be less than substantial. This would be clearly and convincingly outweighed by the public benefits proposed by the application (paragraph 94 to 101).

Transport: Updated bus trip generation figures should be provided to enable officers to fully assess the impact on bus capacity and clarify whether any mitigation is required. Conditions should secure further details regarding car parking, cycle parking and Road Safety Audits (paragraph 102 to 116).

Climate change and urban greening: The approach to energy, drainage and urban greening is generally acceptable, subject to conditions and obligations (paragraph 117 to 135).

Recommendation

That Haringey Council be advised that, whilst the scheme is broadly supported in strategic planning terms, the application does not yet fully comply with the London Plan for the reasons set out in paragraph 139. However, the possible remedies set out in this report could address these deficiencies.

Context

1. On 30 November 2021 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: "Development which comprises or includes the erection of a building of...more than 30 metres high and is outside the City of London."
 - Category 3A: "Development which is likely to— (a) result in the loss of more than 200 houses, flats, or houses and flats."
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 High Road West comprises an 8.57-hectare site in Tottenham which falls within the Lee Valley Opportunity Area and Northumberland Park Growth Area. The site is allocated for comprehensive, masterplanned residential-led mixed use redevelopment in the Tottenham Area Action Plan (NT5). The proposals cover a large and complex urban site covering a number of urban blocks and development parcels in different land ownership and use. This is shown in Figure 1 and the key elements summarised below.

Figure 1 – site location and surrounding context



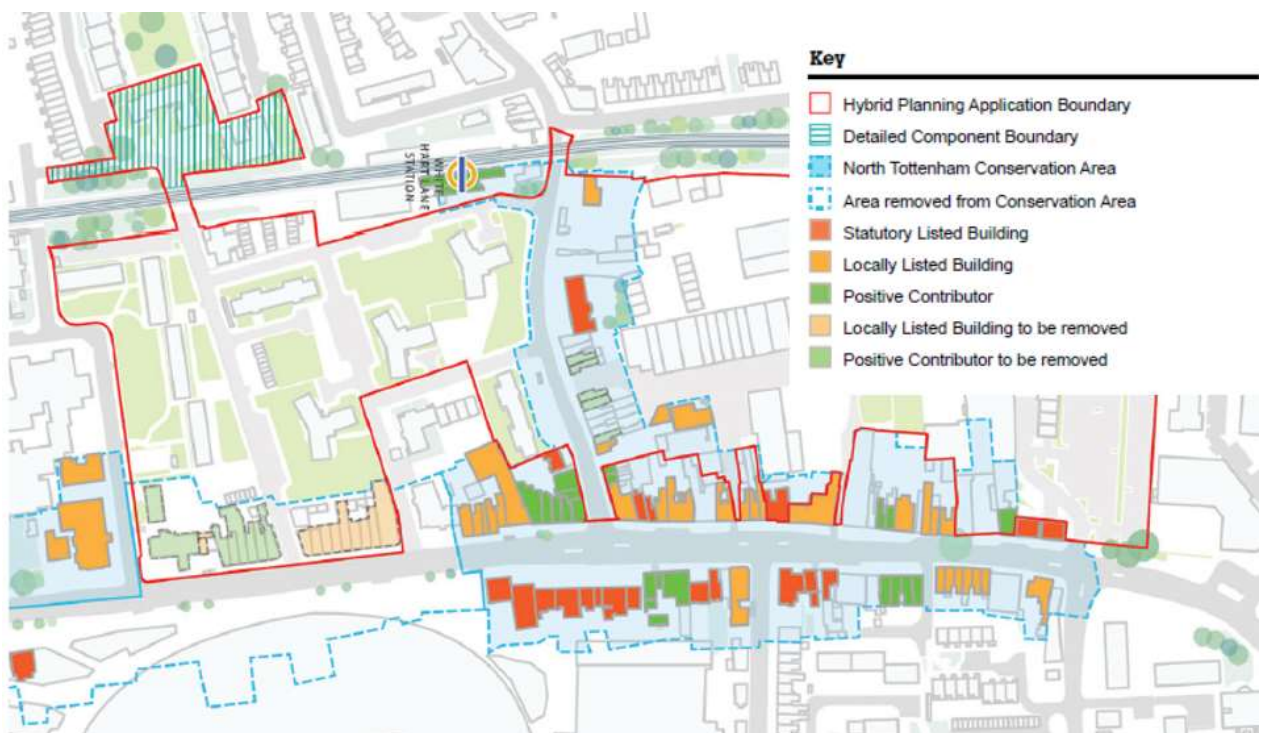
- Southern site (shaded yellow) – This includes the Council owned Love Lane Housing Estate and Coombes Croft Library. This part of the site also includes high street properties at 731 to 759 High Road, which are not statutory listed and are understood to be in multiple ownership. The Love Lane Estate comprises residential buildings of between 4 and 10-storeys, including flats, stacked maisonettes and three 10-storey towers (Charles House, Moselle House and Ermine House), as well as areas of surface car parking, garages, open space, including some relatively mature trees.
- 100 Whitehall Street (shaded purple) – This part of the site is located on the other side of the railway line and comprises the three-storey Whitehall Lodge in residential use (social rent) and single storey community centre building (the Whitehall & Tenterden Community Hall);
- Northern site (shaded in blue) – This includes a number of commercial owned brownfield sites as well as properties along White Hart Lane. This part of the site comprises:
 - The former Goods Yard site - which is now cleared land which was temporarily used as a construction compound for the Tottenham Hotspur Stadium development and is now in temporary use for stadium car parking;
 - Carberry Enterprise Park and Peacock Industrial Estate - which comprises a mix of one and two-storey light industrial units (non-designated industrial land) with ancillary office and car parking;
 - Light industrial buildings and yards to the rear of the High Road which are in a mix of community/ church, banqueting and timber yard uses, together

with three public alleyway routes (Chapel Place, Brunswick Square and Percival Court);

- The Depot - which comprises a large footprint two-storey retail building which is occupied by B&M Stores (previously Sainsbury's) and a large surface car park, as well as five small retail units to the south;
- Numbers 8 to 16 and 24 to 30 White Hart Lane which are unlisted two-storey high street properties;
- The Grade II listed the Grange (34 White Hart Lane); and
- 52 White Hart Lane which is locally listed.

7. The site includes the Grade II listed 819 and 821 High Road and the Grade II listed the Grange (34 White Hart Lane). Parts of the site along the High Road and White Hart Lane fall within the North Tottenham Conservation Area, as updated in the Haringey Local Plan Proposals Map (2017). There are also a number of listed buildings which are immediately adjacent to the site, as shown below. This includes the Grade II listed 7 White Hart Lane; the Grade II listed 797 and 799 High Road and 867 and 869 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.

Figure 2 – heritage context



8. The Public Transport Access Level (PTAL) varies across the site ranging from PTAL 5 to 3 on a scale of 0 to 6b, where 6b represents the highest connectivity to the public transport network as a whole. White Hart Lane station (London Overground and Greater Anglia services) is located immediately adjacent to the site. Bus routes in vicinity of the site include five daytime bus routes with bus stops along the A1010

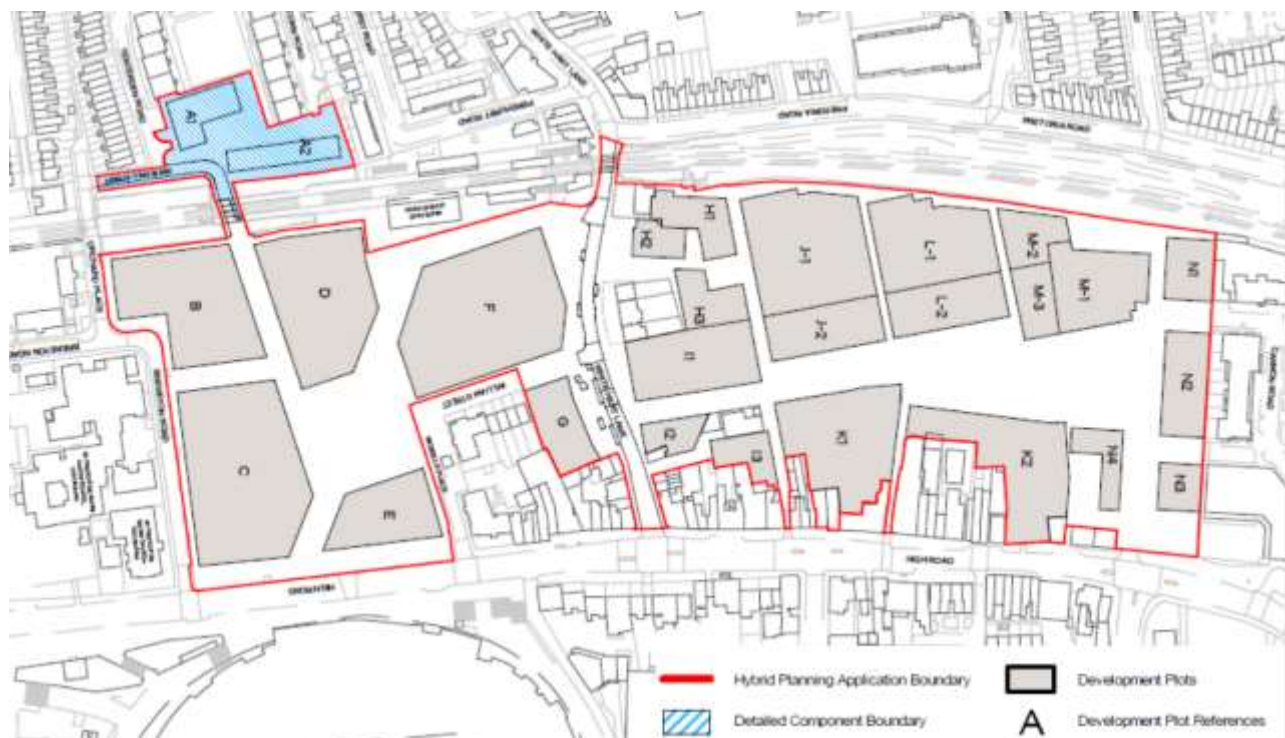
High Road, White Hart Lane and Northumberland Park. In terms of the wider context, Northumberland Park station (National Rail services) and Seven Sisters station (London Underground Victoria Line and London Overground) are approximately 1 kilometre to the east and 3 kilometres south of the site respectively.

9. Cycleway 1 (From Tottenham to Liverpool Street) is located approximately 400 metres south of the development site. 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.

Details of this proposal

10. The applicant seeks hybrid planning permission (part detailed; part outline) for the demolition and comprehensive phased mixed use redevelopment of the site, including the regeneration of the Love Lane Estate and the provision of up to 2,929 homes, together with commercial, community, employment and industrial uses, a new public park and civic square, with buildings ranging in height from 4 to 29-storeys.
11. The detailed element comprises the first phase of the scheme (Plot A – Whitehall Mews). This would comprise two residential blocks ranging in height from 5 and 6-storeys providing 60 homes, with associated landscape, public realm and access improvements. The outline component comprises the demolition of existing buildings and creation of new mixed-use development including residential (Use Class C3), commercial, business & service (Use Class E), leisure (Use Class E), community uses (Use Class F1/F2), and Sui Generis uses together with the creation of a new public square, park & associated access, parking, and public realm works. The detailed and outline elements are shown below.

Figure 3 – Detailed and outline Development zones



12. Matters relating to layout, scale, appearance, landscaping, and access within the site reserved for subsequent approval. The outline element of the scheme is guided by a development specification document setting out minimum and maximum floorspace areas for the proposed development by land use and within each development zone. The outline element would also be guided by parameter plans and a design code, as well as an illustrative masterplan.

Case history

13. GLA pre-application meetings with the applicant took place on 20 July 2021, 5 October 2021 and 17 November 2021. The GLA's pre-application advice note was issued on 1 November 2021 and provided the following strategic planning advice.
 - The estate regeneration proposal is expected to ensure the like for like replacement of existing affordable housing floorspace and the right to return for all residents. The approach to leaseholders and public consultation would also accord with the principles set out in the Mayor's Good Practice Guide to Estate Regeneration.
 - The comprehensive, masterplanned residential-led mixed use redevelopment of the site accords with the expectations set out in the Local Plan site allocation and is supported in strategic planning terms, subject to further details being provided relating to town centre impact and clarification on the quantum of town centre, employment and social infrastructure use and means of securing this, including low cost workspace provision.
 - The application will need to follow the Viability Tested Route. A Financial Viability Assessment (FVA) should be submitted which will be scrutinised by GLA officers to ensure the scheme is providing the maximum viable level of affordable housing. Early, mid and late stage viability review mechanisms will be required. Further discussion is required to confirm the affordability of the intermediate housing.
 - The design and layout is supported and is aligned with the High Road West Masterplan Framework. The density is supported, noting the design-led approach undertaken.
 - The height and massing proposed which includes tall buildings could be supported in this location, subject to the scheme complying with the qualitative criteria set out in London Plan Policy D9 in respect of visual, heritage, functional, environmental and cumulative impacts. The architectural and materials quality of tall buildings should be of an exemplary standard.
 - Harm to heritage assets would be caused through the demolition of non-designated heritage assets and impacts on the setting and significance of other designated heritage assets. This will need to be justified when balanced against the public benefits associated with the scheme.
 - A range of matters relating to transport, energy, drainage, play space, urban greening, circular economy and whole life carbon cycle should be addressed in the planning application.

Tottenham Hotspur Football Club planning applications and permissions

14. Two separate extant planning permissions are in place on the northern site which are summarised below and were secured by a different applicant (Tottenham Hotspur Football Club) which is the landowner of this part of the site:
 - 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.
 - 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.
15. A full planning application was submitted by Tottenham Hotspur FC for the Goodsyards and Depot sites in June 2021 (LPA ref: HGY/2021/1771) This proposes residential-led mixed use redevelopment of the site comprising 867 homes (36% affordable housing by habitable room), 1,878 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 32-storeys.
16. The Mayor's Stage 1 report was issued on 23 August 2021 (GLA ref: 0718). 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. The application was referred to the Mayor at Stage 2 and on 20 December 2021, the Mayor's Stage 2 decision was issued which advised Haringey Council that the Mayor was content for the Council to determine the case. GLA officers understand that an appeal has been submitted by the applicant in relation to this application.

Strategic planning issues and relevant policies and guidance

17. 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.
18. The following are also relevant material considerations:
 - The National Planning Policy Framework and National Planning Practice Guidance;
 - The National Design Guide;
 - The National Model Design Code;
 - The Upper Lee Valley Opportunity Area Planning Framework (OAPF) (2013);

- Haringey Council - High Road West Masterplan (2014);
- Haringey Council – High Road West Masterplan (2021); and
- Haringey Council – North Tottenham Conservation Area Appraisal & Management Plan (2017).

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

- | | |
|--|---|
| • Estate regeneration | <i>London Plan; Affordable Housing & Viability SPG; Housing SPG; The Mayor's Good Practice Guide to Estate Regeneration;</i> |
| • Land use principles | <i>London Plan; Social infrastructure SPG;</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; Good Quality Homes for All Londoners draft LPG;</i> |
| • Urban design and heritage | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Public London Charter LPG; Good Quality Homes for All Londoners draft LPG; Fire Safety D12(A) pre-consultation draft LPG; Fire Statements D12(B) pre-consultation draft LPG; Fire Evacuation Lifts D5(B5) pre-consultation draft LPG;</i> |
| • Inclusive access and equalities | <i>London Plan; Planning for Equality and Diversity in London SPG 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 draft LPG; Whole-life Carbon Assessments draft LPG; 'Be Seen' Energy Monitoring LPG; Urban Greening Factor pre-consultation draft LPG; Air Quality Neutral draft LPG; Air Quality Positive LPG;</i> |
| • Transport | <i>London Plan; the Mayor's Transport Strategy; Sustainable Transport, Walking and Cycling draft LPG.</i> |

Principle of estate regeneration

20. London Plan Policy H8 resists the demolition of affordable housing unless it is replaced by an equivalent amount of affordable housing floorspace, and affordable housing floorspace is reprovided on a like for like basis and integrated into the development to ensure mixed and inclusive communities. As set out in the London Plan, all estate regeneration schemes should take into account and reflect the following key principles set out in the Mayor's Good Practice Guide to Estate Regeneration (GPGER) which apply to all estate regeneration schemes in London:

- like for like replacement of existing affordable housing floorspace
- an increase in affordable housing
- full rights of return for any social housing tenants
- fair deal for leaseholders/freeholders
- full and transparent consultation and involvement

Existing residential homes within the estate

21. The applicant has provided figures confirming the existing homes to be demolished as part of the proposed redevelopment. This includes 297 residential homes, comprising 40 social rent tenure homes, 211 affordable rent tenure homes (temporary accommodation), 22 private owned homes (including right to buy leaseholders), together with a further 24 non-resident leaseholders. The existing housing by tenure and unit size is set out below.

Table 2 – Existing homes proposed for demolition and redevelopment

	Social rent	Non-secure affordable rent (temporary accommodation)	Private leasehold (resident)	Non-resident leasehold	Total
1-bedroom	27	92	1	4	124
2-bedroom	7	46	5	3	61
3-bedroom	6	72	14	17	109
4-bedroom	0	1	1	0	2
5-bedroom	0	0	1	0	1
Total	40	211	22	24	297

Like for like replacement

22. The applicant is proposing 500 social rent tenure units. This would increase the overall provision of low cost rent accommodation (both social rent homes and temporary accommodation) on the site by approximately +250 homes. This is strongly supported. Given that all LAR units would be replaced with secure social rent homes, the application would also provide a net increase of +460 secure social rent tenure homes. This is strongly supported. The proposed social rent provision within the illustrative scheme mix is set out below, showing the proposed net increase in units.

23. Based on these dwelling figures, it is evident that there would be an increase in social rented accommodation by floorspace and habitable room, in accordance with London Plan Policy H8, which also appeared to be the case based on the information

submitted at pre-application stage. However, the applicant should provide further information to clarify the quantum of existing and proposed affordable housing within the estate by floorspace, noting that floorspace is the key metric for assessing re-provision as set out in London Plan Policy H8. Habitable room figures should also be provided to enable a full comparison.

Table 3 – Net change in social rented tenure

	Total existing social rent and affordable rent	Proposed social rent	Net change
1-bedroom	119	55	-64
2-bedroom	53	225	+172
3-bedroom	78	165	+87
4-bedroom	1	55	+54
5-bedroom	0	0	0
Total	251	500	+249

Right to return

24. In terms of the right to return, the applicant's Landlord Offer on which the recent ballot was based confirmed that the right to return to the redeveloped High Road West neighbourhood would be offered to the 40 households on social rent tenancies and 211 households in non-secure temporary accommodation. To benefit from a right to return, households need to have lived on the estate since January 2021. This exceeds the minimum requirement set out in London Plan Policy H8 and the Mayor's GPGER and is strongly supported. The phasing approach seeks to ensure residents only need to move once through a 'single move' approach where possible, which is welcomed.

Fair deal for leaseholders

25. The Mayor's GPGER seeks to ensure that leaseholders affected by estate regeneration are treated fairly and fully compensated. The Landlord Offer sets out the applicant's commitment to ensure fair compensation for resident leaseholders (market value, with an additional 10% compensation, plus all reasonable legal and moving costs paid). Resident leaseholders would also be offered an affordable home within the redeveloped neighbourhood via the offer of financial support in the form of an equity loan / shared equity homes. This approach is acceptable and accords with the key principles set out in the Mayor's GPGER.

Full and transparent consultation

26. The applicant has undertaken a ballot recently which was undertaken by an independent body, in line with the GPGER and GLA funding guidelines. Residents voted 56% "yes" in favour of the regeneration proposals, with a turnout rate of 69% of the eligible residents. This is welcomed and accords with the Mayor's Good Practice Guide to Estate Regeneration (GPGER). The Local Plan site allocation sets out a number of requirements relating to the engagement with existing residents through the establishment of a Residents Steering Group and discussion and feedback with

this group in formulating the masterplan and in formulating phasing and decant options.

27. In its Statement of Community Involvement, the applicant has set out how it has addressed these engagement requirements leading up to the landlord offer, ballot and next steps. The applicant has established a Residents Charter and Design Guide in formulating the masterplan and detailed phase 1 element. This approach is expected to be used for all further estate regeneration phases. This consultation process has been underway for a number of years, leading up to the ballot. Overall, the approach accords with the key principles set out in the GPGER in terms of early engagement and feedback.

Consideration of alternatives

28. London Plan Policy H8 states that before considering demolition of existing estates, alternative options should be considered and the potential benefits associated with the option to demolish and rebuild an estate set against the wider social and environmental impacts. In this case, there is a detailed plan-led approach in place which sets out the rationale for the comprehensive redevelopment of the estate and establishes the principle of demolition and redevelopment in order to optimise the regeneration and potential of the site. This is set out in the High Road West Masterplan (2014) and Tottenham Area Action Plan (2017).

Conclusion – estate regeneration

29. The estate regeneration proposal would ensure the like for like replacement of existing affordable housing floorspace and the right to return for all residents. The approach to leaseholders and public consultation would also accord with the principles set out in the Mayor's Good Practice Guide to Estate Regeneration. Therefore, the comprehensive redevelopment of the estate is supported in this case, subject to the maximum viable level of affordable housing provision being secured. Clarification of the existing affordable housing floorspace should be provided.

Land use principles

Housing supply

30. 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 new homes during this period. Based on the maximum number of gross new homes proposed (2,929 homes), the proposals would comprise 2,632 net additional homes. This would therefore make substantial contribution towards meeting local and strategic housing targets, which is strongly supported.

Town centre use

31. The site currently adjoins the Tottenham High Road North Local Shopping Centre. The Council's site allocation in the Area Action Plan (2017) sets an ambitious vision for the comprehensive regeneration site. This seeks to create a new vibrant mixed use neighbourhood, centred around the new Moselle public square. This new / expanded local centre would comprise a mix of commercial, leisure, indoor sport,

community and cultural uses whilst ensuring this additional floorspace complements nearby centres.

32. The applicant's proposals respond positively to this plan-led vision. The overall quantum of town centre use proposed in the illustrative scheme appears to be slightly over the expectations set in the AAP. However, this can be justified in this case, taking into account the specific circumstances of the development and noting the comprehensive nature and scale of the scheme, alongside the existing and emerging context.
33. The existing site contains circa 9,000 sq.m. of traditional large footprint retail floorspace on the B&M site. The application proposes up to 7,800 sq.m. of flexible Class E (a-c) floorspace. Rather than seek to replace the existing large footprint store, the proposals seek to redistribute the retail floorspace across the site through a range of smaller retail units targeted at independent and local businesses. This is supported and would help to activate the proposed new public realm and supports the strong place making approach in relation to Moselle Square and other key public spaces.
34. The scale of commercial floorspace is considered commensurate with the overall increase in residential density across the site and the overall objectives in the Council's site allocation. An additional site specific in this case is the likely footfall associated with stadium events. The proposals are supported by a retail impact assessment and the overall conclusions of this assessment are considered acceptable in strategic planning terms in terms of the potential impact on nearby town centres. As such, the application is considered to comply with London Plan Policies SD6, SD7 and SD8.

Employment and industrial use

35. The applicant has confirmed that currently there is approximately 11,750 sq.m. of existing industrial floorspace on site, alongside 1,790 sq.m. of office, R&D and light industrial uses. The location and quantum of the existing industrial, retail and community use is set out below.
36. The site allocation seeks the replacement of existing employment uses, including high quality workspace. The illustrative masterplan envisages a series of light industrial / workspaces being accommodated on the northern site to the rear of the existing High Road buildings within the 'Peacock and Roebuck Yards' character area. This seeks to ensure provision for a variety of light industrial and creative SMEs, co-located alongside other residential and commercial uses. Further workspace use could also be provided on the southern site. This overarching land use approach is set out in the proposed parameter plans and development specification. Plot E would be restricted to community uses, with some active commercial potentially at ground floor. This overall approach is supported.
37. The Carberry Enterprise Park and Peacock Industrial Estate comprise non-designated industrial land in active employment use, including existing light industrial occupiers, including a large number of small businesses providing a diverse range of local services including food production, manufacturing, car mechanics and furnishing production workshops. Historically, this land was previously designated as Locally Designated Industrial Site (LSIS) but was de-designated as part of the

Tottenham AAP and Haringey Local Plan (2017). The principle of the redevelopment of these industrial sites is therefore established in the Council's site allocation. As such, the proposals would not conflict with the criteria set in Part C of London Plan Policy E7.

Land Use	Existing GIA' (sqm)	Existing GEA (sqm)
B2: Industrial	9,818	10,800
B8: Industrial	864	950
Use Class B Total:	10,682	11,750
C3: Residential	31,109	34,220
C2: Institutional Accommodation	879	967
Total:	31,998	35,187
E(a): Retail other than hot food	8,236	9,060
E(b): Sale of food and drink mainly for consumption on premise	3,759	4,125
E(e): Medical or healthcare	818	900
E(g): Offices for operational or administrative functions / R&D of products or processes / Industrial processes	1,627	1,790
Use Class E Total:	14,440	15,885
F1(d): Public Library or reading rooms	455	500
F1(f): Public places of worship	595	655
F2(b): Local community halls	1,023	1,125
Use Class F Total:	2,073	2,280
Sui Generis: Public House	1,086	1,195
Sui Generis: Sub Station	86	95
Sui Generis Total:	1,172	1,290
Grand Total:	60,355	66,392

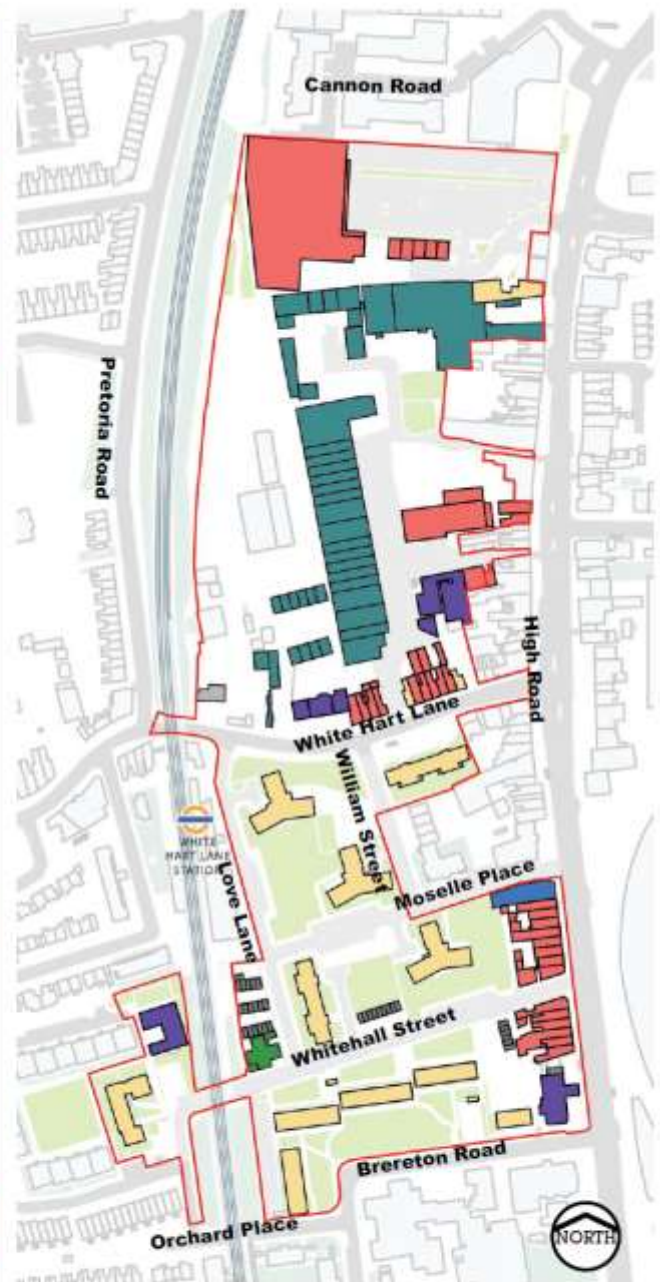
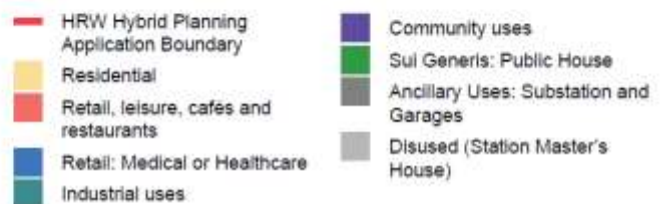


Fig.40 - Existing Land Use Plan



38. London Plan Policy E2 seeks to ensure the reprovion of low cost business workspace in particular defined circumstances, for example, where it is identified locally that there is a shortage of low-cost workspace of particular types, uses or

sizes. Further discussion with the Council and applicant is required to confirm whether this is the case in this instance and the approach that should be taken to secure provision of low cost workspace.

39. The proposed land use parameters would ensure that there is flexibility to provide up to a maximum of 8,000 sq.m. of industrial use, together with a further 7,200 sq.m. of office, R&D and light industrial use (15,200 sq.m. in total) in Class E(g) use. This is supported in principle and would exceed the existing quantum of employment floorspace provision on the site. The applicant has stated that the land use and design parameters proposed would allow some of the existing businesses within the site to relocate within the proposed development. Further details of this aspect of the scheme will be considered at Stage 2.
40. However, it is noted that the minimum floorspace requirements are set at 0 sq.m. for industrial and 1,525 sq.m. for office and light industrial. This is unlikely to be agreed as an acceptable minimum level of provision. Separately, a footnote in the development specification states that a minimum of 4,686 sq.m. GEA of Class B2/ B8 industrial and/or office, R&D and light industrial use (Class Eg).
41. As such, further discussion is required to confirm that this is an acceptable minimum quantum for the site. Further discussion is required to determine the minimum quantum of employment and low-cost workspace which should be secured, in accordance with London Plan Policy E2. A commercial relocation strategy should be secured and provision of affordable and low cost workspace. Given the landownership issues and the position of existing leaseholders on some parts of the site, the applicant and local planning authority should also consider how flexible and responsive the masterplan and phasing programme are to potential land ownership issues over time should it not be possible to assemble the entire site.

Social infrastructure

42. London Plan Policy S1 supports the provision of high quality social infrastructure and seeks to ensure that existing social infrastructure is reprovided as part of proposed redevelopment. The site currently includes the Coombes Croft Library (500 sq.m) and there is understood to be other smaller scale community and faith uses to the rear of the High Road (655 sq.m.). However, clarification on this issue should be provided.
43. A community hub is proposed in Plot E which would comprise a four-storey pavilion / marker building in community use enclosing Moselle Square and fronting the High Road. This is expected to allow for the phased re-provision of the existing library to provide a new library and learning centre with significantly enhanced community facilities early on in the development. It is understood that this would also ensure continuity of provision. However, this should be secured by condition / obligation. Additional community uses would be provided fronting the proposed Peacock Park on the northern site and through the sensitive re-use of the Grade II listed the Grange and locally listed Station Masters House. This is supported.
44. Based on the land use parameters proposed, there would be a minimum requirement for 1,000 sq.m. of community and indoor sport and recreation floorspace, including a minimum of 500 sq.m. library use and minimum 500 sq.m. community hall. This exceeds the current quantum of provision. There would also be scope to provide up to a maximum of 6,000 sq.m. of community and other Class F uses. As such, the

application generally complies with London Plan Policy S1, subject to the wording of the proposed phasing conditions and obligations being reviewed at Stage 2.

Open space

45. Currently, the Love Lane Estate includes an undesignated open space in the form of communal lawns which are mostly fenced off spaces adjacent to blocks, including a number of relatively mature trees. Many of these spaces lack a clear sense of ownership but do provide amenity and urban greening value. The site allocation sets out the Council's objective for the redevelopment of the site to result in a net increase in the quantity of open space and an improvement in its overall quality.
46. The illustrative masterplan proposes approximately 42,100 sq.m. of publicly accessible open space, including a new civic square at Moselle Square and a new urban park (Peacock Park). A minimum of 33,000 sq.m. of publicly accessible open space would be secured in the development specification document, of which, 5,300 sq.m. would comprise the new public park and 3,500 sq.m. would comprise the new public square (Moselle Square). This is strongly supported.

Conclusion – Land use principles

47. In summary, the comprehensive, masterplanned residential-led mixed use redevelopment of the site accords with the expectations set out in the Local Plan site allocation and is supported in strategic planning terms, subject to further discussion and clarification regarding the provision of employment and social infrastructure use and means of securing this.

Housing and affordable housing

Affordable housing and viability

48. London Plan Policy H4 sets out a strategic target that 50% of new homes should be affordable to help address the substantial affordable housing need in London. London Plan Policy H8 requires that existing affordable housing is reprovided in estate regeneration schemes as a minimum and that these schemes should provide an uplift in affordable housing (in addition to the replacement of existing affordable housing). In addition, applicants should consider the availability of grant funding.
49. All development proposals that include the demolition and replacement of affordable housing are required to follow the Viability Tested Route. These applications must be subject to early and late stage viability review mechanisms, in line with the formulas and guidance in the Mayor's Affordable Housing and Viability SPG. Mid-term reviews will be required for a large multi-phased scheme such as this. Further discussion on the timing of the mid-term review mechanisms is required. The review mechanisms should be robustly secured in the S106 agreement. GLA officers request early engagement on the wording of these provisions to ensure they accord with London Plan requirements.
50. The applicant's illustrative housing mix assumes approximately 2,612 homes, including 500 social rent homes, 416 intermediate shared ownership homes, together with 1,696 market tenure homes. This equates to a gross affordable housing offer of 35% by unit, with a 55:45 tenure split which is weighted towards social rent. The applicant has stated that the scheme would achieve 40% affordable housing by

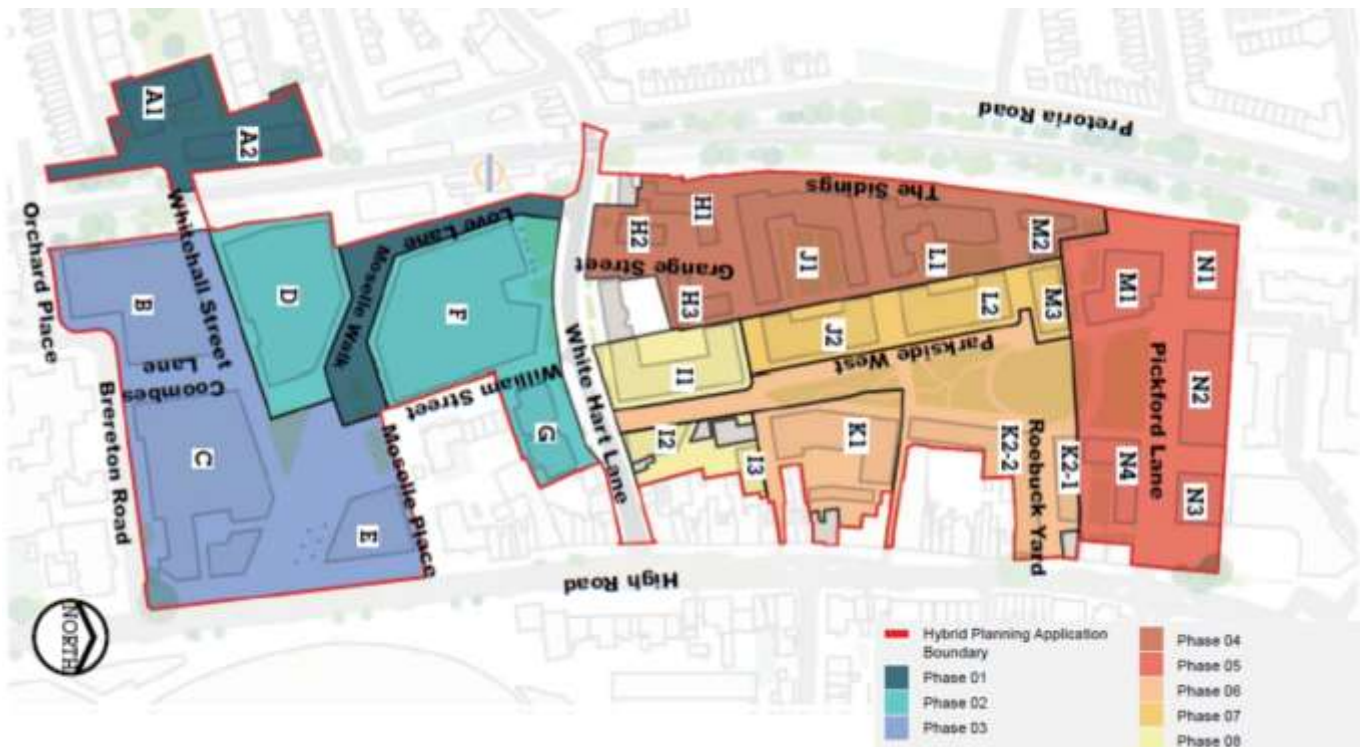
habitable room. The applicant has also committed to deliver fund 40% by unit should sufficient grant funding become available. This additional 'with grant' scenario should be secured in the S106 agreement, as with the Goodsyard and the Depot planning permissions.

51. Once the existing affordable homes on site are accounted for, the net affordable housing proposed is 28%, with a 38:62 tenure split weighted towards intermediate shared ownership.
52. The applicant has submitted a Financial Viability Appraisal (FVA) which is currently being scrutinised by GLA officers to ensure this provides the maximum viable amount of affordable housing.

Phasing and delivery of affordable housing

53. The illustrative phasing of the proposed scheme is shown below. The first Phase (Plot A) is 100% social rent accommodation being the first decant phase. Within the first main phase which is defined as the development zones to the south of White Hart Lane, the applicant has committed to delivering 40% affordable housing by unit. Given the size and site specific circumstances of the scheme, GLA officers require further detailed discussion on the proposed S106 phasing obligations, which should ensure affordable housing delivery is programmed and secured, linked to appropriate triggers relating to the occupation of market homes. Details of the agreed phasing approach should be discussed and agreed with the GLA prior to the Stage 2 referral.

Figure 7 – illustrative proposed phasing



Housing affordability

54. The provision of social rent is strongly supported and should be secured by reference to target social rent levels. Potential service charges should also be fully considered and subject to appropriate caps to ensure overall affordability.

55. London Shared Ownership units should be affordable to households on incomes up to a maximum of £90,000 a year. A range of affordability levels should be provided below the maximum £90,000 household income cap for the first three months of marketing. Furthermore, intermediate tenure households should not be required to spend more than 40% of their net income on overall housing costs, including service charges.
56. Any intermediate rent products, such as Discount Market Rent (DMR) or London Living Rent (LLR) should be subject to a maximum income cap of £60,000. The inclusion DMR and LLR, alongside shared ownership would be supported to ensure a good range of affordability within the intermediate tenure housing.
57. GLA officers request early engagement on the wording of these provisions to ensure they accord with London Plan requirements.

Housing choice

58. The proposed mix for Plot A (the detailed element) which is 100% social rent comprises 42% three-bedroom homes and 6% four-bedroom homes alongside a relatively equal mix of one and two-bedroom homes. This has been informed by housing need studies, taking into account the households which require decant as part of the first phase.
59. Based on the applicant's illustrative mix (which is based on the illustrative masterplan for 2,612 homes), the scheme would be providing 16% family sized homes (3 and 4 bedrooms) across all tenures. The illustrative social rent tenure housing mix comprises 44% family sized homes. A total of 85 studios are proposed, all within the market tenure element of the scheme. GLA officers also note that the social rent provision is based on the needs of existing residents, in line with the Mayor's GPGER. As such, the overall mix of housing provision on the scheme and by tenure is acceptable and accords with London Plan Policy H10.

Play space

60. The detailed element would comprise 299 sq.m. of play space which exceeds the play space requirements across each age groups. The overall play space strategy within the masterplan and outline phases is supported. This would incorporate play space provision in two new large public spaces, providing public benefits for the wider community. A large playground is proposed at Peacock Park, with water based play located in Moselle Square. Additional play space provision would be accommodated within car-free 'home zone' streets and within blocks (at podium and rooftop level).
61. Whilst this overall strategy is supported, limited information has been provided to assess the play requirements based on the illustrative masterplan and illustrative mix in order to assess whether play space requirements are likely to be met within the proposed scheme. GLA officers would therefore welcome further clarification or background assessments which have been undertaken, noting the illustrative nature of the proposals. Play space provision, including its integration by tenure, should also be assessed and secured at each Reserved Matters Phase and secured by condition, in line with London Plan Policy S4. Play space provision should be available to all housing tenures within the immediately adjacent blocks and courtyards to promote social inclusion.

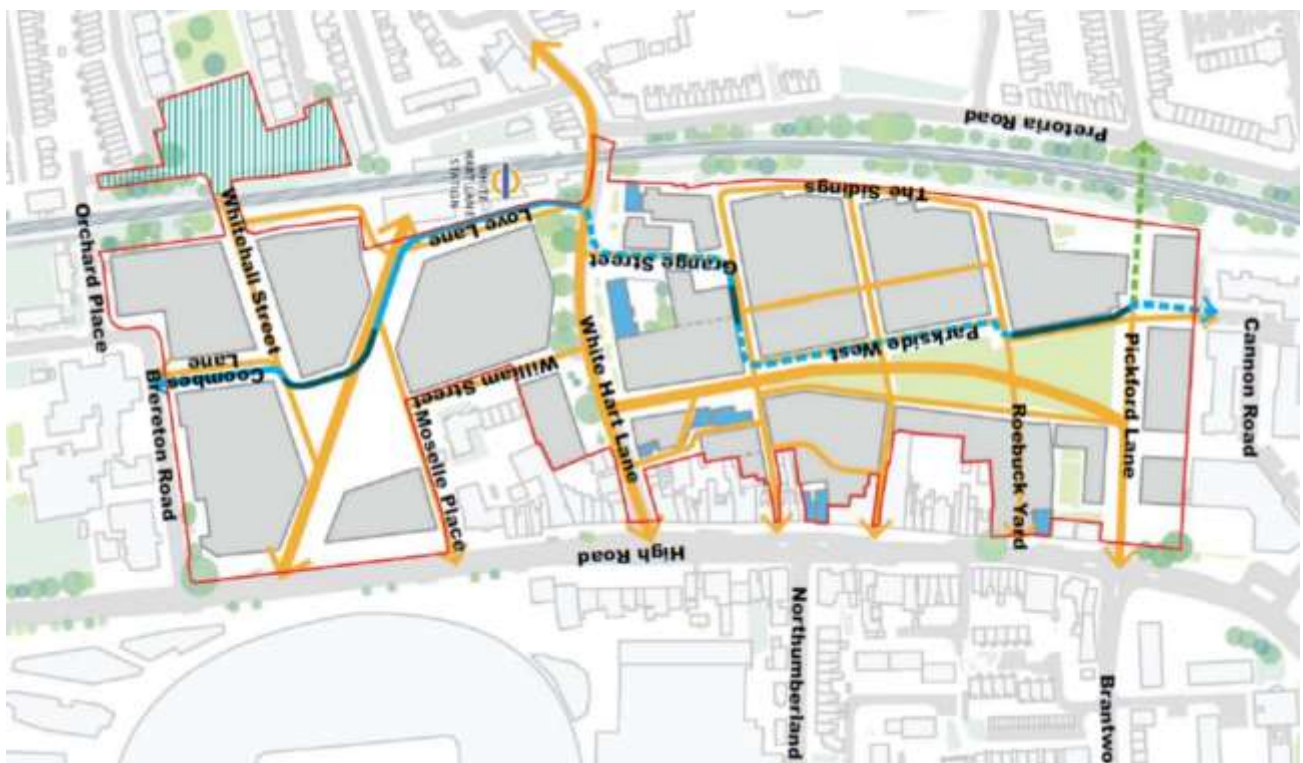
Urban design

Design, layout, public realm and landscaping

62. Overall, GLA officers consider that the proposed masterplan responds positively to these local and strategic urban design principles and the vision set out in the High Road West Masterplan (2014). The applicant's proposals are based on a series of clear and appropriately site-specific overarching urban design and place making objectives. This seeks overall to create a dynamic new urban neighbourhood, reinvigorating the High Road, providing generous public open spaces within the heart of the scheme which would be connected by a generously landscaped continuous public realm and movement framework, which seeks to better integrate the site into the surrounding urban context. Key moves within the proposed masterplan, which are strongly supported include:

- the creation of the two main generously sized public spaces (Moselle Square and Peacock Park);
- the framing and enclosing these key public spaces and routes with surrounding blocks and land uses to ensure the public realm is well-activated with positive overlooking from ground floor uses; and
- the improvements in pedestrian connectivity, permeability and legibility, including in particular a new strong axial movement route linking the station to the High Road and football stadium.

Figure 8 – Proposed block layout, public open space and key movement routes



63. This overarching masterplan also seeks to respond positively to the surrounding heritage assets. The following urban design comments are provided on the key elements of the proposed scheme.

Southern site and civic square

64. The layout of the southern site ensures the provision of a clear and direct visual desire lines linking the stadium, High Road and White Hart Lane Station in both directions. The legibility of the station would be marked by the two tallest elements, with the stadium acting as the key visual focus in the other direction. Permeability and clear views across the square north-south and east-west would be provided, ensuring pedestrian connectivity benefits for the wider area.
65. The civic square (Moselle Square) would be enclosed appropriately on all sides by active non-residential uses. To the east, the four-storey pavilion building in community / leisure and retail use would provide a buffer to the High Road and mediate the scale and massing of the stadium. Double height commercial / community use is proposed on most of the blocks at ground and first floor level which is strongly supported in terms of ensuring the square has a vibrant and active character throughout the day and evening and across the week.
66. The sizing of the square at approximately 66 metres by 64 metres would be sufficiently generous, without being too large. The massing of Blocks C, B and D would also ensure the northern section of the space would receive direct sunlight. The BRE guideline for sunlight and daylight and overshadowing would be met which is welcomed. The access arrangements proposed allow for some limited servicing to the north of the square and rear of southern blocks. As a result, the main space would largely be free of vehicle movements, ensuring the provision of a large pedestrianised space. This is supported.
67. The width and dimensions of the main route through Moselle Square (Moselle Walk) has been defined to facilitate effective crowd flow movement between the station and stadium and potential queuing during busy event days. GLA officers understand that this has been developed and tested through engagement with key stakeholders, including the Metropolitan Police, as well as taking into account other factors such as wind, overshadowing and daylight and sunlight. This design-led approach is welcomed.
68. The emerging landscaping approach proposed for the square is reflective of the density and footfall associated with stadium events and match days and is understood to have been informed by initial consultation with the Met Police. A hard-landscaping approach is proposed, with water features and sculpture, as well as some large feature trees. This is considered appropriate given the multifunctional civic nature and footfall associated with the stadium.

The Northern site and Peacock Park

69. Peacock Park would be a substantial new linear urban park (200 metres in length and between 60 to 37 metres in width), with a strong overall landscape character comprising a mix of lawns, herbaceous planting areas, trees and sustainable urban drainage features and play space provision. This is strongly supported. The park would be well-fronted by the adjacent proposed blocks, with two-storey residential maisonettes with their own front doors lining the park on the west and north and commercial and community employment uses activating the ground floor to the east. This is supported.

70. The layout and design of the Goodsyard and the Depot sites reflects the existing planning permission. It is noted that the current application for the Goodsyard and Depot proposes a slightly different block and public realm arrangement. This removes the rear access route adjacent to the railway (the Sidings), which could potentially be poorly overlooked and unwelcoming after dark and would create a clearer north-south route as an alternative (Embankment Lane). This key move was supported by GLA officers, as set out in the Stage 1 report and is also understood to reflect land ownership and phasing opportunities. It is therefore recommended that the outline element in this part of the site is sufficiently flexible to allow this alternative layout to come forward, noting the design benefits set out above.

Roebuck Yards and Peacock Yards

71. The provision of Peacock Yards and Roebuck Yard would ensure a good mix of activities and land uses across the site, including light industrial and workspace uses. This would help to animate and overlook the relatively tight alleyway and rear yards lining the High Road buildings, helping to create a distinctive character area. Clear views of the park should be provided to ensure legibility.

Whitehall Mews

72. The layout strategy for Whitehall Mews is supported. The arrangement maintains the existing pedestrian access routes and would ensure an improved front to back arrangement, with rear gardens and clearly defined private defensible space and improved natural surveillance. The provision of duplex units within Buildings A2 and A3 is strongly supported.

Design code and parameter plans

73. The overall content and coverage of the design code and parameter plans is considered acceptable, noting the long-term multi-phased nature of the scheme, which will be built out over a number of years. The code captures the overarching urban design principles, vision and place making principles and site specific issues set out above, which are supported and translates this into clear design requirements and instructions which will inform subsequent Reserved Matters Application. This is acceptable.

Height, massing and tall buildings

74. 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.
75. In terms of the local planning policy context, 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. The High Road West Masterplan (2014) suggests heights of 10 to 18-storeys, with taller buildings placed towards the railway line. The Masterplan states that taller buildings should be placed near to the railway, with building heights stepped down towards the High Road. This seeks to sensitively manage the impact on heritage assets and residential amenity.

76. The illustrative scheme which GLA officers considered at pre-application stage proposes six towers ranging in height from 26, 32, 27, 18, 21, 29-storeys (south to north). The heights of the three towers on the northern site are consistent with that in the extant planning permissions. The height of buildings fronting the civic square would range from 2, 3, 4, 6, 7, 14, 18-storeys. On Peacock Park the height and massing would range from 6 to 10-storeys to the west and north, with 3 to 6-storeys to the east adjacent to the High Road. These heights have been translated into metres above ground level maximum heights by different block element, as illustrated below. The illustrative massing strategy is shown below.

Figure 9 – illustrative height strategy

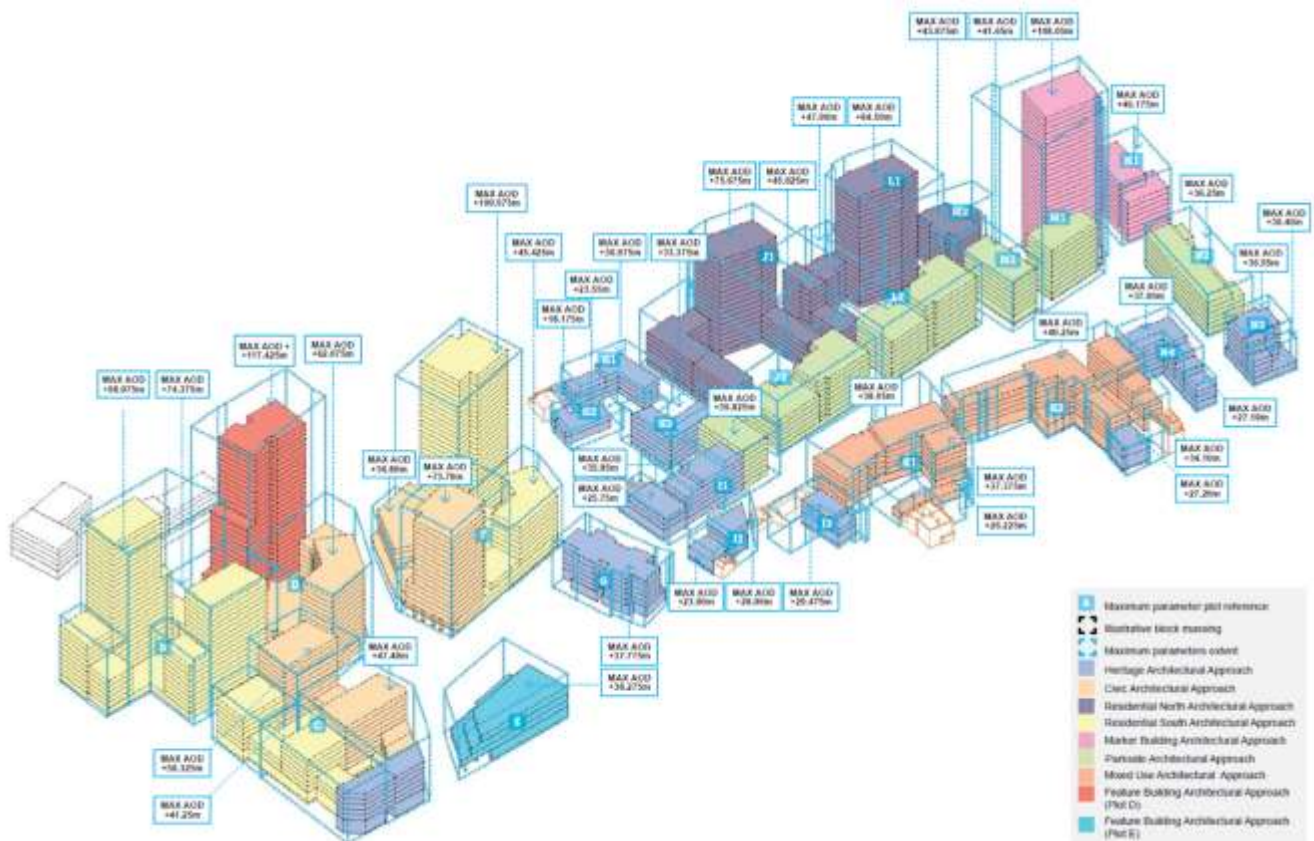


77. This overarching strategy is in line with the High Road West Masterplan and site allocation, as well as the existing permissions in place on the Goodsyard and the Depot sites. GLA officers consider that this general height and massing strategy is well-considered, taking into account the various site opportunities and constraints, the existing and emerging context and noting in particular the need to step down heights towards the sensitive heritage context along the High Road but also recognising the potential opportunity to locate taller elements to mark the presence of the station and main transport corridor, as well as important east-west connections.
78. The varied massing of blocks surrounding the civic square and the location of the taller elements would ensure that the northern section of the public space receives direct sunlight. Similarly, Peacock Park would also not be overshadowed by the taller blocks, given its layout and orientation on a north south axis. In terms of the adjacent residential hinterland to the west, the elevated railway line and mature tree belt would ensure the impact of the proposed tall buildings would be to some extent minimised.
79. Shoulder and corner heights within blocks as well as the lower elements have been appropriately refined taking into account the need to enclose and define key public

open spaces and mark corners and important movement routes. This would also ensure a variety of building typologies and a varied massing is proposed throughout the scheme as a whole and within blocks. This has been specified clearly in the height parameter plan and design code on a block by block basis.

80. This overall approach to height and massing is therefore supported and considered an appropriate response to the opportunities and constraints, taking into account the existing and emerging surrounding context.

Figure 10 – illustrative masterplan scheme set against the maximum height parameters



81. Environmental impacts in terms of wind, daylight, sunlight and overshadowing have been assessed and have informed the design and massing approach. Overshadowing analysis demonstrates that the vast majority of communal amenity areas, including Whitehall Mews, Moselle Place and Peacock Park would have good access to sunlight, providing occupiers with access to sunlit outdoor space throughout the year. As can be expected with a regeneration scheme of this scale, there would be some parts of the scheme where access to sunlight is more limited at certain times of the year, or at times throughout the day and there would be some impacts on the daylight levels of neighbouring properties. However, the overall daylight levels which would be achieved and the impacts on the surroundings are considered to be broadly in line with other similar high density urban regeneration schemes such as this and do not give rise to an unacceptable level of harm. Furthermore, the potential to mitigate these impacts would be further reviewed at detailed design stage.
82. Heritage and visual impacts have been assessed taking into account the applicant's TVIA. Whilst the scheme would have a noticeable visual impact on the surrounding

area and would give rise to less than substantial harm to heritage assets, this is on balance considered acceptable, given the overall public benefits associated with the development, as set out in more detail below.

83. Given that the architectural detail and overall design and materials quality of the proposed tall buildings has not been finalised, it is not possible to fully assess compliance against the requirement in London Plan Policy D9 that tall buildings to be of an exemplary standard of architecture. This will require detailed assessment, townscape analysis and design review at RMA stage.
84. As set out below, the design code provides a suitable basis on which to develop RMAs for tall buildings in terms of advising on the approach to the base and top of tall buildings and the approach which should be followed materiality, detailing, articulation and overall design. This includes matters relating to the functional design, layout, entrances, servicing, public realm and active frontages, in line with the Policy D9 criteria. RMAs should also be subject to further environmental assessment and design review to ensure full compliance with London Plan Policy D9. The applicant has stated that each RMA would be supported by an initial design review, which is welcomed.
85. 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 could comply with the qualitative assessment criteria set out in Policy D9. The architectural quality of the proposed tall buildings must be of an exemplary standard, which should be secured at RMA stage, in line with Policy D9.

Residential quality

86. The residential quality of the detailed element is of a good standard, with a good distribution of unit sizes and a broadly similar dual aspect provision. The larger units (3 and 4-bedrooms) all appear to be dual aspect which is welcomed. Duplex homes would have their own front gardens and front door entrances, with private rear gardens provided at podium level, with kitchens shown on the ground floor. This is strongly supported.
87. The core arrangement is well within the recommended unit per core benchmark in the Housing SPG. Private amenity space is proposed for all units in the form of balconies and terraces.
88. The illustrative masterplan scheme proposes 65% dual aspect units. The illustrative layouts suggest that a good proportion of corner and genuine through dual aspect units and two-storey duplex units at ground and first floor would be provided, which would need to be secured at Reserved Matters Stage, as required by the design code. No north facing single aspect units are proposed and the design code includes a number of clear mandatory design rules which would ensure an acceptable residential quality, in line with London Plan Policy D6.
89. Taking into account the particular site circumstances and the proposed density, GLA officers are satisfied that the provision of dual aspect units on the detailed element of the scheme has been maximised in line with London Plan. Overall, the application complies with London Plan Policy D6 and the residential quality is acceptable.

Architectural and materials quality

90. A simple architectural approach is proposed for the detailed element, with a visually pleasing and contextual brick palette proposed and appropriate detailing proposed to differentiate and define the entrances, windows and balconies. This is acceptable.
91. The design code includes appropriate specifications and design rules for key features of buildings and land uses in different areas of the scheme, depending on the location of each block. This approach is supported and would provide a good basis for the delivery of an architecturally rich and interesting approach in terms of materiality and overall design quality; however, the finished quality will depend on this overall design quality being delivered and secured at Reserved Matters Stage. This should be informed by further detailed design review.

Density and design review

92. The London Plan Policy D4 requirement for additional design scrutiny and design review is triggered in this instance given the height and density proposed, noting the height and density of the scheme. The applicant has undertaken a rigorous design-led process, informed by close collaboration with planning and design officers at the Council and the GLA, as well as numerous design review panels. This meets the requirements set in the London Plan. It is recommended that further design review scrutiny should be incorporated at Reserved Matters Stage, given the size of the scheme and tall buildings proposed.

Fire safety

93. 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 sets out overarching principles for the masterplan (outline phases) and detailed (Plot A) element in terms of building construction, means of escape, passive and active fire safety systems and access and facilities for fire fighting services. Sprinkler systems would be provided in all buildings and land uses. Further detailed fire statements would be provided and secured at Reserved Matters Stage. This information provided meets the requirements set out in London Plan Policy D12.

Inclusive design

94. London Plan D5 requires all new development achieves the highest standards of accessibility and inclusive design with accessible housing design requirements set out in London Plan Policy D7. An inclusive design statement has been provided which details how the scheme would achieve a high quality of inclusive access throughout the land uses proposed and the detailed and outline elements. This is acceptable. Further conditions are required to ensure inclusive access is fully considered and secured at each phase. The application complies with the accessible housing standards in the London Plan Policy D7. This should be secured by condition.

Heritage

95. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings,

all planning decisions should “*have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*”. If it is judged that harm to the heritage asset/s would arise from the proposed development, considerable importance and weight must be attributed to that harm, in order to comply with the statutory duties. In line with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, planning decisions must also give special attention to the desirability of preserving or enhancing the character or appearance of the conservation areas which may be affected by a proposed development.

96. The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset’s conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Where a proposed development will lead to ‘substantial harm’ to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to ‘less than substantial harm’, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
97. 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.
98. Having reviewed the applicant’s Heritage, Townscape and Visual Impact Assessment (HTVIA) and noting the existing location, setting and significance of various heritage assets in the surrounding area, GLA officers have reached the following conclusion in terms of the level of harm caused to designated and non-designated heritage assets. The HTVIA has been undertaken at an appropriate time of year during the winter when leaves are not on the trees, so presents the ‘worst case’ scenario in terms of potential impact.

Heritage asset	Level of harm	Scale	HTVIA view
Listed buildings			
Grade II Listed 867-869	Less than substantial harm	Moderate	View 41
Grade II listed the Grange, 34 White Hart Lane	Less than substantial harm	Moderate	View 39
Grade II listed 797 & 799 High Road	Less than substantial harm	Moderate	View 32
Grade II listed 819-821 High Road	Less than substantial harm	Moderate	View 42
Grade II listed 639 High Road	Less than substantial harm	Low	View 21

Heritage asset	Level of harm	Scale	HTVIA view
Conservation areas			
North Tottenham Conservation Area	Less than substantial harm	Moderate	Views 21, 23, 32, 41, 42
Bruce Castle Park Conservation Area	Less than substantial harm	Low	View 14a, 15
Tottenham Cemetery Conservation Area	Less than substantial harm	Low	View 14b

99. In addition to this, the proposals include the demolition of numbers 731 to 759 High Road. These are unlisted non-designated heritage assets. Numbers 743 to 759 High Road are locally listed three-storey Victorian properties with modern commercial shop fronts. Numbers 731 to 741 also not locally listed but are of a similar age and historic and architectural character. Along White Hart Lane, numbers 8 to 16 and 24 to 30 White Hart Lane would also be demolished. These are unlisted two-storey Victorian high street properties. The majority of these buildings contribute positively to the character and appearance of the North Tottenham Conservation Area. The loss of these buildings would therefore give rise to less than substantial harm to the North Tottenham Conservation Area.
100. Harm caused by the demolition of these assets is considered to be justified in this particular case, taking into account the range of public benefits summarised below, which would outweigh the harm caused. The demolition of these unlisted properties allows for the provision of the community building (Plot E) and enhanced public routes into Moselle Square from the High Road. Similarly, the demolition of the above properties on White Hart Lane allows for the provision of a clearly defined new public route through to Peacock Park. These particular public benefits are significant as noted below and could not be delivered without the limited demolition which is proposed.
101. GLA officers have concluded that the level of harm caused to heritage assets would be less than substantial and at a low or moderate level on the scale of less than substantial harm. This would be clearly and convincingly outweighed by the public benefits proposed by the application, which include:
- Substantial delivery of new homes (up to 2,929 homes, including 500 social rent homes and approximately 400 intermediate homes).
 - Significant affordable housing provision, with the scheme proposing 35% affordable housing (gross) across the site, with an aspiration to reach 40% gross, subject to viability and the availability of grant funding.
 - Delivery of a new Library and Learning Centre, together with study spaces, a children's library and creative enterprise space, providing a new community and social hub.
 - New public spaces and pedestrian and cycle connections, including two major new public open spaces at Peacock Park and Moselle Square and the new main public route linking White Hart Lane Station to the High Road and new Tottenham

Hotspurs Football Stadium and enhanced connectivity linking the site to the High Road

- Significant landscaping, public realm, inclusive access and urban greening improvements throughout the scheme.
- High quality, sustainable design with the new and replacement housing providing an enhancement on the quality of the existing housing stock being replaced in terms of internal floorspace, energy efficiency and overall residential quality.

Transport

Healthy Streets, vision zero, walking and cycling

102. As set out above, the proposals would provide a range of substantial pedestrian and cycle improvements. This includes Moselle Walk linking the station and stadium, a proposed new north-south cycleway running through the development site on the eastern side of the railway line and a major pedestrian route running through the centre of the northern site. This would then also connect through to the southern site via William Street, Moselle Square and Combes Lane. Enhanced public routes are also proposed via the new yard routes. This is strongly supported and would help to open up the site and re-connect it with the surrounding area. The potential for enhanced pedestrian crossing facilities over White Hart Lane would be supported. The applicant's approach to safeguard potential future links along the northern edge of the outline element and the neighbouring Cannon Road is also welcomed.
103. Whilst proposals for the internal street network are subject to outline, the applicant is encouraged to identify any improvements, no matter how small, in order to make a possible contribution to the delivery of Healthy Streets and Vision Zero policies, specifically the route under the bridge along Whitehall Street to support the detailed element.

Access and deliveries and servicing

104. Access by all modes will be accommodated via Tenterden Road, Church Road, White Hart Lane and the High Road. The majority of the development will be serviced through a series of public two-way and one-way streets within the proposed internal network. However, a number of designated shared surface lanes are proposed, allowing restricted access to servicing routes to accommodate service, emergency and larger vehicles along routes otherwise only open to pedestrians and cyclists. Stage 1 Road Safety Audits (RSA) along all shared surface lanes should be completed prior to the determination of detailed planning permission at RMA stage.

Bus infrastructure

105. The development proposals will see an increase in pedestrian and cycle trips to/from the site and the local area, as well as public transport trips. However, there is limited detail on how the new major pedestrian route, following a key desire line between White Hart Lane station and the stadium, will impact on the bus stop (T) on High Road, including its current location, bus stop environment and passenger waiting area.

Car parking

106. Whilst there is no car parking provision within the detailed blocks, two on-street Blue Badge car parking spaces in line with the required 3% are proposed along Whitehall Street. Additional disabled persons' car parking spaces, equivalent to seven per cent of the dwellings could be provided, should the initial provision be insufficient. These spaces are a distance from the blocks however, this is due to the highway constraints in this location so is largely acceptable, subject to the provision of a safe, convenient, direct and accessible access route.
107. For the outline phases, 10 on-street spaces are envisaged in the illustrative masterplan, alongside 48 podium spaces and 31 basement level spaces. This would equate to a car parking ratio of approximately 3%, which appears to be in line with the London Plan. The applicant has also stated that there is space to ensure provision up to 10% should this be required. The applicant is expecting to re-provide existing car parking for decanted residents remaining on the site. However, this has not been specified and this should be clarified.
108. As per the GLA's pre-application advice, any replacement car parking needs to be provided for the occupancy of the returning resident only and be secured by legal agreement along with the requirement to produce a Car Parking Management Plan (CPMP), which will detail how the spaces will be monitored, managed and enforced. A permit-free obligation should be secured to prevent any new occupier access to the on-street car parking provision within the CPZ, other than the disabled spaces as agreed.
109. The majority of the residential car parking would be provided using concealed ground floor podium structures, parking courts or basements to avoid this negatively impacting the quality of the public realm or key public open spaces. A limited quantum of car parking is provided on-street where on-plot parking strategies are not possible. This design approach is acceptable.
110. Electric vehicle charging provision will be provided in excess of the London Plan requirement. This is welcomed in line with London Plan Policy T6.1 and should be secured by condition. The applicant should ensure that physical infrastructure should not negatively affect pedestrian amenity in line with London Plan Policy T6.
111. Car club provision is also proposed which would be in the public realm and should be secured via s106 agreement. In line with the MTS and the London Plan, clarification is necessary to demonstrate how the overall car parking provision/supply is being capped, as a result of the creation of car club spaces.

Cycle parking

112. As part of the detailed element a total of 119 long-stay and 4 short-stay cycle parking spaces is proposed. Whilst this number accords with the London Plan minimum cycle parking standards, further details on the cycle parking provision is required, which could be secured by condition and considered in detail at RMA stage when sufficient design detail is available. All cycle parking must be in accordance with the London Cycling Design Standards (LCDS), including at least 20% Sheffield stands and a further 5% wider spaces for non-standard bicycles.

Trip generation and public transport and highways impacts

113. The applicant is required to provide updated bus trip generation figures. Subject to the outcome of any additional assessment, officers may seek mitigation towards enhancing bus priority measures and/or fund infrastructure upgrades. Further information on this will be provided in TfL's detailed comments on the application. The development is not expected to have a significant impact on the strategic road network.

Technical Approval and Infrastructure Protection

114. 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 RfL.

Travel Plan

115. The submitted outline residential Travel Plan (TP) and Framework Travel Plan (FTP) for the non-residential uses are generally acceptable. The focus on active travel is welcomed. The final TP and FTP and all agreed measures should be secured, enforced, monitored and reviewed through the Section 106 agreement, in accordance with Policy T4 Assessing and mitigating transport impacts of the London Plan.

Deliveries and Servicing and Construction Logistics

116. The outline Delivery and Servicing Plan (DSP) and outline Construction Environmental Management Plan (CEMP) along with the Operational Waste Management Strategy are welcomed and the contents of these documents are found to be broadly acceptable. Due to the phased nature of this development proposal (within a multiple land ownership site) with this detailed element being the first phase of a long-term and comprehensive regeneration of High Road West to be delivered by the applicant, this application will require the adoption of a coherent wayfinding strategy to enable people to access and find the stadium and other key local attractor destinations. The RMA should make clear how the development and construction operations will be managed alongside the continuation of the operations of the stadium and other key local attractors. The full DSP and CEMP, which needs to include infrastructure protection measures in respect of the adjacent railway lines, should be produced in accordance with TfL guidance and secured by condition. This is particularly important, as High Road is a key bus corridor.

Sustainable development

Energy strategy

117. The applicant's energy strategy estimates that the residential element of the scheme would achieve a 60% reduction in CO2 emissions over and above Building Regulations, with the non-residential element achieving a 52% reduction. Of this the residential element would achieve a 12% reduction via energy efficiency savings alone. Of the non-residential element, 17% reductions would be achieved via energy efficiency measures. Whilst this does not comply with the zero carbon target, the

scheme does meet the minimum required on-site levels of reduction in CO₂ emissions which are set out in the London Plan.

118. In terms of heat generation, the scheme proposes to connect to the planned Haringey District Heat Network (via Meridian Water District Heating Network (MWHN)) and is proposing to connect to the network. Primary energy to the DHN will be supplied from the Borough Wide District heating network supplied by the Meridian Water Energy from Waste Plant operated by Energetik. This approach is supported, in line with the London Plan heating hierarchy. Further clarification is sought that the DHN operator has confirmed that the DHN has the capacity to serve the new development, together with supporting estimates of the CO₂ emission factor, installation cost and timescales for connection. The s106 should then secure this approach, alongside the potential back-up option.
119. In the event that connection to the DHN is not feasible, the applicant has proposed detail of a backup solution in the form of a centralised Air Source Heat Pump System (ASHP) system. The details of this backup ASHP System have also provided, as requested at pre-application stage.
120. For Plot A, temporary heating arrangements are required as the site will be complete prior to the DHN being operational. This would comprise gas boilers within a centralised plant room. The applicant should also confirm measures to minimise NO_x emissions from this temporary energy system, which should be secured by condition.
121. A detailed roof layout has been provided for Plot A demonstrating that the roof's potential for a PV installation has been maximised and clearly outlining any constraints to the provision of further PV, such as plant space or solar insolation levels. This approach to maximising solar PV provision should be secured by condition across the RMA phases of the scheme.
122. The risk of overheating has been assessed using the CIBSE TM59 methodology. The passive design measures specified in the overheating assessment in terms of solar glazing and maximising natural ventilation should be secured (option 6).
123. London Plan Policy SI2 requires the energy performance of completed developments to be monitored, verified and reported following construction ('Be Seen'). This should be secured.

Whole Life-cycle Carbon

124. A Whole Life-cycle Carbon Assessment has been undertaken in accordance with the London Plan, which takes into account the draft GLA Guidance (2020). 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 the more detailed design stage when materials are being selected and specified. This further review should be secured through a pre-commencement condition. A post-construction monitoring report should be secured by condition for each phase.

Circular Economy

125. A Circular Economy Statement has been submitted which takes into account the GLA's draft guidance (2020) and 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 re-usability, adaptability, flexibility and longevity. This is supported and complies with London Plan Policy SI7. A post-construction report is proposed by the applicant which would provide further details which should be secured via a planning condition for each phase.

Digital connectivity

126. 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.

Environmental issues

Urban greening

127. Existing mature trees along White Hart Lane, to the rear of the Grange, along the High Road would be retained which is welcomed. A number of other trees would need to be removed within the existing Love Lane Estate, which is justified due to the comprehensive redevelopment and redesign of the estate. The scheme proposes approximately 280 new trees throughout the scheme as compensation. This overall approach is acceptable and should be secured, in accordance with London Plan Policy G5.
128. The applicant has undertaken an urban greening factor (UGF) assessment in accordance with the London Plan. This shows that the detailed element of the scheme would achieve a UGF score of 0.37. The proposals include intensive and extensive areas of green roofs, tree planting, flower rich perennial planting, rain gardens, hedges, green walls and permeable paving. The opportunity to maximise urban greening has been maximised, taking into account the site extent, dimensions and the proposed development.
129. The entire illustrative scheme achieves a 0.22 UGF score. Whilst this falls short of the relevant UGF targets in the London Plan, this would provide a substantial uplift based on the existing UGF score for the site (0.07). There are some site specific reasons for this relatively low score given the size of the site. Moselle Square needs to be primarily hard landscaped due to the high footfall and civic purpose of this space. The applicant has also stated that its current assessment represents a relatively cautious estimate, given the outline nature of the scheme and because a number of the elements have not been fully maximised in terms of their design detail and their contribution to the overall UGF score, e.g. green roofs and landscaping. Whilst this is acceptable at this stage, conditions should be included which require each RMA to

demonstrate that the potential for urban greening has been maximised, in line with the London Plan and UGF benchmark targets.

130. The illustrative masterplan is expected to achieve the aspiration for biodiversity net gain. Conditions should be included to ensure this is subject to further assessment at RMA stage, in accordance with London Plan Policy G6.

Sustainable drainage and flood risk

131. The site lies within Flood Zone 2 with areas of a high risk of surface water flooding along the High Road and White Hart Lane according to the Environment Agency maps. The site is dissected by the Moselle Culvert which runs below White Hart Lane. The drainage strategy for the site aims to protect and incorporate the Moselle Culvert into the masterplan.
132. A range of sustainable urban drainage (SuDs) methods are proposed throughout the illustrative masterplan, including wetland and ecological area detention basin within Peacock Park, rain gardens and a more civic urban wetland environment within Moselle Square, featuring water-based play features. Other proposed SuDs features would comprise green roofs, blue roofs and permeable paving. This would be supplemented by underground storage attenuation tanks. This overall drainage strategy is expected to reduce the existing surfacing water discharge rate on the northern section of the site by 70% and the southern section of the site by 50% during a 1 in 100-year storm event. This is acceptable and in line with the drainage hierarchy set out in the London Plan Policy SI13.
133. Flood risk management and mitigation measures are proposed including raising the existing site levels, finished floor levels and through the proposed location of 'more vulnerable' ground floor uses. These measures should be secured in accordance with London Plan Policy SI12.

Air quality

134. The development is not expected to give rise to significant impacts in terms of air quality, subject to appropriate conditions being included to mitigate potential temporary impacts during the construction phase. No specific mitigation measures are considered to be required to address any risks of exposure to poor air quality in terms of residents within the scheme. This is acceptable and complies with the London Plan, subject to appropriate conditions being secured. Air quality positive statements should be secured at RMA stage, in line with London Plan Policy SI1.

Noise

135. The applicant's noise and vibration study does not raise any concerns in relation to the impact of the scheme or the potential for residential accommodation to be exposed to adverse noise impacts. However, should any noise impacts be identified at RMA stage, for example, due to noise levels associated with the High Road, railway and football stadium, these should be addressed with appropriate sound insulation and balcony design incorporated from the outset, in line with London Plan Policy D14.

Local planning authority's position

136. Haringey Council planning officers are currently assessing the application. The application is expected to be considered at a planning committee meeting in February or March.

Legal considerations

137. 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

138. There are no financial considerations at this stage.

Conclusion

139. London Plan policies relating to estate regeneration, land use principles, housing and affordable housing, urban design, tall buildings, heritage, inclusive design, transport, climate change and urban greening are relevant to this application. Whilst the proposed scheme is broadly supported in strategic planning terms, the application does not fully comply with these policies, as summarised below:

- **Estate regeneration:** The scheme would ensure the like for like replacement of existing affordable housing and the right to return for all social rent households. The approach to leaseholders and public consultation would comply with the Mayor's key principles on estate regeneration. Therefore, the comprehensive redevelopment of the estate could be supported in this case, subject to the maximum viable level of affordable housing provision being secured.
- **Land use principles:** the comprehensive residential-led mixed use redevelopment of the site accords with the expectations set out in the Local Plan site allocation and is supported in strategic planning terms, subject to further discussion and clarification regarding the provision of employment and social infrastructure use and means of securing this.
- **Housing and affordable housing:** The applicant's Financial Viability Assessment (FVA) is being scrutinised to ensure the scheme is providing the maximum viable level of affordable housing. Early, mid and late stage viability

review mechanisms will be required. Affordability levels on intermediate housing should be secured.

- **Urban design:** The design and layout is strongly supported and is aligned with the High Road West Masterplan Framework. The density is supported, noting the design-led approach undertaken. The residential quality is acceptable.
- **Tall buildings:** The height and massing proposed can be supported in this planned location and the scheme would overall comply with the qualitative criteria set out in London Plan Policy D9 in respect of visual, heritage, functional, environmental and cumulative impacts. The architectural and materials quality of tall buildings should be of an exemplary standard.
- **Heritage impact:** The harm to heritage assets would be less than substantial. This would be clearly and convincingly outweighed by the public benefits proposed by the application.
- **Transport:** Updated bus trip generation figures should be provided to enable officers to fully assess the impact on bus capacity and clarify whether any mitigation is required. Conditions should secure further details regarding car parking, cycle parking and Road safety Audits.
- **Climate change:** The approach to energy, drainage and urban greening is generally acceptable, subject to conditions and obligations.

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