



HIGH ROAD WEST

HYBRID PLANNING APPLICATION

PLANNING STATEMENT

PREPARED FOR LENDLEASE (HIGH ROAD WEST) LIMITED BY DP9 LIMITED

OCTOBER 2021

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HRW

EXECUTIVE SUMMARY

EXECUTIVE SUMMARY

This Planning Statement has been prepared by DP9 Limited on behalf of Lendlease (High Road West) Limited (Lendlease or the “Applicant”) in support of a hybrid planning application for the site known as High Road West (“HRW” or the “Site”). The hybrid planning application is formed of detailed proposals in respect of Plot A for which no matters are reserved (“Detailed Proposals”), and outline proposals for the remainder of the Site, with all matters reserved except for points of access (“Outline Proposals”). The Detailed Proposals and Outline Proposals together are referred to as the “Proposed Development”.

The Proposed Development comprises the comprehensive regeneration of High Road West and will deliver new retail, office, leisure and community floorspace along with residential dwellings, including 500 new council homes together with other ancillary uses. It follows on from the successful Estate Ballot for the Love Lane Estate residents held in August/September 2021. Together with a mix of commercial, leisure and community uses the Development will also provide significant, high quality public realm, including a new public square and park.

Overall, the regeneration of High Road West represents an exciting opportunity to deliver transformative change for Tottenham and its residents and has been designed to respond to the vision for the Site to: “create a vibrant and sustainable neighbourhood and support the creation of a new leisure destination for London.” As set out in the High Road West Masterplan.

The purpose of the Planning Statement is to assess the planning considerations associated with the Development in the context of national, regional and local planning policy and guidance. It will describe and analyse the wide-ranging planning benefits of the Development and demonstrate that it substantially accords with planning policy at all levels. In summary, the Development will deliver the following planning benefits:

- **Substantial delivery of new homes:** up to 2,929 new homes including 500 new council homes will be delivered across the masterplan, making a

significant contribution towards the Council's housing delivery including shared ownership and intermediate housing;

- **Significant affordable housing delivery:** The proposals will deliver a minimum of 35% affordable housing across the Site, with a target of 40% subject to viability and future grant funding. 40% affordable housing will be delivered across Phase A to the south of White Hart Lane and 100% social rented accommodation in Plot A;
- **Delivery of a new Library and Learning Centre:** the creation of a new library and learning centre for residents, including study space, expanded children's library and Creative Enterprise space, creating a new hub for the community to meet, learn and socialise;
- **New public spaces and links:** the proposals have been designed to deliver a series of public spaces for the Tottenham community which will be accessible for all, complemented by a series of new cycle and pedestrian routes through the Site;
- **A new, public route between Tottenham Hotspurs Stadium from White Hart Lane Station:** a new public route will be delivered to link White Hart Lane Station and Tottenham Hotspurs Stadium which has been designed to ensure suitable capacity is provided to meet the demand for match days and other Stadium events;
- **Securing high quality, sustainable design:** The Design Code and Parameter Plans will secure high-quality design of the proposed buildings and landscape. The Illustrative Masterplan demonstrates a clear intent by Lendlease to deliver an exemplary, high-quality development with a unique sense of place and character;
- **A new Energy Centre, supporting the wider Tottenham Area:** In addition to supporting the provision of the new High Road West neighbourhood, the new Energy Centre will also support the energy needs for future developments in the Tottenham Area as they are brought forward;

- **Encouraging healthy and active lifestyles:** the network and hierarchy of streets and spaces seek to encourage walking and cycling and the diverse mix of public spaces and activities will create a stimulating place to encourage participation and foster enjoyment;
- **Enhancing the biodiversity value of the Site:** The Development will deliver significant biodiversity enhancements through the delivery of new public realm and the provision of a new public park, together with extensive tree planting and greening throughout. It will equate to a Biodiversity Net Gain of 48% on-site;
- **Creation of new jobs, training and apprenticeship during construction:** As part of delivering High Road West, the proposals will secure a range of employment and training opportunities, including 1,214 new Full Time Equivalent (FTE) jobs directly and a further 1,202 FTE jobs indirectly per annum over the lifetime of construction activity on-site. In addition, Lendlease will be working with LB Haringey and other delivery partners to secure a programme of apprenticeships on-site, supporting residents into work and training, as prioritised in the Haringey Recovery Plan;
- **Developing local supply chains and employment during construction:** Lendlease will work with LB Haringey and its partners to identify opportunities for local businesses operating from and in the borough as part of developing local supply chains over the lifetime of the demolition and construction phases for the Proposed Development, including the procurement of local trades people;
- **Significant contribution to the national economy during construction:** generating **£143.1million of direct Gross Value Added (GVA)** alongside £267.8million of indirect and induced GVA per year of demolition and construction activity towards the national economy;
- **Supporting new jobs and employment:** Once complete, the Proposed Development will support a minimum of 374 permanent FTE jobs on-site;

- **Delivering a significant boost to the vitality and viability of the local economy:** Once complete, the development will generate £23.2million of resident expenditure to the local economy per annum and an economic output of £57.7million per annum.
- **Supporting the Local Community during Construction:** Lendlease will support local community projects and initiatives through the provision of a £10 million investment, delivered through the Annual Community Fund.

1. INTRODUCTION

The Planning Statement

1.1 This Planning Statement has been prepared by DP9 Limited on behalf of Lendlease (High Road West) Limited (Lendlease or the “Applicant”) in support of a hybrid planning application for the site known as High Road West (“HRW” or the “Site”). The hybrid planning application is formed of detailed proposals in respect of Plot A for which no matters are reserved (“Detailed Proposals”), and outline proposals for the remainder of the Site, with all matters reserved (“Outline Proposals”). The Detailed Proposals and Outline Proposals together are referred to as the “Development”.

1.2 Specifically, the planning application seeks permission for:

“Hybrid Planning application seeking permission for 1) outline component comprising the demolition of existing buildings and for the creation of a new mixed-use development including residential (Use Class C3), commercial, business and 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 and associated access, parking and public realm works with matters of layout, scale, appearance, landscaping and access within the site reserved for subsequent approval and 2) detailed component comprising Plot A including the demolition of existing buildings and the creation of new residential floorspace (Use Class C3) together with landscaping, parking and other associated works.”

1.3 The purpose of the Planning Statement is to assess the planning considerations associated with the Development in the context of national, regional and local planning policy and guidance. To this end, the Planning Statement comprises the following:

- Chapter 2: describes the Site and the surrounding area;
- Chapter 3: describes the planning history of the Site;

- Chapter 4: summarises the consultation process undertaken as part of the application proposals;
- Chapter 5: provides a description of the Development;
- Chapter 6: explains the Development content;
- Chapter 7: assesses the Development against planning policy and guidance;
- Chapter 8: sets out the relevant planning obligations, Section 106 Heads of Terms and Community Infrastructure Levy.
- Chapter 9: outlines the benefits of the Development;
- Chapter 10: provides a summary and conclusions.

1.4 A full description of the Development is contained in the Development Specification, prepared by DP9 Limited. A summary description of the Development is contained in Chapter 3 of this Statement.

Planning Application Documents

1.5 This Statement should be read and considered in conjunction with a number of planning application documents, as set out in Appendix 2 of this Statement.

1.6 Due to the nature of the Development, an Environmental Impact Assessment has been both formally and informally scoped and undertaken in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2011.

1.7 Appendices to this Statement comprise:

- Appendix 1: Site Location Plan
- Appendix 2: List of Planning Application Documents
- Appendix 3: Cycle Parking Standards
- Appendix 4: Illustrative Phasing Plan

- Appendix 5: Development Guidelines

2. SITE AND SURROUNDINGS

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The Site

- 2.1 High Road West comprises approximately 8.57ha of mixed-use brownfield land, which stretches to the High Road Corridor in Tottenham. It is principally bound by the High Road to the east and the railway line (including White Hart Lane Station) to the west. A smaller plot to the west of the railway tracks is also included, comprising of Whitehall Lodge and the Whitehall & Tenterden Community Centre. A copy of the planning application boundary is shown in Figure 1 below:



Figure 1: The Site (Planning application boundary shown in red)

- 2.2 Detailed descriptions of the key character areas is set out below:

The Love Lane Estate

- 2.3 The Love Lane Estate comprises of 297 residential properties spread across nine buildings, managed by Homes for Haringey. The Estate varies in height with low-rise four storey blocks alongside three 10-storey towers. As part of the Development, the Love Lane Estate will be demolished which is proposed to be delivered in a number of phases.

Whitehall Lodge and Whitehall & Tenterden Community Centre

- 2.4 Whitehall Lodge comprises Stage One Temporary Accommodation for 22 households and a small community space currently managed by Homes for Haringey. To the north east of Whitehall Lodge is the Whitehall & Tenterden Community Hall which is currently used by local groups and activities. It is bound by the Railway to the east and the Headcorn and Tenterden Estate to the west.

Peacock Industrial Estate

- 2.5 The Peacock Industrial Estate is non-designated industrial land (NB. It is not a Locally Strategic Industrial Site (LSIS), Local Employment Area (LEA), Designated Employment Area (DEA) or a Strategic Industrial Location (SIL)) which sits to the north of the Love Lane Estate, accessed via White Hart Lane and the High Road. The Industrial Estate comprises a mix of one and two storey light industrial and manufacturing units together with car parking and offices.

Land To The Rear Of 867-879 High Road

- 2.6 The Site accommodates a large retail store currently occupied by B&M together with five small retail units and surface carpark. A hybrid planning application was granted in November 2019 to redevelop this part of the Site to convert the adjoining Listed Buildings at Nos. 867 – 869 High Road to deliver 330 residential units together with retail and public open space (Ref: HGY/2019/2929). Further commentary on this consent together with other associated planning permissions are set out in Chapter 3 of this Statement.

The Goods Yard and Carberry Enterprise Park

- 2.7 To the west of the HRW Site is the former Goods Yard and the Carberry Enterprise Park (also undesignated industrial land). The cleared Goods Yard is currently used as a temporary car park in relation to THFC's Stadium. The Goods Yard has previously been used in conjunction with the redevelopment of THFC's Stadium and predominantly comprises of cleared land. The Station Master's House is also included within this segment of the Site and is locally listed. To the south of this portion is the Grange Community Hub which is Grade II Listed.
- 2.8 A hybrid application for the redevelopment of the Goods Yard and the Carberry Enterprise Park to deliver approx. 316 residential units together with offices, retail, community, and leisure uses was originally submitted in December 2017 and subsequently appealed by THFC on grounds of non-determination (Ref: HGY/2018/0187). The scheme was later allowed on appeal in June 2019 (Appeal Ref: 3204592). Further commentary on this consent together with other associated planning permissions are set out in Chapter 3 of this Statement.

High Road Properties

- 2.9 Several groups of properties along the High Road are included within the Site. To the north of White Hart Lane, the properties are largely uniform in character and comprise a series of low-rise Victorian terraces with ground floor retail units; these are all exclusively locally listed and sit within the setting of statutorily listed (see following sections) and sit within the North Tottenham High Road Conservation Area. This includes Chapel Place, where there are locally listed buildings. The properties to the south of White Hart Lane comprise a mix of modern and Victorian terraces, including some locally listed buildings and structures; these are outside of the Conservation Area.

Policy Designations

- 2.10 The Site is covered (in full and in-part) by the following policy designations:
- Site Allocation HT5;
 - Estate Renewal Site;

- Tottenham Area Action Plan;
- Growth Area;
- Local Centre (Tottenham High Road North);
- Moselle Blue Ribbon Network (NB. This stretches along White Hart Lane);
- Tottenham High Road Ecological Corridor;
- North Tottenham High Road Conservation Area;
- Archaeological Priority Area;
- Critical Drainage Area;
- Flood Zone 2 (NB. This covers land to the south of White Hart Lane only);
- Family Housing Protection Zone; and
- Tall Buildings Growth Area.

2.11 In addition to the above, the Site has a PTAL Rating of 3, 4 and 5 ('Good') and is partly located in Flood Zone 2, an extract of which is shown in Figure 2.

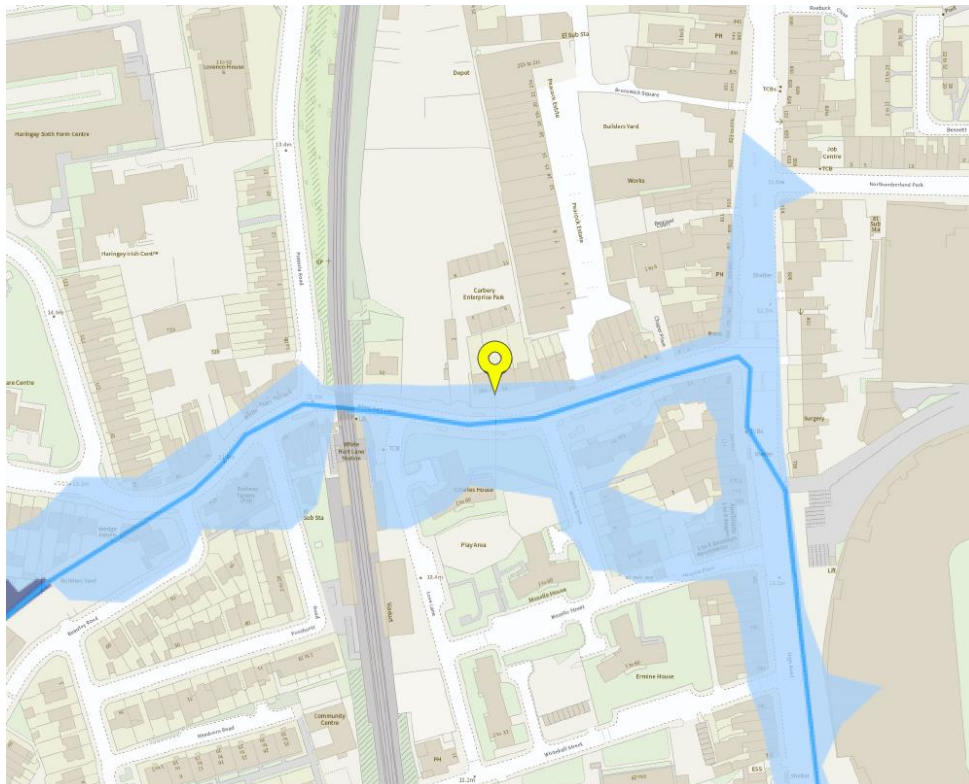


Figure 2: Environment Agency Flood Zone Map Extract

- 2.12 We note that the Upper Lea Valley Opportunity Area makes reference to the north of White Hart Lane as a Locally Significant Industrial Site (LSIS). This designation was subsequently removed in its entirety as part of the latest version of the adopted London Plan which forms part of the Development Plan on which the Development should be assessed. As such it is considered that this designation is no longer applicable.

Surrounding Context

- 2.13 The surrounding context around HRW is immediately characterised by a series of transformative regeneration projects together with more traditional residential patterns of development in the wider vicinity.
- 2.14 To the north of the Site is the Cannon Road residential development, which comprises four residential buildings between 4/5 (Beachcroft Court) and 22/23 storeys (River Apartments) in height as well Brook House Primary School. Beyond is the London Borough of Enfield (LB Enfield) and the Joyce and Snell's Estate which is currently undergoing an estate ballot as part of regeneration proposals. The initial scheme currently looks to deliver circa 2,000 new homes, with a series of heights concentrated along the railway line. The Site also includes the Langhedge Lane Industrial Estate.
- 2.15 To the north-east of the Site along the High Road, is Stellar House and Atlair Close (also referred to as Northumberland Park North). This broad area is designated in the Tottenham Area Action Plan (TAAP) for redevelopment (Site Allocation Reference: NT3) and has been subject to separate engagement by LB Haringey. The area to the south-east of the site along the High Road is dominated by the THFC Stadium which sits directly adjacent to HRW along High Road as part of the Northumberland Park regeneration and is designated within the TAAP (Ref: NT1). The Site was originally granted planning permission in 2011 for its wholesale redevelopment together with the delivery of Tottenham University Technical College and the Club's offices together with the provision of 285 residential units (Ref: HGY/2010/1000 and latterly, HGY/2015/3000).
- 2.16 The context to the south of the Site is predominantly characterised by a series of lower rise residential blocks along Brereton Road and is bound by St Francis de

Sales Church and Junior School (locally listed). Further south is the Tottenham Community Sports Centre and a series of properties along Church Road. The High Road corridor to the south is typified by a series of shopfronts with commercial and residential accommodation above.

- 2.17 The west of the Site is bound by the London Overground Railway Line which traverses the Site north to south, with Whitehall Lodge and Whitehall & Tenterden Community Centre sitting to the west of the Line. To the north west is the Haringey Sixth Form College together with a series of residential roads and the Commercial Road and North Middlesex Estate (designated LSIS). To the south west is the Headcorn and Tenterden Estate which comprises as a series of relatively low-rise residential blocks together with Lancastrian Primary School and Bruce Castle Park.

Heritage Context

- 2.18 The Site and wider area include a number of locally listed and statutorily listed buildings. The following designated and non-designated heritage assets are included within the red line boundary:

- The Grange, 34 White Hart Lane (Grade II)
- 819 – 821 High Road (Grade II)
- Station Masters House (Locally Listed)
- 6A White Hart Lane (Locally Listed)
- 122 – 133 High Road (Locally Listed)
- Chapel Place (Locally Listed)
- Substation to the South of White Hart Lane (Locally Listed)

- 2.19 Part of the Site is covered by the North Tottenham High Road Conservation Area which traverses the Site along White Hart Lane. The Conservation Area together with the significant number of locally listed buildings seek to retain the historic townscape form and appearance along this Section of High Road. This is similarly reflected in the conservation area appraisal which states *“Key features of the conservation area that need to be preserved and enhanced include the historic*

linear continuity of buildings either side of the High Road, maintaining the character of the townscape and its sense of spatial sequence highlighted by the mix of Victorian and Georgian buildings that help to give the street its scale and sense of place.”

- 2.20 A segment of the Conservation Area to the south of White Hart Lane within the boundary of the Site is proposed to be removed. The decision to remove this parcel of land from the designated Conservation Area boundary was mindful of the very poor quality of existing buildings within the sub-area and the potential to deliver a direct route between the Tottenham Hotspur Football Stadium and White Hart Lane Station.

Accessibility

- 2.21 The Site is well served by public transport and has a PTAL Rating of between 3, 4 and 5 across the Site. The site is in close proximity to White Hart Lane Station which sits within the Red Line application boundary of the Site. The Station is served by the London Overground service (Zone 3) between London Liverpool Street and Enfield Town and Cheshunt. It is also served by a number of bus routes as shown in Figure 3 below. These include: W3, 149, 259, 279, 349 and N279 services which link the Site to the wider area and beyond including Waltham Cross Bus Station, Edmonton Green, Northumberland Park, Finsbury Park and Charing Cross.

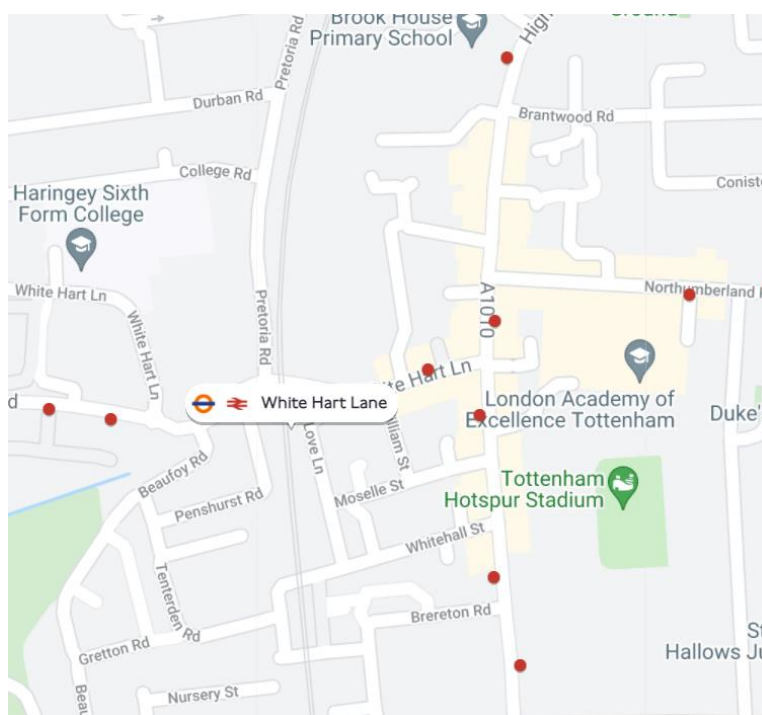


Figure 3: Bus Stops in and around the Site

- 2.22 The High Road (A1010) is a designated TfL Red Route and part of the strategic road network. The Site itself presents a barrier to north-south pedestrian movement, with minimal through routes and poor pedestrian crossing provision. This is mainly owing to the historic pattern of development and limited permeability to the north of White Hart Lane.
- 2.23 To the south of the Site is Cycle Superhighway 1 (CS1) which is routed along Church Road and terminates at the Tottenham Hotspur Stadium.

3. THE DEVELOPMENT

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Description of The Development

3.1 Planning permission is sought for the following:

“Hybrid Planning application seeking permission for 1) outline component comprising the demolition of existing buildings and for the creation of a new mixed-use development including residential (Use Class C3), commercial, business and 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 and associated access, parking and public realm works with matters of layout, scale, appearance, landscaping and access within the site reserved for subsequent approval and 2) detailed component comprising Plot A including the demolition of existing buildings and the creation of new residential floorspace (Use Class C3) together with landscaping, parking and other associated works.”

3.2 The application seeks approval of the parameters for the Outline Proposals. The parameters for the Outline Proposals are detailed within the Development Specification, the Parameter Plans and the Design Guidelines. These should be given equal weighting and should be considered as a whole.

3.3 The application seeks to reserve all matters for the Outline Proposals except access; however, a sufficient level of detail has been provided in accordance with the Town and Country Planning (Development Management Procedure) Order 2015 and Planning Practice Guidance (PPG) Paragraph 006 Reference 14-006-20140306. Matters for future determination are:

- **‘Access’** – the accessibility within the site, for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how these fit into the surrounding access network. Access into the Site is not reserved and is shown on Parameter Plan Ref: 0311-SEW-ZZ-ZZ-DR-T-001006.

- **‘Appearance’** – the aspects of a building or place within the Development which determine the visual impression the building or place makes, including the external built form of the development, its architecture, materials, decoration, lighting, colour and texture.
- **‘Landscaping’** – the treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the site and the area in which it is situated and includes: (a) screening by fences, walls or other means; (b) the planting of trees, hedges, shrubs or grass; (c) the formation of banks, terraces or other earthworks; (d) the laying out or provision of gardens, courts, squares, water features, sculpture or public art; and (e) the provision of other amenity features;
- **‘Layout’** – the way in which buildings, routes and open spaces within the Development are provided, situated and orientated in relation to each other and to buildings and spaces outside the Development.
- **‘Scale’** – the height, width and length of each building proposed within the Development in relation to its surroundings.

The Detailed Proposals

- 3.4 Detailed Proposals are submitted in respect of Plot A for which no matters are reserved. In addition to the documents submitted for the Outline Proposals, a suite of planning application documents is submitted in support of the Detailed Proposals, as set out in Appendix Two.

The Need for Flexibility

- 3.5 The form of the application reflects the nature of the scheme. The Development comprises a true mix of uses which will be built out over a prolonged period of time and will encounter market fluctuations, full economic cycles and demand pressures. The need for flexibility is therefore paramount to allow the Development to respond to changing needs and patterns as future phases come forward for development.
- 3.6 In addition, it is recognised that there are two major extant consents promoted by

Tottenham Hotspurs Football Club (“THFC”) to the north of White Hart Lane. These comprise of the following:

- The Goods Yard (LPA Ref: HGY/2018/0187):

“Hybrid Application with matters of layout, scale, appearance, landscaping and access within the site reserved for residential-led mixed use redevelopment to comprise the demolition of existing buildings/structures and associated site clearance and erection of new buildings/structures and basement to provide residential units, employment (B1 Use), retail (A1 Use), leisure (A3 and D2 Uses) and community (D1 Use) uses, with associated access, parking (including basement parking) and servicing space, infrastructure, public realm works and ancillary development. Change of use of No. 52 White Hart Lane (Station Master's House) from C3 use to A3 use. N.B. Access to the Site is sought for approval in this application. This proposal is accompanied by an Environmental Statement. The Environmental Statement is available in full on the Council's website, but can also be inspected at River Park House, 225 High Road, N22 8HQ between the hours of 10:00-16:00 Monday to Friday. If any consultee or interested person requires hard copies of the Environmental Statement, please contact the case officer.” (Allowed on Appeal 29th June 2019).

- 867 – 879 High Road (LPA Ref: HGY/2019/2929)

“Hybrid planning application (part Full/Part Outline) for the demolition of existing buildings & structures and redevelopment of the site for a residential led mixed-use scheme with up to 330 residential units (class C3), retail/café use (Use Class A1/A3), area of new public open space, landscaping and other associated works. Full details/permission is sought in respect of Block D, 867 and 869 High Road (Grade II listed) and proposed Block G to its rear. Outline permission is sought for the remainder of the site, with details of "scale", "layout", "appearance" and "landscaping" reserved in relation to proposed Blocks A, B and C and details of "appearance", "landscaping" and "layout" only reserved in relation to Block E.” (Granted: 25th September 2020).

3.7 In addition, an application for full planning permission in relation to the Site known as 807 High Road – which is partially included within the red line boundary of the Proposed Development - was granted on 3rd September 2021 (LPA Ref: HGY/2021/0441) for the following:

“Full planning application for the demolition of the existing buildings and the erection of a replacement building up to four storeys to include residential (C3), retail (Class E, a) and flexible medical / health (Class E, e) and office (Class E, g, i) uses; hard and soft landscaping works including a residential podium; and associated works.”

3.8 For the purpose of this application submission, the maximum physical parameters of the Outline Proposals (as shown in Parameter Plans 0311-SEW-ZZ-ZZ-DR-T-001003, 0311-SEW-ZZ-ZZ-DR-T-001004 and 0311-SEW-ZZ-ZZ-DR-T-001005) in the Proposed Development takes the above planning consents into consideration and would allow these extant consents to be built out within the maximum parameters of the hybrid permission. In practice, the intention of this approach is to provide a suitable degree of consistency between the Proposed Development and the extent consents should THFC bring forward their extant consents. The methodology for EIA assessment purposes is set out within the accompanying Environmental Statement.

3.9 The hybrid application seeks planning permission for a maximum total of 339,300sqm GEA floorspace in the Outline Proposals and 7,390sqm GEA of residential floorspace in the Detail Proposals for Plot A.

3.10 Separate to the above, an application for the demolition of the former British Queen Public House was submitted in October 2021 (Ref: HGY/2021/3034), which has been submitted for approval in advance of this application allowing enabling works to commence in early 2022.

Outline Proposals

3.11 The application seeks a total maximum 339,300sqm GEA floorspace for the Outline Proposals. Table 1 defines the maximum floorspace for each category of land use (in GEA sqm) proposed for the Outline Proposals. The amount of floorspace that could come forward is controlled by a maximum GEA cap by zone, land use and for

the Development as a whole contained within the Development Specification. This has been arrived at following extensive testing by the Applicant and Design Team and is justified in the documents supporting the planning application.

3.12 The Development is divided into several Development Plots shown on Parameter Plan Ref: 0311-SEW-ZZ-ZZ-DR-T-001002. A Development Zone Plan for the purposes of the Development Specification has also been prepared and shown on Parameter Plan Ref: 0311-SEW-ZZ-ZZ-DR-T-001012. Table 1 sets out the minimum and maximum total floorspace cap by land use.

Land Use	Minimum GEA (sqm)	Maximum GEA (sqm)
Use Class B2: Industrial*	0sqm	7,000sqm
Use Class B8: Industrial*	0sqm	1,000sqm
TOTAL USE CLASS C:	10,682sqm	8,000sqm
Use Class C3: Residential	235,000sqm	280,000sqm
TOTAL USE CLASS C:	235,000sqm	280,000sqm
Use Class E (a): Retail other than hotfood	4,000sqm	7,800sqm
Use Class E (b): Sale of food and drink mainly for consumption on premise		
Use Class E (c): Commercial, professional (other than medical) or financial services		
Use Class E (d): Indoor sports, recreation or fitness	500sqm	4,000sqm
Use Class E (e): Medical or healthcare	0sqm	1,000sqm
Use Class E (f): Creche, day nursery or centre	0sqm	2,000sqm ³
Use Class E (g: i, ii and iii)*: offices for operational or administrative functions, R+D of products or processes, industrial processes	1,525sqm	7,200sqm
TOTAL USE CLASS E:	6,025sqm	22,000sqm
Use Class F1 (d): Public Libraries or reading rooms	500sqm	3,500sqm
Use Class F1 (e): Public halls or exhibition halls		

Use Class F1 (f): public places of worship	0sqm	0sqm
Use Class F2 (b): local community halls	500sqm	2,500sqm
TOTAL USE CLASS F:	1,000sqm	6,000sqm
Sui Generis: Energy Centre	200sqm	1,800sqm
Sui Generis: Public House	0sqm	3,000sqm
Sui Generis: Sub Station	0sqm	500sqm
Sui Generis: Cinema	0sqm	3,000sqm
TOTAL USE SUI GENERIS:	200sqm	8,300sqm
Residential parking	4,000sqm	15,000sqm
TOTAL:	252,907sqm	339,300sqm

* A minimum floorspace of 4,686sqm GEA will be delivered either as B2, B8 or E(g i, ii or iii) consistent with the Minimum and Maximum floorspace areas for these uses.

Table 1: Minimum and Maximum floorspace areas for the Proposed Development

3.13 Table 2 below provides an indicative summary of each Development Zone.

Development Zone	Summary Description
Zone 1	Zone 1 comprises Plots A1, A2 and A3. It will provide new residential floorspace (Use Class C3).
Zone 2	Zone 2 comprises of Plots B and C. The principal land use will be residential (Use Class C3) above the first floor, with the potential for residential (Use Class C3), commercial, retail and leisure (Use Class E (a – e) and F2), creche, day nursery or centre (Use Class E(f)), office and industrial processes (Use Class E(g)), community floorspace (Use Class F1) and/or for the delivery of a Cinema and/or Public House and/or Energy Centre (<i>Sui Generis</i>) together with parking and/or plant on the ground and first floor levels.
Zone 3	Zone 3 comprises of Plot D. The principal land use will be residential (Use Class C3) above the first floor, with the potential for residential (Use Class C3), commercial, retail and leisure (Use Class E (a – e) and F2), office and industrial processes (Use Class E(g)), community floorspace (Use Class F1) and/or for the delivery of a Cinema and/or Public House and/or Energy Centre (<i>Sui Generis</i>) together with parking and/or plant on the ground and first floor levels.

Zone 4	Zone 4 comprises of Plot E. The principal land use across all floors will be community floorspace (Use Class F1) with the potential for commercial, retail and leisure (Use Class E (a – e) and F2), office and industrial processes (Use Class E(g)) and/or for the delivery of a Cinema and/or Public House and/or Energy Centre (<i>Sui Generis</i>) together with parking and/or plant.
Zone 5	Zone 5 comprises of Plot F. The principal land use will be residential (Use Class C3) above the first floor, with the potential for residential (Use Class C3), commercial, retail and leisure (Use Class E (a – e) and F2), community floorspace (Use Class F1) and/or for the delivery of a Cinema and/or Sub- station (<i>Sui Centre</i>) together with parking and/or plant on the ground and first floor levels.
Zone 6	Zone 6 comprises of Plot G. The principal land use will be residential (Use Class C3) at first floor and above, with the potential for residential (Use Class C3), commercial, retail and leisure (Use Class E (a – e) and F2), office and industrial processes (Use Class E(g)) together with parking and/or plant on the ground floor.
Zone 7	Zone 7 comprises of Plots H1, H2 and H3. The principal land use will be residential (Use Class C3) which will be located at first floor and above in Plots H1 and H3, together with the potential for residential (Use Class C3), commercial, retail and leisure (Use Class E (a – e) and F2), creche, day nursery or centre (Use Class E(f)), community floorspace (Use Class F1) together with parking and/or plant on at ground floor of all plots and at first floor and above in Plot H2.
Zone 8	Zone 8 comprises of Plots I1, I2 and I3. The principal land use will be residential (Use Class C3) which will be located at first floor and above in Plot I1, together with the potential for residential (Use Class C3), commercial, retail and leisure (Use Class E (a – e) and F2), creche, day nursery or centre (Use Class E(f)), offices and industrial processes (Use Class E(g)), light Industrial, storage and distribution (Use Class B2/B8) together with parking and/or plant on at ground floor of all plots and at first floor and above in Plots I2 and I3.

Zone 9	Zone 9 comprises of Plots J1 and J2. The principal land use will be residential (Use Class C3) which will be located at first floor and above in both Plots, with the potential for residential (Use Class C3), commercial, retail and leisure (Use Class E (a – e) and F2), offices and industrial processes (Use Class E(g)) and/or energy centre and/or Sub-station (<i>Sui Generis</i>) together with parking and/or plant on the ground floor.
Zone 10	Zone 10 comprises of Plots K1 and K2. The principal land use will be residential (Use Class C3) which will be located at first floor and above in Plot K1, together with the potential for residential (Use Class C3), commercial, retail and leisure (Use Class E (a – e) and F2), offices and industrial processes (Use Class E(g)), light Industrial, storage and distribution (Use Class B2/B8) and/or cinema and/or energy centre and/or Sub-station (<i>Sui Generis</i>) together with parking and/or plant on at ground floor of both plots and at first floor and above in Plot K2.
Zone 11	Zone 11 comprises of Plots L1 and L2. The principal land use will be residential (Use Class C3) which will be located at first floor and above in both plots, with the potential for residential (Use Class C3), commercial, retail and leisure (Use Class E (a – e) and F2), together with parking and/or plant at ground floor.
Zone 12	Zone 12 comprises of Plots M1, M2 and M3. The principal land use will be residential (Use Class C3) which will be located at first floor and above in all three plots, with the potential for residential (Use Class C3), commercial, retail and leisure (Use Class E (a – e) and F2), creche, day nursery or centre (Use Class E(f)), and/or energy centre and/or Sub-station (<i>Sui Generis</i>) together with parking and/or plant at ground floor.
Zone 13	Zone 13 comprises of Plots N1, N2, N3 and N4. The principal land use will be residential (Use Class C3) which will be located at first floor and above across all plots and exclusively at ground floor in Plots N1 and N3, together with the potential for residential (Use Class C3), commercial, retail and leisure (Use Class E (a – e), offices and industrial processes (Use Class E(g)), creche, day nursery or centre (Use Class E(f)), light Industrial, storage and distribution (Use Class B2/B8), and/or energy centre (<i>Sui Generis</i>) together with parking and/or plant on at ground floor of plots N2 and N4. This plot will also include the provision of new play space in conjunction with the Brook House Primary School, the size, and dimensions of which will be agreed.

Table 2: Development Zone Description

Proposed Land Uses

Residential

- 3.14 The Outline Proposals seek permission for a maximum level of 280,000sqm GEA of Use Class C3 residential floorspace distributed across Development Zones 1, 2, 3, 5, 6, 7, 8, 9, 10, 11, 12 and 13.
- 3.15 In terms of the Detailed Proposals, Plot A will provide 7,390sqm GEA of residential floorspace. The Development will provide a mix of housing types including studio, 1, 2, 3 and 4+ bedroom units. The number of residential units and the mix to be delivered as part of the Outline Proposals is to be agreed at the reserved matters stage.
- 3.16 The Detailed Proposals will provide 100% affordable housing (social rented) by habitable room. The amount of affordable housing to be delivered in subsequent phases will be subject to scheme viability, grant availability and other scheme requirements.

Retail, Food and Drink and Professional Services

- 3.17 The Outline Proposals seek permission for a maximum of 7,800 sqm GEA of Use Class E (a, b and c) floorspace across Development Zones 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12 and 13.

General Industry, Storage, Office and Workspace

- 3.18 The Outline Proposals seek permission for a maximum of 7,200 sqm GEA of Use Class E(g) floorspace across Development Zones 2, 6, 7, 8, 9, 10 and 13.

Learning and Community Facilities

- 3.19 The Outline Proposals seek permission for a maximum of 6,000 sqm GEA of Use Class F1 and F2 floorspace, comprising community facilities in Development Zones 2, 3, 4, 5, 7, 8, 11 and 12. Community facilities will include the new Library and Learning Centre.

- 3.20 The Outline Proposals seek permission for a maximum of 1,000 sqm GEA of Use Class E(e) comprising of new medical facilities or floorspace in Development Zones 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12 and 13¹.

Leisure and Cultural Uses

- 3.21 The Development seeks permission for a maximum of 7,000 sqm GEA of Use Class E(d) comprising leisure and cultural uses together with Sui Generis Cinema floorspace. This could be potentially delivered in Development Zones 2, 3, 4, 5, 7, 8, 10, 11 and 12.

Nursery and Creche Floorspace

- 3.22 The Development seeks permission for 2,000sqm GEA of Use Class E(f) floorspace comprising of creche, day nursery or centre floorspace.

- 3.23 The creche, day nursery or centre floorspace could be located within Development Zones 2, 7, 8, 12 and 13.

Energy Centre and Substation

- 3.24 The Development seeks permission for Sui Generis energy centre with a maximum floorspace of 1,800 sqm GEA. The energy centre could be located within Development Zones 2, 3, 9, 12 and 13.

- 3.25 In addition, the Development also seeks permission for 500 sqm GEA of Sui Generis floorspace for a Substation. The substation could be located within Development Zones 2, 3, 5, 9, 10, 11 and 12.

Publicly Accessible Open Space

- 3.26 In addition to the built floorspace set out above, the Outline Proposals will include areas of open space. These areas include the following:

- Minimum of 33,300 sqm of publicly accessible public realm (excluding the

¹ A minimum floorspace of 4,686sqm GEA will be delivered either as B2, B8 or E(g i, ii or iii) consistent with the Minimum and Maximum floorspace areas for these uses.

Public Park and Public Square);

- A new Public Park, which will include a minimum area of 5,300 sqm of public realm;
- A new Public Square, which will include a minimum area of 3,500 sqm of public realm.

Car and Cycle Parking

- 3.27 The Cycle Parking Provision for each Development Zone or Plot will be delivered in accordance with the adopted London Plan Standards as set out in Appendix Three.
- 3.28 A minimum of 3% blue badge car parking provision will be delivered for each Development Zone or Plot. Up to a further 7% of blue badge car parking provision will be delivered for each Development Zone or Plot, with the first Reserved Matters Application to come forward delivering 10% blue badge parking in total.
- 3.29 All existing tenants in the Love Lane Estate will be offered on-street parking permits within the existing Car Parking Zone.

Phasing

- 3.30 An Illustrative Phasing Plan is included at Appendix Four. The exact phasing of the Proposed Development will be submitted to the Local Planning Authority for approval prior to the commencement of the Development, with Plot A the first Phase to be commenced.

The Detailed Proposals

- 3.31 The Detailed Proposals for Plot A will provide a mixed-use scheme comprising solely affordable (social rented) accommodation. It is subdivided into three separate blocks (A1, A2 and A3). The floor areas for each land use are set out in Table 3.

Land Use

- 3.32 Plot A will provide 60 residential units with a mix of 1 bed, 2 bed, 3 bed and 4 bed units:

Plot A Mix (by unit size)		
No. Bed Spaces	No.	% Mix
1 Bed	16	27%
2 Bed	15	25%
3 Bed	25	42%
4 Bed	4	6%
TOTAL	60	100%

Table 3: Plot A Unit Mix

- 3.33 A total of 5 units (representing 8% of the total units), are for wheelchair users and have been designed in compliance with Building Regulations Part M4 Category 3. The remaining 92% of residential units will be wheelchair adaptable and have been designed in compliance with Part M4 Category 2².
- 3.34 The scheme will include the re-provision of 26 car parking spaces, to be located within the existing CPZ. 123 cycle parking spaces will be provided, including provision for four accessible Sheffield stands and four short-stay visitor spaces.

Public Realm

- 3.35 The public realm and open space in Plot A is designed around a courtyard arrangement and will provide a pedestrian link between Whitehall Street and Headcorn Road. This will provide approximately 1,221 sqm (GIA) of informal play-space as well as amenity space for local residents.

Car Parking

- 3.36 As the proposals for Plot A contain 100% council homes, all tenants will be entitled to a permit for use within the existing CPZ. As set out in the accompanying Transport Assessment, there is considered to be sufficient capacity within the existing CPZ to accommodate car parking provision for all existing tenants that are to be relocated to Plot A. In addition, blue badge parking provision has also been identified within the existing CPZ.

² NB. The masterplan as a whole will deliver a minimum of 10% of all residential units to meet M4(3) Standards.

4. PLANNING HISTORY SUMMARY

4. PLANNING HISTORY SUMMARY

4.1. At This chapter sets out the recent planning history relevant to the Site which is listed in Table 4 below. This has been prepared based on the online records available via the Council's Planning Portal.

Application Ref	Address	Description	Status
HGY/2021/2034	Former British Queen Public House	Demolition of all above ground buildings and structures in relation to the former British Queen Public House including all necessary ancillary and enabling works.	Under determination.
HGY/2021/1771	The Goods Yard and The Depot 36 & 44-52 White Hart Lane (and land to the rear), and 867-879 High Road (and land to the rear)	Full planning application for (i) the demolition of existing buildings and structures, site clearance and the redevelopment of the site for a residential-led, mixed-use development comprising residential units (C3); flexible commercial, business, community, retail and service uses (Class E); hard and soft landscaping; associated parking; and associated works. (ii) Change of use of No. 52 White Hart Lane from residential (C3) to a flexible retail (Class E) (iii) Change of use of No. 867-869 High Road to residential (C3) use. This proposal is accompanied by an Environmental Statement.	Under determination.
HGY/2021/2283	Printworks, 819-829 High Road	Full planning application: Full planning application for the demolition of existing buildings and structures to the rear of 819-829 High Road; the demolition of 829 High Road; and redevelopment for a residential-led, mixed-use development comprising residential units (C3), flexible commercial, business and service uses (Class E), a cinema (Sui Generis), hard and soft landscaping, parking, and associated works. To include the change of use of 819-827 High Road to flexible residential (C3), cinema (Sui Generis), and commercial, business and service uses (Class E).	Under determination.
HGY/2020/1361	807 High Road	Full planning application for the demolition of existing buildings and the erection of a replacement building up to four storeys to include residential (C3); retail (A1); and flexible D1/B1 uses; hard and soft landscaping works including a residential podium; and associated works.	Granted: 03.09.2021
HGY/2019/2929	867-879 High Road	Hybrid planning application (part Full/Part Outline) for the demolition of existing buildings & structures and redevelopment of the site for a residential led mixed-use scheme with up to	Granted: 25.09.2020

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		330 residential units (class C3), retail/café use (Use Class A1/A3), area of new public open space, landscaping and other associated works. Full details/permission is sought in respect of Block D, 867 and 869 High Road (Grade II listed) and proposed Block G to its rear. Outline permission is sought for the remainder of the site, with details of "scale", "layout", "appearance" and "landscaping" reserved in relation to proposed Blocks A, B and C and details of "appearance", "landscaping" and "layout" only reserved in relation to Block E.	
HGY/2019/2210 (LBC)	819-821 High Road	Listed Building Consent for: like-for-like replacement of single glazed, timber, sash windows, removal of paint from cills to allow for condition survey and allow for like-for-like repairs / replacement as required, like-for-like replacement of broken cills, allowance for slim-line secondary glazing internally, subject to the thermal/ acoustic requirements. Storm windows secondary glazing system to be used, as previously installed at Percy House (796 High Road), associated making good, with like-for-like materials, as required following repairs, redecoration of affected areas following repairs.	Granted: 09.10.2019
HGY/2018/0187	The Goods Yard 36 and 44-52 White Hart Lane	Application with matters of layout, scale, appearance, landscaping and access within the site reserved for residential-led mixed use redevelopment to comprise the demolition of existing buildings/structures and associated site clearance and erection of new buildings/structures and basement to provide residential units, employment (B1 Use), retail (A1 Use), leisure (A3 and D2 Uses) and community (D1 Use) uses, with associated access, parking (including basement parking) and servicing space, infrastructure, public realm works and ancillary development. Change of use of No. 52 White Hart Lane (Station Master's House) from C3 use to A3 use. N.B. Access to the Site is sought for approval in this application. This proposal is accompanied by an Environmental Statement.	Allowed on Appeal: 28.06.2019
HGY/2019/0817	Unit 3, Brunswick Square	Increase in height of the existing mansard roof and the insertion of dormer windows to create an additional storey in order to provide customer welfare facilities ancillary to the existing wedding designer business occupying the building.	Granted: 29.04.2019
HGY/2016/2573	White Hart Lane Station	Works to extend the operational railway station at White Hart Lane. Creation of a new station entrance, ticket hall, station facilities and station forecourt. Provision of a new pedestrian entrance from Penshurst Road. Improved access and lift access from street level to platforms, including the erection of new platform canopies. Demolition of the existing station entrance and 33 local authority owned garages. Enhanced public realm and cycle parking facilities. Improvements to the former station building. Plus associated works.	Granted: 02.08.2016

HGY/2016/3914	100 Whitehall Street	Temporary change of use from use as a care home (Use Class C2) to temporary accommodation for families (Use Class C1).	Granted: 20.01.2017
HGY/2021/0218	31 and 32 Nesta Works, Peacock Industrial Estate, White Hart Lane	Erection of an additional storey on top of existing commercial property.	Refused: 18.03.2021
HGY/2017/1146	Unit 2, Peacock Industrial Estate, White Hart Lane	Change of Use from a B8 to a B2 use.	Granted: 16.06.2017

Table 4: Relevant Planning History

HRW

5. CONSULTATION PROCESS

5. CONSULTATION PROCESS

Background

- 5.1. Lendlease has been involved in the High Road West Masterplan since its appointment as the Council's development partner for the Site in July 2017. The masterplan for HRW originally devised as part of LBH's Strategic Regeneration Framework (SRF) which sought to realise the comprehensive regeneration of Tottenham over the next 20 years. The masterplan for HRW was approved by LBH's Cabinet in 2014 and subsequently fed into the Tottenham Area Action Plan (2017).
- 5.2. Since 2012, LBH has been undertaking extensive consultation with local residents on the Love Lane Estate regarding the proposed masterplan for HRW. This included establishing the Residents Design Panel which has fed into the masterplan on matters including the design of new homes, public realm and neighbourhood character. In addition, LBH has also continued to undertake consultation with the local businesses based on the principles of its Business Charter. This has included the Tottenham Heritage Initiative which has invested funding into new frontages and public realm improvements together with practical support for employers.
- 5.3. The Statement of Community Involvement explains all public consultation carried out during the pre-application stage, together with an explanation of the approach to consultation that will continue through the determination of the planning application and beyond.
- 5.4. This Chapter provides a detailed description of the statutory consultation process undertaken, including the pre-application process with LB Haringey; the Greater London Authority (GLA); Transport for London (TfL); and other consultees. It also summarises the public consultation exercise set out in detail in the Statement of Community Involvement.

EIA Scoping Request

- 5.5. Due to the nature of the Development, an Environmental Impact Assessment has

been formally scoped and undertaken in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The Scoping Opinion was requested from the Council on 14th October 2021 (Ref: HGY/2021/2960).

Mayoral Referral

- 5.6. The application is referrable to the GLA as it exceeds the relevant thresholds set out in The Town and Country Planning (Mayor of London) Order 2008. Accordingly, the GLA has been involved in formal pre-application discussions with the Applicant and LB Haringey.

Pre-Application Discussions

- 5.7. Formal pre-application discussions have been held with the Council; the GLA and TfL on the evolving masterplan since January 2021. This follows on from extensive engagement with LB Haringey on the HRWM since 2017 which paused in 2018. Consultation has also taken place with statutory consultees including Historic England and the Environment Agency.
- 5.8. Pre-application meetings on the 2017 and 2021 Masterplan have been held regularly at the Council's Offices. The principal meeting topics included:
- Planning Policy and Land Use;
 - Design and Townscape;
 - Transport;
 - Environmental Considerations (including Energy Strategy and Sustainability); and
 - CIL and Section 106.

Quality Review Panel

- 5.9. As part of comprehensive approach to developing the design of the HRWM, Lendlease together with SEW, PTE and wider consultant team have been actively engaged in a series of iterative meetings with Haringey's Quality Review Panel

(QRP). This has included four sessions in 2021, the latest taking place in September 2021 where the current proposals were presented and discussed. This has helped influence the design of the scheme and the detail included within Control Documents. It is intended that engagement will remain on-going with LB Haringey design officers and the QRP Panel Members involved as the scheme develops through the Reserved Matters stages.

Community Consultation

- 5.10. The Site has been subject to extensive consultation which has predominantly focused on partnership engagement carried out by the London Borough of Haringey, prior to Lendlease's involvement in relation to the Love Lane Estate.
- 5.11. Engagement was initially undertaken during the development of the High Road West Masterplan Framework in 2013 and subsequently during the production of the Residents' Charter and Residents' Design Guide between 2013 - 2016. This was later followed by the Council's housing consultation on the future of the Love Lane Estate between 2014- 2017.
- 5.12. Since 2018, Lendlease in partnership with the London Borough of Haringey have been responsible for community consultation and engagement on proposals for High Road West. This included a series of pop-up events, consultation events, walk and talk days together with a community fun day alongside exhibitions and drop-in events held by the team during the initial phase of engagement. This was followed up at the beginning of 2021 by a second phase of engagement, following a pause on the masterplan between 2019 – 2020. This was focused on the distribution of the new homes offer, which included a number of events and reach-out activities with the local community. In addition, a series of online consultation events were carried out and an online poll conducted.
- 5.13. A further round of engagement was held between May – July 2021 which included a series of online workshops which covered a number of themes on the masterplan including transport and open spaces, neighbourhoods together with new community, workshops and leisure facilities. A standalone workshop session was also held with the Dukes Academy. Meetings were also held with the Headcorn, Tenterden , Beaufoy and Gretton Roads Residents' Association together with the

- 5.14. Between August – September 2021 , the team carried out a further stage of consultation which focused on the detailed designs for White Hall Mews (Plot A) together with details on the broader masterplan proposals such as height, access points and amenities, public realm features and architectural look and feel of the masterplan. A subsequent walk and talk session was also held with the Headcorn & Tenterden Residents' Association regarding the proposals for White Hall Mews (Plot A).
- 5.15. A separate stream of engagement in relation to the Estate Ballot for the eligible residents on the Love Lane Estate was also carried out; this included a community fun day together with a series of drop-in sessions and community reach-out initiatives.
- 5.16. A detailed breakdown of all the consultation engagement carried out in relation to the Proposed Development alongside the Estate Ballot is set out in the Statement of Community Involvement which has been prepared by Soundings. That document also sets out how the scheme has responded to the feedback received as part of a collaborative and responsive engagement process.
- 5.17. It is intended that engagement with the local community, groups and wider stakeholders is maintained throughout the determination of the planning application and beyond. This will include on-going engagement with all stakeholders and the local community over the lifetime of the Development as phases are brought forward and the scheme developed for Reserved Matters Application submissions. It will draw upon the principles established in the Residents' Design Guide and Residents' Charter to help inform and develop the proposals for the local community.

6. PLANNING POLICY FRAMEWORK OVERVIEW

6. PLANNING POLICY FRAMEWORK OVERVIEW

- 6.1. At The purpose of this Chapter is to identify the key national, regional and local planning policy and guidance relevant to the determination of the application for the Development, and to which the proposals have had regard during design development. An analysis of the key policies and tests is included in the relevant sections.
- 6.2. National planning policy is set out in the form of the adopted National Planning Policy Framework (NPPF), which was adopted in July 2021. The NPPF is subject to updates by the Government and is supplemented by the National Planning Practice Guidance (NPPG) which is updated on a regular basis. Both of these documents carry significant material weight.
- 6.3. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- Haringey's Development Plan comprises:
 - London Plan (2021)
 - Strategic Policies Development Plan Document (DPD) (2017)
 - Development Management DPD (2017)
 - Site Allocations DPD (2017)
- 6.4. In addition to the Development Plan, regard has been had to the following:

Supplementary Planning Documents and Guidance

- GLA Public London Charter (2021)
- LB Haringey Planning Obligations SPD (2018)

- GLA Affordable Housing and Viability SPG (2017)
- LB Haringey Tottenham Area Action Plan (AAP) (2017)
- GLA Housing SPG (2016)
- GLA Social Infrastructure SPG (2015)
- The Control of Dust and Emissions during Construction and Demolition SPG (2014)
- GLA Accessible London: Achieving an Inclusive Environment (2014)
- GLA Character and Context SPG (2014)
- Upper Lea Valley Opportunity Area Planning Framework (2013)
- LB Haringey Sustainable Design and Construction SPD (2013)
- GLA London View Management Framework (LVMF) (2012)
- GLA Play and Informal Recreation SPG (2012)

Draft

- GLA Good Quality Homes for all Londoners (2020)
- GLA Circular Economy Statements (2020)
- GLA Whole -life Carbon Assessments (2020)
- GLA 'Be Seen' Monitoring Guidance (2020)
- GLA Air Quality Positive (to be consulted upon in Summer 2021)
- GLA Fire Safety (to be consulted upon in Summer 2021)
- GLA Urban Greening Factor (to be consulted upon in Summer 2021)

Other Documents

- The Mayor's Good Practice Guide to Estate Regeneration (2018)
- Haringey Tottenham Character Study (2015)
- High Road West Masterplan (2014)

6.5. The Development has also had regard to various relevant GLA and Haringey Council strategies and guidance documents, which although do not form part of the Development Plan against which the Development is assessed, have been taken into consideration where relevant.

6.6. The Council is currently in the process of preparing a new Local Plan which underwent a Regulation 18 Consultation in between November 2020 – March 2021. This document set out its First Steps Engagement on the issues and options for the new Local Plan. At the time of writing, the draft new Local Plan has no weight in decision making and very limited policies beyond the context set out in the First Steps Engagement document. As such, this has not been considered at present within the Planning Application submission.

7. ASSESSMENT OF THE DEVELOPMENT

7. ASSESSMENT OF THE DEVELOPMENT

Introduction

- 7.1. The This Chapter assesses the Development in the context of key national, regional and local planning policy and guidance relevant to the determination of the application.
- 7.2. The Proposed Development as a whole is assessed within this Chapter unless otherwise delineated in the assessment between the Outline Proposals and the Detailed Proposals. Where relevant additional commentary on the Proposed Development is provided to reflect the greater level of detail submitted as part of the planning application.
- 7.3. A full assessment of the impacts of the Proposed Development is included in the ES for the associated topics. The ES also recommends any mitigation measures that may be required as a result of the Proposed Development.

Principle of The Proposed Development

National Planning Policy

- 7.4. The principle of the redevelopment of the Site to deliver a high-density mix of uses is supported by planning policy at all levels.
- 7.5. The National Planning Policy Framework (NPPF) was published on 20th July 2021 and sets out the Government's economic, environmental and social planning policies.
- 7.6. This is enshrined in Paragraph 8 of the NPPF which states that "achieving sustainable developments means that the planning system has three over-arching objectives, which are interdependent and need to be pursued in mutually supportive ways..." These are as follows:
 - ***an economic objective: to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types***

is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

- ***a social objective:*** *to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- ***an environmental objective:*** *to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

7.7. The NPPF states that “So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development”. For decision-taking, Paragraph 11 of the NPPF states that this means that development proposals which accord with the development plan should be approved without delay.

7.8. Paragraph 124 of the NPPF states that local planning authorities should support development which makes the most efficient use of land which takes into account:

- *the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
- *local market conditions and viability;*
- *the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that*

limit future car use;

- *the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
- *the importance of securing well-designed, attractive, and healthy places.*

7.9. The national strategic objectives are supported by the Planning Practice Guidance, which sets out further detail on how the Government's objectives can be achieved through plan-making and decision-taking.

Regional Planning Policy

7.10. The London Plan (2021) sets out the Mayor's spatial vision and overall strategic plan for London.

7.11. The vision, objectives and policies set out in the London Plan are underpinned by the principles of Good Growth which is described as "growth which is socially and economically inclusive and environmentally sustainable." As part of delivering Good Growth, the London Plan proposes more efficient use of land in the capital as part of improving the lives of existing and new Londoners. This means in creating areas of higher density in appropriate locations, encouraging a mix of land uses and co-locating different uses to provide communities with a wider range of services and amenities³.

7.12. As part of delivering Good Growth in appropriate locations, the London Plan also states that growth should be directed to the most accessible and well-connected places, making the most of the transport network across all modes⁴. To this end, the London Plan states that all options for using the City's Land more effectively should be explored, including the redevelopment of brownfield land and the intensification of existing places, including outer

³ Paragraph 1.2.2 of the London Plan

⁴ Paragraph 1.2.4 of the London Plan

London⁵. Through making the best use of land, the City is envisaged to grow in a way which works for all and will allow high-quality homes to be built and workspaces to be developed⁶.

- 7.13. High Road West is identified within the Upper Lea Valley Opportunity Area in the London Plan. Policy SD1 of the London Plan states that the Mayor will support regeneration in Opportunity Areas and ensure that they deliver the maximum affordable housing and create inclusive and mixed communities. To this end, Part B of Policy SD1 states that boroughs through development plans and decisions should: supports development which creates employment opportunities and housing choice for Londoners; establish capacity for growth in Opportunity Areas; take into account the indicative capacity for homes and jobs in the London Plan; and include ambitious transport mode share targets. It should also support wider regeneration and ensure that development proposals integrate into the surrounding area.
- 7.14. Opportunity Areas are defined in the Plan as: *“significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. Opportunity Areas typically contain capacity for at least 5,000 net additional jobs or 2,500 net additional homes or a combination of the two.”*
- 7.15. The Upper Lea Valley Opportunity Area is identified as having an indicative employment capacity of 13,000 jobs and a minimum of 21,000 new homes. For development, the London Plan states that *“Development in the Opportunity Area should fully capture the benefits of these significant transport interventions and provide the stimulus for regeneration, broadening employment opportunities for existing communities including those in Edmonton, the Tottenham corridor from Stoke Newington to Northumberland Park, and around Blackhorse Lane and Walthamstow⁷.”*
- 7.16. In conjunction with its designation in the Opportunity Area, High Road West

⁵ Paragraph 1.2.6 of the London Plan

⁶ Paragraph 1.2.8 of the London Plan

⁷ Paragraph 2.1.31 of the London Plan

is also identified within a Strategic Area of Regeneration; this is based on the 20% most deprived super low output areas in England⁸⁹. Policy SD10 of the London Plan outlines that the Mayor will provide leadership and support for regeneration through the London Plan alongside other strategies and programmes. In particular, Development Plans, Opportunity Area Planning Frameworks and development proposals should contribute towards regeneration through tackling inequalities to the environment, economic and social barriers that affect the lives of people, particular in areas identified as strategic and local regeneration areas. This is further reinforced at Paragraph 2.10.3, which states that successful regeneration requires all stakeholders to operate in a collaborative way, pooling resources and creating partnerships.

Haringey: Policies and Local Objectives

- 7.17. Policy SP1 of the Council's Strategic Policies (formerly known as the Core Strategy) states that the Council will focus Haringey's growth in suitable locations, as part of meeting its minimum housing target of 19,802 new homes over the lifetime of the Plan (2011 – 2026); this includes High Road West amongst other strategic sites in North Tottenham, Wood Green and Tottenham Hall.
- 7.18. Policy DM55 of the Development Management Plan states that where development comes forward as part of an allocated site, the Council will require a masterplan to be prepared and accompanied by the proposal. In preparing a proposal, the Council expects the applicant to have engaged with landowners and occupiers on other parts of the Site, and where appropriate neighbouring boroughs. Supporting Paragraph 7.37 states that particular projects which require masterplans, includes Estate Renewal projects (including High Road West), where community consultation and co-ordination will be required.
- 7.19. Policy DM56 states that the Council will support land assembly to achieve

⁸⁹Figure 2.19 of the London Plan

⁹ Please refer to Figure 2.3 of the Tottenham Area Action Plan which indicates that the Site falls with the 5% of the most deprived areas in the UK.

comprehensive and co-ordinated development¹⁰. It will only use Compulsory Purchase Order (CPO) powers where necessary to assemble land for development in the borough where:

- “Landowners and developers can demonstrate that they have:
 - a viable, deliverable and Local Plan compliant scheme;
 - Have made all reasonable attempts to acquire, secure an option over the land needed through negotiation.
- “Comprehensive redevelopment of the assembled Site is required to meet the Site Allocation (including the requirements of a Masterplan were stated in the Plan); and
- “The development proposed for the assembled site would contribute to the delivery of the Local Plan’s objectives.”

7.20. The Tottenham Area Action Plan (TAAP) was adopted in 2017 which sets out the Council’s vision to regenerate the Tottenham and deliver 10,000 new homes together with 5,000 new jobs. Paragraph 1.18 refers to several other documents which should be read in conjunction with the TAAP, including the High Road West Masterplan Framework which:

“highlights opportunities for improvement and change and identifies where housing, open space and play areas, as well as community, leisure, education and health facilities and shops could be provided. The master plan helps to demonstrate how the growth and development planned for HRW could be delivered through strategic interventions over the short to longer term.”

7.21. In addition, it is identified as a site with requirements for comprehensive development¹¹.

7.22. The TAAP sets out the following seven key objectives:

¹⁰ As noted at supporting paragraph 7.38, this is often in the public interest within the borough.

¹¹ Table 2 of the TAAP.

- World class education and training;
- A prosperous hub for business and local employment;
- High quality public realm;
- A different kind of housing market;
- A fully connected place with even better transport links;
- A strong and healthy economy; and
- Enhancement of heritage assets.

7.23. In order to achieve the aspirations set out in the TAAP, Policy AAP1 outlines that the Council will expect all development proposals to be brought forward comprehensively. To this end, development proposals which form part of a site allocation within the TAAP will require a masterplan. Applicants will be required to demonstrate how proposals will:

- contribute towards the objectives of the Site, neighbourhood area and the wider AAP;
- integrate and complement successfully with existing and proposed neighbouring development; and
- optimise development outcomes for the Site.

7.24. The Council will direct development to Growth Areas and Areas of Change and will support planning applications which accord with the Neighbourhood Objectives and site requirements. Proposals should promote the positive regeneration of Tottenham, in-line with the principles of the Strategic Regeneration Framework. Similar to the Mayor, the Council will also work with a range of stakeholders to help deliver change and regeneration in the area. Proposals will be expected to deliver a range of types and sizes of homes as part of creating mixed and inclusive communities, create economic opportunities for residents and businesses, whilst reducing carbon emissions and adapt to climate change. Policy AAP2 also states that

the Council will support site assembly to achieve comprehensive development.

- 7.25. The Site is identified as a Site Allocation in the TAAP (Ref: NT5). The Site has varying indicative capacity studies between the Masterplan (as set out in this Planning Statement) and site allocation. The TAAP sets out an indicative capacity of 1,200 new homes together with approximately 17,300sqm of non-residential development. In addition, the site allocation states the following vision for High Road West:

“Masterplanned, comprehensive development creating a new residential neighbourhood and a new leisure destination for London. The residential-led mixed-use development will include a new high quality public square and an expanded local shopping centre, as well as an uplift in the amount and quality of open space and improved community infrastructure.”

- 7.26. To this end the following site requirements are set out for High Road West:

- The site will be brought forward in a comprehensive manner to best optimise the regeneration opportunity.
- Development should accord with the principles set out in the most up-to-date Council-approved masterplan.
- Creation of a new residential neighbourhood through increased housing choice and supply, with a minimum 1,400 new homes of a mix of tenure, type and unit size (including the re-provision of existing social rented council homes, the offer of alternative accommodation for secure tenants, and assistance in remaining within the area for resident leaseholders from the Love Lane Estate).
- Creation of a new public square, connecting an enhanced White Hart Lane Station, and Tottenham High Road, to complement the redeveloped football stadium.
- New retail provision to enlarge the existing local centre, or create a new local centre, opposite to and incorporating appropriate town centre uses

within the new stadium, including the new Moselle public square. This should complement not compete with Bruce Grove District Centre.

- Enhance the area as a destination through the creation of new leisure, sports and cultural uses that provide seven day a week activity.
- Improve east-west pedestrian and cycling connectivity with places such as the Northumberland Park Estate and Lee Valley Regional Park.
- The site lies within the North Tottenham Conservation Area and includes listed and locally listed buildings. Development should follow the principles under the 'Management of Heritage Assets' section of this document.
- Where feasible, viable uses should be sought for existing heritage assets, which may require sensitive adaptations and sympathetic development to facilitate.
- Deliver new high-quality workspace.
- Increase and enhance the quality and quantity of community facilities and social infrastructure, proportionate to the population growth in the area, including:
 - A new Learning Centre including library and community centre;
 - Provision of a range of leisure uses that support 7 day a week activity and visitation; and
 - Provision of a new and enhanced public open space, including a large new community park and high-quality public square along with a defined hierarchy of interconnected pedestrian routes.

7.27. The above is supplemented by Development Guidelines which are not repeated in the main body of this Planning Statement but set out in Appendix Five for reference.

7.28. The High Road West Masterplan Framework (HRWMF) was adopted in

2014 and pre-dated the adoption of the TAAP. The document sets out the visions and objectives of the HRWMF together with principles for future development proposals on the Site.

Assessment

- 7.29. The Proposed Development for High Road West principally seeks to deliver the comprehensive redevelopment of the Site to deliver a residential-led mixed-use development which will also include the delivery of commercial (including offices, storage and distribution, light industrial and workspace), leisure, community floorspace together with a new public park and new public square. This is linked to the overarching vision for the Site as summarised below:

“The vision for High Road West is to create a vibrant and sustainable neighbourhood and support the creation of a new leisure destination for London”

- 7.30. The Proposed Development will positively respond to meeting the three-over-arching objective for sustainable development at the heart of the NPPF and the principles of Good Growth as defined by the Mayor of London. This will be principally delivered through the prism of a high-quality, comprehensive masterplan which contributes towards the economic, social, and environmental objectives as defined at Paragraph 8 of the NPPF.
- 7.31. At the heart of the placemaking strategy for High Road West is a neighbourhood which is socially and economically inclusive for local residents, the wider community, and visitors alike. This is reflected in the commitment to deliver a range of housing which will comprise of affordable, intermediate, and private accommodation including 500 new council homes.
- 7.32. The Proposed Development will make the most efficient use of the land available. It will deliver a significant number of new homes, together with a range of commercial, leisure and community spaces alongside public open space, achievable as part of a comprehensive masterplan for the Site. This will contribute towards the overarching housing targets for the Upper Lea

Valley Opportunity Area, the TAAP together with LB Haringey's overall housing needs.

- 7.33. In conjunction with the above, the Proposed Development will also fulfil the site requirements set out in the Site Allocation (NT5) for High Road West. It will deliver a minimum of 1,400 new homes, including 500 new council homes – all secure, non-secure tenant and leaseholders on the Love Lane Estate will be offered a new home at High Road West. It will include a new public square which will sit central in the pedestrian link between White Hart Lane Station and Tottenham Hotspur FC's Stadium; this route will be supplemented with a range of retail, leisure and cultural uses including the provision of the new Library and Learning Centre. The collective community and leisure uses will support a 7 day week of activity and visitation.
- 7.34. To the north of the Site, the Proposed Development will deliver a new public park which will be accessible for the local community and provide further opportunities to unlock the north-south permeability across High Road West, supporting and enhancing the pedestrian and cycling network to and from key transport nodes.
- 7.35. By the very nature of the proposed uses at the ground floor level in this location, it is anticipated that this will create a natural extension to the existing town centre, which will inform the emerging boundaries in the draft Local Plan. The Proposed Development will also deliver new flexible workspace; this has been designed within the Development Specification to allow a minimum of 1,525sqm (GEA) of Use Class E(g) floorspace to come forward in the Proposed Development, included within the minimum floorspace of 4,686sqm (GEA) of flexible B2, B8 or E(g) which will be delivered in the Proposed Development.
- 7.36. The Proposed Development does not include proposals to either alter or change the use of existing listed buildings within the red line boundary. Notwithstanding, the proposals have been developed to establish a coherent set of principles in relation to the design of new buildings which sit within close proximity to listed buildings which is set out in the accompanying Design Code.

- 7.37. The North Tottenham Conservation Area was altered in June 2017¹² to exclude a number of properties along the High Road in order to facilitate the provision of a new route from Tottenham Hotspur FC's Stadium to White Hart Lane Station, including a number of locally listed buildings¹³. This application seeks planning permission to demolish these buildings. This is assessed in the Heritage Assessment section of this planning statement and assessed in further detail within the BHTVIA enclosed as part of the Environmental Statement.
- 7.38. Overall, it is considered that the Proposed Development positively accords with the policies and guidance set out in relation to the principle of development at High Road West.

Loss Of Existing Non-Residential Uses

- 7.39. Part A of Policy DM15 of the Development Management Plan DPD states that the loss of specialist accommodation will only be granted where it can be demonstrated that there is no longer an established need or that adequate replacement provision will be provided. The definition of residential hostels/secured accommodation is further defined in supporting paragraph 3.35.
- 7.40. Policy 40 of the Development Management Plan DPD states that all non-designated sites within highly accessible or otherwise sustainable locations, the Council will support proposals for mixed-use, employment-led development where this is necessary to facilitate the renewal and regeneration (including intensification) of existing employment floorspace, in accordance with Policy DM38.
- 7.41. Policy DM49 states that the Council will seek to protect existing social and community facilities unless a replacement facility is provided which meets the needs of the community. Major Developments may also be required to

¹² This de-designated: 2 – 6 Northumberland Park, 1 Moselle Place (Brooklyn Apartments), 761 High Road (Bergen Apartments), 731 – 795 High Road, 742 – 748 High Road and 774 – 776 High Road, Coombe's Croft Library, Kathleen Ferrier Court and 1-3 Park, under Section 69 of the Planning (Listed Buildings and Conservation Areas) Act (as amended) 1990.

¹³ Namely, the Electricity Sub-station and Nos. 743 – 759 High Road.

accommodate new infrastructure as part of mixed-use proposals where feasible, in accordance with the Infrastructure Delivery Plan.

Assessment

- 7.42. As part of the comprehensive redevelopment of High Road West, the proposals will include the comprehensive redevelopment of the Site. Excluding the existing Love Lane Estate (which is assessed in the subsequent sub-section) and statutory listed buildings (noting that these will remain unaltered for the purpose of this Planning Application submission), this will include the demolition of all existing buildings on Site, as shown on Parameter Plan Ref: 0311-SEW-ZZ-ZZ-DR-T-001011. As part of Lendlease's holistic approach to the Site, the proposals will include a comprehensive Commercial Relocation Strategy for existing businesses across the Site. This is aimed at enabling businesses to either temporarily or permanently relocate from High Road West prior to or during the relevant phase of development with the opportunity to return during a future phase. The intention is to allow flexibility for all businesses to return back to High Road West or find new permanent premises elsewhere within the borough and/or wider area.
- 7.43. The maximum floorspace parameters have been developed to allow up to 15,200sqm (GEA) of B2, B8 or E(g: i, ii and iii) to come forward which will be delivered within the maximum parameters for each Development Zone as set out in the accompanying Development Specification. This could potentially deliver floorspace for all existing occupiers which is accommodated within the maximum floorspace areas.
- 7.44. The existing healthcare use on-site is also proposed to be removed as part of the Proposed Development, noting however, that sufficient flexibility has been incorporated within the maximum land use parameters to allow a future healthcare use to be delivered on-site.
- 7.45. The existing Whitehall Lodge is located within Plot A which is the subject of the Detailed Proposals for the Proposed Development. Whitehall Lodge is currently operated as a temporary use, providing temporary emergency

accommodation for families and is managed by Homes for Haringey. The temporary permission granted in 2018 was for a C1 (guest house) although is akin to a Sui Generis form of emergency accommodation. The use is not considered to be C3 residential or a specialist form of C2 accommodation, however, we would note that the historic lawful use was C2 which ceased approximately 10 years ago. The existing operation at Whitehall Lodge is proposed to be relocated to nearby premises within the Homes for Haringey portfolio upon which the use on the Site will cease. As such, there will be no net loss of the temporary accommodation as a consequence of the Proposed Development and satisfies Policy DM15.

Estate Regeneration

- 7.46. Paragraph 94 of the NPPF states that planning policies and decisions should consider the social, economic and environmental benefits of estate regeneration. In addition, planning authorities should use their powers to ensure that estate regeneration is delivered to a high standard.

- 7.47. Policy H8 of the London Plan sets out the requirements for the loss of existing housing and estate redevelopment. Part A outlines that the loss of existing housing should be replaced with new residential development at an equivalent or higher density, with a minimum amount of floorspace equivalent to the existing provided. Part B states that the loss of hostels, staff accommodation or shared/supported accommodation that meet an identified housing need should be satisfactorily reprovided.

- 7.48. Part C states that before demolition and replacement of affordable homes is considered, alternative options should be considered. This should balance the potential benefits of this approach against the wider social and environmental impacts. This should also consider the availability of mayoral funding and any associated conditions.

- 7.49. The Mayor's Good Practice Guide to Estate Regeneration (2018) sets out the Mayor of London's vision and associated guidance for qualifying estate regeneration schemes. This sets out the following key objectives:

- *deliver safe and better quality homes for local people;*
- *increase the overall supply of new and affordable homes; and*
- *improve the quality of the local environment through a better public realm and provision of social infrastructure (e.g. schools, parks, or community centres).*

7.50. In addition, the Guide sets out that the Mayor will expect of estate regeneration proposals to:

- *an increase in affordable housing;*
- *full rights to return or remain for social tenants; and*
- *a fair deal for leaseholders and freeholders.*

7.51. Whilst pre-dating the introduction of estate balloting, LB Haringey's development plan also sets out clear aspirations and policy requirements for estate regeneration proposals. Of note, supporting Paragraph 3.3 states that Haringey's housing policies seek to ensuring that existing housing estates are renewed, and the quality of housing stock significantly improved.

7.52. These principles are similarly reflected in Policy DM11 and supporting Paragraph 3.7 which also outlines that the renewal of estates should re-provide housing on a habitable room basis to increase the capacity to rehouse families into suitable accommodation. This also acknowledges the need to 'cross-subsidise' renewal schemes, through the provision of market housing and shared ownership products which will simultaneously contribute towards creating mixed and balanced communities.

7.53. Paragraphs 3.2.26 – 3.2.30 of the Strategic Policies (2013) sets out the Council's approach to the strategic improvement and/or renewal of the borough's housing estates which draws upon the principles set out above. This also adds that the Council will seek to re-provide the equivalent amount

of social rented housing on a floorspace basis¹⁴.

Assessment

- 7.54. The proposals for High Road West have been developed over a number of years in conjunction with the feedback received through engagement with Love Lane Estate residents and the local community. To this end, an Estate Ballot was undertaken between August – September 2021 on the Landlord Offer including the estate regeneration proposals. In September 2021, the result of the Estate Ballot was published in which residents voted in favour of the future regeneration proposals.
- 7.55. As part of the Landlord Offer, all secure, non-secure tenants and leaseholders will be offered a new home in the Proposed Development (as set out within the Delivery Statement and Landlord Offer document). All new homes will be designed to meet all eligible households' housing needs.
- 7.56. The Proposed Development will deliver a minimum of 500 new council homes; in-excess of the existing 297 homes on the Love Lane Estate. These new homes will be of a high quality and designed to meet the needs of future occupiers. In Plot A, the proposals have been informed by the Residents Charter (2014) and Residents Design Guide (2016). It is envisaged that this process for engagement will set the blueprint for future engagement with local residents as future phases of the Outline Proposals are brought forward.
- 7.57. It is envisaged that an additional 416 affordable homes will be delivered as a minimum at intermediate level across the masterplan. The new homes together with the wider range of uses will be delivered at a higher density across the Site, optimising an efficient use of the Site to deliver high quality public realm. Overall, it is considered that the Proposed Development positively accords with the requirements for Estate Regeneration in the adopted London Plan and associated Mayor's Good Practice Guide to Estate Regeneration together with the adopted Development Plan.

¹⁴ As defined by the Haringey Housing Strategy 2019

Site Suitability and Land Use

- 7.58. This Section assess the Site's suitability for the range of uses proposed as part of the Proposed Development. The assessment evaluates the acceptability of the principle of each of the land uses proposed.

Residential

- 7.59. Chapter 5 of the NPPF seeks to significantly boost the supply of housing. Paragraph 65 states that in order to significantly boost housing supply, it is important to recognise that a sufficient and variety of land can come forward where needed which meets specific housing requirements are addressed.
- 7.60. Part A of Paragraph 65 in the NPPF states that local planning authorities should support development which makes the most efficient use of land which takes into account the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it.
- 7.61. Paragraph 73 sets out the supply of new homes can *"often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:*
- consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;
 - ensure that their size and location will support a sustainable

community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;

- set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community;
- make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally led development corporations); and
- consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.

7.62. At regional level, the London Plan seeks to increase the number of homes across the capital, with a borough target of 15,290 new dwellings over the plan period (until 2028/29), equivalent to 1,529 dwellings per annum. Policy GG2 states that those involved in planning and development must enable the development of brownfield land, particularly in Opportunity Areas. This is similarly reiterated in Policy H1 alongside supporting Paragraphs 1.4.5 and 2.1.8. We would also note that the Council's housing presentation on the new draft Local Plan identifies a shortfall of approximately 2,000 homes since 2011.

7.63. Policy H8 of the London Plan sets out the requirements for the loss of existing housing and estate redevelopment. Part A outlines that the loss of existing housing should be replaced with new residential development at an equivalent or higher density, with a minimum amount of floorspace equivalent to the existing provided.

- 7.64. Policy H10 of the London Plan states that appropriate mix of unit sizes should be determined based on a number of factors including the mix of uses in the schemes, the aim to optimise housing potential on sites, the nature and location of the site and the role of one and two bed units in freeing up family housing. The Policy notes that a higher proportion of one and two beds is generally more appropriate in more central or urban locations and boroughs should not prescribe dwelling size mix requirements (in terms of number of bedrooms) for market and intermediate homes.
- 7.65. Policy SP1 of the Council's Strategic Policies sets a minimum housing target of 19,802 new homes over the lifetime of the Plan (2011 – 2026). Policy DM10 states that the Council will support proposals for new housing on allocated sites within the Site Allocations DPD and Area Action Plans.
- 7.66. The TAAP sets to deliver 10,000 new homes within the AAP including High Road West which sets a minimum of 1,400 new homes in the Site Allocation (Ref: NT5) with a mix of tenure, type and unit sizes. Policy AAP3 sets out that proposals incorporating a housing element will be expected to provide the housing in accordance with the minimum capacities set out in the site allocations, noting that: "Higher densities and capacities may be acceptable in appropriate locations, close to town centres, in areas with good local facilities and amenities and in areas well served by public transport, providing that other policies of [the] AAP and Haringey's Local Plan are not compromised." In addition, AAP3 states that the Council will support proposals which are designed to:
- "Improve the quality and range of affordable housing options;
 - "Better address housing needs in Haringey;
 - "Secure a more inclusive and mixed, sustainable community; and
 - "Increase housing delivery in Tottenham."
- 7.67. The HRWMF sets out a number of key principles¹⁵ in relation to the delivery

¹⁵ Please refer to the Key Principles set out on Page 112 of the HRWMF (2014)

of new homes and the delivery of a high-quality residential neighbourhood. This seeks to deliver a range of housing typologies, sizes, tenures and types similar to that expressed in policy. It encourages the design to support family life, be adaptable as well as enhance the number of larger homes. It requires development to follow the London Housing Design Guide.

Assessment

- 7.68. The Proposed Development will deliver up to 280,000sqm (GEA) of new residential floorspace, equivalent to approximately 2,929 homes and will contribute towards the minimum provision of 1,400 new homes in accordance with the Site Allocation (Ref: NT5).
- 7.69. Overall, the Proposed Development at High Road West will make a significant contribution towards meeting LB Haringey's housing requirements together with the overarching housing targets for the Upper Lea Valley Opportunity Area and the TAAP. This will also contribute towards meeting the Council's under-supply of homes in the borough since 2011.
- 7.70. The Proposed Development will provide a range of unit sizes and tenures to meet the borough's needs over the lifetime of the Plan, creating a mixed and balanced neighbourhood. As such, it is considered to positively accord with the adopted Development Plan.

Town Centres

- 7.71. Paragraph 86 of the NPPF states that policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Of note, sub-sections d) and f) of Paragraph 86 state that policies should:
- allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept

under review where necessary;

- recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.

- 7.72. Policy SD6 of the London Plan states that the vitality and viability of London's varied town centres should be promoted and enhanced by encouraging the delivery of diverse hubs which meet the needs of Londoners. Town centres should also be identified as locations for mixed-use or housing-led intensification to optimise residential growth potential which secures a high-quality environment and complements the local character and heritage assets.
- 7.73. As part of this approach, Part D of Policy SD6 states that particular attention should be given to the suitability of town centres to accommodate a diverse range of housing typologies including Built to Rent, smaller households, student accommodation and older persons accommodation. Town Centres should be full accessible in accordance with the requirements under Part H and should also include the provision of social infrastructure.
- 7.74. Part A of London Plan Policy SD7 states that boroughs should take a town centres first approach, discouraging out-of-centre development of main town centre uses. Part D states that development proposals should ensure that commercial space relates to the size and role and function of the town centre. It should also support a diverse range of unit sizes, particularly on large-scale development.
- 7.75. In addition, Policy SD8 requires Local Planning Authorities to identify deficiencies in the town centre network and ensure that these deficiencies can be addressed by promoting existing centres to a higher level in the retail network, designating new centres and reassessing town centre boundaries. Where a centre is declining, Policy SD8 supports the diversification of uses. Policy SD9 supports strategic and local partnership approaches to the development and growth of town centres.

- 7.76. Policy SP10 of the Council's Strategic Policies states that District Town Centres Tottenham High Road, amongst others, will continue to be supported and strengthened as important shopping and service centres to meet local needs. The Council will take a proactive partnership approach to reinvigorating these through widening their role and improving the public realm and accessibility to them.
- 7.77. Part A of Policy DM41 of the Council's Development Management Plan states that development within existing Local Centres will be supported where they are consistent with the size, function and role of the centre; support the vitality and viability of centres; and contribute towards the borough's spatial strategy. Policy DM45 supports the optimisation of town centre land and floorspace through measures such as encouraging mixed-use development.

Assessment

- 7.78. As shown in Figure 4, the Site currently adjoins the Tottenham High Road North Local Shopping Centre. The TAAP to deliver an expanded local centre as part of the masterplan for High Road West.



Figure 4: Tottenham High Road North Local Shopping Centre¹⁶

- 7.79. The Proposed Development has been designed to complement, enhance

¹⁶ Local Shopping Centre hatched in light blue.

and extend the existing local centre along Tottenham High Road North. It will promote a range of unit sizes, suitable for a range of predominantly local independent businesses, which respond to local needs. It is not intended that future retail provision will be occupied by large multi-national companies and ultimately contributing towards the Council's aspirations for a coherent and expanded local centre.

- 7.80. It is considered that the future retail space will replace the existing poor quality floorspace in a more sustainable location, which is well related to the local centre, White Hart Lane Station and around the proposed Moselle Square. This will bring a wide range of benefits to the area in terms of retail offering, improving the environment and perception of the area, and supporting the local economy.
- 7.81. As set out in the accompanying Retail Impact Assessment, the proposed level of retail provision is not anticipated to result in any material adverse impact on designated retail centres or existing retailers. Overall, it is considered that the Proposed Development positively accords with the Development Plan and associated guidance in relation to the provision of new retail and leisure as part of delivering an expanded and enhance Local Centre along the High Road.

Employment Floorspace

- 7.82. Part C of Policy GG5 of the London Plan states that those involved in planning and development should plan for sufficient employment and industrial floorspace in the right locations and support economic development and regeneration. Part B of Policy SD1 also reflects
- 7.83. Policy E1 states that improvements for the provision of office floorspace of different sizes should be supported by the provision of new, refurbished and mixed-use development. Part D of Policy E1 states that the diverse office market should be consolidated and extended where viable in appropriate locations. Provision should be directed to town centres, supported by connectivity improvements. Proposals for new business floorspace should ensure that the space is fit for purpose having regard to the type and use of

the space in accordance with Policy E2. Policy E3 states that planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for specific social, cultural and/or economic development purposes.

- 7.84. Policy E4 states that a sufficient supply of land and premises in different parts of London to meet demand for industrial and related functions, taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution.
- 7.85. Policy SP8 of the Strategic Policies DPD identifies local Strategic Industrial Locations (SILs), Locally Significant Industrial Sites (LSISs), Local Employment Areas (LEAs). The Site is not covered by any of these designations as shown in Figure 5.1 of the Core Strategy. The Site is defined within the list of Regeneration Areas (RAs) and for such sites, RAs are identified as the most flexible category and can include uses “appropriate in a mixed-use development.” This can include local retail, community and residential uses.
- 7.86. Policy DM40 of the Development Management Plan sets out that the Council will support the provision of mixed-use, employment-led development on non-designated employment sites where it is necessary to facilitate the renewal and regeneration of existing employment land and floorspace in accordance with the requirements under Policy DM38. In accordance with the requirements under Policy DM38, proposals must: maximise the amount of employment floorspace, demonstrate improvements for the site’s suitability as a continued employment location; make provision for an element of affordable workspace; ensure an appropriate level of amenity for neighbours, be designated to provide ultra-fast broadband.
- 7.87. The TAAP identifies land capable of delivering approximately 5,000 new jobs. Policy AAP4 of the TAAP states that the Council will facilitate the regeneration and renewal of selected Designated Employment Areas through the reconfiguration of the local employment offer in order to intensify land uses, maximum business floorspace and increase the number of and

variety of jobs. This will be achieved by protecting where appropriate, industrial land from inappropriate development, supporting development proposals for enabling employment led mixed-use schemes, support additional employment uses along the High Road and the intensification of industrial uses on the borough's stock of SIL. Site Allocation NT5 in the TAAP states that there is an indicative capacity of 4,353sqm of commercial floorspace allocated for High Road West.

- 7.88. The HRWMF states that new work and retail space will “encourage new business and enterprise and will allow for the relocation of some existing businesses into new purpose-built retail units and workspaces.” It should create a net increase in jobs and business opportunities through an increase in the level of commercial space and provision for a range of workspaces, encouraging a greater mix and wider retail offer.

Assessment

- 7.89. As set out in Chapter 2, the Site is not covered by any policy designations in relation to employment floorspace, noting that the previous LSIS designation referenced in the Upper Lea Valley Opportunity Area Planning Framework has been subsequently removed. It is not allocated as Strategic Industrial Land (SIL), LSIS or DEA within the adopted Development Plan.
- 7.90. The Proposed Development will deliver a minimum of 4,686sqm (GEA) of employment floorspace across B2, B8 and E(g) uses. This will include a minimum of 1,525sqm (GEA) of E(g) floorspace. This is in-excess of the indicative capacity set out in the Site Allocation. The maximum floorspace areas for B2, B8 and E(g) equates to 15,200sqm (GEA); this range between the minimum and maximum areas is to enable sufficient flexibility to allow additional employment floorspace to come forward over the construction lifetime of the Proposed Development, as individual plots are brought forward. This reflects the ability of the masterplan to positively respond to local and general market demand for employment floorspace. As set out in preceding sub-section assessments, this will also allow existing businesses within the Site to relocate within the Proposed Development.

- 7.91. The Socio-Economic Chapter of the Environmental Statement states that approximate 2,417 Full Time Equivalent (FTE) jobs will be supported directly and indirectly throughout the construction process. In addition, Lendlease will be working with LB Haringey and other delivery partners to secure a programme of apprenticeships on-site, supporting residents into work and training, as prioritised in the Haringey Recovery Plan;
- 7.92. The proposals will provide a minimum of 374 FTE jobs (worst-case scenario) once the development is completed. An estimate on the number of FTE jobs has also been carried out on the Illustrative Masterplan, which indicates that approximately 657 FTE jobs could be created.
- 7.93. Whilst new provision on-site is below the existing estimated provision (690 FTE), in conjunction with the Commercial Relocation Strategy - which will aim to relocate existing on-site businesses within the borough - it is considered that the Proposed Development will positively contribute towards job creation across the borough, including a significant amount of employment and training during construction. As such, it is considered that the Proposed Development will contribute towards the strategic objectives of the TAAP and the Development Plan overall.
- 7.94. As part of the proposed development, a component of Affordable Workspace will be provided and secured by the Section 106. This is reflected in the Draft Section 106 Heads of Terms set out at Chapter 9 of this Planning Statement.
- 7.95. Overall, it is considered that the Proposed Development is considered to fulfil the requirements of the adopted Development Plan and will provide a suitable level of employment floorspace across the Site which responds to the needs of the area and the demand for such floorspace areas. The compatibility for delivering the co-location of uses is considered further within the accompanying Design Code prepared by SEW.

Community, Leisure and Cultural Use

- 7.96. Policy HC5 of the London Plan states that proposals should identify and

promote new, or enhance existing, locally-distinct clusters of cultural venues and related uses, especially where they can provide an anchor for local regeneration and town centre renewal. In addition, Part A5) outlines that development in “Opportunity Areas and large-scale mixed-use developments [should] include new cultural venues and/or facilities and spaces for outdoor cultural events.”

- 7.97. Policy SP14 of the borough’s Spatial Policies states that the Council will seek to improve the health and well-being through supporting the integration of community facilities and services in multi-purposes buildings. In addition, Policy SP15 outlines that the Council will safeguard and foster the borough’s cultural heritage and promote cultural industries and activities through supporting the provision of new workspaces together with social and cultural, venues to support cultural and leisure activities.
- 7.98. Policy SP16 states that the Council will work with its partnership to ensure appropriate improvement and enhance together with the protection of existing community facilities are provided for the borough’s communities. This will be developed in accordance with the Infrastructure Delivery Plan. It will expect development that increases the demand to make appropriate contributions towards new facilities or improving existing provision. They should also promote the efficient use of facilities and the provision of multi-use community facilities.
- 7.99. Policy DM41 of the Development Management Plan states that proposals for new leisure and cultural uses will be supported in Local Centres where they are consistent with the size, role and function of the centre and it’s catchment; sustain and enhance the town centre network; and contribute towards the borough’s spatial strategy.
- 7.100. Policy DM49 states that the Council will seek to protect existing social and community facilities unless a replacement facility is provided which meets the needs of the community. Where proposals include the loss of such facilities evidence will be required to demonstrate that the facility is no longer required in its current use; that the loss would not result in a shortfall overall; and that the use is no longer viable.

- 7.101. For new social and community facilities¹⁷, Part E of Policy DM49 states that these will be supported where: they are accessible by public transport in town or local centres; Growth Areas or Areas of Change. Major Development proposals will be required to accommodate new infrastructure in mixed-use proposals where feasible in accordance with the Infrastructure Delivery Plan (IDP).
- 7.102. Policy DM51 of the Development Management Plan states that proposals for new nursery and child care facilities will only be permitted where the floorspace occupied is subsidiary to a residential use and the noise generated does not affect the amenity of nearby residents. It should be designed to adequately manage the transport and traffic movements generated by the use, and also demonstrate compliance with the requirements under Part B of Policy DM51.
- 7.103. Paragraph 5.84 of the TAAP identifies the North Tottenham Neighbourhood Area as an area “[to] be transformed into a mixed and sustainable community and new leisure destination for London.” The HRWMF outlines that social infrastructure in High Road West will meet existing and future needs of the community and include the creation of a community hub with learning and enterprise functions in a visible and accessible location. It should provide access to open space, play space and sports facilities together with outdoor gyms and community spaces for events and activities to contribute towards healthy lifestyles and promote wellbeing.

Assessment

- 7.104. The Proposed Development will provide a minimum of 1,500sqm (GEA) up to a maximum of 10,000sqm (GEA) of new community, leisure and cultural spaces across the Outline Proposals. The illustrative masterplan indicates provision for 6,197sqm (GEA). The proposals will include the delivery of a

¹⁷ **Community uses include:** children’s play and recreation facilities, services for young people, older people and disabled people, as well as health facilities, facilities for emergency services, including police facilities, education facilities, libraries, community halls, criminal justice facilities meeting rooms, places of worship, public toilets, pubs and post offices. **Social infrastructure includes:** health provision, early years provision, schools, colleges and universities, community, cultural, recreation and sports facilities, places of worship, policing and other criminal justice or community safety facilities, children and young people’s play and informal recreation facilities.

new Library and Learning Centre, together with the provision of new leisure floorspace (including recreational and fitness) alongside the opportunity to deliver a new cinema and/or public house. The scheme also includes the option to deliver new community floorspace, suitable for use as a community hall or equivalent.

- 7.105. Of note, the new Library and Learning Centre will provide a purpose-built space for the community and will provide study space for young people and older adults, together with an expanded children's library and Creative Enterprise spaces. It will also include a café space and showcase gallery. The vision for the Library and Learning Centre is to provide accessible services to support the community and provide training and enhance life opportunities.
- 7.106. Within the public realm, Moselle Square will act as a multifunctional public space, with the ability to host outdoor events; reflecting its municipal character and spatial role in the High Road West masterplan. Overall, it is considered that the community, cultural and leisure offer proposed within the masterplan will positively reinforce the vision for the Site, the localised leisure offer and the wider North Tottenham Neighbourhood Area.
- 7.107. Overall, it is considered that the Proposed Development will complement the wider leisure offer in the vicinity of the Site, namely the Tottenham Hotspur FC Stadium. It will bring forward uses which contribute towards the vitality of the new neighbourhood and provide a suitable mix of uses which will positively respond to the Council's vision for Tottenham.

Meanwhile Uses

- 7.108. Policy AAP10 states that the Council will support temporary uses on allocated Development Sites as part of delivering meanwhile uses in the short-term. These should contribute towards the vibrancy of the immediate area and support the delivery of the development outcomes and vision of the AAP.

Assessment

- 7.109. The proposals are anticipated to bring forward a series of meanwhile uses over the lifetime of construction. These will include community projects and local initiatives, funded through a £10 million investment provided by Lendlease through the Annual Community Fund. Where required, planning applications for temporary meanwhile uses will be submitted independently of this planning application. This will be secured within the Section 106.

Affordable Housing

- 7.110. The NPPF requires that where Local Planning Authorities identify a need for affordable housing, LPAs should set planning policies which “specify the type of affordable housing required and expect it to be met on-site unless off-site provision or an appropriate financial contribution in lieu can be robustly justified; and the agreed approach contributes to the objective of creating mixed and balanced communities.”
- 7.111. Policy H4 of the London Plan sets a strategic target of 50% for all new homes delivered in the capital to be genuinely affordable. The policy states that the Mayor will apply a threshold approach to application which trigger affordable housing requirements in accordance with the Affordable Housing and Viability SPG (2017). Affordable housing should be provided on-site, with off-site or alternative payments in-lieu delivered only in exceptional circumstances. Policy H5 sets out the threshold approach to affordable housing delivery.
- 7.112. Policy H6 of the London Plan sets out the split of affordable tenures to be applied to residential development. This sets a split of 30% low-cost rented homes (either as London Affordable Rent or Social Rent), 30% Intermediate (London Living Rent or Shared Ownership) with the remaining 40% determined by the local authority.
- 7.113. Part E of Policy H8 of the London Plan states that the demolition of affordable housing (including estate regeneration proposals) will only be permitted where an equivalent amount of affordable housing floorspace is provided. Affordable housing that is replacing social rented accommodation should similarly be provided at social rent levels where a right to return is

being facilitated. It should be integrated into developments as part of creating mixed and balanced communities. Part E of Policy H8 states that all developments for the demolition and replacement of affordable homes will be required to follow the GLA's Viability Tested Route. They should seek to provide an uplift in affordable housing beyond the replacement affordable housing floorspace.

- 7.114. The Mayor's Affordable Housing and Viability SPG identifies that Opportunity Areas are a key source of housing for London, with the potential to create fundamentally new places and communities due to the scale of development (paragraph 2.80).
- 7.115. Paragraph 2.80 also identifies that Opportunity Areas are complex to bring forward and often require significant investment in infrastructure. Against this backdrop of creating new places and infrastructure requirements, paragraph 2.84 notes that LPAs may also consider a local approach in terms of housing mix and tenure through the plan process.
- 7.116. Paragraph 2.84 of the SPG threshold approach will apply in Opportunity Areas, Housing Zones and for industrial land where a local approach has not been progressed.
- 7.117. The SPG also sets out the Mayor's approach to transparency of information and states that the Mayor will treat information submitted as part of, and in support of, a viability assessment transparently.
- 7.118. Part 5 of Policy SP2 states that on site capable of delivering on 10 units or more units will be required to meet a Borough-wide target of 40% affordable housing by habitable rooms, equivalent to 7,920 new affordable dwellings over the plan period up and until 2026. The affordable housing tenure mix should be split 60% affordable rent and 40% intermediate housing. These requirements are similarly reflected in Policy DM13. The Council Housing Strategy adds that on a site by site basis, the Council will seek the maximum reasonable proportion of affordable housing.
- 7.119. TAAP Policy AAP3 states that the Council will expect affordable housing to

be provided in accordance with Policy SP2 and DM13 with the exception of the tenure split which in the TAAP should be provided at 60% intermediate and 40% affordable rented accommodation. This is to rebalance the mix of tenure types in Tottenham which is currently dominated by a single tenure type.

- 7.120. In addition to the Development Plan policies and guidance, we note that part of the Site (Carberry Industrial Estate) is considered to be non-designated Industrial Land, which attracts a 50% affordable housing requirement. As per the GLA Stage 1 Report associated with the current proposals for the Goods Yard and Depot application (Ref: HGY/2021/1771), the adopted approach assesses a 'blended' approach to the affordable housing requirement, which confirms that only the floorspace associated with the Carberry Industrial Estate should be subject to the 50% threshold for the purposes of the Affordable Housing requirement.
- 7.121. The Proposed Development will deliver a minimum of 35% affordable housing by unit as a minimum across the whole Site, including 500 new council homes. Plot A (White Hall Mews) will deliver approximately 60 council homes as part of the first phase of the Proposed Development for Love Lane Estate residents.
- 7.122. Phase A (the part of the Site to the south of White Hart Lane) of the Proposed Development will deliver 40% affordable housing by unit. The target is to deliver 40% affordable housing by unit across the whole Site, subject to viability and future grant funding. All existing social rented homes will be replaced within the Proposed Development will all secure, non-secure tenants and leaseholders offered a new replacement home in the masterplan.
- 7.123. As set out in the accompanying Affordable Housing Statement prepared by DS2, the illustrative scheme includes the provision for 500 new council homes and 416 intermediate units (Shared Ownership and shared equity units for resident leaseholders); representing 35.1% affordable housing by unit or 40% on a habitable room basis. The tenure split in the illustrative scheme is equivalent to 54.6% social rented and 45.4% intermediate

(Shared Ownership and shared equity).

- 7.124. The provision of affordable housing within the Proposed Development is considered to adequately meet the requirements for affordable housing as required by the Development Plan. The indicative tenure split within the illustrative scheme is considered to be proportionate to the requirements of the Site Allocation and will make a significant contribution towards meeting the Council's affordable housing target of 7,920 new affordable dwellings up to 2026. In accordance with Policy H8 of the London Plan, the planning application will be subject to the Viability Tested Route. A Financial Viability Appraisal has been prepared by DS2 which is enclosed as part of this planning application for consideration by LB Haringey's independent viability assessors and the Greater London Authority.

Housing Mix

- 7.125. Policy H10 of the London Plan states that residential schemes should generally consist of a range of unit sizes, with applicants and decision-makers have due regard to a number of considerations, including the housing evidence base¹⁸, delivering mixed and inclusive neighbourhoods, the nature and location of the Site together with the aim of optimising the potential of housing site.
- 7.126. The principles of Policy H10 are similarly reflected in Development Management Policy DM11, which goes on to states that the target mix for affordable housing should be compliant with Policy SP2 and DM13, with the priority afforded to family-sized dwellings. Proposals for the comprehensive renewal of housing estates will be required to re-provide the existing affordable housing on a habitable room basis, tailored to better meet current housing needs and achieve more inclusive and mixed communities. The Council will not support proposals which result in an over-concentration of one and two bed units.
- 7.127. The Council's Housing Strategy sets the following mixes for intermediate

¹⁸ Where not available, the London Strategic Housing Market Assessment (2017)

and affordable housing:

Tenure	Intermediate	Social Rented ¹⁹
Unit Sizes	% of Mix	% of Mix
One Bed	30%	10%
Two Bed	60%	45%
Three Bed	10%	35%
Four Bed+		10%

Table 6: LB Haringey Preferred Unit Mix (by tenure)

Assessment

7.128. The Proposed Development seeks to deliver a range of unit sizes which meet the needs of existing residents together with the Council's housing needs. To this end, an illustrative housing mix has been developed as set out in Table 7 below, which seeks to positively respond to the requirements set out in policy together with delivering accommodation which better suits the needs of existing Love Lane Estate residents. This means that where existing residents' have a home which is too large or too small, the Proposed Development will include new homes which better suit their needs. Overall, it is considered to be consistent with the requirements set out in the Housing Strategy 2019.

Tenure	Market		Intermediate		Social Rented		Overall	
Unit Sizes	No.	% Mix	No.	% Mix	No.	% Mix	No.	% Mix
Studios	85	5%	0	0%	0	0	85	3%
One Bed	678	40%	126	30%	55	11%	859	33%
Two Bed	764	45%	248	60%	225	45%	1,238	48%
Three Bed	169	10%	42	10%	165	33%	375	14%
Four Bed+	0	0	0	0	55	11%	55	2%
	1,696	-	416	-	500	-	2,612	100

Table 7: Illustrative Scheme Proposed Unit Mix (by tenure)

7.129. As part of the Proposed Development, the detailed proposals for Plot A

¹⁹ As defined by the Haringey Housing Strategy 2019

include the provision of 60 new council homes, which have been designed to meet the needs of Love Lane Estate residents. This is reflected in the overall unit mix for Plot A as shown in Table 8 below:

Plot A Mix (by unit size)		
No. Bed Spaces	No.	% Mix
1 Bed	15	25%
2 Bed	16	27%
3 Bed	25	42%
4 Bed	4	6%
TOTAL	60	100%

Table 8: Plot A Unit Mix

- 7.130. The overall residential unit mix will continue to flex and develop as future Reserved Matters Applications are brought forward and will be designed to ensure that the Proposed Development meets the housing needs of Tottenham and the borough more widely.

Housing Quality

- 7.131. Policy D6 of the London Plan sets out the Mayor's requirements for housing quality and standards. This includes meeting the Nationally Described Space Standards which minimum floor areas, requirements for outdoor amenity space for new dwellings as well as maximising the number dual-aspect units. Policy D6 is supplemented by the Housing SPG (2016) which sets out a number of standards to be followed for new homes.
- 7.132. Paragraph 3.2.7 of the Core Strategy states that the Council will expect all new development to be built to the highest standard in accordance with the Mayor's Housing SPG (2016). The Council will also use the CABE Building's for Life criteria when assessing the quality of new homes, with all new affordable housing meeting the minimum standards set by the Mayor.
- 7.133. Policy DM12 of the Development Management Plan DPD states that all new housing must be of a high quality, taking into consideration the privacy and amenity of neighbouring uses. All units must meet or exceed the minimum space standards. Ground floor residential dwellings must have access to

private garden/amenity space, with units on upper floors provided access to balcony or terrace spaces.

- 7.134. Mixed tenure residential development must be designed to be ‘tenure blind’ to ensure homes are indistinguishable in terms of design quality, space standards and materiality.

Assessment

- 7.135. The Proposed Development has been designed to deliver high quality new homes across High Road West. This includes creating a tenure-blind scheme, which focuses on integrating a new community at this location. All new residential units will meet or exceed the minimum space standards and will be fully compliant with the requirements for private outdoor amenity space. Residential amenity space on Plots within the Outline Proposals will be provided at podium level.
- 7.136. The Illustrative Masterplan has sought to maximise the number of dual-aspect units (64.5% of all units); and there are no north-facing single aspect dwellings. The overall number of dual-aspect units will be sought to be increased as each Reserved Matters Application is brought forward and will be developed through the iterative design process together with the Council.
- 7.137. Plot A has been designed in conjunction with the feedback from Love Lane Estate residents and in accordance with the Residents’ Design Guide and Charter. The design also takes into consideration the policy requirements and associated guidance. The size of these units has been designed to be in-excess of the minimum standards, with all units provided private outdoor amenity space, with ground floor units provided entrances onto private gardens. The proposals will include a high proportion of dual aspect units (68%).

Design

- 7.138. Paragraph 73 of the NPPF outlines that large-scale development have the ability to make a significant contribution towards the provision of new homes. In such scenarios, the strategic policy-making authority should identify suitable locations for development and in doing so, set clear expectations for the quality of places and ensure appropriate tools such as design codes and masterplans are used to secure a variety of well-designed and beautiful homes to meet the different needs of the community. Similarly, Paragraph 124 states that these tools a be used to help ensure that land is used efficiently while also creating beautiful and sustainable places.
- 7.139. Chapter 12 of the NPPF sets out in further detail the expectation for achieving well-designed places, which is fundamental to the what the planning and development process should achieve²⁰. Paragraphs 124 and 127 within the NPPF states that good design is a key aspect of sustainable development, is indivisible from good planning, creates better places in which to live and work and helps make development acceptable to communities. Planning policies and decisions should ensure developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.
- 7.140. Paragraph 129 sets out guidance in relation to design guides and codes, which by their very nature are encouraged to be developed as part of a Plan or SPD. These may be informed by landowners or separately design codes on sites proposed to be developed. These should be based on effective community engagement and the principles of the National Model Design Code²¹ and National Design Guide²². Paragraph 130 (Parts a – f) outlines the requirements for developments as part of decision-making.
- 7.141. Policy D3 of the London Plan states that all development must make the best use of land by following a design-led approach. Higher density

²⁰ Please refer to Paragraph 126 of the NPPF.

²¹ Adopted in July 2021.

²² Adopted in July 2021.

developments should be located in areas with good connectivity. Part D of Policy D3 outlines the requirements of development proposals including the form and layout; experience; quality and character. Policy D4 sets out the requirements in bringing forward high-quality and well-designed developments; this includes a requirement to optimise the design review process early on for referable schemes.

7.142. The London Plan also sets out a number of key policies relevant to the design of buildings, including Policy D5 which states that the Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design, with Policy D7 setting the requirements for the delivery accessible housing through the provision of 10% wheelchair adaptable units under M4(3) and ensuring that all dwellings are accessible and adaptable under M4(2). Policy D11 states that development should include measures to design out crime and contribute to a sense of security.

7.143. Strategic Policy SP11 states that all development should enhance and enrich the borough's-built environment. It should be of the highest quality design and respect the local context, character, and historic significance. It should ensure that environmental impacts are minimised and incorporate measures to reduce crime and the fear thereof. It should ensure that buildings designed to be flexible and adaptable with the ability to integrate services and functions. In addition, it should seek the highest standards of accessibility in all buildings and places. In conjunction with SP11, Development Management Plan Policy DM1 sets out the requirements for design, including the Haringey Design Charter together with the design standards for development.

Assessment

7.144. The Proposed Development has been principally designed to be high-quality and sustainable. For Plot A, the proposals developed by PTE have been designed to positively respond to the surrounding built context and have been developed in conjunction with feedback from local residents

together with the Residents Charter and Residents Design Guide for High Road West, which has been positively endorsed by Haringey's Quality Review Panel. This approach will set the standard for developing future homes to be delivered as part of Reserved Matters Applications with the Love Lane Estate residents.

- 7.145. The detail of the Outline Proposals for the rest of the Site will be brought forward in individual Reserved Matters Applications, where the detailed design will form part of the submissions. This will be guided by the principles set out in the Design Code, together with the Parameter Plans and the Development Specification, which have been submitted for approval as part of this planning application. The purpose of these documents is to govern how the proposals for the Reserved Matters Applications can and should be brought forward, ensuring that the proposals will deliver high-quality architecture across High Road West.
- 7.146. The Proposed Development will deliver a minimum of 10% wheelchair adaptable units as per standards M4(3) with all dwellings designed to be accessible and adaptable under M4(2). As set out within this Planning Statement, the number of units designed to be M4(3) in Plot A is equivalent to 8% - this is due to developing the proposals for specific Love Lane Estate residents' needs.
- 7.147. The Proposals have also been informed through engagement with Secure by Design (SbD) Officer from the Metropolitan Police, including meetings throughout 2021. Further details on the engagement is set out in the accompanying Design and Access Statements. It is envisaged that engagement will continue with the SbD officer as the scheme is developed.
- 7.148. Overall, it is considered that the Proposed Development will deliver a new, high-quality neighbourhood, which will incorporate exemplar design throughout. It will sympathetically respond to the surrounding context, character and history of the Site, which is reflected in the accompanying Design Code for approval as part of this submission. The combination of these factors will embed High Road West as a positive contributor to the emerging context and setting of North Tottenham.

Tall Buildings, Townscape and Views

- 7.149. Policy D9 of the London Plan provides the strategic approach to tall buildings. Part A defines tall buildings as those of a height more than six storeys or 18 metres from the ground to the uppermost floor. Part B sets out the framework for the location of tall buildings, noting that boroughs are expected to identify the appropriate locations for tall buildings, which should be identified on development plan maps. Part C of Policy D9 outlines the impacts which should be assessed as part of proposals for tall buildings; this incorporates townscape, functional, environmental and cumulative impacts. Part D states that where appropriate, public access should be incorporated into proposals.
- 7.150. Policy SP11 of the Strategic Policies DPD states that tall buildings will be assessed against the criteria within an adopted AAP or masterplan framework, criteria under Policy DM6 of the Development Management Policies DPD together with CABE Guidance on tall buildings (2007). The Strategic Policies DPD defines tall buildings as those which are “substantially taller than their neighbours, have significant impact on the skyline or are over 10 storeys...[or are otherwise] larger than the threshold set for referral by the Mayor.”²³
- 7.151. Policy DM5 of the Development Management Plan sets out that development proposals within the viewing corridors of the Locally Significant Views (shown in Figure 6 below). The proposals must demonstrate that how the scheme enhances the viewers ability to recognise and appreciate the landmark being viewed; makes a positive contribution to the characteristics and composition of the local view. These should also have regard to the Council Tall Buildings and Views SPD²⁴. Obstructions to Locally Significant Views should be minimised and should consider opportunities to create new local views. They should also have due consideration of the views identified in the Conservation Area Appraisals

²³ Please refer to Paragraph 6.1.16 of the Strategic Policies DPD.

²⁴ Not currently available.

and Management Plans.

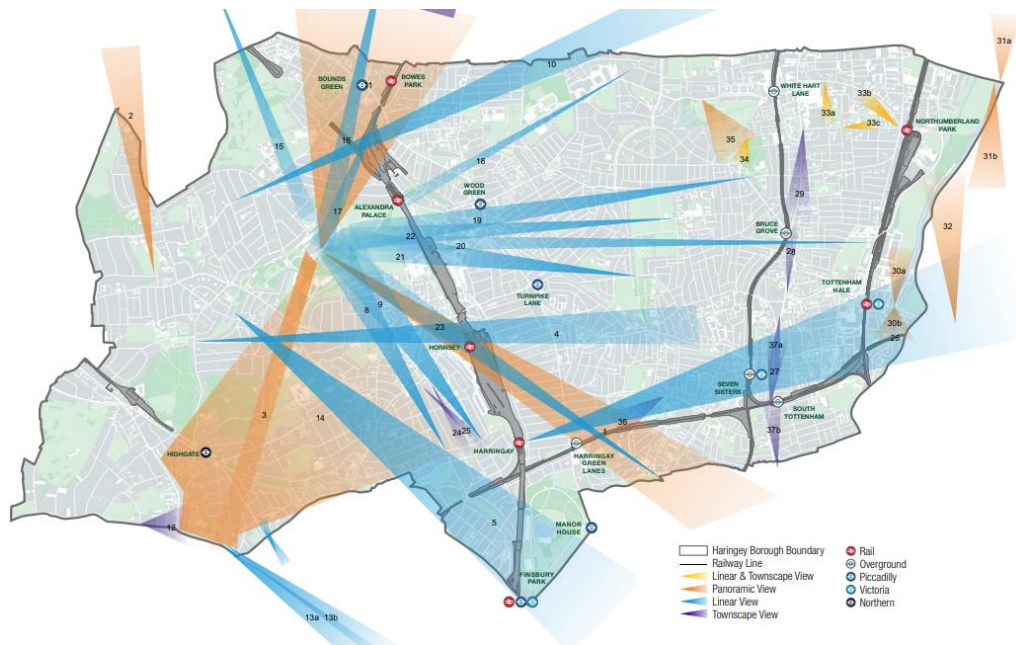


Figure 6: Figure 2.1 Haringey Views

- 7.152. Figure 2.2 of the Development Management Plan identifies the whole of the site as a location appropriate for tall buildings²⁵. Policy DM6 states that the Council will expect building heights to be of an appropriate scale taking into consideration the local context. Part B, C and D of Policy DM6 sets out the expectations, criteria and requirements for the delivery of tall buildings, which should be of the highest quality design and located only within identified areas. Part E sets out the procedural requirements for assessing tall building proposals.
- 7.153. Similarly, the OAPF states that future tall buildings will generally be located in areas of well-defined clusters in urban growth areas, including around THFC's stadium.
- 7.154. Policy AAP6 states that in line with Policy DM6, North Tottenham (including High Road West) is identified as being potential suitable locations for the delivery of tall buildings as shown in Figure 7 below:

²⁵ Tall Buildings are defined in the Development Management Plan as 10 storeys or above



Figure 7: Figure 4.2 of the TAAP – Locations suitable for Tall Buildings

- 7.155. These should be developed in accordance with the principles set out in Policies DM1 and DM6 together with the associated site allocation requirements. Part F of Policy AAP6 states that taller buildings will be appropriate along parts of the Tottenham High Road; retained suburban areas will be protected from inappropriate development with taller buildings only being permitted where it can be demonstrated that the existing character will not be compromised in accordance with Part G of Policy AAP6. Tall buildings will be considered in the context of Local Views.
- 7.156. In conjunction with the above, supporting AAP Paragraph 4.25 states that the planned and expected infrastructure in Tottenham together with the need to optimise housing and employment outcomes in accessible locations, means that there is provision for higher density and tall buildings on specific sites and locations, noting that tall buildings can make an important contribution towards delivering employment and community space alongside housing to create new urban form.
- 7.157. HRWMF sets out within its key principles²⁶ states that “Any Tall Buildings

²⁶ Please refer to the Key Principles of the HRWMF (2014) on Page 92.

should be placed along the railway corridor to create a legible tall building spine. The buildings should use Brook House as a reference point and descend in height.” In addition, the Key Principles for the HRWMF also states that development should “reflect the scale and impact of the new Tottenham Hotspur Football Club stadium on the High Road by locating larger commercial and leisure buildings opposite it to create new sports and leisure destination for North London.” It goes on to state that vistas to key elements on the edges of the site will be established and framed appropriately. Views along key movement routes will also be established to reinforce movement patterns and enhance access to open space.

- 7.158. In conjunction with the above, the approval of Planning Permission Ref: HGY/2018/0184 for the Goods Yard establishes the principle of taller buildings beyond that consented for Brook House along the spine of the railway corridor – this is a material planning consideration to be taken into account in the context of the adopted development plan and assessment of the application as per Section 38(6) of the Planning and Compulsory Purchase Act 2004.

Assessment

- 7.159. The Proposed Development includes a number of tall buildings as defined by the London Plan (i.e. 18m plus or six storeys). This is considered to represent the latest definition in respect of tall buildings. In accordance with Part B of Policy D9, it is considered that there is appropriate evidence within the adopted Tottenham Area Action Plan which identifies the appropriate locations for tall buildings, which covers the whole Site Allocation for High Road West (Ref: NT5).
- 7.160. As indicated on the parameter plans and the illustrative masterplan, the location of tall buildings within the Proposed Development are located along the railway corridor and therefore considered to be consistent with the aspirations of the HRWMF. In the consented Goods Yard development (Ref: HGY/2018/0184) the proposed heights are considered to be consistent and acceptable within the broad parameters of the Proposed Development,

noting that a degree of flexibility has been incorporated to allow reasonable alterations to be made to the consented schemes. The overall approach to tall buildings has been to reinforce the emerging spatial hierarchy of tall buildings along the railway corridor, with the tallest component demarcating White Hart Lane Station as part of aiding legibility and the broader wayfinding strategy in accordance with Part C(b) of Policy D9. This will complement the emerging context at Tottenham and sits below the consented fulcrum building at Northumberland Park, which is approximately 36 storeys.

- 7.161. The Proposed Development has been assessed from a series of long-range, mid-range and immediate views as set out in the accompanying BHTVIA and as required by Part C(1: i - iii) of Policy D9. As set out in the accompanying BHTVIA, the proposed development would not materially change the character of any LVMF protected vistas or viewing corridors in strategic views. In relation to the mid-range views, the proposals are experienced as part of a diverse context which includes taller development at the THFC Stadium. Their proximity to White Hart Lane station marks the location of a local transport hub and are considered to aid in wayfinding.
- 7.162. The impact on local views are considered to represent the most important for assessment purposes and also require consideration from a heritage perspective. From west side of the High Road, the tight urban grain and continuous building line means that the viewer won't see or be aware of the Proposed Development for much of the route. From east side of the road, the context already includes the football stadium, and taller buildings are set behind as a layer which will read separately. As concluded within the BHTVIA, the Proposed Development is considered to overall, improve the visual amenity in the area.
- 7.163. As part of the Illustrative Masterplan, the environmental and technical impacts of tall buildings has been assessed, which is covered within the accompanying Design and Access Statement prepared by SEW together with wind analysis of the Illustrative Masterplan by RWDI as set out in the Environmental Statement. Whilst these matters will continue to be

developed and tested as part of the detailed applications, it is considered that the Illustrative Masterplan demonstrates that the proposed tall buildings will meet the functional and environmental requirements under Policy D9.

- 7.164. Overall, it is considered that the Proposed Development and in particular the location of tall buildings, is acceptable and accords with the requirements of the Development Plan.

Density of The Development

- 7.165. Paragraph 122 of the draft revised NPPF requires planning policies and decisions to support development that makes efficient use of land, taking into account the identified need for housing, local market conditions and viability, the availability and capacity of infrastructure and services, the desirability for promoting regeneration and change and the importance of well-designed, attractive places. Paragraph 125 states that, where there is or an anticipated shortage of land to meet identified housing needs... “it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site.”
- 7.166. Policy D6²⁷ of the London Plan requires development proposals to make the most efficient use of land and be developed at the optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given to: the site context, its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL) and the capacity of surrounding infrastructure. The Policy goes on to state that proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused. Supporting Paragraph 3.3.22 also states that the following measurements of density should be provided for all planning applications that include new residential units:

²⁷ Together with reference made in Policy D3 (Part B) of the London Plan

- number of units per hectare;
- number of habitable rooms per hectare;
- number of bedrooms per hectare;
- number of bedspaces per hectare.

- 7.167. Policy SP2 states that high quality new residential development in Haringey will be provided by ensuring that it meets the density matrix of the London Plan²⁸. Paragraph 2.1.8 states of the Local Plan states that one way of making the most efficient use of land is to encourage higher densities in the borough. Similarly, good design can increase density while protecting and enhancing the character of an area. The Council establishes a minimum density below which, development will not be permitted.
- 7.168. Paragraph 3.2.7 states that the Council will adopt a 'design-led' approach to density, noting that appropriate density ranges are related to location, existing building form and massing alongside the PTAL rating.
- 7.169. As set out above, Policy AAP3 sets out that proposals incorporating a housing element will be expected to provide the housing in accordance with the minimum capacities set out in the site allocations, noting that: "Higher densities and capacities may be acceptable in appropriate locations, close to town centres, in areas with good local facilities and amenities and in areas well served by public transport, providing that other policies of [the] AAP and Haringey's Local Plan are not compromised." Part D of Policy AAP6 states that the Council expects the highest density development to be located adjacent to public transport nodes and in Growth Areas and Areas of Change. At their boundary, development is expected to transition between these areas through the scaling of heights.

Assessment

- 7.170. The Proposed Development adopts a design-led approach to the

²⁸ This refers to former policy now archived.

masterplan which is reflected within the principles of the Design Code and associated proposals for Plot A as the Detailed Proposal for the planning application.

- 7.171. Policies and adopted guidance indicate that the densification at this location will be supported. The Proposed Development seeks to make the most efficient use of the Site to optimise the delivery of housing together with a range of other non-residential uses as part of delivering a comprehensive masterplan for High Road West. To this end, the Proposed Development is denser than the existing Site arrangement.
- 7.172. The density has been calculated across the Site at 337 dwellings per hectare in accordance with the calculation set by the GLA. For the south of White Hart Lane this is equivalent to 393 dwelling per hectare and to the north of White Lane, 292 dwellings per hectare.
- 7.173. Overall, it is considered wholly appropriate within the urban setting of the Site and consistent with comparative schemes.

Public Realm, Play Space, Open Space And Amenity Provision

- 7.174. London Plan Policy D4 includes standards for private outdoor space. This states that a minimum of 5 sqm of private outdoor space should be provided for 1 – 2 person dwellings and an extra 1 sqm per each additional occupant. Private external spaces, including balconies, should be at least 1.5 m deep and wide.
- 7.175. London Plan Policy D8 promotes the need for well-designed public realm to create safe, accessible, inclusive, attractive and well-connected places. Good public realm can encourage active travel and mitigate impacts from traffic. Considered design of public realm can create well-connected places which promote safety, well-being, social interaction and a sense of place.
- 7.176. London Plan Policy S4 supports residential development or development likely to be used by children and young people to provide opportunities for

play. This states that at least 10 sqm per child should be provided. Highlighting that play should be designed into development as an integral part of neighbourhoods, accessible public realm should incorporate incidental playable space. This policy also highlights that developments should consider routes to existing play provision, schools and youth centres within the surrounding area. This policy is supported by a separate Supplementary Planning Guidance (SPG) which sets a benchmark requirement of 10sqm of play space per child²⁹.

- 7.177. Standard 26 of the Mayor's Housing SPG requires a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant. The SPG adds that "In exceptional circumstances, where site constraints make it impossible to provide private open space for all dwellings, a proportion of dwellings may instead be provided with additional internal living space equivalent to the area of the private open space requirement. This area must be added to the minimum GIA." Enclosing balconies as glazed, ventilated winter gardens can be considered an acceptable alternative to open balconies and is recommended for all dwellings exposed to NEC noise category C or D141.
- 7.178. Policy SP13 of the Council Strategic Policies DPD states that new developments should provide amenity space in accordance with the Council's Open Space and Recreational Standards SPD³⁰. This includes seeking on-site provision and/or financial contributions in accordance with the adopted SPD standards. New Development will also be expected to contribute towards children's play space in accordance with the Mayor's adopted SPG. This should include play spaces which are attractive, welcoming and engaging for all children, which is both informal and formal. This should be secured by way of S106 obligations.
- 7.179. Policy DM20 states that development which protects and enhances Haringey's green and open spaces will be supported. Part C of Policy DM20

²⁹ Note: This SPG has been superseded by the Council's Planning Obligations SPD (2018)

³⁰ Note: This SPD has been superseded by the Council's Development Management DPD (2017)

states that where new open space is to be provided, the Council will expect the development to link into to All London Green Grid. Part G states that for sites of over 1ha in areas of Open Space Deficiency, proposals should seek to create new publicly accessible open space in accordance with the open space standards set out in the Haringey Open Space and Biodiversity Study (2013). It should also take into consideration national planning guidance.

- 7.180. Policy AAP9 states that high priority will be afforded to enhance access through on-site provision of Tottenham Green Grid project in areas identified as deficient in access to open spaces. As noted in supporting Paragraph 4.36, due to the significant need for new housing and employment in Haringey – more specifically in Tottenham – the Council acknowledges that delivering open spaces of significant scale is unrealistic, however, will support the provision of open spaces where opportunities arise. The AAP envisages a new east-west axial Green Grid route, which links White Hart Lane Station, High Road West through to the THFC Northumberland Park Development to the Lee Valley Regional Park beyond.
- 7.181. The HRWMF, seeks to deliver a cohesive community which promotes social interaction with new public open spaces, fostering community cohesion and social inclusion³¹. As set out in the Key Principles, it should create a legible network of east-west streets that connect into the surrounding area, existing lanes off the High Road, pocket parks and other open spaces.
- 7.182. In addition to the above, the HRWMF also sets out specific key principles for open space, namely: the provision of a new public square to the south of White Hart Lane as a focus for new community and leisure buildings; a high-quality pedestrian route from White Hart Lane Station to the High Road; public realm improvements along White Hart Lane as part of creating a heritage setting for existing statutory and non-statutory listed buildings; a new community park to the north of White Hart Lane; integration of child play areas within shared private courtyard blocks.

³¹ See 'The Vision for High Road West' on Page 88 of the HRWMF (2014).

Assessment

- 7.183. As part of the Proposed Development, the Outline Proposals will include the delivery of a new public park and public square which will provide significant, new public realm, contributing towards the network of open spaces in Tottenham. These spaces will be designed to provide a safe, inclusive environment improving the connectivity to and permeability across the Site, including key transport nodes. In addition, they will also offer generous spaces to host community, recreational and leisure-based events, designed to encourage socialisation, enjoyment and use of the outdoors. This will positively reinforce placemaking principles for High Road West as a new neighbourhood, which promotes wellbeing, social interaction and a sense of place. In Plot A, a new landscaped area will be introduced with a variety of low level and tree planting incorporated together with SuDS. This will complement a new, open route between Whitehall Street and Headcorn Road, alongside playspace.
- 7.184. All residential units within the Proposed Development will include the minimum external private amenity space required under London Plan Policy D4 and Standard 26 of the Mayor's Housing SPG. This is further set out within the Design Code accompanying this submission for approval. In Plot A, all units will be provided with private outdoor amenity space, with ground floor units provided entrances onto private gardens. Two units have marginally undersized private terraces (1 x 2b4p and 1 x 3b5p unit), however, both dwellings contain have larger living spaces in-excess of standards which is considered to outweigh the shortfall in external amenity space.
- 7.185. For Plot A, 299sqm (GIA) of playspace for 0 – 4 years will be incorporated into the landscaping within the Plot boundary, which is in-excess of the required 294sqm (GIA) required based on the child yield calculated for the Plot. Provision for 5 – 11 years is currently available at Bruce Grove Play Park and together with playspace for 12 – 17 years, will be included within the wider playspace strategy for the Outline Proposals. This is included within the Design Code, which sets out that the provision of child playspace

will be designed to be accessible for all ages (i.e. 0 – 4 years, 5 – 11 years and 12 – 17 years) and establishes principles for how this will be brought forward.

- 7.186. Overall, it is considered that the provision of public realm within the Outline Proposals will make a significant contribution towards the borough's wider network of open spaces and a space which promotes well-being and social interaction in a safe and secure environment. A Financial Contribution towards existing play spaces may also be provided as part of meeting the needs of future occupiers in the immediate phases of the Proposed Development.

Fire Strategy

- 7.187. Policy D5 of the London Plan states that development proposals should be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments, a minimum of one lift core should be suitably sized for fire evacuation. Policy D12 of the London Plan states that to ensure fire safety for all building users, all development proposals must achieve the highest standards of fire safety, inclusive of the requirements set out in policy. In addition, all major applications should be submitted together with a Fire Statement in accordance with the requirements set out in Policy D12.

Assessment

- 7.188. The enclosed planning application includes a set of two Fire Statements prepared by OFR Consulting in relation to the Detailed Proposals for Plot A and the Outline Proposals. The Fire Statements have been prepared by OFR Consulting to follow the requirements for Planning Gateway One, whilst acknowledging the limitations of the current proposals for the Outline Proposals. It is anticipated that all future Reserved Matters Applications will include a Planning Gateway One Fire Statement as part of adhering to the requirements set out in policy and the recommendations set out in the Fire Statement.

- 7.189. Whilst a Planning Gateway One assessment is not strictly required for Plot A, the enclosed Fire Statement similarly follows guidance for the purpose of completeness. This demonstrates that all suitable measures have been incorporated into the design of the Detailed Proposals in accordance with Building Regulations and BS Standard 9991, 9991:2015, 5839-1, 5839-6 and 9251:2021 and sets out measures to allow safe evacuation, alongside fire-fighting access.
- 7.190. Overall, it is considered that the Proposed Development accords with the requirements of the adopted Development Plan.

Energy

- 7.191. Paragraph 148 encourages proposals which support renewable and low carbon energy and associated infrastructure. Paragraph 153 states that, in determining planning applications, local planning authorities should expect new development to:
- comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated that it is not feasible or viable; and
 - take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
- 7.192. The London Plan sets out that major development should be designed to be net zero-carbon in accordance with the energy hierarchy set out in Policy SI2. Proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within this framework, with a minimum on-site reduction of 35% over Part L. Any shortfall should be met either through a payment in-lieu or off-site provision.
- 7.193. Policy SI3 states that major development proposals within Heat Priority Network Areas should have communal low temperature heating systems. Where a heat network is planned but not in existence, development should be designed for connection at a later date. Policy SI4 outlines that major

development proposals should demonstrate through the energy strategy that they will reduce the potential for internal overheating and reliance on air conditioning systems, in accordance with the cooling hierarchy.

- 7.194. Core Strategy Policy SP4 states that the Council will promote and require all new developments to adopt measures to reduce energy use and carbon emissions during design. In accordance with Part 2 of Policy SP4, developments are required to assess, identify and implement site-wide and area-wide decentralised energy facilities including the potential to link into the wider network, where viable.
- 7.195. Policy DM21 of the Development Management Plan states that all new development should apply the energy hierarchy to minimise energy use and exceed the minimum carbon reduction targets (noting that consideration will be given towards carbon off-setting payments where the full reduction cannot be achieved). In addition, they should also apply the cooling hierarchy to reduce the potential for overheating and limit the reliance on mechanical air conditioning systems.
- 7.196. Policy DM22 of the Development Management Plan states that proposals which contribute towards the Decentralised Energy Network (DEN) will be supported. All major developments within 500 metres of a planning DEN will be expected to secure connection to the future DEN subject to technical feasibility and viability.
- 7.197. The HRWMF states that High Road West will incorporate sustainable design and construction principles, including passive and energy efficient measures, generation and distribution. It should reduce energy consumption. The Key Principles outline that the proposals should integrate an efficient supply of heating and cooling to and within the development, including the provision of a local low carbon energy centre for both High Road West and the wider North Tottenham area. This should also include the safeguarding of a connection to the Lee Valley Heat Network and maximise carbon reductions.

Assessment

- 7.198. The proposals for Plot A have been designed to achieve a carbon reduction of 69.79% over Part L, which is almost a doubling of the carbon reduction sought on site in accordance with London Plan Policy SI2. For the Outline proposals, an on-site saving of 59% over Part L is anticipated to be achieved based on the illustrative masterplan proposals. The on-site carbon reductions for the Outline proposals will be assessed in further detail as each Reserved Matters Application is brought forward. In order to achieve net zero carbon, a mechanism within the s106 will be included to ensure that the appropriate payment in-lieu is made towards net zero carbon activities, where 100% savings on-site is not possible.
- 7.199. The Outline proposals have been developed to allow the Proposed Development to connect into the Meridian Water District Heat Network (DHN) should a connection be made available. Further detail on the connection into the heat network is available at Appendix A of the Energy and Sustainability Report prepared by Buro Happold. Two connections are proposed at energy centres to the North and South of White Hart Lane which will link into the DHN. The energy centres will have back up gas boiler capacity and an ability to provide heat offsite as discussed and agreed with LBH during pre-application meetings. In the event that the DHN is not realised, a fall back low-carbon energy solution is being planned with a sitewide heat network supplied with Air Source Heat Pumps (ASHPs) and gas boiler heat.
- 7.200. The Detailed Proposals for Plot A together with the Outline Proposals for the rest of the Site designed to follow the Cooling Hierarchy in accordance with Policy SI4.
- 7.201. Overall, it is considered that the Proposed Development accords with the Development Plan and will continue to seek opportunities to further reduce on-site carbon reductions as future Reserved Matters Applications are brought forward.

Digital Connectivity

- 7.202. Policy SI6 of the London Plan states that development proposals should ensure that proposals include sufficient ducting for full fibre connectivity, meet expected demand for mobile connectivity and undertake appropriate measures to avoid reducing mobile connectivity. In addition, they should also accommodate well-designed and suitably located mobile digital infrastructure on rooftops and in the public realm.

Assessment

- 7.203. The Proposed Development will include full fibre broadband to all future occupiers across the Site, including the Detailed and Outline Proposals. This will be further secured within the S106.

Sustainability

- 7.204. Policy GG3 of the London Plan states that new development should seek to improve London's air quality, improve access to and quality of green spaces; provide new green spaces and play spaces whilst ensuring that buildings are well insulated and ventilated. Policy GG6 states that those involved in planning should support the move to a low carbon circular economy, ensuring that buildings can adapt to climate change.
- 7.205. Policy SI2 of the London Plan states that Major Developments should be net zero-carbon, in accordance with the energy hierarchy. Referrable schemes to the Mayor should calculate whole life-cycle carbon emissions and actions to reduce associated carbon emissions through the submission of a Whole Life-Cycle Carbon Assessment.
- 7.206. Policy SI5 states that new residential developments should achieve mains water consumption of less than 105 litres per person per day and non-residential development should achieve the BREEAM Excellent minimum standard according to credit Wat 01.
- 7.207. Policy SI7 promotes a circular economy as part of improve resource

efficiency in material re-use, keeping them for their highest use for as long as possible. This principle together with other collaborative targets are set out in Part A. For referable applications to the Mayor, Part B states that applicants are required to prepare and submit a Circular Economy Statement and aim to be no-zero waste. Circular Economy Statement should demonstrate how materials on-site will be re-used and recycled throughout the demolition and construction phases, as well as how the completed development will support recycling and re-use and opportunities to manage waste on-site. Such documents should also set out how much waste is likely to be generated and how the performance will be monitored.

- 7.208. Policy SP6 of the Strategic Policies DPD states that the Council will support the sustainable objectives for waste set out by the Government and the London Plan. To do this, it will seek to minimise waste creation and increase recycling rates. It will require recycling facilities to be designed into all new developments.

Assessment

- 7.209. The Outline proposals have been assessed against the BREEAM Communities standard, which is used as a toolkit to help inform the sustainability measures which can be incorporated for masterplans. The BREEAM Communities assessment carried out by Buro Happold indicates that the Outline proposals will achieve a minimum rating of BREEAM “Very Good” with a target of “Excellent”. The full details of the sustainability measures proposed for individual plots will be brought forward and assessed as part of the Reserved Matters Applications.
- 7.210. In conjunction with the above, a Circular Economy Statement has been prepared by Buro Happold for the Outline Proposals. This targets a minimum diversion of 98% of non-hazardous demolition waste away from land-fill for reuse, recycling and recovery, alongside together with other target benchmarks as Reserved Matters Applications are brought forward. It is anticipated that the design and construction teams will continue to look for opportunities to meet and improve upon the aspirations set out in the

Circular Economy Statement as the scheme progresses.

- 7.211. The Detailed Proposals for Plot A have been designed to meet Home Quality Mark 4*. As part of the approach adopted for Plot A, the proposals will achieve a mains water consumption of less than 105 litres per person per day in accordance with Policy SI5. A Circular Economy Statement has been prepared by Aecom for Plot A as part of the planning application submission. This targets the following:
- A minimum diversion of 95% of non-hazardous demolition waste away from landfill for reuse, recycling and recovery;
 - A minimum diversion of 95% of inert excavation waste away from landfill for beneficial use;
 - A minimum diversion of 95% of construction waste away from landfill for reuse, recycling and recovery;
 - To facilitate recycling levels in operation which will exceed the waste recycling target of 65% by 2030; and
 - Specify a minimum of 20% of the total value of the selected products and materials to include recycled and reused content.
- 7.212. As part of the submission, Whole Life-Cycle Carbon Assessments (WLCA) have also been carried out for the Detailed and Outline Proposals respectively, in accordance with the GLA template guidance. The WLCAs conclude on recommendations to further incorporate carbon reductions in-line with the benchmarks assessed. For the Outline Proposals, future WLCAs will be submitted in accordance with the recommendations set out in the WLCA prepared for the Outline Proposals as part of future Reserved Matters Applications.
- 7.213. Overall it is considered that the Proposed Development positively accords with the Development Plan, going above and beyond the adopted targets to deliver a highly sustainable and net zero carbon development. This will seek to further improve over and above the carbon-reductions as part of

developing the detailed designs, for both Plot A and future Reserved Matters Applications, in accordance with the recommendations of the WLCAs.

Flooding and Sustainable Urban Drainage

- 7.214. Paragraph 154 of the NPPF states that new development should be planned for in ways that avoid increased vulnerability to climate change. Paragraph 167 outlines that local planning authorities should ensure that flood risk is not increased elsewhere when determining planning applications. Development in areas of flood risk will only be allowed where it meets the requirements set in sub-paragraphs (a – e). Paragraph 169 outlines the requirements for major developments to incorporate sustainable drainage systems.
- 7.215. Policy SI12 of the London Plan states that proposals should ensure that flood risk is minimised and mitigated, and that any residual risk is addressed. This should include making space for water and aiming for development to be set back from the banks of watercourses.
- 7.216. Policy SI13 states that development proposals should seek to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to the source as is possible. There should also be a preference for green over grey drainage infrastructure using the drainage hierarchy.
- 7.217. Core Strategy Policy SP5 states that the Council will require all development in Haringey to be water efficient during construction and operation and to reduce all form of flood risk. To achieve this, all developments will be expected to cover a series of measures including: improve the water environment, quality and drainage systems; minimise water use; take into consideration flood risk in accordance with the NPPF tests; implement measures to prevent local surface water and downstream flooding and implement SuDS Strategies.
- 7.218. Policy DM24 of the Council's Development Management Plan states that all proposals for new development within Flood Zones 2 and 3a will be required

to provide sufficient evidence for the Council to assess whether the requirements of a Sequential or Exceptions Test have been met. All proposals will be required to manage and reduce surface water run-off and managed water and waste discharges.

- 7.219. Policy DM25 of the Development Management Plan states all new proposals should seek to manage surface water as close to its source as possible, in line with the drainage hierarchy set out in the London Plan. New SuDS systems should be sensitively incorporated into new developments, reducing surface water run-off to greenfield run-off rates for a 1:100 year critical storm event. Where SuDS Systems are used, they will be expected to accord with local and national guidance (as required and where appropriate) and incorporate measures within the Surface Water Management Plan (SWMP), maximise biodiversity and local benefits.
- 7.220. Policy DM26 states that proposals in Critical Drainage Areas will be required to incorporate measures which reduce the overall level of flood risk. New Development in Flood Risk Zones must include a statement which describes how flood risk issues have been addressed.
- 7.221. Policy DM27 states that new development should be set 5 metres back from existing ordinary watercourses.

Assessment

- 7.222. The enclosed Flood Risk Assessment and Sustainable Urban Drainage Strategy prepared by Robert Bird Group (RBG). The majority of the Site is located within Flood Zone 1 (Plot A entirely within Flood Zone 1) with some areas located in Flood Zone 2. A sequential assessment has been carried out to establish whether an exceptions test to be carried out in accordance with the required of the NPPF. On the basis that there are no 'highly vulnerable' areas proposed in Flood Zone 2, no exceptions test is required. Recommendations have been set out in relation to the Outline Proposals, which includes:
- Finished Floor Levels (FFLs) to be above the estimated flood node

levels;

- Ground floor areas on Plots within Flood Zone 2 to not include uses which could be considered more vulnerable (i.e. sleeping accommodation);
- Flood Warning and Emergency Plan to be prepared for plots within Flood Zone 2;
- Best practice design with external areas falling area; and
- SuDS and drainage strategies to be incorporated throughout the Site.

7.223. The document also sets out the proposed measures and features to be embedded within the design of the Outline proposals in order to minimise flood risk and reduce surface water discharge rates (predicted to be 50% reduction to the south and 70% to the north of White Hart Lane). Whilst the scheme will not meet greenfield run-off rates, the surface water reductions are considered acceptable (using a 40% climate change allowance) and will avoid a possible requirement for pumping on-site. This is considered to be an acceptable approach to the Site in conjunction with the multifaceted approach set out in RBG's report.

7.224. Overall, it is considered that the Proposed Development accords with the Development Plan, incorporating opportunities to include SuDS throughout the Site where possible.

Waste Management

7.225. Core Strategy SP6 states that the Council will require all new development to integrate well-designed recycling facilities. The Council will require Site Waste Management Plans for all major applications to identify the volume and types of wastes from demolition and construction, and to demonstrate how waste will be minimised and managed during construction and occupation.

Assessment

- 7.226. A Site Waste Management Plan and associated Operational Waste Management Plan has been prepared by Waterman. The documents set out the anticipated waste levels arising from demolition and construction of the Proposed Development, together with the associated waste levels with the end-users (note that this is based on the Illustrative Masterplan). The recommendations from these reports have been incorporated into the Circular Economy Statements.

Water Supply and Waste Capacity

- 7.227. Policy DM29 of the Development Management Plan states that the Council will seek to ensure that there is adequate surface water, foul drainage and sewerage treatment capacity to serve all existing and new development in the borough. All proposals for new development will be expected to demonstrate that there is adequate capacity in the sewerage network to accommodate the development, ensuring separate between surface and foul water systems and implement SuDS systems. Similarly, new developments will also be expected to demonstrate that there is adequate water supply infrastructure for the development, together with the installation and management of measures for the efficient use of water. Residential development should meet the London Plan targets for mains water consumption.

Assessment

- 7.228. As set out in the accompanying Flood Risk Assessment and Drainage Strategy, pre-planning enquiry has been submitted to Thames Water to confirm that there is sufficient capacity on the existing sewer network for the Proposed Development. As part of the proposed development a total of 10 new Foul Water sewer are Proposed Development, together with 12 new connections to the Surface Water sewer. These are proposed to be secured by a Section 106 application to Thames Water.
- 7.229. A standalone Utilities Statement has also been prepared by Gattica

Associates, which confirms the existing Potable Water (i.e. clean water) capacity within the network. Engagement is currently underway with Thames Water to confirm how future Potable Water capacity can be met.

Trees, Biodiversity and Nature Conservation

- 7.230. Paragraph 131 of the NPPF state that trees make an important contribution to the character and quality of urban environments and can help mitigate climate change. Planning policies and decision should ensure that new streets are tree-lined and other opportunities are taken to incorporate trees elsewhere.
- 7.231. Policy G1 of the London Plan states that development proposals should incorporate appropriate elements of green infrastructure that are incorporated into London's wider network. Policy G5 states that major developments should contribute to urban greening through the delivery of high-quality landscaping. To determine the level of urban greening, an Urban Greening Factor (UGF) of 0.4 will be sought of residential developments and 0.3 on commercial schemes (excluding B2 and B8 uses).
- 7.232. Policy G7 states that the planting of additional trees should generally be included in new developments, this will be directed towards large-canopied species. Where replacement trees are necessary, these should be based on the existing value of the tree to be removed.
- 7.233. Part I of Policy D8 states that street trees and other vegetation should be incorporated within the public realm and support sustainable drainage alongside biodiversity.
- 7.234. Policy SP13 of the Strategic Policies DPD states that sites should improve the biodiversity and nature conservation. This will be achieved through protecting and maintain existing trees and through the planting of new where appropriate.
- 7.235. Policy DM6 of the Development Management Policies DPD states that tall buildings should take into consideration the impact on ecology and

microclimate. Policy DM19 states that Developments which include or sit adjacent to designated sites (including Site of Important Nature Conservation) should protect and enhance their nature conservation value of the Site. Where development causes a direct or indirect adverse impact or in combination with other development will only be permitted where the harm cannot be reasonably avoided or appropriate mitigation can address the harm caused.

- 7.236. Part A(c) of Policy DM21 states that proposals should maximise opportunities to enhance biodiversity on-site, including through appropriate landscaping SuDS, living roofs and green walls.

Assessment

- 7.237. The Proposed Development will incorporate a significant amount of greening, tree and shrub planting throughout including approximately 280 new trees throughout. This will create a new and expanded network of habitats and plant species which will also positively enhance the ecological value of the Site. The landscaping strategy will be developed as Reserved Matters Applications are brought forward to ensure that opportunities for biodiversity and landscaping enhancements are secured.
- 7.238. As part of the Proposed Development, the scheme will incorporate a significant uplift in green infrastructure, representing a biodiversity net gain across the Site of approximately 48% when assessed against the illustrative scheme.
- 7.239. As part of this submission, an Urban Greening Factor (UGF) assessment has also been carried out. When assessing the illustrative masterplan, the proposals will achieve a 0.22 UGF; whilst this is below the target set out in the London Plan, this represents a significant uplift against the existing performance of the Site. Additional opportunities for increasing the green roof coverage across the illustrative masterplan could take this figure up to 0.34 UGF. The Proposed Development will seek to target a UGF of 0.4 overall, which will be aggregated as Reserved Matters Applications are brought forward. The UGF calculated for the Detailed Proposals confirms

that the proposal will deliver 0.4 UGF on-site.

- 7.240. As part of the submission, a Preliminary Ecological Appraisal has been carried out together with an assessment at Chapter 10 of the Environmental Statement. As concluded within Chapter 10 of the ES, no significant effects are likely to arising on Important Ecology Features (IEFs) as a consequence of the Proposed Development. A series of recommended mitigation measures are also proposed, which include provisions within the Construction Environmental Management Plans (CEMPs) together with the incorporation of bird and bat boxes within the building designs (with specific recommendations for Plot A which are referenced in the Design and Access Statement for Plot A).

Heritage

- 7.241. The legislation governing listed buildings and conservation areas is the Planning (Listed Building and Conservation Areas) Act 1990. Section 66 (1) of the Act requires decision makers to ‘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’ when determining applications which affect a listed building or its setting. Section 72(1) of the Act requires decision makers with respect to any buildings or other land in a conservation area to pay “special attention...to the desirability of preserving or enhancing the character or appearance of that area”.
- 7.242. The NPPF establishes national level policy on the conservation and preservation of the historic environment. Paragraph 194 requires applicants to describe the significance of any heritage assets affected, including any contribution made by their setting. Paragraph 197 further states that the desirability of new development should make a positive contribution to both local character and distinctiveness.
- 7.243. Paragraph 199 provides that when considering the impact of a Proposed Development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. It emphasises that the weight given to an asset’s conservation should be proportionate to its

significance, and that clear and convincing justification will be required for loss and harm to heritage assets.

- 7.244. Paragraph 202 also states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 7.245. Finally, under paragraph 206 of the NPPF, when considering the impact of a Proposed Development on the significance of a designated heritage asset, LPAs should look for opportunities for new development in Conservation Areas and the setting of heritage assets to enhance or better reveal their significance and proposals that preserve or better reveal the significance of heritage assets should be treated favourably.
- 7.246. The London Plan promotes development of the highest architectural quality. Policy D3 sets out design-led approach for developments to optimise the potential of sites and be designed in consideration of the local context including potential impact on listed buildings and conservation areas, providing a development that enhances the public realm, uses a palette of materials that complements the local architectural character, is inclusive and is flexible to allow for different activities.
- 7.247. Policy SP12 of the Strategic Policies DPD states that the Council will ensure the conservation of the Borough's heritage assets. The Historic Environment should be used as the basis for heritage-led regeneration and as the basis for good design and positive change. Where possible, development should be designed to improve access to the historic environment. Supporting Paragraphs 6.2.14 - 6.2.16 describe the historic character of the Tottenham High Road Historic Corridor.
- 7.248. Policy AAP5 of the TAAP states that the Council will seek to deliver growth and regeneration in Tottenham through well-managed and balanced changes whilst ensuring that the historic environment continues to contribute towards the needs of local communities. This will be secured through strengthening the historic and local character of Tottenham,

enhancing heritage assets, their setting together with the wider historic environment. Proposals for new developments (where appropriate) will be required to identify and positively respond to the distinctive character and significance of heritage assets whilst balancing the sensitive regeneration and renewal of neighbourhoods; and maximising opportunities to integrate heritage assets in new development and enhance connectivity between them.

- 7.249. Policy AAP8 outlines that the Council will encourage heritage-led regeneration and development along the High Road. Development will be supported where it enhances the distinctive character and setting of neighbouring and nearby buildings, producing improved views along the High Road and long views from other parts of the High Road.
- 7.250. The HRWMF key principles state that development proposals should “enhance the heritage value contribution of the High Road, reinforcing its fine grain and diversity of retail offer...”. This is followed by the key principles for the Conservation Area which sets out that development should preserve and enhance the character of the Conservation Area as a whole. These can include demolition within the Conservation Area where the “benefits of change and sympathetic new development can enhance the overall viability of wider development as well as, crucially, support the viability... of other heritage buildings in the area.”
- 7.251. The approach in the HRWMF states that development will result in, no loss of statutorily listed buildings; the demolition of Kathleen Ferrier Court and Coombes Croft Library- reprovided in a new Learning Centre; demolition of 10 locally listed properties between 731 – 741 High Road and 743 – 759 High Road which are considered to be of a poor appearance with modern additions at street level; creation of a Gateway on the High Road to the new Public Square and strategic link to White Hart Lane Station; new buildings along the High Road to *“reflect the scale and architecture of [the] new stadium development opposite, enhancing the urban grain on this section of the High Road with a new Stadium.”*

Assessment

- 7.252. The proposals will include the demolition of some locally listed buildings within the Site boundary, comprising 743-757 High Road, 759 High Road and the Electricity Substation. These non-designated heritage assets previously formed part of the North Tottenham Conservation Area prior to the de-designation in 2017. As set out in the accompanying BHTVIA, the heritage significance of these non-designated assets is considered to be very low and their removal necessary to facilitate the route through the Site connecting White Hart Lane Station to THFC's Stadium.
- 7.253. Other locally listed buildings located on the west side of High Road and adjacent to the Site will experience tall and large development in their immediate setting that will bring about a limited adverse change to their setting.
- 7.254. In accordance with paragraph 203 of the NPPF, a balanced judgement will be required having regard to their loss or impact to setting and the significance of the assets.
- 7.255. The proposals will retain all other locally listed building located within the Site boundary, and which are also located in the North Tottenham Conservation Area. There will be no loss of buildings within the Conservation Area that positively contribute to its character and appearance.
- 7.256. Those retained assets will experience improvements to their landscape setting, including the Former Catholic Chapel and Pastor's House. These buildings are currently abutted and enclosed by existing modern buildings that detract from their setting. The proposals will remove the buildings in the immediate area and replace with contemporary buildings of high architectural quality that reinforce the courtyard in front of the property.
- 7.257. Equally, the proposals retain all designated heritage assets within the Site boundary, comprising No. 34 White Hart Lane (Grade II) and Nos. 819 and 821 High Road (Grade II). In relation to No.34 White Hart Lane, the

demolition of the adjacent Nos.24-30 White Hart Lane that present a flank wall to its eastern boundary will have a demonstrably beneficial impact to its setting. This will facilitate the public realm works envisaged along the frontage and the setting back of the building line during the operational phase. This condition would be consistent with the original condition of No.34 White Hart Lane.

- 7.258. The retained designated and non-designated buildings are to be enhanced by public realm works to their frontage. The submitted design code also outlines ways in which the building line, roof line, scale and form of the proposed development should respond sensitively to the buildings.
- 7.259. The proposals will give rise to some residual harm, which would be less than substantial in the terms of paragraph 202 of the NPPF. Those assets comprise the North Tottenham CA; Tottenham Cemetery CA; Bruce Castle CA; 819 and 821 High Road N17 (grade II); 7 White Hart Lane (grade II); and 797 and 799 High Road (grade II). In relation to a finding on that basis, the decision maker is required to give considerable importance and weight to the less than substantial harm.
- 7.260. In addition, Paragraph 202 of the National Planning Policy Framework advises the grant of consent only where there is a clear and convincing justification for harm, which comprises the balance of planning benefits set out in paragraph 202. The decision maker must consider the policy designations for the Site that envisage significant growth and transformational change within the area, and the embedded design mitigation within the proposed development. Considerable importance and weight is also attached to the enhancement of designated heritage assets, including the Grade II listed No. 34 White Hart Lane.
- 7.261. The BHTVIA concludes that the limited degree of heritage harm is decisively outweighed by heritage benefits, including improvements to the way the adjoining Conservation Area would appear and function. On that basis, and overall, the proposals are considered to meet the terms of the NPPF and the Development Plan policies.

Transport

- 7.262. Paragraph 102 of the NPPF states that development should take opportunities to promote walking, cycling and public transport use as part of the earliest stages of development proposals.
- 7.263. The London Plan promotes car-free development and sustainable transport modes as part of meeting the Mayor's strategic target of 80% of all trips made by foot, cycle or public transport. Development should make the effective use of land, reflecting its connectivity and accessibility by existing and future transport routes. For the purpose of this assessment, the PLP sets out the following supporting policies:
- Policy GG2 states that proposals must plan for good sustainable transport modes with a strategic target of 80% of journeys using such modes;
 - Policy T2 requires developments to demonstrate how they will deliver improvements that support the ten healthy streets indicators and reduce the dominance of vehicles, whilst also being permeable by foot and cycle.
 - Policy T4 sets out the requirement for transport assessments to embed the Healthy Streets Approach in new developments;
 - Policy T7 provides the framework expectations for delivery and servicing of new developments.
- 7.264. Core Strategy Policy SP7 states that the Council will work with its partners to deliver key transport and highway changes as part of tackling climate change, improve local place-shaping and public realm together with environmental and transport quality and safety. Measures include: promoting public transport, cycling and walking (including minimum cycle parking standards) together with car clubs and car sharing; locate major developments during locations with good accessibility and adopt maximum car parking standards and car-free housing wherever possible.

- 7.265. Policy DM31 of the Development Management Plan states that the Council will expect developments which include uses which are high trip generating to be located near high PTAL areas. They will support developments which protect, create and improve the cycle and pedestrian network, particularly where they are located to transport hubs.
- 7.266. Part B of Policy DM33 states that new access roads to development will only be adopted where they serve a large new of new dwellings (200+), form a link to the highway network or form a useful extension to the existing highway network.
- 7.267. Policy AAP7 states that the Council will support future improvements to public transport accessibility and capacity across the TAAP. This includes improvements to connectivity and permeability for pedestrian and minimising the risk of conflicts with vehicles. In addition, the Council will also work with partners to promote and support the delivery of key infrastructure to support the regeneration of the area. It will support applications which enhance the transport interchange between various transport modes.
- 7.268. The HRWMF sets out within the Key Principles that the development will create a legible street network which connects into the wider area. It will create attractive north-south links which connects public parks and squares together with key buildings and White Hart Lane Station. In addition, it should preserve opportunities for connections west over the railway line; integrate and improve accessibility to bus services through high quality public realm along White Hart Lane and the High Road; locate more intensive uses next to public transport nodes; integrate traffic calming measures and changes to route alignments; seek enhancements to public transport services; and integrate cycle lanes and parking that connect into wider routes.

Assessment

- 7.269. The Proposed Development will make significant improvements to the pedestrian network, creating a network of clear and legible routes which are logical and serve primary desire lines which will link the Site and wider area

to key transport nodes. This will be curated around wayfinding principles and a Legible London neighbourhood. The proposed cycle network has been similarly developed, incorporating a Healthy Streets Approach from the outset of the design development, taking into consideration London Cycling Design Standards (LCDS) throughout. The illustrative masterplan includes the provision of a north-south cycle route along the western edge, which by-passes the vehicle-dominated High Road. This has been designed to potentially link into the Cycle Superhighway 1 (CS1) in the future. Overall, the illustrative masterplan indicates that the Proposed Development will secure over 95% of trips using sustainable transport modes, in-excess of the London Plan targets and the Local Implementation Plan of 88%.

7.270. The proposed street arrangement has been designed around prioritising pedestrian and cyclist movements over vehicles. To this end, the illustrative masterplan proposes a series of one and two-way streets designed to service residential buildings, with a revised one-way network to the south of White Hart Lane and a series of two-way and restricted access routes to the north³². Such principles will be embedded within the masterplan as Reserved Matters Applications are brought forward. In addition, the Proposed Development will safeguard a suitable area of land for a potential east-west link over the railway in the future.

7.271. Overall, it is considered that the Proposed Development positively accords with the adopted Development Plan and demonstrates through the illustrative masterplan the ability to deliver on the policy requirements.

Parking Provision

7.272. Paragraph 40 of the NPPF states that Local Authorities should seek to improve the quality of parking in town centres so that it is convenient, safe and secure, including appropriate provision for motorcycles. Further, they should set appropriate parking charges that do not undermine the vitality of town centre.

³² Refer to Figure 4.7 in the Transport Assessment.

- 7.273. Policy T6 of the London Plan sets out the maximum car parking requirements for new developments as well as the requirements for Blue Badge parking. Policy T5 seeks secure cycle parking at least in accordance with the minimum standards set out in Table 10.2 of the Plan.
- 7.274. Core Strategy Policy SP7 states that the Council will promote minimum cycle parking standards and adopt maximum car parking standards and car-free housing wherever possible. Policy DM32 of the Development Management Plan states that development proposals will be assessed against the minimum cycle parking standards set out in the London Plan. In addition, the Council will encourage contributions towards car club schemes as an alternative to on-site car parking provision. The Council will support proposals which include limited or no car parking where: there are alternative means of transport available, the PTAL is at least 4; a CPZ exists or will be provided prior to occupation; parking is provided for disabled people, and/or parking is provided in car-capped schemes³³.
- 7.275. The HRWMF states that development should provide safe and secure parking to agreed standards within a strategy that promotes walkable, liveable neighbourhoods. This should be provided on-plot, and where delivered on-street, it should be well-lit and integrated within the landscaped streetscape as part of traffic-calming measures.

Assessment

- 7.276. The Development has been designed to be car free, except for the replacement car parking for Love Lane Estate residents and blue badge parking. This will be reprovided within the existing capacity within the CPZ. For the Detailed proposals for Plot A, a total of 26 car parking spaces will be provided on-street. As set out within the accompanying Transport Assessment, there is considered to be sufficient capacity within the CPZ for additional Blue Badge parking, should it be required.
- 7.277. For the Outline proposals, a minimum of 3% of Blue Badge Bays will be

³³ Policy AAP7 also expects parking provision to be provided in accordance with the requirements of DM32.

provided throughout the Site and up to an additional 7% on a Plot by Plot basis to be determined at the Reserved Matters Application Stage. It is proposed that the first Reserved Matters Application to come forward will include 10% Blue Badge parking. Should there no longer be a requirement for the parking space in a future scenario, it is anticipated that the parking space will be utilised either for alternative parking requirements or for other functions, the details of which will be explored as part of the Reserved Matters Applications.

- 7.278. The Detailed proposals for Plot A will include the provision for 119 long-stay and 4 short-stay cycle parking spaces within the development. This is in excess of the requirement set by the London Plan standards. The cycle parking provision for the Outline proposals will be delivered in accordance with the London Plan standards for cycle parking which is included at Appendix Three of this Planning Statement for reference. These requirements are included within the Development Specification, which will act as the guide for all future Reserved Matters Applications.

Noise And Vibration

- 7.279. Paragraph 185 states that development should mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life.
- 7.280. Policy D13 sets out that the Agent of Change principle places the responsibility for mitigating the impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. This means that development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue to grow with unreasonable restrictions being placed on them.
- 7.281. Policy D14 of the London Plan requires new noise sensitive development to be separated from major noise sources wherever practicable through the use of distance, screening, or internal layout in preference to sole reliance

on sound insulation; and promoting new technologies and improved practices to reduce noise at source.

- 7.282. Part D of Policy DM23 of the Development Management Plan states that the Council will seek to ensure new noise sensitive development is located away from existing or planned sources of noise pollution. Proposals for potentially noisy development will be required to demonstrate that measures will be implemented to mitigate its impact.

Assessment

- 7.283. An assessment of the likely effects arising in relation to noise and vibration from the Proposed Development has been assessed within the accompanying Environmental Statement (ES) and includes recommendations for the Design Codes as part of developing the design of the proposals through the Reserved Matters Application stage – this includes the selection of plant.

- 7.284. The noise and vibration chapter of the ES concludes that the likely effects arising from the Proposed Development will be negligible besides road traffic noise along William Street and Brereton Road which may have local adverse effect of up to moderate significance. Notwithstanding, as concluded in the ES, these potential effects are considered to be insignificant given the noise arising from adjacent A-roads. Mitigation to offset noise impacts during construction are also identified and should be accommodated within future Construction Environmental Management Plans.

Air Quality

- 7.285. Paragraph 174 within the NPPF seeks to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.

- 7.286. Paragraph 186 further states that development proposals should contribute

towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas (AQMA).

- 7.287. Policy SI1 of the London Plan states that in order to tackle poor air quality, proposals should be at least air quality neutral. As part of this, proposals should use design solutions to prevent or minimise increased exposure to existing air pollution. In order to assess the impacts of development proposals, Air Quality Assessments should be provided as part of the application submission.
- 7.288. Policy DM23 of the Development Management Plan states that all development should consider air quality. Proposals should be designed to improve/mitigate the impact on air quality within the borough and for future occupiers and users. Air quality assessments are required for all major development proposals and where necessary provide adequate mitigation.

Daylight, Sunlight And Overshadowing

- 7.289. Part C of Paragraph 125 of the NPPF (2021) states that local planning authorities should refuse applications which they consider fail to make efficient use of land and when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site.
- 7.290. Paragraph 0006 (Ref: 66-006-20190722) of the NPPG states that local authorities will need to consider whether applications for proposed developments would give rise to an unreasonable impact on the daylight and sunlight levels enjoyed by neighbouring occupiers. It should also consider whether the daylight and sunlight within the development would provide satisfactory living conditions. Paragraph 0007 (Ref: 66-007-20190722) states that when assessing appropriate levels of sunlight and daylight, this will depend to some extent, on the context of the development and its detailed design.

- 7.291. Policy D6 of the London Plan states that development should provide sufficient daylight and sunlight to new and existing housing that is appropriate to its context, whilst avoiding overheating, minimising overshadowing and maximising the useability of outdoor amenity spaces. This is similarly reflected in the requirements under Policy D9.
- 7.292. The Mayor's Housing SPG broadly summarises the need to adopt an "appropriate degree" of flexibility when applying the BRE Guidance when assessing the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves.
- 7.293. Part D of Policy DM1 outlines that development proposals should provide a high standard of privacy and amenity for future users and neighbours. To this end, the Council will support proposals which provide appropriate daylight and sunlight (including private amenity space and land) within the development and neighbouring buildings.
- 7.294. The HRWMF states that development should achieve appropriate levels of daylight and sunlight and avoid overshadowing.

Assessment

- 7.295. The impact of the Proposed Development on neighbouring residential properties has been assessed by Consil and included within the accompanying ES. The Chapter assesses the maximum parameters of the Outline Proposals together with the Detailed Proposals as a "worst case" scenario supplementary by an assessment of the illustrative masterplan to understanding the impacts of a potential configuration of the masterplan to come forward.
- 7.296. As a consequence of the Daylight and Sunlight analysis undertaken, a number of recommendations for future Reserved Matters Applications for the Outline Proposals has been included in order to mitigate any adverse impacts on neighbouring residential properties to the Site, noting that most properties would retain levels that are directly comparable to values that have been accepted within the extant THFC consented schemes.

7.297. The Detailed Proposals for Plot A have also been assessed and included within the standalone Daylight and Sunlight Report prepared by Consil. This concludes that 91% of all windows (including 95% of all proposed living rooms) within the proposals for Plot A are BRE compliant using the ADF test.

7.298. Overshadowing analysis undertaken demonstrates that the vast majority of communal amenity areas, including Whitehall Mews, would have good access to sunlight throughout the year.

Lighting

7.299. Part F of Policy DM23 in the Development Management Plan states that development proposals for external lighting must mitigate against any adverse effects. Where appropriate, proposals will be required to submit additional details for external lighting.

Assessment

7.300. The enclosed Planning Application includes a lighting masterplan, the principles of which will be incorporated as the Outline Proposals for the Proposed Development are brought forward for the Reserved Matters Application stages – at this stage the masterplan principles have been designed to improve visibility, provide visible routes and links across the masterplan as well as delineate public and private areas.

7.301. In addition, a Lighting Guide for the Detailed Proposals for Plot A has also been developed, which has been designed to help inform the public realm strategy. The lighting proposals for Plot A are proposed to be reserved by Condition with the specific details submitted for approval by the local planning authority.

Contaminated Land

7.302. Part G F of Policy DM23 in the Development Management Plan states that developments will be permitted where it can be demonstrated that any risks

associated with land contamination can be adequately addressed in order to make the development safe. Where required, a preliminary risk assessment will be required to be submitted and where necessary, a risk management and remediation strategy provided.

Assessment

- 7.303. A ground investigation report has been carried out by Robert Bird Group which includes an assessment of the potential for contaminated land. This is summarised and assessed in the Ground Conditions and Contamination Chapter of the ES. The Chapter concludes that there are potential sources of contamination on-site. As such, the ES recommends that a detailed Ground Investigation Report and Preliminary Risk Assessment is prepared prior to demolition and construction of the Proposed Development in order to further assess the potential for contamination on-site.

Wind Microclimate

- 7.304. Part J of Policy D8 of the London Plan states that development should take into consideration microclimate considerations including wind for the purposes of people in the public realm. Similarly, Section 3) of Policy D9 states that environmental impacts of tall buildings (18m or more) should be assessed including wind. This should be carefully considered to ensure that comfort and enjoyment of open spaces is not compromised. Supporting paragraph 3.3.8 of the London Plan emphasises the importance in creating comfortable pedestrian environments with regard to matters including wind.
- 7.305. Policy DM1 states that the Council will support proposals which address matters including microclimatic conditions. Similarly, Policy DM6 states that proposals for tall buildings should consider the impact on the microclimate. The HRWMF also states that development should avoid wind tunnelling effects.

Assessment

- 7.306. As part of this submission, the Illustrative masterplan has been wind

tunnelled tested to establish the likely significant effects arising from the Proposed Development in respect of wind microclimate. The illustrative scheme has been tested as oppose to the maximum parameters on the basis that it is considered to be more representative of the likely massing of the final Proposed Development.

- 7.307. As set out in the conclusions of the ES Chapter, the illustrative masterplan together with the implementation of suitable wind mitigation, is not considered to give rise to significant adverse effects in relation to wind microclimate and considered to be negligible overall. Further assessments of the illustrative outline component of the Proposed Development will be undertaken at each Reserved Matters Application as the detail design progresses.

8. DELIVERY STATEMENT

8. DELIVERY STATEMENT

- 8.1. This section of the Planning Statement explores considerations in relation to delivery of the Proposed Development. This section will cover ownership, delivery, the estate ballot, third party planning applications and phasing.
- 8.2. It is well documented that Lendlease (High Road West) Limited are the selected development partner for High Road West. To that end, when the Proposed Development is commenced Lendlease will be granted a lease in relation to the part of the HRW site area owned by LBH. This lease will allow Lendlease to deliver the early phases of the Proposed Development. In doing so, the Proposed Development aligns with Policy SP17 of the Haringey Local Plan. This policy seeks to deliver the aspirations of the Local Plan through 'Private Sector partnership working'.
- 8.3. Given the Council's ongoing ownership, they will remain the ultimate landowner but also undertake a number of other roles including landlord to social tenants, highway authority and regeneration champion. They also undertake the role of local planning authority, which is independent to all the other functions of the Council.
- 8.4. From 18 July 2018, the Mayor of London requires any landlord seeking GLA funding for estate regeneration projects which involve the demolition of social homes to show that residents have supported their proposals through a ballot. This is to make sure that GLA funding only supports estate regeneration projects if residents have had a clear say in plans and support them going ahead. High Road West is set to benefit from funding from the Mayor and therefore an estate ballot has been necessary as a gateway to bringing the scheme forwards. The estate ballot for High Road West concluded on 6th September 2021 and the positive result was announced on 12th September which reported that 55.7% of residents of the Love Lane Estate voted in favour of the redevelopment. This was based on the formal Landlord Offer made to residents by LBH. A selection of the key elements of that offer are set out below:

- Secure tenants: were guaranteed a new suitably sized council home in the newly redeveloped neighbourhood or the option to move to another council home elsewhere if preferred.
- Non-secure tenants living in temporary accommodation: were guaranteed a new suitability sized council home in the newly redeveloped neighbourhood on a permanent secure tenancy.
- Resident leaseholders: were guaranteed a new affordable home in the newly redeveloped neighbourhood, with an offer of financial support from LBH through an enhanced equity loan. If resident leaseholders would prefer to live elsewhere they have the option of an affordable home in Haringey or nearby with financial support from LBH through an equity loan, or a leasehold swap with an existing council-owned property in the borough, subject to limited availability.

- 8.1. The Proposed Development will provide the physical infrastructure, primarily new homes, to deliver this commitment to residents.
- 8.2. Another important element to delivery is the third party ownerships within the HRW redline boundary. There are a variety of different owners that would be expected in a scheme of this scale. The majority of third party ownership lies in the areas to the north of White Hart Lane. Given the early focus of the Proposed Development is on the south of White Hart Lane and delivery of new homes for the Love Lane Estate residents, this allows time to address the third party ownerships in the north. In the first instance, we will seek commercial agreements from and with landowners to incorporate their interests into the wider scheme. However, exploring the option of CPO powers maybe necessary as an absolute last resort.
- 8.3. It is material that THFC not only own significant land in the north of the Site but have also secured two significant planning permissions for this land alongside a variety of smaller permissions. The Proposed Development has allowed for all THFC consents to be built out as consented. With regard to the emerging proposals at the site known as the Printworks, the Proposed Development has also allowed for these proposals should they be

consented at a later date. This will enable the consented schemes to be compatible with the Proposed Development, as part of a comprehensive approach to the Site. For all other areas, consideration has been given as to whether these are genuinely required, where it has been concluded that these are necessary to deliver an acceptable consent; this will be enabled through negotiation with the relevant stakeholders or through CPO as a last resort.

- 8.4. In terms of the phasing of delivery of the Proposed Development, for the purposes of the EIA, it has been assumed that all components of HRW are delivered concurrently. This reflects the 'worst case' environmental impacts and the ability of other third party landowners to implement extant consents. However, this does not discount the possibility of HRW being delivered in a slightly different way, namely with areas south of White Hart Lane being delivered ahead of areas to the north of White Hart Lane. This would most obviously start with the delivery of the detailed component of this Hybrid Application, namely Whitehall Mews, which would be delivered first and foremost.

HRW

9. DRAFT S106 HEADS OF TERMS

9. DRAFT S106 HEADS OF TERMS

9.1. This section sets out a summary of the draft Heads of Terms for the Proposed Development. The draft Heads of Terms have been considered in relation to Haringey's Section 106 Planning Obligations SPD (2018).

9.2. This S106 will be read alongside the Development Agreement which has been entered into with LB Haringey and Lendlease (High Road West) Limited. It should reflect upon the complexities associated with the delivery of this Site.

9.3. It is envisaged that discussions relating to the following draft heads of terms and the Section 106 Agreement will continue with LBH during the determination of the planning application.

- **THFC Consents:** A clause which addresses the extant Tottenham Hotspur FC consents within the Red Line Boundary;
- **Affordable Housing:**
 - **Affordable Housing Scheme:** A minimum of 35% across the whole of the Proposed Development, including the provision of 500 new council homes;
 - **Affordability:** The definition of affordability across different tenures;
 - **Viability Review Mechanism:** An early and late-stage review mechanism to maximise the delivery of affordable housing;
 - **Marketing of Intermediate Housing:** A marketing strategy for all intermediate housing to be provided on-site – to include a Tottenham-first approach;
- **Marketing of Market Housing:** A marketing strategy for all market housing to be provided on-site – to include a Tottenham-first approach;
- **Whitehall Lodge Relocation Strategy:** A relocation strategy to be submitted to the Local Planning Authority which sets out the proposed

relocation of existing provision at Whitehall Lodge;

- **Library and Learning Centre:** Delivery of a new Library and Learning Centre;
- **Healthcare Provision:** To secure future healthcare provision on-site or equivalent payment in-lieu as required by the Clinical Commissioning Group;
- **The Grange:** Retention and refurbishment of the existing building, including a requirement for a future Listed Building Consent (where required);
- **Commercial Relocation Strategy:** The submission and resubmission of a Commercial Relocation Strategy for existing businesses for each Phase of the Proposed Development, to be submitted for each relevant Reserved Matters Application;
- **Affordable and Low Cost Workspace:** A proportion of Use Class E(g) floorspace provided within the masterplan will be provided as affordable workspace, suitable for a range of small and micro-sized businesses;
- **Public Park:** Provision of a public park to be delivered to the north of White Hart Lane in accordance with the parameter plans;
- **Public Square:** Provision of a public square to be delivered to the south of White Hart Lane in accordance with the parameter plans;
- **Improvements to adjoining Public Realm and Open Spaces:** Where required, public realm and improvement works to be delivered on adjoining open spaces alongside improvement works along Brereton Road;
- **Placemaking and Meanwhile Use Strategy:** A strategy including provision for meanwhile uses across the Site together with the provision of public art, to be included and delivered within the Masterplan;
- **CPZ Contribution:** A financial contribution towards a future Controlled

Parking Zone (CPZ);

- **Net Zero Carbon/Carbon Off-set:** A mechanism with the S106 will be included to allow a financial contribution to be paid where individual Plots do not fully meet net zero carbon on-site;
- **Car-free Development:** A obligation will be included to restrict parking permits for new residents (excluding Love Lane Estate residents and Blue Badge holders);
- **Construction Phase Skills and Training:** The S106 will incorporate all provisions within the SPD in relation to construction phase skills and training, including work experience placements and apprenticeships;
- **End-user Phase Skills and Training, Local Enterprise arrangements, and Apprenticeships:** A mechanism will be included to allow a financial contribution to be paid towards end-user phase skills and training in accordance with the requirements of the SPD;
- **Loss of Non-Designated Employment Floorspace:** A mechanism will be included to allow a financial contribution to be paid where there is a net loss of employment floorspace in a given Plot, in accordance with the calculation and requirements of the SPD;
- **Residential and Commercial Travel Plans:** The submission of Travel Plans associated with residential and commercial premises;
- **Improvements to Percival Court:** A commitment to resurface Percival Court;
- **Travel Plan Monitoring Contribution:** A financial contribution will be payable to the Council prior to occupation of a given Plot towards the monitoring of a Travel Plan;
- **Highway Works and S278:** A financial contribution will be payable towards highway works in agreement with LB Haringey. Where appropriate and required, Lendlease will enter into a S278 agreement to

carry out the works directly;

- **Stopping-up Agreement:** The submission of a Stopping-up application for temporary and permanent works;
- **Car Clubs:** A mechanism will be included to allow a financial contribution to be paid towards car club bays in accordance with the SPD, where agreed as part of future Reserved Matters Applications;
- **Car Parking Management Plan:** A plan to be submitted for each Phase of the Proposed Development, which includes details of all temporary car parking provision (as required), details of permanent car parking provision, including their number and location;
- **District Heat Network and Connection:** An energy centre will be installed to connect into the Borough's District Heat Network subject to a feasibility study;
- **Considerate Constructors Scheme:** Lendlease will sign-up to the Considerate Constructors Scheme.
- **Construction Partnership:** A partnership agreement with the London Borough of Haringey for Construction of the Development;
- **Telecommunications Infrastructure:** A commitment to install broadband and other telecommunication infrastructure into the development including all new homes;
- **Reconciliation Phasing Plan:** The provision of a reconciliation phasing plan which is submitted for each approved phase.

10. BENEFITS OF THE DEVELOPMENT

10. BENEFITS OF THE DEVELOPMENT

10.1. This Section of the Statement summarises the key planning benefits as well as the wider benefits that the Development will deliver. The Development will realise the regeneration of the Site and secure growth on a strategic scale. The Development will bring about a range of social, economic and environmental benefits and will fulfil the potential of the Site as an Opportunity Area. Moreover, this Development will create a new destination to live, work and visit thereby enhancing London's status as a World City.

10.2. This Planning Statement has described and analysed the wide-ranging planning benefits of the Development and has demonstrated that it substantially accords with planning policy at all levels. In summary, the Development will deliver the following planning benefits:

- **Substantial delivery of new homes:** up to 2,929 new homes including 500 new council homes and approximately 400 new intermediate units will be delivered across the masterplan, making a significant contribution towards the Council's housing delivery;
- **Significant affordable housing delivery:** The proposals will deliver a minimum of 35% affordable housing across the Site, with a target of 40% subject to viability and future grant funding. 40% affordable housing will be delivered across Phase A to the south of White Hart Lane and 100% social rented accommodation in Plot A;
- **Delivery of a new Library and Learning Centre:** the creation of a new library and learning centre for residents, including study space, expanded children's library and Creative Enterprise space, creating a new hub for the community to meet, learn and socialise;
- **New public spaces and links:** the proposals have been designed to deliver a series of public spaces for the Tottenham community which will be accessible for all, complemented by a series of new cycle and pedestrian routes through the Site;

- **A new, public route between Tottenham Hotspurs Stadium from White Hart Lane Station:** a new public route will be delivered to link White Hart Lane Station and Tottenham Hotspurs Stadium which has been designed to ensure suitable capacity is provided to meet the demand for match days and other Stadium events;
- **Securing high quality, sustainable design:** The Design Guidelines and Parameter Plans will secure high-quality design of the proposed buildings and landscape. The Illustrative Masterplan demonstrates a clear intent by Lendlease to deliver an exemplary, high-quality development with a unique sense of place and character;
- **A new Energy Centre, supporting the wider Tottenham Area:** In addition to supporting the provision of the new High Road West neighbourhood, the new Energy Centre will also support the energy needs for future developments in the Tottenham Area as they are brought forward;
- **Encouraging healthy and active lifestyles:** the network and hierarchy of streets and spaces seek to encourage walking and cycling and the diverse mix of public spaces and activities will create a stimulating place to encourage participation and foster enjoyment;
- **Enhancing the biodiversity value of the Site:** The Development will deliver significant biodiversity enhancements through the delivery of new public realm and the provision of a new public park, together with extensive tree planting and greening throughout. It will equate to a Biodiversity Net Gain of 48% on-site;
- **Creation of new jobs, training and apprenticeship during construction:** As part of delivering High Road West, the proposals will secure a range of employment and training opportunities, including 1,214 new Full Time Equivalent (FTE) jobs directly and a further 1,202 FTE jobs indirectly per annum over the lifetime of construction activity on-site. In addition, Lendlease will be working with LB Haringey and other delivery partners to secure a programme of apprenticeships on-

site, supporting residents into work and training, as prioritised in the Haringey Recovery Plan;

- **Developing local supply chains and employment during construction:** Lendlease will work with LB Haringey and its partners to identify opportunities for local businesses operating from and in the borough as part of developing local supply chains over the lifetime of the demolition and construction phases for the Proposed Development, including the procurement of local trades people;
- **Significant contribution to the national economy during construction: generating £143.1million of direct Gross Value Added (GVA)** alongside £267.8million of indirect and induced GVA per year of demolition and construction activity towards the national economy;
- **Supporting new jobs and employment:** Once complete, the Proposed Development will support a minimum of 374 permanent FTE jobs on-site;
- **Delivering a significant boost to the vitality and viability of the local economy:** Once complete, the development will generate £23.2million of resident expenditure to the local economy per annum and an economic output of £57.7million per annum.
- **Supporting the Local Community during Construction:** Lendlease will support local community projects and initiatives through the provision of a £10 million investment, delivered through the Annual Community Fund.

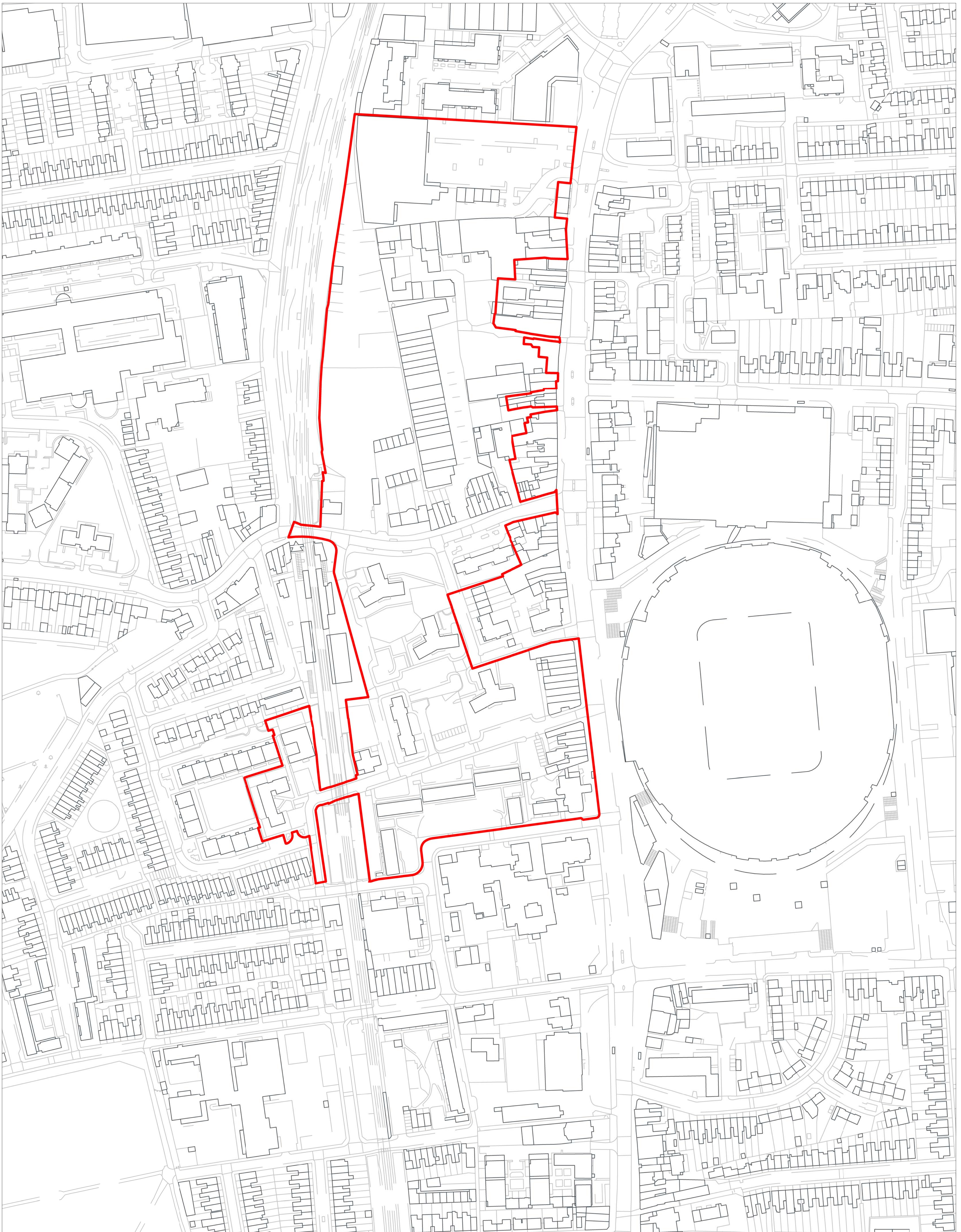
11. SUMMARY AND CONCLUSION

11. SUMMARY AND CONCLUSION

- 11.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the Development Plan unless other material considerations indicate otherwise.
- 11.2 Overall it is considered that the Proposed Development positively accords with the requirements and aspirations of the Development Plan, in accordance with supplementary guidance and supporting documents.
- 11.3 The Proposed Development will cultivate a new neighbourhood at High Road West as part of the comprehensive regeneration of North Tottenham, delivering a suite of new retail, office, leisure and community floorspace alongside a significant number of new homes including 500 new council homes. It will be complemented by high quality public realm throughout, including a new public square and park, which will be accessible and available for the whole community.

APPENDIX ONE:

SITE LOCATION PLAN



Site Location Plan (For Approval)

1 : 1250

Key

— Hybrid Planning Application Boundary

General Notes

General Notes

No implied licence exists. This drawing should not be used to calculate areas for the purposes of valuation. Do not scale this drawing. All dimensions to be checked on site by the contractor and such dimensions to be their responsibility.

All work must comply with relevant British Standards and Building Regulations requirements. Drawing errors and omissions to be reported to the architect.

[illegible]

P1	22.10.21	Planning Submission
Rev	Date	Reason for issue

AR	
CH	

Keyplan

Scale Bar

0 50m

1:1250

Drawing Title
Site Location Plan (For Approval)

Project Number 0311	Status For Planning
Scale at A1 1 : 1250	Date 22/10/21
Drawn by GY	Checked by AR
Drawing Number 0311-SEW-ZZ-ZZ-DR-T-000001	

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Client
Lendlease

Project	
0211 - High Road West	

APPENDIX TWO:

PLANNING APPLICATION DOCUMENTS

The documents submitted for approval in respect of the Outline Proposals include:

- Design Code: Masterplan, prepared by Studio Egret West Architects;
- Development Specification, prepared by DP9 Limited;
- Parameter Plans, prepared by Studio Egret West Architects.

The additional documents submitted for approval in respect of the Detailed Proposals include:

- Proposed Drawings, prepared by Pollard Thomas Edwards Architects for Plot A.

The documents submitted in support of the Proposed Development include:

- Affordable Housing Statement, prepared by DS2 Limited;
- Application Form, including Land Ownership and Agricultural Holdings Certificate, prepared by DP9 Limited;
- Arboricultural Impact Assessment, prepared by Waterman Infrastructure and Environment Limited;
- Basement Impact Assessment, prepared by Robert Bird Group;
- Biodiversity Net Gain Assessment, prepared by Waterman Infrastructure and Environment Limited;
- CIL Additional Information Requirement Form, prepared by DP9 Limited;
- Circular Economy Statement for the Outline Proposals, prepared by Buro Happold;
- Circular Economy Statement for the Detailed Proposals (Plot A), prepared by Aecom;

- Construction Logistics Plan, prepared by Lendlease (High Road West) Limited;
- Design and Access Statement for the Outline Proposals (including: Landscape Masterplan, Crime Prevention Statement and Dated Site Photographs), prepared by Studio Egret West Architects;
- Design and Access Statement (including Landscape Proposals) for the Detailed Proposals (Plot A), prepared by Pollard Thomas Edwards Architects;
- Economic Benefits Statement, prepared by Lichfields;
- Internal Daylight, Sunlight and Overshadowing Report, prepared by Consil;
- Energy and Sustainability Statement for the Outline Proposals, prepared by Buro Happold;
- Energy Statement for the Detailed Proposals (Plot A), prepared by Aecom;
- Equalities Impact Assessment, prepared by Lichfields;
- Financial Viability Appraisal, prepared by DS2 Limited;
- Fire Statement for the Outline and Detailed Proposals (Plot A), prepared by OFR Consultants;
- Flood Risk Assessment and Drainage Strategy (including Sustainable Urban Drainage Strategy), prepared by Robert Bird Group;
- Framework Travel Plan, prepared by Steer;
- Geo-Located 3D Massing Model in FBX File Format, prepared by Studio Egret West Architects;
- Inclusive Design Statement for the Outline Proposals, prepared by Lord Consulting;
- Inclusive Design Statement for the Detailed Proposals (Plot A), prepared by Lord Consulting;
- Lighting Masterplan and Guidelines for the Outline and Detailed Proposals (Plot A), prepared by Aecom;

- Planning Statement (including Delivery Statement and S106 Heads of Terms), prepared by DP9 Limited;
- Operational Waste Management Plan, prepared by Waterman Infrastructure and Environment Limited;
- Outline Residential Travel Plan, prepared by Steer;
- Outline Commercial Travel Plan, prepared by Steer;
- Outline Delivery and Servicing Plan, prepared by Steer;
- Outline Construction Environmental Management Plan, prepared by Lendlease (High Road West) Limited;
- Overheating Assessment for the Detailed Proposals (Plot A), prepared by Aecom;
- Rapid Health Impact Assessment, prepared by Lichfields;
- Retail Impact Assessment, prepared by DP9 Limited;
- Site Waste Management Plan, prepared by Waterman Infrastructure and Environment Limited;
- Statement of Community Involvement, prepared by Soundings;
- Sustainability Statement for the Outline Proposals, prepared by Buro Happold;
- Sustainability Statement for the Detailed Proposals (Plot A), prepared by Aecom;
- Utilities Statement, prepared by Gattica Associates;
- Ventilation and Extraction Statement for the Detailed Proposals (Plot A), prepared by Aecom;
- Whole Life Carbon Assessment for the Outline Proposals, prepared by Buro Happold;
- Whole Life Carbon Assessment for the Detailed Proposals (Plot A), prepared by Aecom;

- Environmental Statement, prepared by Waterman Infrastructure and Environment Limited, comprising:
 - **Volume 1:** Main Report;
 - **Volume 2:** Figures;
 - **Volume 3:** Built Heritage, Townscape and Visual Impact Assessment, prepared by Montagu Evans;
 - **Volume 4:** Technical Appendices, including:
 - Air Quality Monitoring Report, prepared by Waterman Infrastructure and Environment Limited;
 - Air Quality Modelling Study, prepared by Waterman Infrastructure and Environment Limited;
 - Air Quality Positive Statement, prepared by Waterman Infrastructure and Environment Limited;
 - Archaeological Desk Based Assessment, prepared by Waterman Infrastructure and Environment Limited;
 - Bat Survey Report, prepared by Waterman Infrastructure and Environment Limited;
 - Climate Change Resilience Risk Assessment, prepared by Waterman Infrastructure and Environment Limited;
 - Demolition and Construction Noise Assessment, prepared by Waterman Infrastructure and Environment Limited;
 - Geotechnical and Geo-environmental Desk Study Report, prepared by Robert Bird Group;
 - Habitat Regulations Assessment, prepared by Waterman Infrastructure and Environment Limited;
 - Preliminary Ecological Appraisal prepared by Waterman Infrastructure and Environment Limited;
 - Pedestrian Level Wind Microclimate Assessment Methodology Report, prepared by RWDI.

- Road Traffic Noise Assessment, prepared by Waterman Infrastructure and Environment Limited;
- Transport Assessment (including Car Parking Management Plan), prepared by Steer;
- **Volume 5:** Non-Technical Summary.

APPENDIX THREE:

MINIMUM CYCLE PARKING STANDARDS

Use Class		Long-stay	Short-stay
E(a)	Food-retail above 100sqm	1 space per 175sqm (GEA)	first 750 sqm: 1 space per 40 sqm; thereafter: 1 space per 300 sqm (GEA)
	Non-food retail above 100sqm	first 1000 sqm: 1 space per 250 sqm thereafter: 1 space per 1000 sqm (GEA)	first 1000 sqm: 1 space per 125 sqm; thereafter: 1 space per 1000 sqm (GEA)
E (b – c) and associated <i>Sui Generis</i> Uses	Financial and/or professional services; cafes and restaurants; drinking establishments; and take-aways above 100 sqm	1 space per 175 sqm (GEA)	1 space per 40 sqm (GEA)
E(d)	Indoor sports and recreational or fitness	1 space per 8 FTE staff	1 space per 100 sqm (GEA)
E(e)	Medical or healthcare services	1 space per 5 FTE staff	1 space per 3 FTE staff
E(f)	Nurseries	1 space per 8 FTE staff + 1 space per 8 students	
E (g) (i)	Business offices	1 space per 150 sqm (GEA)	first 5,000 sqm: 1 space per 500 sqm thereafter: 1 space per 5,000 sqm (GEA)

E (g) (ii and iii)	Light industry and research and development	1 space per 250 sqm (GEA)	1 space per 1,000 sqm (GEA)
B2 and B8	General industrial, storage and distribution	1 space per 500 sqm (GEA)	1 space per 1,000 sqm (GEA)
C3	Residential dwellings (all)	1 space per studio or 1 person 1 bedroom dwelling 1.5 spaces per 2 person 1 bedroom dwelling 2 spaces per all other dwellings	5 to 40 dwellings: 2 spaces Thereafter: 1 space per 40 dwellings
F1(d, e and f)	Public halls, libraries and places of worship	1 space per 8 FTE staff	1 per 30 seats
Sui Generis	Cinema	1 space per 8 FTE staff	1 per 30 seats
Sui Generis	Public House	1 space per 175 sqm (GEA)	1 space per 40 sqm (GEA)
Sui Generis	Other	As per most relevant other standard.	

APPENDIX FOUR:

ILLUSTRATIVE PHASING PLAN



Illustrative Phasing Plan

1 : 1000

Key (Not for Approval)

Hybrid Planning Application Boundary

Existing buildings, associating structures and spaces to be retained

Phase 1 - Plots A, G and Love Lane (2022 - 2024)

Phase 2 - Plot D and F (2023 - 2028)

Phase 3 - Plot B, C, E and Moselle Square (2029 - 2032)

Phase 4 - Plots M2, L1, L2, H1, H2, H3 (2022 - 2024)

Phase 5 - Plots M1, N1, N2, N3, N4 and upper portion of Peacock Park (2023 - 2026)

Phase 6 - Plot K2, M3, L2 and portion of Peacock Park (2026 - 2028)

Phase 7 - Plots K1, J2 and remaining portion of Peacock Park (2026 - 2029)

Phase 8 - Plots I1, I2 and I3 (2027 - 2029)

General Notes

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All work must comply with relevant British Standards and building regulations requirements. Drawing errors and omissions to be reported to the architect.

Rev	Date	Reason for Issue	AR	CH
P1	22.10.21	Planning Submission	AR	CH

Keyplan

Scale Bar

0 10 20 30m

1:1000

Drawing Title

Illustrative Phasing Plan

Project Number

0311

Scale at A1

1 : 1000

Drawn by

NJ

Drawing Number

0311-SEW-22-ZZ-DR-1-002008

Status

For Planning

Date

22/10/21

Checked by

AR

Revision

P1

Client

Lendlease

Project

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Studio Egret West

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Studio Egret West
3 Brompton Road
London W1 2LL

APPENDIX FIVE:
TOTTENHAM AREA ACTION PLAN: NT5
DEVELOPMENT GUIDELINES

Development Guidelines

- Produce a net increase in the amount and the quality of both public open space and private amenity space within the area.
- To deliver transport improvements including a new, safe and attractive entrance to White Hart Lane Station and improved rail connectivity.
- Re-provision of employment floorspace lost as a result of the redevelopment as new leisure, sports and cultural floorspace and as modern, flexible workspaces. This could be achieved by workspaces with potential to connect to High Road retail properties, and/or through the creation of workspace behind the High Road and the railway arches.
- This central portion of the site is in an area of flood risk, and a Flood Risk Assessment should accompany any planning application.
- This site is identified as being in an area with potential for being part of a Decentralised Energy (DE) network. Development proposals should be designed for connection to a DE network, and seek to prioritise/secure connection to existing or planned future DE networks, in line with Policy DM22.
- Create a legible network of east-west streets that connect into the surrounding area, existing lanes off the High Road, and open spaces.
- Establish clear building frontages along the High Road and White Hart Lane to complement the existing character of the Local Centre.
- Incorporate a range of residential typologies which could include courtyard blocks of varying heights and terraced housing.
- In the part of the site facing the new stadium, development should respond to both the existing High Road Character and the greater heights and density of the new stadium. This needs to be carefully considered given the height differential between the existing historic High Road uses and future stadium development.
- Larger commercial and leisure buildings should be located within close proximity to the new public square linking the station to the stadium.
- Due to the size of the site and scale of development envisaged, particular consideration of the effect of the works on the nearby communities, including how phasing will be delivered. This is referenced in the High Road West Masterplan Framework.
- Where development is likely to impact heritage assets, a detailed assessment of their significance and their contribution to the wider conservation area should be undertaken and new development should respond to it accordingly.
- The Moselle runs in a culvert underneath the site and will require consultation with the Environmental Agency.

HRW
HIGH ROAD WEST

