

Appendix 2: Internal and External Consultee Representations

Stakeholder	Comment	Response
INTERNAL		
Arboricultural Officer	<p>I hold, from an arboricultural point of view, no initial objections to the hybrid planning application yet to be fixed (excluding Plot A).</p> <p>The 8.57 hectare site is within the North Tottenham Conservation Area.</p> <p>An Arboricultural Impact Assessment and Tree Survey has been carried out by Waterman Infrastructure Limited dated October 2021. The report has been carried out to the British Standard 5837: 2012 Trees in Relation to Design Demolition, and Construction- Recommendations.</p> <p>I mostly concur with the findings of the report and the quality assessment and the categorisation of the trees on site.</p> <p>There are 134 trees in total:</p> <ul style="list-style-type: none"> • Two category A • 61 category B • 66 category C <p>67 arboricultural features are proposed to be removed. Of these:</p> <ul style="list-style-type: none"> • 27 category B • 39 category C <p>It is proposed to plant 236 new trees. This is a 4:1 ratio for the loss of the above.</p> <p>A vast majority of these replacement trees will be suitable heavy standards to make an instant impact, and standards. This is to replace the loss, ensure increased future continuity of cover, and an opportunity for species diversity.</p> <p>An illustrative Landscape Plan titled Illustrative Landscape Masterplan has also been submitted. This shows the extent of the planting, throughout the site with new planting to the north where industrial estates, lacking trees and vegetation, currently exist.</p> <p>The detailed proposals will require an Arboricultural Method Statement. Tree and root protection areas are not to be compromised for the trees to be retained.</p> <p>The fixed Landscape Plan will require specifications, and a species list. A five year aftercare plan will also be required to ensure independence in the landscape.</p> <p>London Plane trees T1, 3, 4, 5, 63, 64, and 65 are the largest trees on and adjacent to site. All are shown on the trees for retention map 0311-SEW-ZZ-DR- A- 001- 100 however, T1, 3, 4, 5, 63, 64, 65, 148, 147 have been left off the Illustrative Landscape Masterplan.</p>	<p>Landscape and arboricultural conditions are proposed to be attached to the permission.</p>

Stakeholder	Comment	Response
	The trees for retention map shows T64 Plane tree to be retained. However, the survey recommends removal. This appears to be a street tree already under management. Confirmation will be required.	
ASB Specialist	No comment received	
Building Control	<p>The BiA submitted reflects the Planning Application and is outline in nature and as such a detailed BiA will be required for the scheme when the detailed application is submitted. The principles noted in the BiA and its format are correct, however more detail is required that is not currently available.</p> <p>The fire safety statement is also like the BiA, outline and lacks specific detail as that is not known at this stage. Everything noted in the statement is correct (very much states that it will comply with all the relevant codes), but without the detailed knowledge of each building, it is outline in nature and a detailed fire safety statement for each building should be requested with the detailed planning application.</p>	Detailed BIA and Fire Safety Statements will be secured by planning condition.

Carbon Management Team	<p>Carbon Management Response 21/12/2021</p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> • Energy and Sustainability Statement (Parts 1-3) prepared by (dated October 2021) • Outline Whole Life Carbon Report, prepared by Buro Happold (dated October 2021) • Detailed Whole Life Carbon Report Plot A, prepared by Buro Happold (dated October 2021) • Outline Circular Economy Statement, prepared by Buro Happold (dated October 2021) • Detailed Circular Economy Statement, prepared by Buro Happold (dated October 2021) • GLA carbon emission reporting spreadsheet • Relevant supporting documents. <p>1. Summary</p> <p>The development achieves a reduction of 44% carbon dioxide emissions on site overall, which is supported in principle. This will be achieved primarily through a connection to the Decentralised Energy Network.</p> <p>The detailed element of the hybrid application (Plot A) is proposed to reduce emissions by 91% overall, which is supported in principle. However, this plot does not fully comply with Policy SI2(B), which will need to be addressed. It also does not comply with Policy SI4 as the overheating strategy is not acceptable.</p> <p>Some further information is requested in relation to the Whole Life Carbon Assessment and the energy strategy for the outline element.</p> <p>Appropriate planning conditions will be recommended once this information has been provided.</p> <p>2. Energy – Overall</p> <p>Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L (2013)). The London Plan (2021) further confirms this in Policy SI2.</p> <p>The overall predicted reduction in CO2 emissions for the development shows an improvement of approximately 44% in carbon emissions with SAP2012 carbon factors, from the Baseline development model (which is Part L 2013 compliant). This represents an annual saving of approximately 2,137 tonnes of CO2 from a baseline of 4,871 tCO2/year.</p> <p>London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations. The calculated unregulated emissions are:</p> <p>7,052 tCO2 for the outline and detailed elements. The operational energy use requirement is calculated to be less than 43 kWh/m2 /year (including regulated and unregulated energy).</p>	<p>Planning conditions and planning obligations will be attached to the permission to secure the energy strategy, detailed carbon lifecycle assessment, boiler details, DEN details, carbon offsetting payments, Overheating assessment and mitigation, BREEAM accreditation, living roof details and management and details circular economy statement.</p>
------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

The ESS reports the reduction in emissions based on SAP10 carbon factors. SAP2012 carbon factors have been quoted below, in line with GLA guidance on carbon factors for sites connecting to a DEN.

	Residential (detailed)		Residential (outline)		Non-residential		Site-wide	
<i>(SAP2012 emission factors)</i>	tCO ₂	%	tCO ₂	%	tCO ₂	%	tCO ₂	%
Baseline emissions	40.1		3,789		1,042		4,871	
Be Lean savings	2.5	6%	371	10%	190	18%	563	12%
Be Clean savings	29.1	72%	1,293	34%	210	20%	1,532	32%
Be Green savings	4.8	12%	60	2%	13	1%	79	2%
Cumulative savings	36.3	91%	1,724	46%	413	40%	2,137	44%
Carbon shortfall to offset (tCO₂)	3.8		2,064		629		2,698	

Energy – Lean

Detailed: Plot A

The applicant has proposed a saving of 2.5 tCO₂ in carbon emissions (6%) through improved energy efficiency standards in key elements of the build, based on SAP2012 carbon factors. This does not meet the minimum 10% reduction set in London Plan Policy SI2, so this is not in line with policy and must be addressed.

Outline

The applicant has proposed a saving of 371 tCO₂ in carbon emissions (10%) for the residential and a saving of 190 tCO₂ (18%) for the non-residential elements of the outline through improved energy efficiency standards, based on SAP2012 carbon factors. This meet the minimum 10% and 15% reduction respectively set in London Plan Policy SI2, so this is supported.

Overall The following u-values, g-values and air tightness are proposed:

Thermal bridging	Accredited Construction Details		
Low energy lighting	100%	LEDs	100 lm/W lamp 60 lm/W display
Heating system (efficiency / emitter)	Communal gas boilers (89.5%, SAP heat losses 1.05 – Be Lean only)	Communal gas boilers (89.5%, radiators, SAP heat losses 1.05 – Be Lean only)	FCUs supplied via heat interface from DEN Direct electric hot water (retail)
Cooling	TBC	None	VRF / split system, EER/SEER 4.5
Thermal mass	Low		
Space heating requirement	40.2 kWh/m ² /y (Block A1) 42.5 kWh/m ² /y (Block A2/3)		
Improvement from the target fabric energy efficiency (TFEE)	13% improvement		

Actions:

- The carbon reduction under Be Lean for Plot A should be increased to at least 10% with SAP 2012 carbon factors.
- What is the g-value for windows on Plot A?

Overheating is dealt with in more detail below.

Energy – Clean

The Be Clean strategy to connect to the DEN is generally acceptable.

Detailed

The applicant proposes a temporary arrangement for Plot A before it is connected to the DEN. This would include installing high-efficient communal gas boilers within a centralised plant room in Plot A. This includes the same inputs as under Be Lean.

Outline

The development will connect into the southern Energy Centre (EC), to enable a connection to the Energy from Waste heat from Edmonton.

A backup solution has been proposed for the southern EC in case the connection into the Meridian Water Heat Network is unfeasible. This would be powered by an air source heat pump district heating solution, based in the

	<p>northern EC for the wider High Road West site. The 3MW ASHPs would operate with a heat fraction of >90%, with 9.2 MW back-up gas boilers. The system would include external air coolers and a 50 m2 thermal store.</p> <p>The applicant will need to demonstrate that they will provide the following details prior to the commencement of construction:</p> <ul style="list-style-type: none">a) Buried pipe (dry and filled with nitrogen) to our specification from the GF plant room to a manhole at the boundary of their site and evidence of any obstructions in highway adjacent to connection point;b) A good quality network within the building – 60/40 F&R, R, <50W/dwelling losses from the network – ideally to an agreed standard in the S106;c) A clear plan for QA of the network post-design approval through to operation, based on CP1;d) A clear commercial strategy identifying who will sell energy to residents and how prices/quality of service will be set. Further comments from the Energy Infrastructure Manager will be included separately. <p>Energy – Green</p> <p>As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4.</p> <p>The application has reviewed the installation of various renewable technologies. The report concludes that solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 79 tCO2 (2%) reduction of emissions are proposed under Be Green measures.</p> <p>Detailed</p> <p>The solar photovoltaic array peak output would be circa 36 kWp, which is estimated to produce around 18,000 kWh/year of renewable electricity per year, equivalent to a reduction of 4.8 tCO2/year.</p> <p>Outline</p> <p>The estimated solar photovoltaic array peak output is modelled at 1,274 kWp, with an annual generation of 955,739 kWh/year.</p> <p>Actions:</p> <ul style="list-style-type: none">- How will the solar energy be used on site (before surplus is exported onto the grid)? Will this feed into the centralised plant room and communal areas? Is there an option to provide the benefit equally to residents? <p>Energy –Seen</p> <p>Detailed</p> <p>The estimated energy demand for Plot A is 204,243 kWh/year for electricity and 258,888 kwh/year for the district heating. The development will have smart meters installed per dwelling.</p> <p>3. Carbon Offset Contribution</p>	
--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

A carbon shortfall of 2,698 tCO₂/year remains, based on the development connecting to the DEN. The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years.

A deferred carbon offset contribution mechanism will apply to this scheme as it is expected to connect to the DEN when this has been built.

The applicant should present two carbon reduction table scenarios:

- Scenario 1: Connection to the DEN scenario (residual tCO₂ over 30 years)
- Scenario 2: Communal heating and gas boilers (residual tCO₂ over 30 years)

Two carbon offset payments will be calculated. The carbon offset contribution for scenario 1 will be due at the commencement of development and the difference in the offset contribution between the first and second scenarios will be deferred for 10 years and indexed accordingly.

1. Payment for the residual emissions in the DEN scenario (Scenario 1) would be due at commencement of development.
2. A deferred carbon offset contribution is calculated through the difference in the offset contribution: Scenario 2 – Scenario 1 = Deferred Payment.
3. If, after 10 years the development has not connected to the DEN, the deferred payment (+indexation) is due.
4. If, after 10 years the development has connected to the DEN, the deferred payment would not be due but this amount would be available as a connection charge to the DEN.

	Base Carbon Offsetting Contribution (Communal gas boiler scenario; tCO ₂)		Carbon Offsetting Contribution (Connecting to DEN scenario; tCO ₂)	
	Residential	Non-residential	Residential	Non-residential
Baseline				
Total cumulative savings per annum (tCO ₂ , %)	(%)	(%)	(%)	(%)
Shortfall to offset	X1	Y1	X2	Y2
Carbon offset payment due for scenario	(X1+Y1) x 30 x £95 = £A		(X2+Y2) x 30 x £95 = £B	
Carbon Offsetting Contribution payment due at commencement of development			£B	
Deferred Carbon Offsetting Contribution (+indexation) payment due <u>if not connecting to the DEN</u>			£A - £B = £C	

4. Overheating

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

Detailed Overheating Assessment Plot A

In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 weather files, and the cooling hierarchy has been followed in the design. The Overheating Report prepared by Aecom (dated October 2021) is contained in the ESS.

Overheating Commentary and Actions:

Weather centre

- As outlined during pre-application discussions, the model needs to be redone with London Weather Centre data (not Heathrow) to represent the urban heat island effect. Further justification was also included in the emails dated 29th October, demonstrating that Tottenham (and this area in particular) suffers from 'high heat risk', which is the highest level of risk, on the GLA Climate Risk Metrics map (screenshot added below – ref Image 1). In addition:

- o The proposed development and forthcoming development surrounding this site will cumulatively worsen the urban heat island effect, strengthening the need to undertake modelling with the London Weather Centre file.
- o The site is in a unique position with noise/air pollution impacts from surrounding uses. The stadium is an additional contributor to noise, and with the stadium events being increased, this impact will be greater for local residents. This means the newhomes in this area must be built to address of concerns of noise (amongst other issues).
- o This site will accommodate affordable housing. Occupants in affordable housing are more likely to be vulnerable in terms of their physical or mental health and wellbeing, may be restricted in their ability to leave their home during heatwaves, and may go into coolth poverty due to the need to install expensive cooling solutions. As such, it is even more important that such future occupants are protected from the overheating risks so that their homes will support them and not make their living situation worse.

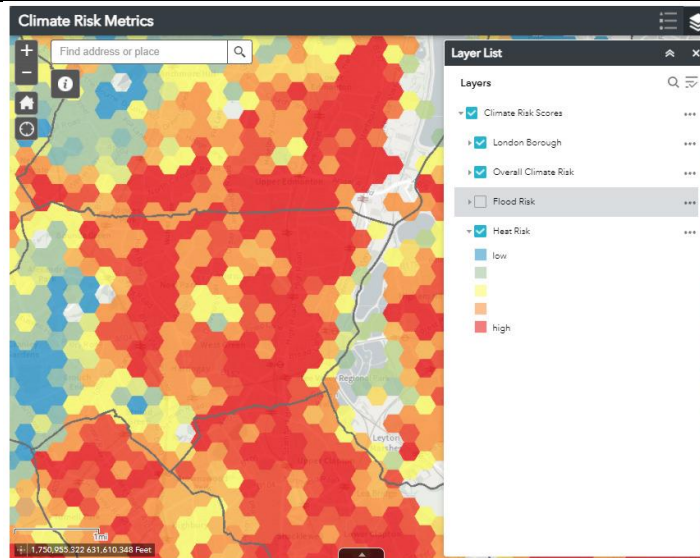


Image 1: GLA Heat Risk Map for Tottenham Haringey (dark red is highest risk)

Modelling further weather files

- The applicant has not modelled DSY 2 or 3 (2020s) or DSY1 (2050s and 2080s) for the development. Please also model these and ensure the design has incorporated as many mitigation measures to pass DSY 2 and 3 as feasible. These files should be used to inform what mitigation measures should form part of the retrofit plan to reduce future overheating risk, demonstrating that these measures can theoretically be accommodated within the current design in terms of structure/space requirements. This retrofit plan should be included within the submission. This is in line with the approach taken for the northern part of High Road West.

Additional modelling of dwellings

- The report has modelled 6 dwellings (10% of total apartments), under the London Heathrow files (this should be London Weather Centre). No rooms were modelled in Blocks A1 or A3, which is not considered acceptable. The applicant even notes in their report that further spaces should be modelled.

- Additional modelling should take place for representative dwellings in Blocks A1 and A3. Whilst it is acknowledged that dwellings in Block A2 may represent the 'worst case' in terms of noise levels, the other dwellings may not need noise attenuation/mitigation and therefore will require a different overheating strategy.

o Please model the following most likely to overheat rooms in these blocks:

- At least 15% of all rooms across the development site;
- All single-aspect dwellings facing west, east, and south;
- At least 50% of rooms on the top floor;

75% of all modelled rooms will face South or South/western facing;
 Rooms closest to any significant noise and / or air pollution source or on the ground floor, with windows closed at all times (unless they do not need to be opened and confirmed in the Noise and the Air Quality Assessments).
 - Include further modelling of the corridor in Block A3.

Showing location of modelled spaces
 - The assessment doesn't show any floorplans annotating which flats and corridors have been modelled, nor does it specify why the 6 flats have been chosen. It's hard to tell from the 3D images. The applicant noted during pre-application discussions that this would be addressed in the report submitted in the planning application, in addition to further rationale for which dwellings were chosen.

Principle of natural vs mechanical ventilation for modelling
 - Due to the noise constraints of this site being adjacent to the railway line, the TM59 criteria for predominantly mechanically ventilated dwellings apply (assuming windows need to remain closed based on a fixed temperature test). The assessment identifies that the top three floors (eastern façade A2) and top two floors (eastern façade A3) are deemed 'high risk' in terms of noise levels.
 - The overheating report has modelled the sample dwellings based on the principle of relying on natural ventilation. Constraints for residents to open windows have been identified, including noise from the railway and risk of crime for ground floor habitable rooms. In principle, where no mitigation is proposed, the overheating model should be based on mechanically ventilated dwellings with different criteria.

a. The report does not clearly set out 1) which constraints apply to which dwellings, 2) proposed mitigation to noise/crime constraints, 3) which overheating criteria should be met. A plan should be included annotating which dwellings are subject to adverse noise constraints, which will have mitigation (and what mitigation), and whether they will be assessed under the natural or the mechanical ventilation (closed windows scenario) criteria.

b. The report notes that the worst-case six dwellings have been modelled. If no acoustic mitigation is proposed for the dwellings that are subject to adverse noise levels, these should be assumed closed, and the assessment should assume they are mechanically ventilated. The applicant has Options 1-6 assuming open windows with various levels of mechanical ventilation/window opening and solar gain mitigation, without noise mitigation.

c. Paragraph 1.6.1.2 notes that the rooms exposed to noise levels would not pass TM59 assuming closed windows without supplementary mechanical ventilation or temperature lopping. Paragraph 1.6.1.5 notes that acoustic mitigation was investigated but discounted (but no details). The applicant notes that enhanced mechanical ventilation 6-9ach would be suitable for closed windows, or temperature lopping. However, no modelling has been undertaken to demonstrate compliance.

d. The applicant stated in pre-application discussions that secure by design measures were included in the design to allow residents to open their windows at night. No mitigation measures have been proposed to this effect.

b. In summary: the applicant needs to clearly respond to point (a). Then, the overheating model needs to be done for natural/mechanical ventilation criteria, mitigating the overheating risk with measures in line with the Cooling Hierarchy. This means that passive design solutions need to be implemented before seeking enhanced mechanical ventilation or temperature lopping.

Further detailed comments to report:

- The Executive Summary should be clear on what the parameters/inputs of the modelled options are before summarising their results.
- Please set out the difference in energy demand, level of control and comfort between enhanced ventilation (6-9ach) and temperature lopping.
- The assumed pipework heat losses of 11W/m may be a little high depending on the diameter of the pipe and how the system is designed.
- Confirm that Haringey Council will own the overheating risk when the building is occupied (not the residents).

Overheating Design Guidelines Outline Plots

Design guidelines for the outline plots are described in Section 6. In summary this includes:

- Natural ventilation preferred approach
- Optimising passive design
 - o Cross-ventilation through openable windows in dual aspect rooms and flats
 - o MVHR
 - o Balcony placement to reduce solar gain on southern facades
 - o Deep window reveals (200-300mm)
 - o Set maximum glazing area to maximum 25% of its floor area
 - o Reduce floor-to-ceiling glazing in favour of more horizontal glazing
 - o Consider orientation and massing in relation to layouts

5. Sustainability

Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques.

BREEAM Communities – masterplan level

The applicant has prepared a BREEAM Communities Pre-Assessment Report for the whole masterplan. This holistic approach to sustainability is supported as part of this hybrid application and it will continue to help shape the development with a community focus thereafter. A 'Very Good' rating should be achievable according to the Pre-Assessment. The tracker assessed that a score of 76.8% is achievable for Step 1 (with 22% of potential extras for Step 1); this results in an overall achievable score of 27.3% so far. The applicant is aiming to achieve 'Excellent', which should be attainable as well.

BREEAM Requirement – plot level

Policy SP4 requires all new non-residential developments to achieve a BREEAM rating 'Very Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable. BREEAM New Construction will sought at plot level in addition to the BREEAM Communities accreditation. Furthermore, Home Quality Mark (HQM) will be

sought for the new homes at plot level. The dwellings at Plot A are predicted to achieve a 4-star rating (256 credits), according to the HQM Pre- Assessment.

Living roofs

All development sites must incorporate urban greening within their fundamental design, in line with London Plan Policy G5. The development is proposing living roofs in the development.

All landscaping proposals and living roofs should stimulate a variety of planting species. Mat-based, sedum systems are discouraged as they retain less rainfall and deliver limited biodiversity advantages. The growing medium for extensive roofs must be 120-150mm deep, and at least 250mm deep for intensive roofs (these are often roof-level amenity spaces) to ensure most plant species can establish and thrive and can withstand periods of drought. Living walls should be rooted in the ground with sufficient substrate depth. Living roofs and walls are supported in principle, subject to detailed design. Details for living roofs will need to be submitted as part of a planning condition.

Whole Life Carbon

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

Plot A	Estimated carbon emissions	Meets benchmark?
Modules A1-A5	415 kgCO ₂ e/m ²	Meets GLA target (800 kgCO ₂ e/m ²) and LETI aspirational target (500 kgCO ₂ e/m ²)
Modules B-C (excl. B6 and B7)	218 kgCO ₂ e/m ²	Meets GLA target (400 kgCO ₂ e/m ²) and LETI aspirational target (240 kgCO ₂ e/m ²)

Action:

- The applicant's outline WLC report is not loading correctly which means information is missing (sentences or words). Please submit a new version of the pdf to receive comments.

Circular Economy

Policy SI7 requires applications referable to the Mayor of London to submit a Circular Economy Statement demonstrating how it promotes a circular economy within the design and aim to be net zero waste. Haringey Policy SP6 requires developments to seek to minimise waste creation and increase recycling rates, address waste as a resource and requires major applications to submit Site Waste Management Plans.

The applicant has submitted a hybrid CES and a detailed CES for Plot A.

The principles used for this development are:

- Long-term habitation

- Phased development over 10 years, including meanwhile uses, especially to support repair and storage capacity.
- Robustness and maintenance in terms of public realm design appropriate for large pedestrian numbers
- Integration of social aspects into the masterplan circular economy
- Future proofing the site for new economic and social trends
- Based on the Lendlease Sustainability Standards (Sustainable Economic Growth, Vibrant & Resilient Communities and Cities, and Healthy Planet and People)
- Designing for longevity of residential
- Designing for flexibility and adaptability of all uses
- Promoting flexible spaces for all open and green spaces
- Using new materials responsibly and sustainably, re-using and using less materials, sitewide
- Restoring and enhancing the community
- Reusing materials from existing buildings with a Pre-Demolition Audit (included in Appendix E for Plot A)
- Minimise operational waste and provide adequate space for recycling site-wide

Outline: The report sets out the Outline Application Key Commitments (Table 4-1), Recycling and waste reporting form (Table 4-2). Bill of materials is not available at masterplan level. The report includes a circular economy narrative and implementation strategy.

Plot A: The report sets out the Key Commitments (Table 3), Bill of materials (Table 4) and Recycling and waste reporting form (Table 5).

6. Conclusion

Overall, it is considered that the application cannot currently be supported as it does not comply wholly with London Plan Policies SI2, SI4 and Local Plan Policies SP4 and DM21.

Planning Conditions

To be secured (with detailed wording TBC):

- Energy strategy
- Overheating
- BREEAM Communities Certificate
- BREEAM New Construction Commercial Certificate(s)
- Home Quality Mark Certificates
- Living roofs and walls
- Circular Economy
- Whole-Life Carbon
- Biodiversity

Planning Obligations Heads of Terms

- Be Seen commitment to uploading energy data
- Deferred carbon offset mechanism (and associated obligations), including a 10% management fee

- Connect to the DEN within 10 years of the permission, if it doesn't come forward a lowcarbon fallback position should be submitted and agreed by the Local Planning Authority.

Carbon Management Response 04/03/2022

In preparing this consultation response, we have reviewed:

- Plot A TM59 Overheating Report, prepared by Aecom (dated February 2022);
- Lendlease Consultant response to CM comments on overheating issued 21 December 2021, rev 01;
- Lendlease Consultant response to CM comments issued 21 December 2021, dated 15th February 2022;
- GLA carbon emission reporting spreadsheet for Plot A (in two sheets and a third sheet summarising);
- Relevant supporting documents.

Summary

The proposed development now complies with the relevant London Plan and Local Plan planning policies in relation to carbon reduction and sustainability, subject to securing the conditions as listed at the end of this response.

Energy

Discussions with the applicant confirmed the justification for using SAP2012 carbon factors.

Plot A

A revised table for Plot A has been issued – copied below.

	Plot A carbon reductions			
	Interim gas boiler scenario		Connection to DEN scenario	
(SAP2012 emission factors)	tCO ₂	%	tCO ₂	%
Baseline emissions	80.9		80.9	
Be Lean savings	4.9	6%	4.9	6%
Be Clean savings	0	0%	44.2	54.6%
Be Green savings	9.2	11.4%	9.2	11.4%
Cumulative savings	14.1	91%	58.3	72.1%
Carbon shortfall to offset (tCO₂)	66.8		22.6	
Carbon offset contribution	£190,380		£64,410	

An initial offset contribution for Plot A of £64,410 + 10% management fee would be due.

If the development does not connect to the DEN, a deferred offset contribution of £125,970 + 10% management fee will be due (£190,380 - £64,410).

Overheating

The following changes have been made to the report that are of note:

- The sample units as noted above have now been reworked with the London Weather Centre file.
- Additional units have been modelled, increasing the sample size from 6 to 23 (15 in A1; 2 duplex units in A2/A3).

Other considerations/responses are:

- Noise from the stadium was considered to be blocked by the massing of Block D.
- Noise from stadium crowds travelling to or waiting at White Hart Lane were not considered within the response.
- 10 units (top three floors on eastern façade of Blocks A2 and top two floors of Block A3) will be constrained by noise due to its orientation facing the railway. These will be mitigated through mechanical ventilation or a peak lopping system.
- Natural ventilation openable to 90 degrees (with 100mm night-time restrictors), g-values of 0.47 and internal blinds (shading coefficient of 0.353 and short-wave radiant fraction of 0.68), will be achieved for all other units similar to the sampled dwellings.

The initial overheating assessment was carried out on block A2 (which also represents block A3 as they have the same layouts).

Various options were modelled:

- Option 1 - 100mm restrictors on the side hung windows were removed, all windows open to 90°.
- Option 2 - As option 1, with a more intelligent user behaviour by the occupier, i.e. windows are shut to preventing warm external air entering space at peak times, allowance of night-time trickle ventilation through the windows using the 100mm restrictors.
- Option 3 - As option 2, with the openings updated: all side hung windows that are not opening onto a balcony are restricted to 100mm, bottom pane windows are openable via bottom hung with 100mm opening restrictions. All balcony doors are closed, one of the two balcony doors in each apartment is opaque, 1100mm windowsill (balconies) has a fully openable window to 90°.
- Option 4 – As option 3, with restrictors on the side hung windows increased to 300mm.
- Option 5 – As option 4, with restrictors on the side hung windows increased to 600mm. Internal blinds applied to the closed balcony doors.
- Option 6 – As option 5, side hung windows no longer have restrictors and are fully openable to 90°.
- Option 6a includes the same parameters as option 6 above, however fully openable windows now feature blinds that only operate when the windows are closed. The blinds feature a shading coefficient of 0.353 and short-wave radiant fraction of 0.68 were applied to the closed balcony doors.

Compliance with DSY1 2020s

Unit	Base case	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 6a
A2.02.01	Fail	Fail	Fail	Fail	Fail	Pass	Pass	Pass
A2.02.02	n/a	n/a	n/a	Fail	Fail	Pass	Pass	Pass
A2.02.03	Fail	Fail	Fail	Fail	Fail	Fail	Pass	Pass
A2.05.01	Fail	Fail	Fail	Fail	Fail	Fail	Pass	Pass
A2.05.02	n/a	n/a	n/a	Fail	Fail	Fail	Fail	Pass
A2.05.03	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Pass

Compliance of Option 6a

	Number of habitable rooms pass TM59
DSY1 2020s	24/24
DSY2 2020s	9/24
DSY3 2020s	10/24

Overheating risk in corridors

These assessments have been done in the event that the windows in the corridor could not be opened.

TM59 assessment result – Communal corridor overheating results

Ventilation rate	No. hours > 28°C	% Annual hours > 28°C	Significant overheating risk?
1ach	2986	34.1	Yes
2ach	1271	14.5	Yes
3ach	377	4.3	Yes
4ach	200	2.3	No

Retrofit options for future reduction of overheating risk

To be considered in order of the Cooling Hierarchy:

- More efficient internal lighting installations to further reduce internal gains
- Efficient LTHW pipework to minimise heat loss and heat gain to spaces.
- Consider additional external shading, louvres, fins and canopies.
- Internal shading devices upgrades
- Glazing replacement strategies – improve solar control (g-value)

- Consider retrofits to allow windows/doors to remain more open at night.
- Improve cross ventilation by considering fire louvred/dampers above internal doors to allow additional air flow.
- Increased mechanical ventilation rates
- Addition of temperature lopping units and or increase cooling capacities
- Consider air movement fans to assist comfort temperatures, i.e. ceiling fans, standalone fans

Conclusion

The overheating strategy is considered generally acceptable, subject to securing a planning condition.

Planning Obligations Heads of Terms

- Energy Plan and Sustainability Review by phase
- Be Seen commitment to uploading energy data
- Deferred carbon offset mechanism (and associated obligations), including a 10% management fee
- Connect to the DEN within 10 years of the permission, if it doesn't come forward a low-carbon fallback position should be submitted and agreed by the Local Planning Authority.

Planning Conditions

Energy Strategy (Plot A)

The development hereby approved shall be constructed in accordance with the Energy Statement for Plot A prepared by Aecom (dated October 2021) delivering a minimum 72% improvement on carbon emissions over 2013 Building Regulations Part L, with SAP2012 emission factors, high fabric efficiencies, connection to the Decentralised Energy Network and a minimum 36 kWp solar photovoltaic (PV) array.

(a) Prior to above ground construction, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:

- *Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;*
- *Confirmation of the necessary fabric efficiencies aiming to achieve a minimum 10% reduction in SAP2012 carbon factors, including details to reduce thermal bridging;*
- *Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the units;*
- *Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp);*
- *A metering strategy.*

The development shall be carried out strictly in accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.

(b) Within six months of first occupation, evidence that the solar PV installation has been installed correctly shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, a six-month energy generation statement, and a Microgeneration Certification Scheme certificate.

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

Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.

Gas Boilers (Plot A)

The combination gas boilers that are to be installed throughout the development shall achieve a minimum seasonal space heating energy efficiency rating of 92% as defined under the Energy-related Performance Directive (ErP), without relying on additional technologies to control the operation of the boiler. The applicant shall demonstrate compliance by supplying installation specification within three months post-completion of the development. Once installed these boilers shall be operated and maintained as such thereafter.

Reason: In the interest of reducing the impacts of climate change, in accordance with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM21.

Energy Strategy (Reserved Matters Applications)

(a) Each application for the first reserved matters relating to Appearance, Layout or Scale submitted by phase/block shall be accompanied by an Energy Strategy. This phase block shall achieve the minimum requirements in line with the most up to date planning policy framework at the time of submission and shall achieve no less than a reduction in carbon emissions of 46% (residential) or 40% (non-residential) compared to a Building Regulations Part L 2013 compliant building with SAP2012 carbon factors.

The strategy will set out:

- Confirmation of how this phase/block will meet the zero-carbon policy requirement in line with the Energy Hierarchy;*
- How this phase/block will achieve minimum carbon reductions at the Be Lean Stage in accordance with the most up-to-date planning policy requirements, but no less than 10% (residential) or 18% (non-residential) with SAP2012 carbon factors;*
- The proposed heating, renewable energy and ventilation strategies (including their efficiency, output and layout);*
- How the phase/block will contribute to the site-wide minimum solar PV array output of 1,274 kWp, demonstrating that the roof spaces have been maximised to deliver the maximum amount of solar PV output;*
- Calculate carbon offset contribution for that phase/block;*
- A metering strategy;*

- *Design of the energy centre detailing space for a sub-station to connect to the off-site (primary) network and on-site (secondary) network, as well as dry primary pipework from the energy centre to the agreed point of connection.*

The final agreed energy strategy shall be installed and operation prior to the first occupation of the relevant phase/block. The development shall be carried out strictly in accordance with the details so approved and shall be operated and maintained as such thereafter.

Should the agreed target not be able to be achieved on site through energy measures as set out in the aforementioned strategy, then any shortfall should be offset at the most up-to-date approved cost per tonne of carbon plus a 10% management fee. Should an increased level of CO₂ reduction be achieved, any carbon offset payment would be reduced in line with this price.

Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.

Energy Strategy (Commencement of each Block/Phase)

(a) Prior to the commencement of construction works for each blocks/phase, details relating to the Energy Strategy must be submitted to and approved by the local planning authority. This shall include:

- *A metering strategy;*
- *Detail of pipe routes and lengths, pipe sizes (taking account of flow and return temperatures and diversification) and insulation to determine heat loss from the pipes in Watts per dwelling in order to demonstrate losses have been minimised;*
- *Further detail of how the developer will ensure the performance of the system will be safeguarded through later stages of design (e.g., value engineering proposals by installers), construction and commissioning including provision of key information on system performance required by CoP1 (e.g. joint weld and HIU commissioning certificates, CoP1 checklists, etc.);*
- *Any outstanding requirements set out in a response to the Energy Strategy by the local planning authority or GLA submitted for relevant Reserved Matters Application of that plot/block.*

(b) Within six months of completion of each block, evidence shall also be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.

Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.

Overheating (Plot A)

Prior to the commencement of development, or at the submission of any amendment application for Plot A concerning the design and layout, a revised Overheating Assessment shall be submitted to and approved by the Local Planning

Authority. The overheating model will assess the overheating risk in line with CIBSE TM59 (using the London Weather Centre data) and demonstrate how the risks have been mitigated and removed through design solutions. These mitigation measures shall be operational prior to the first occupation of the development hereby approved and retained thereafter for the lifetime of the development.

This report will include:

- *Additional overheating modelling for Units in Block A1 for a representative sample of dwellings;*
- *Remodelling of the sample dwellings modelled for Blocks A2 and A3 incorporating any design changes following planning permission;*
- *Annotated floorplans showing which spaces/dwellings have been modelled. The report should model all single-aspect dwellings, min. 75% of rooms facing south or south-west, min. 50% of top-floor rooms, and rooms closest to any risk of crime / noise and / or air pollution source that assume windows closed at all times (unless the constraint is mitigated to allow for openable windows as confirmed in the Noise and the Air Quality Assessments).*
- *Details of the mitigation design measures incorporated within the scheme (including details of the feasibility of prioritising passive cooling and ventilation measures in line with the Cooling Hierarchy) to ensure adaptation to higher temperatures are addressed, the spaces do not overheat, and the use of active cooling is avoided.*
- *Information supporting the assumed pipework heat losses as required under the Energy Strategy condition.*

REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.

Overheating (Outline - Residential)

(a) Each application for the first reserved matters relating to Appearance, Layout or Scale submitted by phase/block shall be accompanied by a detailed Overheating Assessment. The Overheating Assessment shall be submitted for the written approval of the Local Planning Authority and shall be informed by Dynamic Thermal Modelling based on CIBSE TM59 for the residential spaces and TM49 weather files. The assessment shall be undertaken in line with the following:

- i. The London Weather Centre dataset;*
- ii. Mandatory pass of DSY1 for 2020s file, with the necessary mitigation measures in line with the Cooling Hierarchy;*
- iii. Demonstrate the reduction in overheating risk for future weather patterns (DSY2 and DSY3 2020s, DSY1 2050s). Mitigation for the 2020s period must be integrated into the design through passive design measures as far as feasible. The risks and the mitigation strategy for the periods of the 2050s should be set out in a retrofit plan, confirming that measures can be fitted in the future and who will own the overheating risk;*
- iv. Include any replacement / repair cycles and the annual running costs for the occupiers;*
- v. Floor plans highlighting the modelled dwellings across the development and showing all rooms (with unique reference number). The applicant is expected to model the following most likely to overheat dwellings:*
 - *At least 15% of all rooms across the development site;*

- All single-aspect dwellings facing west, east, and south;
- At least 50% of rooms on the top floor;
- 75% of all modelled rooms will face South or South/west;
- Rooms closest to any risk of crime / noise and / or air pollution source, with windows closed at all times (unless mitigation measures demonstrate that these windows can be opened, as confirmed in the Noise and the Air Quality Assessments).

(b) Any overheating mitigation measures set out in an approved Overheating Assessment shall be implemented before any of the dwellings in the Block to which they relate are first occupied and retained thereafter for the lifetime of the development.

REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.

Overheating (Outline - Non-residential)

At least six months prior to the occupation of each non-residential area, an Overheating Report must be submitted to and approved by the Local Planning Authority if that space is to be occupied for an extended period or will accommodate any vulnerable users, such as office/workspace, community, healthcare, or educational uses.

The report shall be based on the current and future weather files for the CIBSE TM49 London Weather Centre dataset. It shall set out:

- *The proposed occupancy profiles and heat gains in line with CIBSE TM52*
- *The modelled mitigation measures which will be delivered to ensure the development complies with DSY1 for the 2020s weather file.*
- *A retrofit plan that demonstrates which mitigation measures would be required to pass future weather files (DSY2 and DSY3 2020s; DSY1 2050s), with confirmation that the retrofit measures can be integrated within the design.*

The mitigation measures hereby approved shall be implemented prior to occupation and retained thereafter for the lifetime of the development.

REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.

Living roofs/Living walls

(a) Prior to the commencement of development, details of the living roof(s) and/or living wall must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:

- A roof plan identifying where the living roof(s) will be located;*

- ii. A ground floor plan identifying where the living wall(s) will be rooted in the ground, if any, and a section showing the soil planting depth;
- iii. A section demonstrating varying settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);
- iv. Roof plans annotating details of the substrate: showing at least two substrate types across the roof, annotating contours of the varying depths of substrate;
- v. Details of the proposed type of invertebrate habitat structures on the roof(s) with a minimum of one feature per 30m² of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m², rope coils, pebble mounds of water trays;
- vi. Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m²) and density of plug plants planted (minimum 20/m² with roof ball of plugs 25m³) to benefit native wildlife, suitable for direct sunshine/shading of the different living roof spaces. The living roof will not rely on one species of plant life such as Sedum (which are not native);
- vii. Roof plans and sections showing the relationship between the living roof areas and photovoltaic array, if any; and
- viii. Management and maintenance plan, including frequency of watering arrangements.

(b) Prior to the occupation of 90% of the dwellings of the Block to which the living roof(s) and/or living wall(s) relate, evidence must be submitted to and approved by the Local Planning Authority that the living roof(s) have been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roof(s)/wall(s) have not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roof(s)/wall(s) shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.

Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.

BREEAM (Communities)

(a) Prior to commencement on site, a BREEAM Communities design stage accreditation certificate must be submitted to and approved by the Local Planning Authority confirming that the development will achieve a BREEAM "Very Good" outcome (or equivalent), aiming for "Excellent".

The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.

(b) At least six months prior to occupation, a BREEAM Communities post-construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved.

In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority's approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.

Reasons: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.

BREEAM (New Construction)

(a) Prior to commencement on site, a BREEAM New Construction design stage accreditation certificate for every type of non-residential use must be submitted to and approved by the Local Planning Authority confirming that the development will achieve a BREEAM "Very Good" outcome (or equivalent), aiming for "Excellent".

The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.

(b) At least six months prior to occupation, a BREEAM New Construction post-construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval for every type of non-residential use, confirming this standard has been achieved.

In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with two months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within three months of the Local Authority's approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.

Reasons: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.

Circular Economy (Outline applications)

Each application for reserved matters shall be accompanied by a detailed Circular Economy Statement and Operational Waste Management Strategy in line with the GLA's Circular Economy Statement Guidance, which shall be submitted to and approved in writing by the Local Planning Authority. The statement shall adhere to the principles set out in the draft Circular Economy Statement. The development shall be carried out in accordance with the details so approved.

Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials.

Circular Economy (Post Completion Reports)

Prior to the occupation of any phase, a Post Completion Report setting out the predicted and actual performance against all numerical targets in the relevant Circular Economy Statement shall be submitted to the GLA at: circulareconomystatements@london.gov.uk, along with any supporting evidence as per the GLA's Circular Economy Statement Guidance. The Post Completion Report shall provide updated versions of Tables 1 and 2 of the Circular Economy Statement, the Recycling and Waste Reporting form and Bill of Materials. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation.

Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials.

Whole Life Carbon

Prior to the occupation of each building, the post-construction tab of the GLA's whole life carbon assessment template should be completed accurately and in its entirety in line with the GLA's Whole Life Carbon Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage, including the whole life carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. This should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation of the relevant building.

Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings.

Carbon Management Response 12/07/2022

Summary

Further to the Carbon Management response issued on 4th March 2022, this response seeks to clarify this response in relation to the carbon emission factors used. Revised planning conditions have been recommended in relation to the Energy Strategy for Plot A and the Outline components.

Energy – Update

Discussions with the GLA confirmed a different position now that the revised Energy Assessments Guidance (June 2022) will be taking effect imminently following the publication of the revised Building Regulations Part L in December 2021.

The GLA's guidance currently states that development proposals in a Heat Network Priority Area and where there is the potential to connect to a new network using low-emission CHP (i.e. the energy from waste plant in Edmonton), SAP2012 carbon factors should be used.

With the update to the guidance to reflect Part L 2021, the GLA have now advised that using SAP10 carbon factors is more appropriate for developments connecting to a DEN before the new guidance is implemented. This response has therefore been updated to reflect the reporting under SAP10 carbon factors.

Plot A

A revised table for Plot A has been issued – copied below.

	Plot A carbon reductions			
	Interim gas boiler scenario		Connection to DEN scenario	
<i>(SAP10 emission factors)</i>	tCO ₂	%	tCO ₂	%
Baseline emissions	71.82		71.82	
Be Lean savings	7.27	10.1%	7.27	10.1%
Be Clean savings	0	0%	38.71	53.9%
Be Green savings	4.15	5.8%	4.15	5.8%
Cumulative savings	11.42	15.9%	50.12	69.8%
Carbon shortfall to offset (tCO₂)	60.4		21.7	
Carbon offset contribution	£172,140		£61,845	
+10% management fee	£17,214		£6,184.50	

An initial offset contribution for Plot A of £61,845 + 10% management fee would be due.

If the development does not connect to the DEN, a deferred offset contribution of £110,295 + 10% management fee will be due (£17,214 - £61,845).

Outline

A revised table for the outline proposals is copied below, based on an email received from DP9 on 29th June 2022. These are indicative figures based on the outline parameters of this scheme. Design matters are reserved which will determine the energy performance of the blocks in the reserved matters applications.

	Outline element carbon reductions - DOMESTIC	
	Connection to DEN scenario	ASHP backup scenario

<i>(SAP10 emission factors)</i>	tCO ₂	%	tCO ₂	%
Baseline emissions	3,368		3,368	
Be Lean savings	401	12%	401	12%
Be Clean savings	1,585	47%	1,521	45%
Be Green savings	27	1%	27	1%
Cumulative savings	2,013	60%	1,949	58%
Carbon shortfall to offset (tCO₂)	1,356		1,419	
Carbon offset contribution	£3,864,600		£4,044,150	
+10% management fee	£386,460		£404,415	

	Outline element carbon reductions – NON-DOMESTIC			
	Scenario A: Connection to DEN		Scenario B: Communal ASHP	
<i>(SAP10 emission factors)</i>	tCO ₂	%	tCO ₂	%
Baseline emissions	738		738	
Be Lean savings	123	17%	123	17%
Be Clean savings	257	35%	247	33%
Be Green savings	6	1%	6	1%
Cumulative savings	386	52%	258	51%
Carbon shortfall to offset (tCO₂)	352		375	
Carbon offset contribution	£1,003,200		£1,068,750	
+10% management fee	£100,230		£106,875	

DEN Connection Scenarios

There are two scenarios in relation to the DEN connection:

1. LBH is the appointed heat supplier - the connection charges to connect the development to the DEN within the commercial agreement will need to include any difference in carbon offset based on either:
 - a. Connecting to the Meridian Water Energy Recovery Facility (Scenario A)
 - b. Delivering the back up solution of ASHPs (Scenario B)
2. Third party heat supplier - the council will make an offer to the developer for the development to connect to the Meridian Water Energy Recovery Facility. The developer must connect if it is a reasonable offer, and the offer will include a connection charge. The connection charge should include the carbon offset contribution (as listed in bullet points a and b above), plus any savings from not having to provide Scenario B communal ASHPs. This depends on timing e.g.,:
 - a. The development should connect to the Meridian Water Energy Recovery Facility before December 2027. Building Regulations require the development to have a permanent low-carbon heat source after this date.

Carbon Management Response 12/07/2022

Summary

Further to the Carbon Management response issued on 4th March 2022, this response seeks to clarify this response in relation to the carbon emission factors used. Revised planning conditions have been recommended in relation to the Energy Strategy for Plot A and the Outline components.

Energy – Update

Discussions with the GLA confirmed a different position now that the revised Energy Assessments Guidance (June 2022) will be taking effect imminently following the publication of the revised Building Regulations Part L in December 2021.

The GLA's guidance currently states that development proposals in a Heat Network Priority Area and where there is the potential to connect to a new network using low-emission CHP (i.e. the energy from waste plant in Edmonton), SAP2012 carbon factors should be used.

With the update to the guidance to reflect Part L 2021, the GLA have now advised that using SAP10 carbon factors is more appropriate for developments connecting to a DEN before the new guidance is implemented. This response has therefore been updated to reflect the reporting under SAP10 carbon factors.

Plot A

A revised table for Plot A has been issued – copied below.

	Plot A carbon reductions			
	Interim gas boiler scenario		Connection to DEN scenario	
<i>(SAP10 emission factors)</i>	tCO ₂	%	tCO ₂	%
Baseline emissions	71.82		71.82	
Be Lean savings	7.27	10.1%	7.27	10.1%
Be Clean savings	0	0%	38.71	53.9%
Be Green savings	4.15	5.8%	4.15	5.8%
Cumulative savings	11.42	15.9%	50.12	69.8%
Carbon shortfall to offset (tCO₂)	60.4		21.7	
Carbon offset contribution	£172,140		£61,845	
+10% management fee	£17,214		£6,184.50	

An initial offset contribution for Plot A of £61,845 + 10% management fee would be due.

If the development does not connect to the DEN, a deferred offset contribution of £110,295 + 10% management fee will be due (£17,214 - £61,845).

Outline

A revised table for the outline proposals is copied below, based on an email received from DP9 on 29th June 2022. These are indicative figures based on the outline parameters of this scheme. Design matters are reserved which will determine the energy performance of the blocks in the reserved matters applications.

	Outline element carbon reductions - DOMESTIC			
	Connection to DEN scenario		ASHP backup scenario	
<i>(SAP10 emission factors)</i>	tCO ₂	%	tCO ₂	%

Baseline emissions	3,368		3,368	
Be Lean savings	401	12%	401	12%
Be Clean savings	1,585	47%	1,521	45%
Be Green savings	27	1%	27	1%
Cumulative savings	2,013	60%	1,949	58%
Carbon shortfall to offset (tCO₂)	1,356		1,419	
Carbon offset contribution	£3,864,600		£4,044,150	
+10% management fee	£386,460		£404,415	

	Outline element carbon reductions – NON-DOMESTIC			
	Scenario A: Connection to DEN		Scenario B: Communal ASHP	
<i>(SAP10 emission factors)</i>	tCO₂	%	tCO₂	%
Baseline emissions	738		738	
Be Lean savings	123	17%	123	17%
Be Clean savings	257	35%	247	33%
Be Green savings	6	1%	6	1%
Cumulative savings	386	52%	258	51%
Carbon shortfall to offset (tCO₂)	352		375	
Carbon offset contribution	£1,003,200		£1,068,750	
+10% management fee	£100,230		£106,875	

DEN Connection Scenarios

There are two scenarios in relation to the DEN connection:

1. LBH is the appointed heat supplier - the connection charges to connect the development to the DEN within the commercial agreement will need to include any difference in carbon offset based on either:
 - a. Connecting to the Meridian Water Energy Recovery Facility (Scenario A)
 - b. Delivering the back up solution of ASHPs (Scenario B)
2. Third party heat supplier - the council will make an offer to the developer for the development to connect to the Meridian Water Energy Recovery Facility. The developer must connect if it is a reasonable offer, and the offer will include a connection charge. The connection charge should include the carbon offset contribution (as listed in bullet points a and b above), plus any savings from not having to provide Scenario B communal ASHPs. This depends on timing e,g,:
 - a. The development should connect to the Meridian Water Energy Recovery Facility before December 2027. Building Regulations require the development to have a permanent low-carbon heat source after this date.

Stakeholder	Comment	Response
Conservation Officer	Set out in Appendix 15	The less than substantial harm arising to designed and non-designated heritage assets is considered to be outweighed by the significant public benefits arising from the development including but not limited to new housing (including affordable housing, substantial, public realm improvements, new access routes, new civic square, new public park, new employment and training opportunities and new community infrastructure.
Design Officer	<p><u>Summary</u></p> <p>This is a hugely significant development, and is designed with an ambition to create a new neighbourhood of excellent design and living conditions, supporting a vibrant new town centre that would contribute to changing North Tottenham from a place dominated by the presence of Tottenham Hotspurs Football Club as a disruptive monster descending</p>	Officers are confident that the submitted control documents would provide a high quality

Stakeholder	Comment	Response
	<p>every 2 weeks on a sleepy, economically deprived suburb, to a town centre where Spurs are a welcome part of a more rounded, vibrant economy and a safer, more pleasant place to live.</p> <p>It is also notable for the ambition of the architecture, with two grand new public spaces, one a green park, the other a civic square, a parade of tall buildings rising to a dramatic pinnacle beside the new station building, and a landmark new home for the local library, expanded into a learning centre, anchoring the opposite side to the stadium in community, to have a woodland climbing over it and to be designed by an open competition.</p> <p>With such ambition comes danger, that the living conditions will not be great, and the spaces between buildings feel oppressive, between such tall buildings and dense blocks. There are refinements and modifications I would still like to see, to the design quality of Plot B, to the precise location of the tall building in Plot F and the precise form of Plot G and the White Hart Lane frontage. But with changes or responses to those points, I am confident this proposal could be well designed, a vibrant and exciting town centre, a pleasant place to live and something of beauty.</p> <p><u>Context, & Structure of the Application</u></p> <ol style="list-style-type: none"> 1. High Road West is one of the most significant developments proposed in the whole of Haringey and is of London wide significance, both for the amount of development and number of new houses it should be able to provide and for its potential to transform its location and surrounding neighbourhood, catapulting the centre of North Tottenham, from being a sleepy and poverty stricken neighbourhood with an economy and lifestyle dominated by the shadow of the Spurs Football Stadium, lively only on match days, to a vibrant all-week, mixed economy, better paid town centre. 2. Other developments also contribute to this, particularly the redevelopment of the stadium itself, that has done so much to broaden the offer it provides, with other businesses and much more tourism opportunity in and immediately around the stadium and with a striking, well designed appearance set in well considered, designed and built public spaces, restored buildings of heritage significance and more new development to come. The High Road here also contains a collection of some of the best built heritage in Haringey, including Grade II* Listed Queen Ann and Georgian buildings of national significance and a sense of coherence and enclosure around the wider stretch where Northumberland Park and White Hart Lane meet it, at the heart of the North Tottenham Conservation Area, then compressing at the northern end, forming a townscape gateway to Edmonton, and southern end, a similar gateway to the stadium frontage. Ongoing restoration of significant heritage buildings and shopfronts also contribute to this North Tottenham renaissance. 3. But the High Road West development has the potential to complete and round off the elevation of North Tottenham. It will provide a grand setting to the newly improved and expanded White Hart Lane Station, provide a visible, direct pedestrian route from the station to the stadium that will safely accommodate crowds on match and other event days, yet become a vibrant town square at other hours, accommodating sizable commercial, cultural and community uses, to rival in use and architectural form the stadium and provide the economic functions of a town centre. It will also provide a new park, relieving the northern part of the location of its Open Space Deficiency, and reprovided employment uses in yard spaces suitable for a wide range of knowledge, craft and maker businesses. As well as a lot of new homes. 	<p>mixed use developments that broadly delivers on the AAP and HRWMF vision and principles. The final design will be secured at reserved matters stage which will be subject to further daylight, sunlight, overheating, and microclimate assessment as well as design scrutiny and subsequent determination by the Local Planning Authority.</p>

Stakeholder	Comment	Response
	<p>4. This application is for the bulk of the High Road West Site Allocation, NT5 in the Tottenham Area Action Plan DPD (adopted July 2017) and fulfils all the site allocation requirements and guidelines. To accompany the Site Allocation, a more detailed High Road West Masterplan Framework was prepared by Arups for the Council. The areas within the site allocation not part of this application are some of the properties fronting the High Road, generally those where no redevelopment of existing buildings is envisaged. Nevertheless, the masterplan within this application establishes clear principles for those properties. The proposals within this application also accommodate wholesale those other proposals that had received planning approval recently in the northern half of the site.</p> <p>5. One small part of the site is a Detailed Planning Application, whilst the rest is in Outline. The detailed part is the only part of the site that is to the west of the overground railway that runs north-south, marking the western boundary of the Outline Site. The Detailed Site, known as Whitehall Mews, and its surrounding residential context, has an urban character and feels very detached from the land to the east of the railway, whilst still having easy connections through two bridges. Therefore, in this document, the Detailed Site is dealt with completely separately, after the Outline Site.</p> <p><u>Outline Scheme</u></p> <p><u>Masterplan & Street Layout</u></p> <p>6. The Outline Site stretches from Brereton Road at the southern end of the site to the Cannon Road development to the north, with White Hart Lane cutting east-west across the centre of the site. Its western boundary is the raised, London Overground, Liverpool Street to Enfield Town and Broxbourne railway, with White Hart Lane Station immediately south of White Hart Lane itself. North of White Hart Lane there are no bridges over or under the railway until quite a considerable distance north of the site, whilst south of White Hart Lane there is a pedestrian link through within the new station building, and two vehicular streets, Whitehall Street close to the southern edge of the site and Orchard Pace on its southern boundary. The Masterplan Framework asks for provision to be made for a pedestrian bridge in the north-west corner of the site and this application retains provision in the approved scheme for this part of the site.</p> <p>7. The proposed masterplan would create a series of coherent development blocks that frame existing and new streets, as well as the new urban square. being known as Moselle Square (names to be confirmed, & in all likelihood to be different), at the heart of the southern half of the site and the new park, known as Peacock Park, at the heart of the northern half. These streets are extremely well integrated into surrounding existing streets where they are available; connecting to Cannon Road to the north via the two intended southern links in that development, while to the south, Whitehall Street, Brereton Road and Orchard Place remain in place.</p> <p>8. The eastern boundary is generally the backs of properties fronting the High Road or of properties accessed from the High Road, with two exceptions, to the north and south. At the southern end, the proposals include new High Road frontage between Brereton Road and Moselle Street, south of the Conservation Area and opposite the new Spurs Stadium, including a new Library and Learning Centre in an architectural landmark to respond in design terms with the stadium. This is an appropriate response to the context of the stadium and acknowledges the completely different urban character to the High Road in front of the stadium compared to the frontage in the</p>	

Stakeholder	Comment	Response
	<p>Conservation Area. The two shorter sections of High Road frontage at the northern end of the site extend the playground of the school in the Canon Rubber development site, and a small infill where a new east-west street would cross the timber yard site. This and the two existing alleyways off the High Road, Percival Court and Brunswick Square, provide new east-west streets across the northern half of the development, connecting the new housing, workspace and park to the High Road.</p> <p><u>Height, including Tall Buildings</u></p> <p>9. The heights proposed follow the strategy of the Masterplan Framework, with lower heights compatible with the existing buildings where they are close to the retained buildings of the High Road and White Hart Lane, rising up to tall buildings along the railway edge. However the overall heights are increased, as housing targets and expectations of density have increased, active travel and public transport improvements have been delivered, particularly the new White Hart Lane Station and Cycle Superhighway 1, and other tall buildings in the vicinity have been approved, such as the six tall buildings to the south of the new stadium and Spurs other developments at the “Goods Yard” and “Depot” sites within this site, the designs of which, including their heights are adopted wholesale for the tall buildings proposed north of White Hart Lane.</p> <p>10. The six main proposed tall buildings will form a row, with the existing River Apartments tower just to the north forming a seventh. The plan of each tower is strongly aligned north-south, around 40m wide (north-south), but under 20m deep (east-west), and the illustrative scheme suggests and design code requires they would be offset or chamfered in plan to accentuate their slenderness from the north and south, whilst the gaps between each, including to Rivers Apartments, is each around 30m. This means they should avoid “coalescence”; the effect of views of the towers merging together as they overlap, except in a narrow cone of views from the south-south-west and north-north-east, directions where there happen to be relatively few sensitive viewing points. The main views will be from the High Road to the south and north, Northumberland Park to the east, and from White Hart Lane and Tottenham Cemetery to the west, in all cases from where they will be clearly separated</p> <p>11. Tall buildings would be embedded within podia and shoulder blocks of their constituent plots and into the street pattern, tying them into the wider grain and mitigating their scale, with the remainder of the plots formed by mansion block scaled blocks of four to ten storeys, yet with gaps providing glimpses and sun and daylight access into podium gardens.</p> <p>12. Considering each criterion from Haringey’s tall building policy is set in SP11 of our Strategic Policies DPD (adopted 2013 (with alterations 2017) and DM6 of our Development Management DPD (adopted 2017), skipping the 3rd & 4th bullets from the Strategic Policies, that reference the other document and the document used in preparing DM6:</p> <ul style="list-style-type: none"> • The site is within the areas of both the adopted Tottenham AAP and the adopted Masterplan Framework. Both support the principle of tall buildings in this location. The adopted Masterplan Framework established in 2014 a principle that it would be acceptable to have a row of five tall and taller buildings alongside the edge of the railway in the High Road West area of North Tottenham, with the height of those towers dropping away to prevailing existing heights two – four storeys) at White Hart Lane and rising in height north and south. The Masterplan Framework suggested the row of towers north of White Hart Lane 	

Stakeholder	Comment	Response
	<p>should rise to a highest tower at the northern end of the redevelopment area the then Canon Rubber Factory site. As it happened, that site was built out first, being completed in 2015, with its highest block, River Apartments, at 22 storeys. Since then, housing targets, density expectations and public transport accessibility have improved, and it is therefore reasonable for the number and heights to increase;</p> <ul style="list-style-type: none"> • The council prepared a borough-wide Urban Characterisation Study in 2016, which supported tall buildings in this location, right beside the railway edge, well away from the High Road with its sensitive heritage, dropping in height closer to White Hart Lane. The Characterisation Study recognises that the railway forms a significant barrier and buffer between the two sides, with the west side a much quieter, and therefore lower rise neighbourhood than the east, as well as the railway corridor being at its widest beside this site, giving a much greater distance of 30-70m, with the broad, wooded embankments providing further buffering between the two areas; • High quality design especially of public realm is promised in the Design Code and Illustrative Scheme, but will be considered in detail at Reserved Matters phase. Heritage assets and their settings are covered by the Conservation Officer's comments; • They will be capable of being considered "Landmarks" by being wayfinders or markers within the masterplan, marking the station and closing vistas of the east-west streets, the main north-south street, marking the new development with its new park from the south, west and east, and marking White Hart Lane station from the north; • They should also be capable of being considered "Landmarks" by being elegant, well proportioned and visually interesting when viewed from any direction. Aspects of the Design Code on tall buildings also provide assurances that they must be high quality designs, regular form, slender, grounded, with a clear base, middle and top with double height entrances and pronounced features to mark their tops but this will be subject to Reserved Matters application(s); • Consideration of impact on ecology and microclimate encompasses daylight, sunlight and wind, examined in detail below. Impact on ecology could also include impact on the flight of birds and other flying creatures, but this is only likely to be relevant adjacent to open countryside, a large open space or open waterway • The proposed tall buildings will be in <i>some</i> proximity to the built River Apartments, but this is by design to produce an intended effect of a row of tall buildings. They will be sufficiently far apart though, at around 30m from each other, and are slender in width east-west, to avoid detrimental effects of proximity and in any case are a line of aligned, north-south proportioned towers; there would be no canyon effect as their short sides would be the ones facing each other; <p>13. It should be noted that all buildings north of White Hart Lane, to plots J, L & M, are designed currently to be identical to the extant planning permissions for those sites. Nevertheless, <i>all</i> the tall buildings in the whole site, in</p>	

Stakeholder	Comment	Response
	<p>common with all the outline part of the outline part of the development¹, will require Reserved Matters Approval, which will include consideration by the Council's Quality Review Panel as well as the Planning Committee.</p> <p><u>Design Code - Form, Elevational Composition and Materiality</u></p> <p>14. The outline part of the site is not detailed with proposed floor plans and elevations, as is to be expected. These will be part of the Reserved Matters applications and will be considered separately by the Quality Review Panel and Committee when the time comes. However, the applicants have prepared a detailed Design Code to control all aspects of the proposals more detailed than street and block pattern and maximum height. This is accompanied by the Illustrative Scheme, which acts as an illustration of one way the development could be detailed, in accordance with the Parameter Plans and Design Codes.</p> <p>15. The Design Code comprises site-wide coding and plot by plot coding, as well as coding for landscaping. Rules within the design code are all described as "must" where following that rule is mandatory, or "should" where there is <i>some</i> flexibility, but a strong expectation; unlike most design codes, there are no "may" codes, which strengthens the certainty that the code provides.</p> <p>16. Site wide codes include important guarantees of quality like active frontages, defining "Primary Frontages" to where blocks face main streets and spaces, including the High Road, White Hart Lane, Moselle Square, Peacock Park and the key streets connecting them together; these should have shop frontages or primary residential entrances, front doors and habitable room windows, should not have refuse stores and must not have plant room doors or car park entrances. Further codes define high quality design approaches to all the required relationships between buildings and streets, including for instance, detailed coding to ensure refuse storage is convenient yet discreet.</p> <p>17. A series of Architectural and Landscape Codes apply to different character areas of the site, including "Civic" around Moselle Square, "Parkside" around Peacock Park and "Heritage" along the High Road and White Hart Lane and immediately adjacent to significant heritage assets such as The Grange; for these the broad, site-wide materials codes get refined into more specifically appropriate palettes, with masonry, predominantly brick, being the main required building material finish. These codes also define whether balconies should be recessed (such as to the square) or projecting (such as to the park) and that balcony balustrades need to provide privacy and screening to residents' clutter.</p> <p>18. Detailed codes deal with each plot, so I will comment on each one in turn. Plot A is not included, as that is the detailed part of the scheme. Plots H, J, L, M & N are essentially the same as the permitted schemes for The Goods Yard and The Depot, which I will cover briefly together.</p>	

¹ Parts of the detailed planning permissions obtained for The Goods Yard, 867-879 High Road and The Printworks, are detailed planning permissions; namely Plots H1 & 2, K1 & N2 & 4, are detailed planning permission and could be built without further Reserved Matters approval, but none of these contain tall buildings; indeed, they are all characterised by being lower rised. As appropriate to their immediate heritage context close to the rear of the High Road or White Hart Lane.

Plot B

- This is probably the trickiest plot in design terms, with a significant height and quantum of development on a small plot. It is less constrained by development around it, but has the tallest building in the development, on Plot D, immediately to its north across the relatively narrow Whitehall Street to its north and the lower rise Plot C to its east, along with the railway to its west and existing buildings outside of the site to the south, but the parameter plans and design code permit and the illustrative scheme suggest a modest odium courtyard enclosed by one tall block, mansion blocks and a small gap to its south east.
- In and following recent meetings the applicants have successfully shown it could be reconfigured to open up the podium more to the south and even remove completely the southern side, creating a ground level landscaped space, which would provide better day and sunlight and outlook to the communal amenity space and lower floor flats, but could overshadow Plot D, reduce enclosure and animation from front doors and passive surveillance to the streets to the south, which are currently rather lacking in enclosure and animation, and be contrary to the Design Code.
- It is worth pointing out that this block is probably going to be all market sale housing, and that its upper floors will get some of the best light and views. Provided extra effort is taken to ensure the lower mansion block “shoulders” are kept as low as possible, as many as possible are dual aspect and have as generous windows as possible, it should be possible to achieve acceptable living accommodation.
- Whilst the buildings should be as close to the railway as possible, to maximise the podium space and minimise what is likely to be an ugly, unused, service space at lower levels along the railway edge, it will be important to ensure that any residential units are raised above the level of passing trains before they look out onto the tracks. This would seem to suggest the “service” spaces; bins, bukes, plant etc, might be better stacked up on the lower floors of the tower rather than spread out under a podium.

Plot C

- Further clarification has confirmed that the three north-south blocks of Plot C, and the eastern-most side of Plot B will each be over 20m apart, which should ensure good privacy, day and sunlight. As the east-west winds of this block will be lower rise 4-6 storeys with a landscaped amenity roof garden acting in concert with the landscaped western podium garden and trees in the eastern yard space, they should have a green outlook complimenting the three retained trees on their Brereton Road (south) side, as well as creating a good variety of amenity spaces including childrens playspace.
- Provided the Design Code is followed scrupulously, this plot should be capable of providing excellent residential quality suitable of a variety of residents including families and affordable housing tenants, along with business uses in the High Road frontage and yard space, and strong retail / food & beverage uses unto the square & east-west route.

Plot D

- This is the “landmark” plot of the whole southern half of the development, with the tallest tower sitting beside and marking the White Hart Lane Station end of the route from the stadium and acting as a marker for the

Stakeholder	Comment	Response
	<p>station and Moselle Square, particularly in longer views from the west. For this reason, this tower is proposed to have a unique “Feature Building” architectural approach. It <i>should</i> be the tallest building in the development, and it could be a good idea to also procure its detailed design via an architectural competition, as is proposed for Plot E.</p> <ul style="list-style-type: none"> • Nevertheless, the same comments made for the lower floors of the tall building in Plot B, against the railway edge, apply, with the danger of dead space against the railway edge being particularly relevant since this is proposed to house an energy centre. However the 2nd floor podium is sufficiently open, particularly to the south, but also with an attractive slot providing a glimpse / lookout to the station frontage to the north, to promise good quality private amenity space, including children’s play space, and day and sunlight. <p><u>Plot E</u></p> <ul style="list-style-type: none"> • This is the other “landmark”, a low-rise landmark that fills the gap between the Moselle Square and the High Road without hiding the view through, over and past it, from the station to the stadium and vice versa. It is also proposed to have public functions within and publicly accessible landscaping stepping up from the square over its roof, providing a vantage point view. • Nevertheless, this amounts to a particularly tricky design conundrum; a single-use singular building, with active frontage on all sides and no particular back, that must address the square yet hold the High Road frontage as part of the continuous historic high road, repairing the gap potentially opened up by losing the existing “not bad – if unexceptional” terrace on this site, a gap already created by the stadium opposite, a monumental landmark building, against which, despite being smaller, this needs to architecturally compete! Hence it is evident that the proposed open architectural competition is necessary and vital to secure the exceptional design quality such a significant and tricky brief requires. • Securing a reputable competition is essential, and the competition should be organised and administered by a reputable independent expert company or organisation such as RIBA Competitions (link to website) or Malcolm Reading Consultants (also a link). The correct balance between securing national and international interest in the competition with ensuring participants are grounded and connected to the local community, along with ensuring appropriate resourcing and timescale is provided, should be decided on the advice of the specialist consultants, and in accordance with recommendations in the RIBA Competitions Guidance for Clients. Buy in from the local community should also be secured by involvement in the brief writing, but it would be important to ensure that the judging be primarily by independent, expert design professionals. Timing could also be tricky given the need to presumably provide Plot E, completed, before the existing library on the neighbouring Plot C. But above all, it is essential for the exceptional quality of design required here, to secure and guarantee a competition, with integrity. <p><u>Plot F</u></p> <ul style="list-style-type: none"> • This is a large plot, that is expected to house one of the taller buildings in the development, in its north-western side or corner, along with another semi-tall building addressing the square. However, the proposals are generally pretty sound and logical from a design point of view, except in the one crucial aspect of the 	

Stakeholder	Comment	Response
	<p>precise location of the tallest building. The block facing the square, with its civic character and two floors of active town centre-retail use promises to animate this most important side of the square, and the generous two storey high podium, with gaps providing glimpses in and out, its lower shoulder to the south-west permitting day and sunlight in, promises to support excellent residential accommodation for a range of residents.</p> <ul style="list-style-type: none"> The tall building is, however, something of a concern, for its impact directly onto White Hart Lane, as proposed in the illustrative scheme, right on the north-western corner of this plot. The scale difference of such a tall block with no mitigating step in scale to the low-rise buildings, many of heritage significance, and picturesque space of White Hart Lane, curving gently and on this south side tree-lined, seems very harsh. In recent discussions, the applicants have shown us variations within the parameter plans and design code that would push the tower slightly south, closer to the station, with its civic function and wider forecourt a compatible neighbour to tall buildings, and with a moderating 10 or so storey shoulder to White Hart Lane, which would be preferable in design terms. <p><u>Plot G</u></p> <ul style="list-style-type: none"> This modest plot has nevertheless proved problematic, but that is partly because greater detail has gone into this, with the applicants having started its pre-application discussion on the reserved matters, albeit that these are far from compete. The illustrative scheme shows a symmetrical, four-square, six storey building. It is correct that it should close the vista of the street proposed to be heading north opposite this building, but it must equally turn the corner within its own plot, to its west, from White Hart Lane into William Street, which will lead through to Moselle Square, whilst it also needs to step down towards the 2 storey height of the neighbouring Listed Georgian building to its east. The design code correctly states it must be no more than 3 storeys adjacent to the Listed Building, which would seem to contradict the illustrative scheme and parameter plans. In recent discussions the applicants have shown us what would be a far more preferable model for this site's development, as a building that steps up from 3 to 6 and 7; this would respond better to the Listed context and to the street corner, whilst it could still acknowledge the vista to its north in its entrance location. The stepping façade could also continue as 9 and 10 storey steps in Plot F as modified as discussed above, which would provide much greater coherence to the whole south-side-of White Hart Lane frontage, complementary to the Conservation Area and Listed Buildings opposite and with a sense of movement along this major street, progressively, gently rising to the key turning to the station at its western end. <p><u>North of White Hart Lane Plots H & I)</u></p> <ul style="list-style-type: none"> These are really three plots, rather than two. Blocks H 1 and 2 form a plot with the retained Station Masters House that essentially adopts wholesale the approved scheme for The Goods Yard, which is accepted. 	

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> H3 and I1 form a plot with the retained The Grange Listed Building. The design code is strict for these, but they must be very respectful of The Grange, in height, elevational treatment, proportions of fenestration and materials. Blocks I2 and 3 form a plot with the retained no. 6a White hart Lane, a very modest 2 storey house, and with The Chapel, both of heritage significance. The entire block is completed by further buildings on White Hart Lane up to the corner of the High Road, and along the High Road, all outside the boundary of this site, as far as Percival Court, a narrow alleyway that forms its northern edge, with its western edge being that important new street north from White Hart Lane to Peacock Park. As a Back-of-High Road yard space, this is intended to house employment uses in the yard space, perhaps with residential above but as the proposed height of thee is never more than 4 storeys and they will have to step down to all the retained buildings there is not likely to be much accommodation in this plot. Nevertheless, I2/3/etc is worryingly ambiguous in its front and back relationships; it will be necessary to achieve active frontage to the new street to the west as well as to Percival Court to the north, especially as the chapel and its attached Former Pastor's House line up with both those streets but appear to not have any active frontage to those sides. <p><u>Plots to the North</u></p> <ul style="list-style-type: none"> Most of the rest of the plots to the north have planning permission over a large part of them, from the "Goods Yard" "Printworks" & 867-879 High Road (aka "The Depot") permissions, which have been adopted whole, and leave nothing to be said. They should, importantly contribute significantly to the provision of the park, and given that mot of this application site north of White Hart Lane is in a designated area of Open Space Deficiency, it is important that it is delivered early. Two exceptions remain. One comprises J2, L2 and M3 and form the western side of Peacock Park. These are simple, straightforward, residential mansion blocks facing the park and are unproblematic in design. The other is K3, which includes a new street through the existing timberyard site from the High Road to the park, and the blocks either side. This street is considered essential as part of the masterplan and site allocation objective of creating east-west streets, and would be, in this approximate location, roughly evenly spaced between Brunswick Square and the continuation of Brantwood Road, with Percival Court and White Hart Lane similarly spaced. I am also convinced that this street need not be particularly wide, and should have a great deal in common with Percival Court and Brunswick Square, as streets with very narrow, pedestrian only (& possibly cycle) constricted throats onto the High Road and an alleyway character that when the two existing examples have been cleaned up, resurfaced and enlivened with a couple of attractive new buildings, could be streets of considerable charm and appeal, complimenting and strengthening the Conservation Area. All three are noted as being intended for pedestrian priority, not for motor vehicles generally except for very occasional servicing However, the applicants' illustrative scheme is here somewhat vague, albeit that the Design Code is definitive. This may reflect that there is potential for considerable adjustment as more is discovered about the 	

Stakeholder	Comment	Response
	<p>site before a Reserved Matters application. The Design Code seems to be as clear and definitive as possible to preserved design quality for this site.</p> <p><u>Residential Quality (Aspect, Daylight, Sunlight and Wind Microclimate)</u></p> <p>19. Residential quality will be mostly decided when Reserved Matters applications are made for each plot. It is not possible to make any judgements on flat or room sizes or on private amenity space at this stage. There is indicative indication in the Design & Access Statement (p82) and Illustrative Scheme drawings that the number of flats per floor per core should not ever need to exceed eight, and would normally be well below that, which is welcomed.</p> <p>20. The same drawings show how the applicants have been able to demonstrate that layouts could be provided that minimise single aspect homes, avoiding completely single aspect north facing homes, very few single aspect south facing homes, and that blocks can be positioned sufficient distances apart or off-set from each other that residents will benefit from privacy from neighbours.</p> <p>21. The applicants provided Daylight and Sunlight Reports on levels within their development and the effect of their proposals on relevant neighbouring buildings, prepared in accordance with council policy following the methods explained in the Building Research Establishment's publication "Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice" (2nd Edition, Littlefair, 2011), known as "The BRE Guide".</p> <p>22. In the case of higher density developments, it should be noted that the BRE Guide itself states that it is written with low density, suburban patterns of development in mind and should not be slavishly applied to more urban locations; as in London, the Mayor of London's Housing SPG acknowledges. In particular, the 27% Vertical Sky Component (VSC) recommended guideline is based on a low density suburban housing model and in an urban environment it is recognised that VSC values in excess of 20% are considered as reasonably good, and that VSC values in the mid-teens are deemed acceptable. Paragraph 2.3.29 of the GLA Housing SPD supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city. Therefore, full or near full compliance with the BRE Guide is not to be expected.</p> <p>23. Their assessment finds the proposed outline scheme can achieve good levels of daylight and sunlight to most floors, but that it will be more difficult to achieve in many of the lower floors of the outline proposals. For instance, 87% of the facades on Plot B, 81% on Plot C, 83% on Plot D and 93% on Plot F would receive 15% VSC or better. Approximately 67% of each plot will meet or exceed BRE Guide recommended sunlight. Nevertheless, these are only assessments of the facades of proposed blocks, not actual window positions; as part of detailed designs, by making windows larger, varying heights and block profiles, changing flat layouts etc..</p> <p>24. For open spaces, their assessment finds that 54% of Moselle Square and all of Peacock Park would receive at least 2 hours of sunlight on a sunny equinox day (50% is the BRE Guide recommendation). All the podium and roof garden spaces pass except that on Plot D, but the courtyard spaces to the approved Goods Yard scheme do not. Their consultants note that it should be possible to design the amenity areas so that features that have higher dependency on sunlight such as play space and seating are positioned to receive sunlight</p>	

Stakeholder	Comment	Response
	<p>25. The assessment on neighbours finds a range of effects, with most existing residential neighbours not being adversely affected or only to a minor degree, but some close neighbours being significantly affected. The most dramatically affected are a group of homes to the rear of 841 High Road, that were converted from business units without planning permission, to subsequently gain a certificate of lawful development on time grounds. It is also worth noting that, at present, most of the neighbours benefit from the site being unusually under developed, with low rise warehouse units and extensive surface car parking.</p> <p>26. To assess the impact of the proposals on wind microclimate, the applicants carried out wind tunnel testing of a physical model and measured the findings against long term wind statistics applicable to the site, in accordance with the industry standard “Lawson” criteria. Their assessment finds that the proposed towers will cause some downdrafts and tunnelling of wind in some street spaces along the western side of the site. Following some mitigations and design modifications, the locations of potentially uncomfortable wind conditions were found to be reduced to just a few places where sitting would be uncomfortable but strolling fine. Nevertheless, the applicants’ stated intention is that further mitigation as part of detailed landscape proposals should iron out any remaining concern.</p> <p><u>Detailed Scheme</u></p> <p>27. The detailed scheme comprises just two blocks, in Plot A, which is to the west of the railway, on the site of two former community buildings. They are connected to the rest of High Road West via two railway bridges, on Whitehall Street and Orchard Place (which connects to Brereton Road), north and south respectively of Plot B, but the proposed blocks would be closer to Plot D. The immediate context to the west is existing two and three storey council housing in Tenterden Road, Headcorn Road and Penshurst Road, a series of quiet culs-de-sac, with a square green space also immediately adjacent.</p> <p>28. The proposals are of five and six storeys, in brick in an understated but elegant architecture with regular pattern of windows of a vertical proportion, interspersed with columns of balconies. To the eastern of the two blocks, there will be two storey maisonettes on the ground and first floor, with their own front doors and private back gardens. The end unit would be entered off the south facing flank wall onto the existing Whitehall Street, the remainder onto the new pedestrianised and lushly landscaped Whitehall Mews, between this block, the other block and the flank and of the existing housing. Two communal entrances to the flats above would also face this space, whilst at the northern end the terrace is closed with a secure cycle store.</p> <p>29. The western of the two blocks is on the opposite side of Whitehall Mews, shifted south, and L-shaped in plan, with its entrance facing down Whitehall Street. It contains flats on each floor. Both blocks’ communal entrances are celebrated with pigmented concrete “frame” encompassing entrance door, glazing to the entrance hall and solid, painted refuse / cycle store doors. The entrance frame to the western block turns the corner providing more passive surveillance to Whitehall Mews. Dark glazed bricks separate entrance door / windows from utility doors, and a darker red brick is used to the base of the eastern block, around doors and to end flank elevations to the softer pink primary brick. Balconies are thoughtfully detailed in brick, concrete and metal, referencing the traditional pot designs produced in this area.</p>	

Stakeholder	Comment	Response
	<p>30. All flats are dual aspect except for 1-bedroom flats, which face either east or west; the majority of flats are two or three beds, with three and four bed maisonettes. The applicants sun and daylight consultants prepared a full assessment of the detailed development, finding that 91% of proposed rooms, 95% of proposed living rooms, would receive at least the BRE recommended daylight levels. Given the expectations in denser urban developments mentioned above, this is considered an excellent outcome. Sunlight levels are not so successful, 57% receiving recommended annual levels but 95% receiving recommended winter levels. The applicants' consultants suggest these results could be due to the orientation being east-west, but these results can still be considered good in a dense urban setting. The effect of the proposals on neighbours is affected by many of those neighbours having windows that are already significantly overshadowed by balconies, so that their existing day and sunlight levels are poor, and following the development they would be worse. Presumably residents of those homes have learnt not to have a great expectation of daylight from already overshadowed windows. Generally, windows that are not overshadowed do not suffer a significant, or in many cases any noticeable loss of day or sunlight.</p> <p>31. These two blocks are modest but elegantly designed, and form an appropriate transition between the high-density, high-rise urban density and intensity of the rest of High Road West (& indeed other developments beyond, particularly the Spurs Stadium) and the modest, sleepy character and lower rise, scattered layout existing housing to the west of the railway. Details are thoughtful and materials robust, durable, and attractive. The detailed scheme will only give a hint as to what the rest of the scheme, in outline, could be, but if it is a marker for what is to come, it is a promising marker.</p>	
Drainage	<p>Thank you for consulting us on the above planning application reference number HGY / 2021 / 3175, which is a Hybrid Planning application seeking permission for :</p> <p>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.</p> <p>Having reviewed the applicant's submitted Masterplan Flood Risk Assessment document parts 1 to 9, prepared for Lendlease (High Road West) Limited by Robert Bird Group dated October 2021, please see below our comments :</p> <p>1) For the Outline component of the application:</p> <p>We would like to propose a couple of conditions relates to the Surface water Drainage and it's management and maintenance, which will need to be attached as a part of any consent on this planning application.</p>	Conditions are recommended to secure the final drainage and maintenance arrangements.

Stakeholder	Comment	Response
	<p>Please see below some wording for Conditions.</p> <p>Surface Water Drainage condition:</p> <p>No development shall take place until a detailed Surface Water Drainage scheme for site including overland flow path and final detailed design drainage drawings has been submitted and approved in writing by the Local Planning Authority. The development shall not be occupied until the Sustainable Drainage Scheme for the site has been completed in accordance with the approved details and thereafter retained.</p> <p>Reason: To endure that the principles of Sustainable Drainage are incorporated into this proposal and maintained thereafter.</p> <p>Management and Maintenance condition:</p> <p>Prior to occupation of any blocks hereby approved, a detailed management maintenance plan for the lifetime of the development, which shall include arrangements for adoption by an appropriate public body or statutory undertaker, management by Residents management company or other arrangements to secure the operation of the drainage 2 scheme throughout the lifetime of the development. The Management Maintenance Schedule shall be constructed in accordance with the approved details and thereafter retained.</p> <p>REASON: To prevent increased risk of flooding to improve water quality and amenity to ensure future maintenance of the surface water drainage system.</p> <p>2) For the detailed component comprising Plot A</p> <p>With regards to the information as submitted for Plot A specifically, if the scheme is to built as per the submitted FRA, calculations, drawings, management and maintenance plan then we are content with the same and we have no further comments to make on the application for Plot A.</p>	
Economic Regeneration Senior Business Growth Manager	No comment received	
Education	I don't have any particular comments from a place planning perspective at this stage. We have 5 primary schools in close proximity to the Love Lane estate with large surpluses and our annual place planning projections from the GLA take into account future housing trajectories.	Officers are satisfied that the proposal would not have an adverse impact on education provision.
Ecology	No comment received	

Stakeholder	Comment	Response
Emergency Planning and Business Continuity	No comment received	
Employment & Skills Officer	No comment received	
Haringey CCC	No comment received	
Housing Design & Major Projects	No comment received	
Housing team	No comment received	
Noise EHS	No comment received	
Parks & Open Spaces	No comment received	
Planning Policy	<p>Location: 867-879 High Road N17 8EY</p> <p>Proposal: 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/cafe 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"" and ""landscaping"" only reserved in relation to Block E.</p> <p>Key designations</p> <ul style="list-style-type: none"> • Tottenham Area Action Plan • Northumberland Park Growth Area • High Road West Site Allocation (Reference: NT5) • North Tottenham, Conservation Area (part) • Archaeological Priority Area (part) • Listed Buildings • Tall Building Growth Area • Ecological Corridor (part) <p>Site and Proposal</p> <p>The site is located at 867-879 High Road. The proposal is for the redevelopment of the site for a residential led mixed use development scheme with up to 330 residential units, retail/café, area of public open space, and other associated works. Detailed permission is sought for Blocks D and G. change of use at 867 and 869 High Road (Block F), and outline permission is sought for remainder.</p>	<p>Officers are satisfied that the proposal delivers on the vision and aspiration and key principles, when read as a whole. The limited departures are considered to be justified and outweighed by the significant public benefits that the scheme delivers including but not limited to new housing (including affordable housing, substantial,</p>

Stakeholder	Comment	Response
	<p>Principle of development</p> <p>The site is located within the Lea Valley Opportunity Area and North Tottenham Growth Area. Policy SP1 of the Local Plan Strategic Policies document sets out that the Council will promote development within the North Tottenham Growth Area. Haringey's Growth Areas are areas with the greatest capacity for growth and it is expected that the majority of homes, jobs and infrastructure will be delivered in these areas over the plan period.</p> <p>The Tottenham Area Action Plan (AAP) gives effect to the Council's spatial strategy for Tottenham by identifying and allocating development sites. The site falls within the High Road West site allocation (reference NT5). The allocation covers the High Road West regeneration area of which 867-879 High Road is just a relatively small part. The allocation is expected to deliver a new residential neighbourhood and a new leisure destination for London comprising 1,200 new residential units (net).</p> <p>The Council adopted the High Road West Masterplan Framework in December 2014. In advance of the Tottenham AAP being finalised, this set out key principles for the redevelopment and regeneration of High Road West. 867-879 High Road is located within the northern part of High Road West which is identified for a new residential neighbourhood (Peacock Gardens) set around a large new community park.</p> <p>The proposal seeks to deliver a residential led mixed use development scheme with up to 330 residential units and small retail/café unit. It will involve the loss of circa 5000sqm retail floorspace, however the existing retail use is within an out of centre location and does not have specific policy protection. The residential led mixed use development of the site generally accords with the Local Plan Strategic Policies document, Tottenham AAP and High Road West Masterplan and the principle of the proposal is therefore considered acceptable.</p> <p>Masterplanning</p> <p>Policy AAP1 of the Tottenham Area Action Plan expects all development proposals in the AAP area to come forward comprehensively to meet the wider objectives of the AAP. To ensure comprehensive and coordinated development is achieved, a masterplan will be required to accompany development proposals which form part of a Site Allocation.</p> <p>The Council adopted a comprehensive Masterplan Framework for the High Road West in 2014. It is not necessary therefore for the application to be accompanied by a masterplan, instead the application should accord with the principles within the Council's approved masterplan. The Tottenham High Road Masterplan framework envisages the creation of a new residential neighbourhood in the northern part of the High Road West area. The land uses proposed at the site (867-879 High Road) accord with the masterplan framework and in general terms will support the creation of such a neighbourhood. Detailed consideration will need to be given to the layout of development and vehicular, cycle and pedestrian routes to ensure that the regeneration opportunity is optimised and that the site integrates well with other sites which have already come forward (to the north) or are expected to come forward in the remainder of the plan period (to the south).</p>	<p>public realm improvements, new access routes, new civic square, new public park, new employment and training opportunities and new community infrastructure.</p>

Stakeholder	Comment	Response
	<p>Quantum of development</p> <p>Policy SP1 of the Local Plan Strategic Policies document states that the Council expects development in Growth Areas to maximise site opportunities. The High Road West site allocation does not specify how many dwellings should be delivered at 867-879 High Road rather the site is expected to contribute to the overall target of 1,200 net residential units within the wider allocation.</p> <p>Policy SP2 of the Local Plan Strategic Policies document sets out that high quality new residential development in Haringey will be provided by ensuring that new development, amongst other things, meets the density levels set out in the Density Matrix of the London Plan. In December 2019 the Mayor published his Intend to Publish version of the new London Plan. This has been subject to examination and includes changes in response to the Inspectors' recommendations. It moves away from the use of a density matrix to a more holistic approach to making the best use of land and achieving sustainable densities. Regard should be had to policy D3 of the Intend to Publish London Plan when assessing the quantum of proposed development on the site. Policy D3 seeks to optimise site capacity through a design-led approach. This approach is consistent with policy DM11 of the Council's Development Management DPD which expects optimum housing potential of a site to be determined through a rigorous design-led approach.</p> <p>Mix of housing Policy</p> <p>DM11 of the Development Management DPD requires that proposals for new residential development should provide a mix of housing. The application documentation indicates that only 14% of homes would be 3+ bed units. Consideration should be given as to whether it would be appropriate for the scheme to deliver more family sized housing as the proposed amount is low.</p> <p>Affordable Housing</p> <p>The proposal provides 25% affordable housing by habitable room. An affordable housing viability appraisal has been provided to justify this level of provision which is short of the borough wide affordable housing target of 40% set out in Policy SP2 of the Local Plan Strategic Policies document. The viability appraisal should be scrutinised to ensure that the level proposed is the maximum reasonable amount of affordable housing provision. The Council's Housing team should be consulted in relation to the proposed tenure mix.</p> <p>Transport & Access</p> <p>We note that detailed comments have been provided by the Transport team in connection with the application. It is important that the access and movement proposals support comprehensive development across the High Road West allocation. Parameter Plan 05 addresses potential future accesses to the site from the south. It should be demonstrated that these are deliverable and will facilitate the connections envisaged in the High Road West Masterplan Framework.</p>	

Stakeholder	Comment	Response
	<p>Tall building</p> <p>It is noted that a tall building is proposed within the site. Only outline planning permission is sought for the tall building as part of this application. North Tottenham has been identified as being potentially suitable for the delivery of tall buildings as set out on Figure 2.2 of the Development Management DPD. Regard should be had to policy AAP6 of the Tottenham Area Action Plan and policies DM1 and DM6 of the Development Management DPD when deciding if the proposed tall building is appropriate in this location.</p> <p>Heritage</p> <p>The south eastern corner of the site falls within the North Tottenham Conservation Area. The part of the site falling within the Conservation Area contains a Grade II Listed Building (867-869 High Road). The proposal retains the Listed Building and seeks to convert it to residential use. The retention of the Listed Building is supported. Policy AAP8 of the Tottenham Area Action Plan sets out that the Council will encourage heritage-led regeneration and development on Tottenham High Road. Policy DM9 sets out development that conserves and enhance the significance of a heritage asset and its setting will be supported. The Council's Conservation Team should be consulted to ensure that the proposals will not have an unsatisfactory impact on the historic environment.</p>	
Pollution Team	<p>Thanks for contacting the Carbon Management Team (Pollution) regarding the above hybrid planning application for outline component comprising demolition of existing buildings and creation of new mixed- use development including residential (Use Class C3), commercial, business & service (Use Class E), leisure (Use Class E), community uses (Use Class F1/F2), and Sui Generis uses together with creation of new public square, park & associated access, parking, and public realm works with matters of layout, scale, appearance, landscaping, and access within the site reserved for subsequent approval; and Detailed component comprising Plot A including demolition of existing buildings and creation of new residential floorspace (Use Class C3) together with landscaping, parking, and other associated works and I will like to comment as follows.</p> <p>Having considered all the relevant supportive information especially the Construction Environmental Management Plan dated October 2021, Energy & Sustainability Statement dated October 2021 taken note of section 5 (Silverside Energy Statement), Geotechnical and Geo-Environmental Desk Study with reference 4200 – RBG – ZZ – RP – GE – 00001 Revision P04 prepared by RBG Ltd dated 8th October 2021 taken note of Table 6.3 (Preliminary Conceptual Site Model (CSM)), sections 4 (Ground Conditions), 5 (Preliminary Contaminations Assessment) and 7 (Recommendations), Geotechnical and Geo-Environmental Desk Study Report with reference 4202 – RBG – ZZ – ZZ – RP – GE – 001 Revision P03 also prepared by RBG Ltd dated 20th October 2021 taken note of Tables 13 & 14 (Preliminary Conceptual Site Model) for North and South Zone respectively, sections 7 (Ground Conditions & Environmental Setting), 8 (Preliminary Contamination Assessment), 10 (Hazard Register) and 11 (Conclusions) as well as Environmental Statement Vol 4 CH07 Air Quality which we consider insufficient in addressing the details AQ concern as advised in our email dated 18th June, 2021 @ 1921hr, please be advise that we have no objection to the proposed development</p>	<p>Conditions are proposed to secure further contaminated land and air quality assessment and associated mitigation, construction and environmental management plans and CHP details.</p>

Stakeholder	Comment	Response
	<p>in respect to air quality and land contamination but the following planning conditions and informative are recommend should planning permission be granted.</p> <p>1. <u>Land Contamination</u> Before development commences other than for investigative work:</p> <ul style="list-style-type: none"> a. Using the information already submitted in the Geotechnical and Geo-Environmental Desk Study reports above, chemical analyses on samples of the near surface soil in order to determine whether any contaminants are present and to provide an assessment of classification for waste disposal purposes shall be conducted. The site investigation must be comprehensive enough to enable; a risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing any additional remediation requirements where necessary. b. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site. c. Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and; d. A report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied. <p><u>Reason:</u> To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p>2. <u>Unexpected Contamination</u> If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.</p> <p><u>Reasons:</u> To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework.</p> <p>3. <u>NRMM</u></p> <ul style="list-style-type: none"> a. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at http://nrmm.london/. Proof of registration must be 	

Stakeholder	Comment	Response
	<p>submitted to the Local Planning Authority prior to the commencement of any works on site.</p> <p>b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.</p> <p><u>Reason:</u> To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMMLEZ</p> <p>4. <u>Demolition/Construction Environmental Management Plans</u></p> <p>a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst</p> <p>b. Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority.</p> <p>The following applies to both Parts a and b above:</p> <p>a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).</p> <p>b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include:</p> <p>i. A construction method statement which identifies the stages and details how works will be undertaken;</p> <p>ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays;</p> <p>iii. Details of plant and machinery to be used during demolition/construction works;</p> <p>iv. Details of an Unexploded Ordnance Survey;</p> <p>v. Details of the waste management strategy;</p> <p>vi. Details of community engagement arrangements;</p> <p>vii. Details of any acoustic hoarding;</p> <p>viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance);</p> <p>ix. Details of external lighting; and,</p> <p>x. Details of any other standard environmental management and control measures to be implemented.</p> <p>c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on:</p> <p>i. Monitoring and joint working arrangements, where appropriate;</p> <p>ii. Site access and car parking arrangements;</p>	

Stakeholder	Comment	Response
	<p>iii. Delivery booking systems; iv. Agreed routes to/from the Plot; v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the Plot during the demolition/construction phase; and vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation offacilities such as concrete batching.</p> <p>d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control(2014) and shall include:</p> <p>i. Mitigation measures to manage and minimise demolition/construction dust emissions during works; ii. Details confirming the Plot has been registered at http://nrmm.london; iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in theevent of Local Authority Inspection; iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kepton site, which includes proof of emission limits for equipment for inspection); v. A Dust Risk Assessment for the works; and vi. Lorry Parking, in joint arrangement where appropriate.</p> <p><u>The development shall be carried out in accordance with the approved details. Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out.</u></p> <p><u>Reason:</u> To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic,protect air quality and the amenity of the locality.”</p> <p>5. <u>Air Quality Assessment</u></p> <p>In other to minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) where development islikely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people),</p> <ul style="list-style-type: none"> • An Air Quality Neutral Assessment, taking into account emissions from the installation of temporaryand permanent boilers, transport sources and all other sources of emissions must be undertaken and submitted for approval. • Otherwise, the applicant will need to provide us a current addendum AQ assessment of the proposed development taken into consideration all emission sources for the purposes of reaching aconclusion on its significance effects on local air quality. <p><u>Reason:</u> To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design andConstruction.</p>	

Stakeholder	Comment	Response
	<p>6. <u>Combined Heat and Power (CHP) Facility</u></p> <p>Prior to the commencement of the development, details of the Combined Heat and Power (CHP) facility of the energy centre and associated infrastructure shall be submitted in writing to and for approval by the Local Planning Authority. The details shall include:</p> <ul style="list-style-type: none"> a) location of the energy centre; b) specification of equipment; c) flue arrangement; d) operation/management strategy; and e) the method of how the facility and infrastructure shall be designed to allow for the future connection to any neighbouring heating network (including the proposed connectivity location, punch points through structure and route of the link) f) details of CHP engine efficiency <p>The Combined Heat and Power facility and infrastructure shall be constructed in accordance with the details approved, installed and operational prior to the first occupation of the development and shall be maintained as such thereafter.</p> <p><u>Reason:</u> To ensure the facility and associated infrastructure are provided and so that it is designed in a manner which allows for the future connection to a district system.</p> <p>7. <u>Combustion and Energy Plant</u></p> <p>Prior to installation, details of the gas boilers to be provided for space heating and domestic hot water should be forwarded to the Local Planning Authority. The boilers to be provided for space heating and domestic hot water shall have dry NOx emissions not exceeding 40 mg/kWh (0%).</p> <p><u>Reason:</u> As required by The London Plan Policy 7.14.</p> <p><u>Informative:</u></p> <ul style="list-style-type: none"> 1. Prior to demolition or any construction work of the existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out. 	
Public Health	<p>Background:</p> <p>Public Health has reviewed the High Road West site planning application and development proposals of this scale should consider the impacts of health and wellbeing on communities in line with national, London and Haringey planning policies. This document describes the policy context and provides comments on how the</p>	Officers are satisfied that subject to conditions, the proposal would

Stakeholder	Comment	Response
	<p>development addresses health impacts. We have viewed the London Healthy Urban Development Unit Rapid Health Impact Assessment (HIA) submitted by the applicant.</p> <p><u>Housing design</u></p> <p>Key points we would like to ensure the development considers:</p> <ul style="list-style-type: none"> • The development build is Disability Discrimination Act (DDA) compliant. In housing and other community facilities (i.e., libraries), must ensure the accessible toilets are large enough to accommodate people with disabilities and baby changing facilities. Feedback from Disability Action Haringey asks us to consider larger disabled toilets to facilitate parents who are in wheelchairs who look after their own children. The wheelchair and baby change do not work well when both are needed at the same time. • Has the development considered full rotation of the large <u>electronic</u> wheelchairs in accessible toilets and homes? Places to store and charge them? Are there public spaces where electric wheelchairs can be charged? Do the workspaces accommodate accessible wheelchair access? • The High Road West site including outdoor spaces are dementia and autism friendly and considers other physical disabilities. A checklist of recommendations for designing dementia- friendly outdoor environments Neighbourhoods for life. https://www.housinglin.org.uk/assets/Resources/Housing/Support materials/Other reports and guidance/Neighbourhoods for Life Checklist.pdf • The design and access statement should also mention fire management plans and how will this development take into consideration the lessons learned from the Grenfell Tower incident? We would like to ensure preventative fire measures are in place for the safety of the community. • Installation of public drinking fountains in high footfall areas, can improve people's health by providing a broad access to safe and affordable drinking water and reducing plastic waste pollution. Climate change is likely to intensify the urban heat island effect and as a result caused discomfort and excess summer deaths amongst vulnerable people. Measures can be put in place to help to achieve the Mayor's target to make London a zero-waste city • Lighting Strategy – do the measures support a reduction in crime and support community safety? Access to biodiversity contributes to mental health and wellbeing, the strategy must consider the impact of night-time lighting on biodiversity and measures are put in place to protect i.e., light-sensitive species. Therefore, the type and location of lighting to balance both needs are crucial. <p><u>Healthcare and social care services and other social infrastructure</u></p> <p>Key points we would like to ensure the development considers:</p> <ul style="list-style-type: none"> • Housing developments should be accessible by a lift that can accommodate an ambulance trolley, one of the main methods of transportation of immobile patients is by trolley bed. Housing SPG Standards 15 and 16 relate to the provision of lifts. Good practice standard - the provision of an ISO standard 13 	<p>not have an adverse impact on public health.</p>

Stakeholder	Comment	Response
	<p>person lift in a configuration which can accommodate a trolleybed (see Department of Health Technical Memorandum 08-02: Lifts, https://www.england.nhs.uk/estates/health-technical-memoranda/).</p> <p><u>Access Green Spaces, Trees and Biodiversity</u></p> <p>Positives:</p> <ul style="list-style-type: none"> - Retaining ecological corridor and green links to the wider ecological network is being considered in this large-scale development. - There is a good understanding on the importance of the relationship between water and the people of Tottenham. We are happy to see a water feature is being introduced in Moselle Square and as a night-time feature. This is very positive to see as blue spaces have a positive impact on the wellbeing of the community. - Outdoor spaces to encourage socialising i.e., garden space on the rooftop <p>Key points we would like to ensure the development considers:</p> <ul style="list-style-type: none"> • We would like to see there is a Community Liaison Manager who builds a strong relationship with local businesses and residents prior to the demolition, and they feel confident to contact the manager. Also, to ensure there is a feedback and complaint procedure in place for residents and businesses open after working hours. • Contamination assessment of Moselle River – We agree water has good benefits for mental health, this would need to be opened up in a safe manner to prevent public health harms. We would want to ensure that open water has been tested for E.Coli and other water-borne infections to prevent any outbreaks particularly in prolonged and hot weather. • We are glad to see there is some increase in biodiversity. The GLA has set a 0.3 Urban Green Factor (UGF) for commercial schemes and 0.4 for residential. The HRW Masterplan achieved a score of 0.22, below the target. We would like to know the breakdown of the UBF for the commercial scheme and residential in HRW masterplan as well as further design solutions to increase UGF (green roofs, living walls). • Large trees with uplighters – we would like to know how many of the large trees will not have uplighters to allow urban biodiversity. • The design and access statement mentions “roof terraces at higher storeys are less prescriptive, providing shared recreational spaces (for older age groups with higher vantage points and quieter environments” – we would like to ensure there is security measures mentioned in the roofscape strategy. • More details on teenage play including size measurements and the opportunities available 	

Stakeholder	Comment	Response
	<p>for them.</p> <ul style="list-style-type: none"> We would like to see more at how the scheme will address growing obesity levels in children, alcohol consumption, and address other health inequalities pertinent to the area. Public Health is willing to support with data. <p><u>Accessibility and active travel</u></p> <p>Key points we would like to ensure the development considers:</p> <ul style="list-style-type: none"> Design of the cycle storage - consider decreasing the maximum number of cycles per store (currently maximum 70 cycles per store) and with different entrances to the cycle storage for additional safety measures and ensure residents feel safe to use the cycle storage. <p><u>Comments on the Rapid Health Impact Assessment (HIA)</u></p> <p>Minor corrections</p> <ul style="list-style-type: none"> Boss leisure is a business not a leisure centre (page 35) No mention of those who don't have access to recourse to public funds (page 36). This should be included as a priority group with those on low income. Access to healthy foods - mention of food banks and affordable healthy foods. We would like to see a map illustrating all the healthy food businesses in High Road West site as there are many Turkish and Polish grocery stores. (4.3.1) Education, training and skills - child minders and special needs schools are not included. The East part of the borough already has a high number of young people compared to other parts of the borough; we would like to see a list of all the schools in the area. <p>Addressing obesity/overweight</p> <ul style="list-style-type: none"> The proposals encourage the use of stairs by ensuring that they are well located and welcoming, having stairs located to the front and with windows allowing natural daylight can encourage people to use them. <p>Access to healthcare services and other social infrastructure</p> <ul style="list-style-type: none"> Map showing the social infrastructure surrounding the site – primary and secondary schools, GP, library, allotments/community growing spaces, sports facility, cemetery, public open space. There will be an increase in demand for secondary school places and this will create the need for mitigation (such as financial contributions as suggested by the applicant). We expect the applicant would be required to pay CIL which would contribute towards investment in education. 	

Stakeholder	Comment	Response
	<p>Social cohesion and inclusive design</p> <ul style="list-style-type: none"> - It states there has been no specific opportunities identified for the voluntary and community sectors – Has voluntary and community sectors in the area been consulted on this? <p>Air quality, noise and neighbourhood amenity</p> <ul style="list-style-type: none"> - Dust Management Plan (DMP) must also be considered in Construction Environmental Management Plan (CEMP). There are construction works being carried out in Enfield, Edmonton, which may coincide with High Road West site. Therefore, we must ensure this is being considered and work across borough, when looking into reducing the cumulative impact of dust, air pollution and noise. - Further mitigation measures may also include a dust, noise and vibration monitoring programme developed to ensure that sensitive receptors are monitored and noise is managed throughout the construction phase. <p>Access to work and training</p> <ul style="list-style-type: none"> - Economic development can be used to improve people's health and reduce health inequalities. We would like to ensure there are sustainable and high-quality professional jobs and a particular focus on promoting better quality of jobs for workers in low-paid roles. We need to ensure there is not a focus on entry level jobs and ensure the number of access to real job, training and types of jobs is monitored on a regular basis throughout the build. - How many jobs are being created and the types of jobs for ethnic minorities? - What is the specific net gain of new jobs being created? - Further assessment needed on childcare facilities – the number of childcare facilities in the area and how many needed if there is a demand. - The Proposed Illustrative Development must ensure there is a proportion of floorspace will be dedicated to affordable workspace for local businesses, specifically designed to meet the needs of SMEs. 	
Regeneration	No comment received	
Transportation	<p>Environmental Statement Clarification is sought on the definition of 'interim scenario'. At Paragraph 15.2.7, it is stated that it will be assessed in two future year scenarios (peak demolition and construction phase, and complete and occupied phase), however elsewhere in the document (Paragraph 15.1.5), it is stated that the interim scenario is the scenario whereby only the southern site is developed. What is the scenario whereby both southern and northern sites are developed, and has it not been used as a basis for the environmental impact assessment?</p> <p>Chapter 15. Transport & Access The receptor sensitivities are all set at a 'medium' level, which lacks subtlety:</p>	Officers are satisfied that subject to conditions, the proposal would not have a severe impact on the transport network.

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> • Pedestrians (including wheelchair users, people with pushchairs and people with mobility impairments) and cyclists are vulnerable road users and their sensitivity should be high. Any changes to conditions are likely to have a greater impact on them due to the time and effort required to travel on foot or by cycle. • Drivers are not the only road users that should be included. As a more general and inclusive term, this category should be renamed 'Motorised vehicle users' (including private car, taxi, bus drivers, delivery and servicing vehicle drivers, construction vehicle drivers and any vehicle passengers but excluding bus passengers). All motorised vehicle users experience delays as a result of changes in traffic flows and changes in routes which may affect only a proportion of their journeys. As such, their sensitivity should remain medium, as already suggested. • Bus passengers' sensitivity should be medium as they are sensitive to changes in traffic flows and routes which may affect only a proportion of their journeys. • Rail users' sensitivity should be medium due to localised changes in passenger flows which may affect only a proportion of their journeys. <p>In Table 15.2, it is stated that, for amenity, fear and intimidation, the affected receptors include pedestrians, cyclists, bus and rail passengers. However, amenity, fear and intimidation do not normally apply to bus and rail passengers as they are already onboard services, only to pedestrians (including before and after using public transport services) and cyclists.</p> <p>The list of impacts for assessment is fine and in line with the guidance, however as I indicated in early feedback (informal scoping opinion request and formal scoping opinion request – HGY/2021/2960) it would be welcome to assess an additional impact, which is road user on-street parking. As you know, parking is critical in this scheme and the impact of it deserves to be assessed, especially as the on-street parking stock would be significantly altered and a substantial number of on-street parking activity (whether on public or private roads) would be generated. The parking stress surveys carried out as part of the Transport Assessment would be a good starting point to establish a baseline, on which the assessment of the parking impact could be built for future year scenarios.</p> <p>In light of the revised receptor sensitivities, and the effect scale matrix for the evaluation of significance, all likely significant effects, residual effects and residual cumulative effects should be reviewed to reassess the different impact groups of the proposed development. The review should also take account of the revised multi-modal trip generation assessment in the Transport Assessment (proposed and net alike).</p> <p>For each impact (severance, delay etc), and in particular if the assessment of the magnitude of impact is qualitative as opposed to quantitative, it is important for the proposed magnitude of impact to be clearly stated, in line with Tables 15.4 and 15.5 of Chapter 15 of the October 2021 ES. Below is a quick suggested re-appraisal of the likely significant effects with comments and questions for review:</p>	

Stakeholder	Comment			Response
	Impact and Receptor	Likely Significant Effect (Steer)	Likely Significant Effect (LB Haringey)	
	<i>Demolition and Construction</i>			
	Severance: Pedestrians and Cyclists	Temporary, medium-term, local, adverse, and of minor significance	Very low magnitude of impact x high sensitivity = minor effect	
	Driver Delay: Drivers	Temporary, medium-term, local, adverse, and of minor significance	Medium magnitude x medium sensitivity = moderate effect – not minor	
	Public Transport Delay: Bus Passengers	Temporary, medium-term, local, adverse, and of minor significance	<i>Low or medium magnitude x medium sensitivity – minor or moderate effect? How many workers would commute to and from the site at peak? We need some data here to explain the magnitude of impact.</i>	
	Public Transport Delay: Rail Passengers	Negligible	<i>Why has the impact on rail not been assessed? Is it assumed that construction workers and visitors would not travel to and from the site by London Overground? If so, why?</i>	

Stakeholder	Comment			Response
	Pedestrian and Cyclist Delay: Pedestrians and Cyclists	Temporary, medium-term, local, adverse, and of minor significance	Medium magnitude x high sensitivity = major effect – not minor	
	Amenity, Fear and Intimidation: Pedestrians and Cyclists	Temporary, direct, medium-term, local, adverse, and of minor significance	Low magnitude x high sensitivity = minor effect	
	Complete and Operational Development			
	Severance: Pedestrians and Cyclists	Permanent, direct, long-term, local effect of minor beneficial significance	Very low magnitude x high sensitivity = minor effect – not negligible <i>Residual effects: With permeability improved throughout the site, would that equate to an overall negligible effect? This should also be updated to reflect the outcome of the discussions had with THFC/Spurs around crowd management and mitigation measures.</i>	
	Driver Delay: Drivers	Negligible	Very low magnitude x medium sensitivity = negligible effect	
	Public Transport Delay: Bus Passengers	Permanent, direct, long-term, local effect of minor adverse significance.	Low magnitude? x medium sensitivity = minor effect <i>I think we need a little more than professional judgement here. To justify the low magnitude of impact, we need a matrix with percentages of change per bus service to assess the magnitude of impact. The capacity of typical buses per line should be stated and an overall view can then be taken on the percentage of change throughout all affected bus services.</i>	
	Public Transport Delay: Rail Passengers	Permanent, direct, long-term, local effect of minor adverse significance.	Low magnitude x medium sensitivity = minor effect	
	Pedestrian and Cyclist Delay: Pedestrians and Cyclists	Permanent, direct, long-term, local effect of minor beneficial significance	Very low magnitude x high sensitivity = minor effect	
	Amenity, Fear and Intimidation: Pedestrians and Cyclists	Permanent, direct, long-term, local effect of minor beneficial significance.	Low magnitude x high sensitivity = minor effect	
	Accidents and Safety: Pedestrians and Cyclists	Permanent, direct, long-term, local effect of minor beneficial significance	Low magnitude x high sensitivity = minor effect	
ES Non-Technical Summary including Addendum				

Stakeholder	Comment	Response
	<p>The non-technical summary is fine, subject to any numerical revisions in light of the requested changes to the trip generation assessments (proposed and net), as well as revisions with respect to the predicted likely significant effects (see comments on the ES chapter above).</p> <p>No comment</p> <p>Design Code Pedestrian routes – The absolute minimum pedestrian footpath width must be 1.8m, not 1.5m. Otherwise, the minimum of 2m should be met. Cycle routes – Across the site, high-quality segregated facilities should be provided to separate cyclists from both pedestrian and vehicular traffic, over and above minimum requirements.</p> <p>Parameter Plans</p> <p>No comment.</p> <p>Outline Residential Travel Plan The baseline surveys would be undertaken within 6 months of first occupation of the first phase or 75% residential occupation, with further surveys undertaken as each subsequent phase is complete and occupied. It should be made clear throughout the document that the trigger for the baseline travel surveys would be within 6 months of first occupation or once 75% occupation has been reached, whichever occurs first.</p> <p>The forecast residential modal splits in Table 3.1 must be revised in line with the comments made on the Transport Assessment, notably in terms of car driver and passenger mode shares.</p> <p>Likewise, the targets set in Table 4.1 will have to be revised for the same reasons. Although a reduction in the car driver and passenger mode shares is desirable over time, and in particular over the monitoring period, the decrease may only be in the region of a few percentage points.</p> <p>References to car parking must reflect that all Council housing residents will be able to access a car parking space if they need one (not just decanted residents). Family parking should also be mentioned in the measures and action plan accordingly.</p> <p>The Residential Travel Plan would be secured by Section 106 planning obligation. We would seek preoccupation interim documents then post-occupation full documents after the completion of the baseline travel surveys, to be repeated for each phase as the phased delivery of the proposed development progressed. For the present hybrid application, interim and operational documents would be sought for Plot A but the mechanism for future phases to be delivered with Reserved Matters would also be secured in the Section 106 agreement.</p> <p>Outline Framework (Commercial) Travel Plan</p> <p>Individual tenants would have to produce their own individual Travel Plans or Travel Plan Statements by using the Framework Travel Plan as a basis, if they are above the minimum threshold for producing a document as per the TfL</p>	

Stakeholder	Comment	Response
	<p>guidance. They would also be required to have their own Travel Plan Coordinators answering to the site-wide, overarching Travel Plan Co-ordinator.</p> <p>The baseline travel survey would be undertaken within six months of first occupation of each phase of development, at the same time as the baseline delivery and servicing surveys.</p> <p>The forecast commercial modal split in Table 3.1, derived from the Transport Assessment (Table 5.25), shows an assumed 50-50 split between London Overground and bus services. My earlier comments on the Transport Assessment did not pick this up, therefore I would like to understand why this assumption has been made as it seems highly arbitrary. Owing to the high volume of commercial trips forecast to be made by public transport during the peak hours (in excess of 500 two-way movements), a significant number of trips could potentially be directed to the wrong public transport mode and the impact assessment undertaken in the Transport Assessment skewed as a result.</p> <p>The Framework Travel Plan and associated documents would be secured by Section 106 planning obligation. We would seek pre-occupation interim documents then post-occupation full documents (including an updated operational Framework Travel Plan and individual Travel Plans/Travel Plan Statements) after the completion of the baseline travel surveys, to be repeated for each phase as the phased delivery of the proposed development progressed. For the present hybrid application, the mechanism for future phases to be delivered with Reserved Matters would also be secured in the Section 106 agreement.</p> <p>Outline Delivery and Servicing Plan</p> <p>The delivery and servicing trip generation figures presented in Table 3.1 are derived from Table 5.28 in the TA, and therefore may have to be revised depending on the outcome of the comparison with TRICS which has been requested to ascertain the robustness of the proposed trip rates proposed by Steer. The resulting loading bay requirements (based on the maximum parameters) should also be derived from the delivery and servicing peak hour and be stated in the Outline Delivery and Servicing Plan (DSP).</p> <p>For the present hybrid application, both an interim DSP and a Detailed DSP would be sought for the masterplan (including Plot A) to be produced respectively before occupation and post occupation (after the baseline delivery and servicing surveys undertaken within 6 months of first occupation). The mechanism for the DSP as part of future phases to be delivered with Reserved Matters applications would also be secured by planning condition. The surveys would be carried out at the same time as the baseline travel surveys.</p> <p>Outline Construction Environmental Management Plan</p> <p>Revised Demolition and Construction Environmental Management Plan (DEMP/CEMP) would be submitted for each future RMA.</p>	

Stakeholder	Comment	Response
	<p>A Detailed Construction Logistics Plan (CLP) would be secured by planning condition for Plot A. Future RMAs would include Outline CLPs as part of revised CEMPs/DEMPs, and Detailed CLPs would subsequently be secured by planning condition associated with each RMA/phase of development.</p> <p>Cycle storage would be provided on site for site operatives, with numbers to be reviewed against demand on a monthly basis. This is welcome. It is understood that, at peak, 300 Lendlease and extended supply chain management staff to be present on site full time alongside circa 1,400 site operatives.</p> <p>The maximum number of on-site personnel would therefore be around 1,700 people on two occasions, in 2026 and 2028. The peak HGV traffic per month is expected to be attained in mid-2026 and late 2028 with 7,100 vehicle movements consisting of 4,300 HGV and 2,800 LGV movements. The peak year is expected to be 2028 with 14,780 movements. The Transport Assessment indicated that the impact of construction at peak would lead to fewer vehicles than the existing vehicle trip generation.</p> <p>Due to the proximity of the site with a number of schools, every effort should be made to schedule deliveries and collections where construction traffic is to pass by schools outside school opening and times (namely 08:00-09:00 and 15:00-16:00). Generally, construction deliveries and collections should also be scheduled outside the local network peak hours. Please ensure this is reflected in future documents.</p> <p>Section 106 Heads of Terms</p> <ul style="list-style-type: none"> - Car-free/capped development – both residential and commercial, including £5,000 towards the amendment of the local Traffic Management Order, excluding Council housing residents - Car club: <ul style="list-style-type: none"> o Car club provision (10No. on-site spaces) o Establishment or operation of a car club scheme o Contributions from developer to residents - two years' free membership for all residents and £50 (fifty pounds in credit) per year for the first 2 years and an enhanced car club membership for the residents of the family-sized units (3+ bedrooms) including 3 years' free membership and £100 (one hundred pounds in credit) per year for the first 3 years – CPZ contributions to the ongoing review and expansion of existing Controlled Parking Zones – under review. <ul style="list-style-type: none"> - S.278 highway works agreement (scope and extent of works to be defined after obtaining a detailed Section 278 drawing for costing purposes) - Commercial Travel Plan (including Interim and Full documents, monitoring reports and a £3,000 monitoring contribution) including: <ul style="list-style-type: none"> o Appointment of a Travel Plan Coordinator (to also be responsible for monitoring Delivery Servicing Plan) o Provision of welcome induction packs containing public transport and cycling/walking information, map and timetables to every new tenant/organisation 	

Stakeholder	Comment	Response
	<p>o Cyclist facilities (lockers, changing rooms, showers, drying rooms for the non-residential uses) - Residential Travel Plan (including Interim and Full documents, monitoring reports and a £3,000 monitoring contribution) including:</p> <p>o Appointment of a Travel Plan Coordinator (to also be responsible for monitoring Delivery Servicing Plan)</p> <p>o Provision of welcome induction packs containing public transport and cycling/walking information, map and timetables to every new household - Future Connectivity and Access Plan - Enfield Traffic Management Order contribution - £20,000 (indicatively, based on past applications)</p> <ul style="list-style-type: none"> - Walking and cycling/transport infrastructure contributions – under review - Public highway condition (before/after works) - Cycle parking and access details - Detailed Construction Logistics Plan - Demolition/Construction Environmental Management Plans - Delivery and Servicing Plan - Car Parking Design and Management Plan (including the provision of electric vehicle charging points – both active and passive, space allocation strategy, wheelchair-accessible car parking) - Combined Stage 1/2 Road Safety Audits along all shared surface lanes within the masterplan and for all new access points on White Hart Lane, the A1010 High Road, Brereton Road and Whitehall Street - Basement Vehicular Access Control Arrangements (RMA stage) - Highway stopping-up, diversion and adoption (if relevant) details <p>Transport Assessment (including Car Parking Management Plan) and Design and Access Statement</p> <p>Baseline Conditions</p> <p>It is noted that 64% of the site falls within PTAL 4, 25% PTAL 5 and 11% PTAL 3.</p> <p>A parking stress survey was requested as per the Lambeth methodology and undertaken in May 2021. It highlighted significant spare capacity within the local Controlled Parking Zone (CPZ) that is operating at 60% capacity. It also found that there was limited capacity within the private car parks and on private roads, including those managed by Homes for Haringey (Tenterden Road and Headcorn Road). Overall, 71% of all spaces in the study area were utilised. Additionally, LBH Regeneration undertook a telephone survey of current Homes for Haringey residents and found that 43% of respondents (out of a sample of 87) said they owned a vehicle.</p> <p>ATZ Assessment</p> <p>The ATZ assessment was reviewed in detail.</p> <p>The lists of personal injury accidents for each route do not say whether any of the accidents were attributable to reasons other than human error. However, no physical interventions which could reduce the frequency and severity of such accidents are recommended in this section, but a number of suggestions have been made, namely:</p> <ul style="list-style-type: none"> - Review and removal of footway parking where relevant to facilitate pedestrian flows along footways; - Inclusion of cycle lanes to encourage cycling as a safe mode of transport; - Addition of benches for pedestrians to stop and rest; 	

Stakeholder	Comment	Response
	<p>- Improvements to pedestrian crossings with tactile paving, or creation of formal zebra crossings; and</p> <p>- Improvements to footway and crossing surfacing.</p> <p>Is the increase in trips as a result of the proposed development (and local committed schemes) likely to result in additional accidents on the network and, if so, are the measures outlined above sufficient?</p> <p>If mitigation is necessary then we need to know. Can the exact locations of the proposed improvements set out above be identified accurately on a map?</p> <p>Development Proposals</p> <p>Quantum of Development</p> <p>The floorspace and accommodation schedule of the outline element of the proposed development reflects suitable flexibility for a range of land uses, ranging between minimum and maximum parameters.</p> <p>The latter are as follows:</p> <ul style="list-style-type: none"> - 280,000sqm C3 - 8,000sqm B2/B8 - 22,000sqm E - 6,000sqm F - 8,300sqm Sui Generis - 5,000sqm as on-plot residential parking <p>Maximum total: 339,300sqm</p> <p>A maximum total of 2,977 residential units are proposed (297 existing properties, hence a proposed uplift of 2,680 units including +747 affordable units).</p> <p>The detailed element of the proposed development, Plot A, comprises 60 dwellings, of which 29 units are proposed to be family dwellings (3+bed units).</p> <p>Cycle Access and Parking (Plot A)</p> <p>Cycle parking and access details for Plot A would be secured by planning condition.</p> <p>Cycle Access and Parking (Masterplan)</p> <p>The masterplan proposes a dedicated cycle route running through the masterplan site in a north-south direction, which avoids the High Road. A connection with the extension to Cycleway 1 is allowed for to the west of the site. Within the site it is understood that the intention is for cycling to be accommodated on carriageway along one-way and two-way</p>	

Stakeholder	Comment	Response
	<p>vehicle routes as well as through public realm areas. Delineation would be provided along one-way routes and across the public realm, but not along two-way routes. No segregation is proposed.</p> <p>Further justification is required in relation to the creation of a one-way system on Love Lane, Moselle Street and William Street. Where one-way systems are provided, dedicated cycle contraflow facilities are required.</p> <p>Cycle parking is proposed to be provided in line with the London Plan (2021) minimum standards, with 5% of the total provision to cater for larger cycles with adequately enlarged spaces. In addition to this, we would expect to see a proportion of cycle parking delivered in the form of Sheffield stands for regular cycles. This proportion should be comprised between 5% and 20% and would be discussed as part of any future Reserved Matters applications. Cyclist facilities such as lockers, changing rooms, showers, drying rooms etc for non-residential will be required and must be secured via the Travel Plan as part of the S.106 agreement.</p> <p>Car Parking (Plot A)</p> <p>No general car parking is proposed on Plot A due to spatial constraints. Based on the telephone surveys of existing residents, it is estimated that the 60 units would generate parking demand for 26 vehicles. The proposal is to accommodate that demand on street in the local area in the interim, where sufficient spare capacity has been identified by the parking stress survey. It is assumed that an all on-street parking solution would be a short-term solution until more plots got delivered and some parking for Council housing residents relocated off street/off the CPZ. Any parking occurring on street would require CPZ permits to be arranged by Homes for Haringey on behalf of Plot A residents.</p> <p>Car Parking (Masterplan) and Car Park Management Plan</p> <p>a. General</p> <p>The proposals are for a combination of on-street spaces on public (CPZ) roads, private roads and off street car parks (on plot). Existing accessible and doctors' bays as well as taxi ranks would be retained, which is welcome. It is indicated that the minimum 3% wheelchair-accessible provision would be 3 delivered from the outset for each plot in the future, and the plan in Appendix F shows the indicative (safeguarded) footprints of delivering the full 10% wheelchair-accessible parking provision. Wheelchair accessible parking for non-residential uses would also be provided, in line with the London Plan standards.</p> <p>b. Council Housing</p> <p>The telephone survey undertaken in May 2021 established a baseline to determine the likely maximum demand generated by future residents housed by Homes for Haringey. As all 500 Council housing units would be provided south of White Hart Lane, it is important that all plots delivered within that area as part of any future Reserved Matters applications make adequate allowance for parking. Based on the existing parking demand generated by current Council housing residents, if all Council housing residents were offered the right to park, up to $500 \times 43\% = 215$</p>	

Stakeholder	Comment	Response
	<p>spaces would be required to meet the likely demand, which would have to be met mostly south of White Hart Lane, in close proximity of the proposed Council homes.</p> <p>Presently it is difficult to understand how much on-street parking there is proposed to be on site (with the exception of the 10% wheelchair-accessible parking provision) and what the total capacity would be, over and above accessible parking. Due to the potentially high number of spaces to be provided for Council housing residents, the provision of the 10% accessible parking from the outset on the southern plots is highly encouraged to create and maximise the amount of off-street parking, of which a proportion not taken up by future resident wheelchair users could be reallocated to Council housing residents through a dynamic Car Park Management Plan to be conditioned.</p> <p>c. Family Dwellings (3+ bed units)</p> <p>Likewise, it is noted that the whole masterplan would include approximately 16% of family dwellings (based on the illustrative masterplan). Any surplus non-CPZ parking not taken up by wheelchair users living on site should be offered to residents of family dwellings (in the order of priority, Council housing tenants would come in first, then residents of non-Council family-sized units). The priority order and mechanism for reallocation of accessible spaces on temporary leases should be discussed in more detail in the Car Parking Management Plan to be secured by planning condition.</p> <p>North of White Hart Lane where residential units would not be managed by Homes for Haringey and where the primary function of car parking would be for wheelchair users residing on site, it is essential to safeguard the necessary land/footprint to deliver all additional spaces (maximum 10% provision in line with the London Plan) from the off. In addition, we strongly advise that the proposed basement car park be also designed at full capacity (delivering sufficient spaces to meet the 10% accessible parking provision target) to provide such reallocation flexibility in favour of family dwellings.</p> <p>d. Conclusion</p> <p>The illustrative scheme shows that the minimum 3% parking provision delivered from the outset would provide a total of 89 spaces. If future Council housing residents follow the same vehicle ownership patterns as existing ones on the Love Lane estate, and all are granted a right to park, then up to 215 spaces would be required to meet that demand (of which a small proportion would overlap with the accessible provision). Additionally, we strongly recommend the applicant provide the further 7% parking from the outset throughout the whole masterplan site to cater for Council housing residents' off-street parking demand and any demand likely to arise from occupiers of family-sized dwellings. Planning committee members are very keen to see some parking made available to larger residential units. Relying on any potential unused non-CPZ accessible parking is the right way of boosting parking available on site without overproviding on-site parking and adding unnecessary pressure on CPZ parking.</p> <p>That would therefore bring the total parking provision somewhere in the region of 512 spaces (or slightly fewer due to a number of wheelchair users being Council housing and family-dwelling residents). That would equate to an overall car parking ratio of 0.17 spaces per unit across the whole masterplan site. Whilst this is not an indication of an</p>	

Stakeholder	Comment	Response
	<p>absolute target to aim for, this is broadly in line with what was agreed for the Goods Yard and the Depot application (HGY/2021/1771) which provided an overall car parking ratio of 0.16 spaces per unit with parking provided at basement level.</p> <p>Overall, WebCAT indicates that the site mostly lies in areas of PTAL 4, with pockets of PTAL 5 and with the northwestern corner having a slightly lower PTAL (3). The site is also located in the Tottenham North CPZ. In accordance with Policy DM32: Parking of the Development Management DPD, the proposed development would qualify for a car-free status (the part of the site with lower connectivity is immediately adjacent to areas of PTAL 4; London Plan paragraph 10.6.4 also states that “the starting point for discussions should be the highest existing or planned PTAL at the site”).</p> <p>The Council would not issue any occupiers with on-street resident/business parking permits due to its car-free nature, with the exception of Council housing residents relying at least in part on CPZ parking. The Council would use legal agreements to require the landowners to advise all occupiers of the car-free status of the proposed development.</p> <p>Car club</p> <p>A car club viability report has been provided which highlights that Zipcar recommends a total of 10 car club spaces. Car club membership contributions for all residents would be secured via a Section 106 planning obligation.</p> <p>Non-Residential Trip Generation</p> <p>As far as the non-residential trip generation assessment is concerned, the use of Goods Yard Transport Assessment office trip rates and adjusted journey-to-work modal split is accepted.</p> <p>Highway Impact</p> <p>Completed Development In addition to my earlier queries, will network modelling be required after the proposed and net trip generation assessments have been revised?</p> <p>Public Transport Impact</p> <p>In TfL’s response following the TfL pre-application meeting in June 2021, it was noted that “Cumulative impacts on the bus network will be considered by TfL and will not be set out in the TA.” Whilst we appreciate TfL’s request, we will still require sight of that cumulative impact assessment as part of the review of the planning application.</p>	
Waste	<p>The document provides some detail on how waste is to be contained and managed within Plot A and the 3 cores (A1, A2 and A3) that make this up. This has therefore been the focus of this review. There is reference to more detail following in reserve matters applications on how waste will be managed across the other blocks that form part of the</p>	<p>Conditions are proposed to secure appropriate</p>

Stakeholder	Comment	Response
	<p>wider development. An outline of bin numbers required for each block has been set out in Appendix B. These appear to have been calculated in line with LBH guidance and are therefore adequate.</p> <p>Communal bin collections from this development will be weekly. The bin calculations for Plot A presented in table 5, section 4.1. Are in line with LBH requirements. For Plot A1 there is reference to a 360l bin for food waste. We would now prefer that space is made for 140l bins (1 bin per 10 units). Therefore 3 x 140l bins would be needed here.</p> <p>The indicative communal bin store locations on the appended drawings (Appendix A) appear to acknowledge the 10m drag distance for bin collections specified in the SPD and referenced under 2.1.7 in the OWMS. The wheeled bin pulls from the duplex units appear to be acceptable. The swept path analysis provided will need to show more clearly that efforts have been made to limit reversing of RCV vehicles/factoring in space for vehicles to turn around.</p> <p>Commercial waste management sits outside of this strategy. Sizing/number of bins will very much depend on the type of businesses that occupy the space in operation, the waste/recycling they generate and the contracts they put in place for the collection of this. Commercial waste collection companies can provide up to twice daily collections 7 days per week. I would however advise against sizing the bins store based on minimum size and maximum collections. The store should be sufficient to store waste for one week.</p> <p>I hope these comments are helpful. We will be happy to review further drawings and documents in relation to operational waste management from this development as these are developed and shared.</p>	waste storage and collection arrangements.
External		
Affinity Water	No comment received	
Arriva London	No comment received	
National Planning Case Unit	I confirm that we have no comments to make on the environmental statement.	
Clinical Commissioning Group	<p>28.01.2022</p> <p>Thank you for the opportunity to comment on this planning application. This is a significant development of up to 2,929 new homes on a strategic site of 8.5 ha in north Tottenham. It is allocated as Site NT5 in the Tottenham Area Action Plan (2017). The development will have a significant impact on healthcare infrastructure and the High Road West Masterplan Framework (2014) acknowledges that additional healthcare provision is needed in the area, particularly primary care services. The site is located in Northumberland Park ward which is one of the most deprived wards in England. Therefore, access to healthcare and wider health inequalities are a key issue.</p> <p>The site is a multiple ownership, with the Council as main landowner of land to the south of White Hart Lane, including the Love Lane Estate. This includes sites owned by Tottenham Hotspur Football Club north of White Hart Lane. The CCG has responded to current applications for 867 new homes and commercial space on the Depot and Goods Yard</p>	A planning obligation is proposed to ensure that the proposal does not generate a deficit in local healthcare provision.

Stakeholder	Comment	Response
	<p>site (HGY/2021/1771) and an application for 72 new homes, a cinema and supporting commercial uses on the Printworks site (HGY/2021/2283).</p> <p>To the north of the site, in Enfield, is the Joyce and Snells Estate, where the London Borough of Enfield is looking to bring forward an estate renewal scheme comprising approximately 1,992 homes and associated social infrastructure and open space. This together with High Road West will have a cumulative impact on healthcare services in the area.</p> <p>We note that Table 1 of the Planning Statement sets out the minimum and maximum total floorspace cap by land use. It includes Use Class E (e): Medical or healthcare with a floorspace range of between 0 sqm to 1,000 sqm (GEA). Paragraph 3.20 implies that the healthcare floorspace could be provided in, or across a number Development Zones (Plots).</p> <p>The application site includes Tottenham Health Centre at 759 High Road which would be demolished as part of the plans for Plot E and the creation of Moselle Square. Policy DM49 (A) of the Development Management DPD (July 2017) 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. Paragraph 7.44 of the planning statement states that “sufficient flexibility has been incorporated within the maximum land use parameters to allow a future healthcare use to be delivered on-site” to replace the existing facility.</p> <p>16.03.2022</p> <p>The CCG is concerned that the planning committee report doesn't fully reflect the CCG's comments, which were submitted on 28th January 2022.</p> <p>We note that Appendix 2 'Internal External Consultees Representations' only includes page 1 of the CCG response and omits pages 2-3.</p> <p>On page 2 of the response, we suggest that the legal agreement should include a requirement for a healthcare delivery plan to be submitted with the Reserved Matters Applications for Phase 2 which would identify, in consultation with the Council and CCG the location of the new health centre, the timing of provision and the design and specification. We understand that the intention is to provide the new facility as shell and core floorspace and as such additional capital investment will be needed to fit-out the new facility. In addition, the future rental level should be affordable to the CCG.</p> <p>Paragraph 8.2 of the applicant's Planning Statement refers to third party ownerships within planning application boundary. The Tottenham Health Centre is owned by the GP practice. The Planning Statement indicates that the Council will seek commercial agreements from and with landowners to incorporate their interests into the wider scheme and will explore the option of Compulsory Purchase Order powers where necessary. The committee report does not specifically refer to the intention to purchase the health centre site. Whilst we support the proposed s106 heads of terms to secure the new healthcare facility to be in operation prior to demolition of the existing Tottenham</p>	










Stakeholder	Comment	Response
	<p>Health Centre, we suggest that a healthcare delivery plan is needed to ensure the continuation of healthcare services and to ensure that the new health centre can be delivered, and additional capacity is provided to accommodate the additional demand generated by the development. We also suggest that there should be a mechanism to monitor and evaluate the construction impacts and mitigation measures to ensure that services delivered from the Tottenham Health Centre would not be disrupted during the construction stages.</p> <p>We do not agree with the summary and conclusions in sections 7 and 11 of the report regarding healthcare impact and the need for mitigation. Paragraph 7.22 suggests that the replacement healthcare facility will meet the needs of the additional population without further mitigation. The healthcare facility will replace the floorspace lost if the Tottenham Health Centre is demolished. It does not provide the necessary additional floorspace needed to accommodate the additional demand. The report considers that the introduction of up to 6,410 additional residents into the area would not have a significant adverse effect on primary healthcare provision (paragraph 30.5) and refers the Environmental Statement (ES) assessment in paragraph 11.11. The CCG considers that the proposed scheme would have a significant effect on primary healthcare provision in the north Tottenham area which is already under pressure. In fact, paragraph 14.5.18 of the ES states that, without mitigation, the assessment identifies a permanent, long-term and moderate adverse effect, which is significant in EIA terms. Paragraph 14.5.19 refers to the use of mitigation in the form of financial contributions in order to manage the additional demand created. With this mitigation in place, the effect of the proposed scheme on the provision of healthcare facilities is assessed as negligible, and therefore not significant.</p> <p>Paragraph 30.5 of the committee report refers to the use of CIL payments to help fund additional provision. There is an identified significant site-specific impact which requires direct mitigation by way of a s106 contribution in addition to the replacement health facility. The CCG has requested a contribution of £3,073,120 which could be reviewed as part of the suggested healthcare delivery plan. The request for a s106 contribution would meet the tests in CIL Regulation 122 as it is considered necessary, reasonable and directly related to the development. CIL funding is not a material consideration in the determination of a planning application and CIL cannot be used to make the development acceptable in planning terms.</p> <p>16.03.2022</p> <p>We note that the Council is re-consulting on the above planning application as the applicant has submitted an addendum to the Environmental Statement and other documents and plans.</p> <p>The CCG submitted comments on the planning application on the 28th January 2022. It submitted further comments on the 16th March 2022 as it was concerned that the Planning Sub-Committee Report did not fully reflect the CCG's previous comments. These further comments were summarised in a Planning Sub-Committee Addendum Report and we note that the Officer's note in response stated that "Further consideration of the matters raised is required". The planning application was deferred by the Planning Sub-Committee.</p>	

Stakeholder	Comment	Response
	<p>We note that the addendum to the Environmental Statement includes a new Chapter 14 'SocioEconomics' and an updated Economic Benefits Statement. However, neither document responds to the CCG's previous comments.</p> <p>The CCG welcomes the provision of a replacement health centre within the proposed development. However, at present the planning application does not provide sufficient detail to ensure that the new facility is delivered and existing healthcare services will not be disrupted. Also, the proposal does not adequately mitigate the impact of new housing on healthcare infrastructure to ensure that sufficient capacity is provided in addition to a replacement facility.</p> <p>The CCG's previous responses are attached with these comments. We would welcome the opportunity to discuss further the matters raised in these responses.</p>	
Enfield LB	No comment received	
Environment Agency	<p>We understand that it is deemed not feasible to de-culvert the Moselle Brook as part of this application which you are in agreement with because of the constraints and place making requirements associated mainly with the stadium and access. We can accept this justification.</p> <p>With this in mind, we believe that planning conditions could be invoked to ensure that the culvert is protected and fit for purpose for the lifetime of the development. We have discussed wording of these conditions with the applicant and if agreeable these planning conditions would enable us to remove our objection. Before confirming this position I need to discuss the planning conditions with my flood risk colleagues. I will have this discussion early next week and submit a more formal response on the matter by Tuesday.</p> <p>9.03.2022</p> <p>We previously responded to this application on 3 February 2022 (NE/2022/134143/01- L01). At this time we objected to the application because the proposals missed the opportunity for de-culverting the Moselle Brook, designated main river, and did not provide an 8m undeveloped buffer zone from the edge of the culvert.</p> <p>We have since had discussions with yourself and the applicants agents regarding this objection. We have also received the following additional document:</p> <ul style="list-style-type: none"> • Design Note, EA Planning comments, 4202-RBG-ZZ-XX-DN-CV-01002 EA planning, 02.03/22, prepared by Robert Bird <p>We understand that it is unfeasible to de-culvert the Moselle Brook as part of this development because of other planning and place making requirements. It is also unfeasible to completely setback the development 8 metres from the Moselle Brook.</p> <p>Based on this we would be willing to remove our objection to the proposals subject to planning conditions.</p> <p>Condition 1- Culvert Condition Survey (pre-development)</p>	<p>Suitably worded planning conditions are proposed to ensure that the proposal does not adversely impact on the existing culverted river.</p>

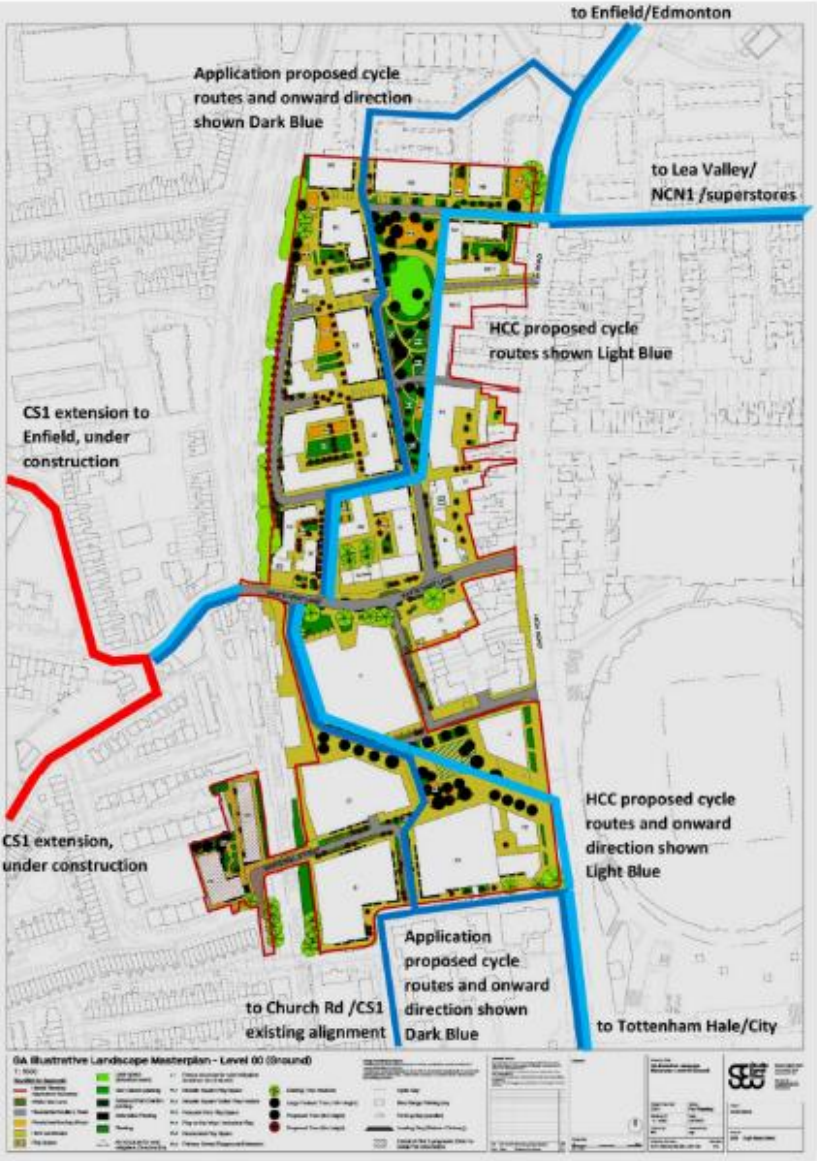
Stakeholder	Comment	Response
	<p>For each Reserved Matters Application (RMA) adjacent to the Moselle Brook Culvert, a strategy for maintaining and improving the culvert should be submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:</p> <ol style="list-style-type: none"> 1. A line, level and condition survey of the existing culvert. The survey should demonstrate what the residual life of the culvert is. 2. A scheme, based on the condition survey in (1), to undertake any required improvements, repairs, or replacement of the culvert prior to the construction works. The scheme shall demonstrate how the culvert will be fit for purpose for the lifetime of the development (100 years). It should include a plan for any required long term monitoring and maintenance and a program for the improvements, repairs or replacement completion. <p>The scheme shall be fully implemented and subsequently maintained, in accordance with the scheme's timing/phasing arrangements, or within any other period as may subsequently be agreed, in writing, by the Local Planning Authority.</p> <p>Reasons To prevent flooding on site and elsewhere by ensuring that the Moselle Brook culvert is in satisfactory condition which is commensurate with the lifetime of the development. This condition is in line with the following national and local policies:</p> <ul style="list-style-type: none"> • Paragraph 163 of the NPPF 'When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere'. • Policy DM28 of the Haringey Development Management Development Plan Document (DPD) 'Where appropriate the Council will require proposals to include a condition survey of existing watercourse infrastructure to demonstrate that it will adequately function for the lifetime of the development, and if necessary, make provision for repairs or improvements.' <p>Condition 2 - Culvert Condition Survey (post-development)</p> <p>Within three months of completion of development blocks adjacent to the Moselle Brook and prior to the development plots being occupied (whichever comes first) an updated condition survey of the culvert, to identify any adverse impacts resulting from the construction works, shall be undertaken, submitted to, and approved in writing by the local planning authority. Any damage that may have arisen during construction is to be remediated by the applicant within an agreed timeframe.</p> <p>Reasons To ensure the structural integrity of the culvert is not compromised and to prevent flooding on site and elsewhere. This condition is in line with the following national and local policies:</p> <ul style="list-style-type: none"> • Paragraph 163 of the NPPF 'When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere'. • Policy DM28 of the Haringey Development Management Development Plan Document (DPD) 'Where appropriate the Council will require proposals to include a condition survey of existing watercourse infrastructure to demonstrate that it will adequately function for the lifetime of the development, and if necessary, make provision for repairs or improvements.' 	

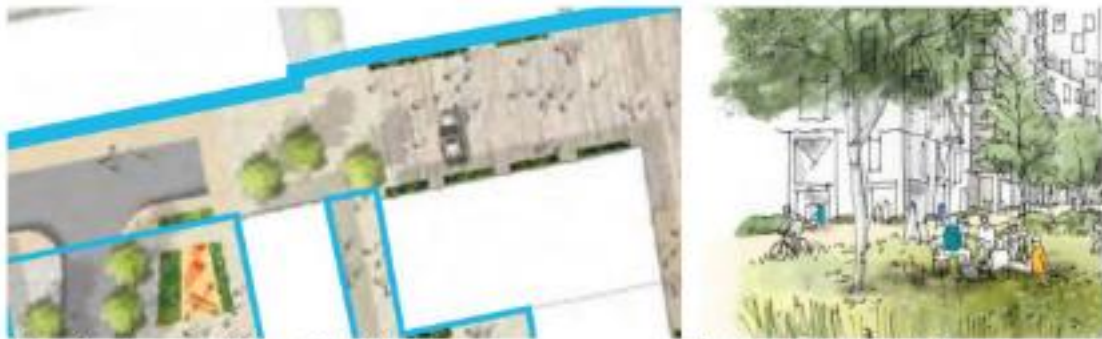

Stakeholder	Comment	Response
	<p>Condition 3 – Piling/Foundations Method Statement</p> <p>For each Reserved Matters Application (RMA) adjacent to the Moselle Brook Culvert, a detailed method and design statement for the piling, or any other foundation designs</p> <p>Reasons</p> <p>To ensure the structural integrity of the culvert is not compromised and to prevent flood risk on site and elsewhere. This condition is in line with the following national and local policies:</p> <ul style="list-style-type: none"> • Paragraph 163 of the NPPF ‘When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere’. • Policy DM28 of the Haringey Development Management Development Plan Document (DPD) ‘Where appropriate the Council will require proposals to include a condition survey of existing watercourse infrastructure to demonstrate that it will adequately function for the lifetime of the development, and if necessary, make provision for repairs or improvements.’ <p>Condition 4 – Buffer Zone</p> <p>For development plots E, C and G, a minimum buffer zone of 3 metres between the outer edge of the culvert and any structures or buildings will be maintained. For all other development plots adjacent to the culvert a minimum buffer zone of 8 metres will be maintained.</p> <p>Reasons</p> <p>To ensure that there is sufficient access for inspection and maintenance of the culvert and to ensure the structural integrity of the culvert is not compromised. This condition is in line with the following national and local policies:</p> <ul style="list-style-type: none"> • Paragraph 163 of the NPPF ‘When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere’. • Policy DM28 of the Haringey Development Management Development Plan Document (DPD) ‘New development must be set back at a distance of 8 meters from a main river and 5 meters from an ordinary watercourse, or at an appropriate width as agreed by the Council and the Environment Agency, in order to provide an adequate undeveloped buffer zone’. <p>Informative – Flood Risk Activity Permit</p> <p>The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:</p> <ul style="list-style-type: none"> • on or within 8 metres of a main river (16 metres if tidal) • on or within 8 metres of a flood defence structure or culvert (16 metres if tidal) 	

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> • on or within 16 metres of a sea defence • involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert • in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission. <p>For further guidance please visit https://www.gov.uk/guidance/flood-risk-activitiesenvironmental-permits or contact our National Customer Contact Centre on 03702 422 549. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.</p> <p>Flood risk standing advice</p> <p>The proposed development falls within Flood Zone 2, which is land defined in the planning practice guidance as being at risk of flooding.</p> <p>We have produced a series of standard comments for local planning authorities and planning applicants to refer to on 'lower risk' development proposals. These comments replace direct case-by-case consultation with us. This proposal falls within this category.</p> <p>These standard comments are known as Flood Risk Standing Advice (FRSA). They can be viewed at https://www.gov.uk/guidance/flood-risk-assessment-for-planningapplications#when-to-follow-standing-advice We recommend that you view our standing advice in full before making a decision on this application.</p> <p>We do not need to be consulted. Final Comments Thank you for contacting us regarding the above application.</p> <p>Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. In accordance with the Planning Practice Guidance (Reference ID: 7-043-20140306), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.</p>	
Haringey Cycling Campaign	<p>HCC were consulted in 2018 and again in 2021 on the plans for this development. We emphasised the need for cycle routes serving identified destinations, routed directly and clearly defined for legibility and to avoid pedestrian conflict. We also commented in 2021 that the main public open space should be more generous.</p> <p>The scheme now submitted proposes virtually invisible cycle routes that wander aimlessly to the North of the site and in a slightly less aimless fashion to the South. The Mayor's London Plan Guidance has statutory weight in planning decisions and makes it clear that development plans should "protect and improving existing cycle routes and create new strategic routes and local links", as the extract below. Additionally the statutory guidance in LTN1/20 makes it</p>	<p>Planning conditions are proposed to secure the detailed landscaping details, cycle parking</p>

Stakeholder	Comment	Response									
	<p>clear that cycle routes should be direct and easy to follow, as the core design principles (below left) and makes clear, wherever there are high pedestrian numbers, cycles must be physically separated from pedestrians, as the summary principles, below right.</p> <p>The development is planned to have 2,869 new homes and at least 7,225sqm of commercial, office, retail and community uses and there will be considerable pedestrian traffic, generated both by the development and in the surrounding areas. The development is not a small housing estate where limited shared use might be acceptable.</p> <p>Development Plans should identify and make provision for current and future needs for cycling, including protecting and improving existing cycle routes and creating new strategic routes and local links. They should identify locations for cycling facilities such as cycle parking hubs, additional cycle land requirements and, where applicable, areas of potential expansion of the Cycle Hire network..... Development Plans should identify strategic cycle routes based on the corridors in TfL's Strategic Cycling Analysis (SCA), set out preferred route alignments as far as possible and include safeguarding as necessary..... Development Plans should identify and make provision for local cycle links that connect to and complement the strategic cycle network..."</p> <p>https://www.london.gov.uk/sites/default/files/sustainable_transport_walking_and_cycling_london_plan_guidance_0.pdf</p> <div data-bbox="533 770 1061 1332"> <p>Figure 1.1: Core design principles</p> <table border="1"> <thead> <tr> <th data-bbox="539 802 734 879">Coherence</th><th data-bbox="734 802 929 879">Directness</th><th data-bbox="929 802 1055 879">Accessibility</th></tr> </thead> <tbody> <tr> <td data-bbox="539 879 734 1098"></td><td data-bbox="734 879 929 1098"></td><td data-bbox="929 879 1055 1098"></td></tr> <tr> <td data-bbox="539 1098 734 1327"> <p>DO Cycle networks should be planned and designed to allow people to reach their day to day destinations easily, along routes that connect, are simple to navigate and are of a consistently high quality.</p> </td><td data-bbox="734 1098 929 1327"> <p>DO Cycle routes should be at least as direct – and preferably more direct – than those available for private motor vehicles.</p> </td><td data-bbox="929 1098 1055 1327"> <p>DO Not only if cycle infrastructure, it should be perceived to be that more people can cycle.</p> </td></tr> </tbody> </table> </div> <div data-bbox="1173 836 1621 1321"> <p>2) Cycles must be treated as vehicles and not as pedestrians. On urban streets, cyclists must be physically separated from pedestrians and should not share space with pedestrians. Where cycle routes cross pavements, a physically segregated track should always be provided. At crossings and junctions, cyclists should not share the space used by pedestrians but should be provided with a separate parallel route.</p> <p>Shared use routes in streets with high pedestrian or cyclist flows should not be used. Instead, in these sorts of spaces distinct tracks for cyclists should be made, using sloping, pedestrian-friendly kerbs and/or different surfacing. Shared use routes away from streets may be appropriate in locations such as canal towpaths, paths through housing estates, parks and other green spaces, including in cities. Where cycle routes use such paths in built-up areas, you should try to separate them from pedestrians, perhaps with lowells or a kerb.</p> </div>	Coherence	Directness	Accessibility				<p>DO Cycle networks should be planned and designed to allow people to reach their day to day destinations easily, along routes that connect, are simple to navigate and are of a consistently high quality.</p>	<p>DO Cycle routes should be at least as direct – and preferably more direct – than those available for private motor vehicles.</p>	<p>DO Not only if cycle infrastructure, it should be perceived to be that more people can cycle.</p>	<p>arrangements and road safety audits of areas where there is a potential conflict between highway users.</p> <p>The proposal would also contribute to improving cycling in the area through a S106 obligation towards the feasibility and design of protected cycle facilities along the A1010 from Seven Sisters station to the borough boundary with LB Enfield. A1010 High Road.</p>
Coherence	Directness	Accessibility									
											
<p>DO Cycle networks should be planned and designed to allow people to reach their day to day destinations easily, along routes that connect, are simple to navigate and are of a consistently high quality.</p>	<p>DO Cycle routes should be at least as direct – and preferably more direct – than those available for private motor vehicles.</p>	<p>DO Not only if cycle infrastructure, it should be perceived to be that more people can cycle.</p>									

Stakeholder	Comment	Response
	<p>The Site Plan below shows the circuitous cycle routes proposed by the applicants, together with routes proposed by HCC, which we suggest would be better used and could give compliance with LTN1/20.</p>	

Stakeholder	Comment	Response
	 <p>The Design and Access Statement includes details of path surfacing that make no allowance for safe cycle use and do not comply with LTN1/20. Cycle users are given no indication of where they are meant to cycle and pedestrians will have no idea of where to expect cycles. In fact the proposed cycle routes will be virtually invisible.</p>	

Stakeholder	Comment	Response
	<div data-bbox="546 188 1644 560">  <p data-bbox="546 528 1032 560">Part of cycle route, N from White Hart Lane</p> <p data-bbox="1234 528 1525 560">Cycle route, Peacock Park</p> </div> <p data-bbox="360 587 1883 724">Although not directly a cycling matter, we would point out the main public space, Peacock Park has shrunk in size since the competition winning design of 2018. We suggest the wedge shaped park, narrowing to a point and hemmed in by tall buildings on all sides, will feel uncomfortable and should be redesigned to give a more relaxed and generous space.</p> <div data-bbox="517 788 1653 1177">  <p data-bbox="517 1145 741 1177">Competition sketch</p> <p data-bbox="1032 1145 1234 1177">Present proposal</p> </div> <p data-bbox="360 1203 1883 1342">I would be grateful if you could register Haringey Cycling Campaign's objection to the proposals and in particular our objection to the cycle routes, which will not comply with current standards and good practice. Legible, safe and direct cycle routes are essential, which will serve increasing cycle use by residents and the wider community, improve health and mobility and help in the fight against climate change.</p> <p data-bbox="360 1374 510 1406">27.05.2022</p>	

Stakeholder	Comment	Response
	<p>It is disappointing the submission of further details by the applicant does not appear to take account of comments on cycle provision made by Haringey Council, TfL and HCC. The current Transport Assessment, Transport Plan and Design and Access Statement have no apparent changes from the original submission.</p> <p>Firstly on cycle storage, the Transport Plan states “...the principles of the design will be such that cyclists are able to cycle up to cycle store doors without the need to dismount and walk over significant distances”, however (as confirmed in a response to LBH comments), the walking distance to one of the cycle stores will be 72m and the D&A Statement shows cycle storage at 1st Floor level, without explaining how it is accessed. We are a voluntary group and do not have the resources to look through all the drawings to discover what is intended, but in any case far from “cycling up to the store doors”, users may have to walk 72m, or go up a ramp or lift to the 1st floor! One wonders if the designers have read the transport plan?</p> <p>On cycle routes the D&A Statement imply the development will connect to local cycling infrastructure, however none of the cycle routes proposed for the development connect to existing routes, as can be seen in the D&A extracts over page. The “potential cycle and pedestrian link” to the extended CS1, would run under the railway, so is almost certain never to be built. The proposals show the new “Pickford Lane” connecting to the important cycle route going East on Brantwood Road, but show the proposed cycle route wandering North, away from Pickford Lane. This is in clear contradiction to the core design principles, including direct and easy to follow cycle routes, given in in LTN1/20. We have previously commented on the lack of a direct connection to the High Road at the Spurs Stadium.</p> <p>The D&A Statement shows the High Road as a “Primary cycle friendly road” and White Hart Lane as a “Quiet Street”. Apart from advanced stop lines at the junction there is nothing that makes these roads cycle friendly.</p> <p>All vehicle routes within and adjacent to the development should be audited in accordance with Healthy Street Principles and should tick all 10 criteria. White Hart Lane has been audited, but we do not believe the completed work gives compliance.</p> <p>We have previously attended 3 consultation meetings with the developer’s representatives, but not with members of the design team. We suggest a meeting be held on site with the transport consultants, to gain an appreciation of the existing cycling environment and how the development could give residents (and cycle users generally), attractive and usable cycle routes.</p> <p>HCC was recently consulted on the Council's scheme for the Ashley Rd Depot, Tottenham, and the travel planning for this was excellent, with clearly set out proposals for cycle storage and cycle routes, fully integrated with other development criteria. On the contrary, rather than seeing cycle provision as something to be integrated to the development, to everyone’s advantage, the approach at HRW seems to be that cycle provision is an imposition that should be marginalised as far as possible, while giving an impression of compliance with current standards.</p> <p>The development’s current proposals do not “protect and improve” existing routes, or “provide new strategic routes and local links” in any meaningful way</p>	

Stakeholder	Comment	Response
Historic England	<p>Thank you for your letters of 3 February 2022 and 18 November 2021 regarding further information on the above application for planning permission. On the basis of this information, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation advisers, as relevant.</p> <p>It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.</p> <p>This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.</p> <p>The full GLAAS consultation criteria are on our webpage at the following link: https://www.historicengland.org.uk/services-skills/our-planning-services/greaterlondon-archaeology-advisory-service/our-advice/</p>	Specialist Heritage advisers have been consulted on the proposal.
London and Middlesex Archaeological Society	<p>The London and Middlesex Archaeological Society (LAMAS) promotes London's archaeology, local history, and historic buildings. The LAMAS Historic Buildings and Conservation Committee reviews planning applications relating to important historic buildings and seeks to ensure a sustainable future for vital aspects of London's built heritage.</p> <p>The Committee reviewed and discussed the application documents at and subsequent to its meeting on 22nd November and wishes to make the following comments. The Committee is concerned by the scale of the loss of locally listed buildings that would result from the proposed development, namely Nos. 743–759 High Road and the electricity substation building adjoining Coombes Croft Library. These losses are much greater than it would normally consider acceptable. On this occasion, however, it acknowledges that Haringey has in effect already set the direction of travel by proposing in its own Conservation Area Appraisal and Management Plan (paragraphs 2.8.5 to 2.8.8) the de-designation of subarea C of the North Tottenham Conservation Area in which the buildings stand, facilitating their removal and likewise of those around them to improve passage between the Tottenham Hotspur Stadium and White Hart Lane Station. This strategy on the part of Haringey of diminution and division of the Conservation Area is arguably more objectionable than the proposed destruction of locally listed heritage assets.</p> <p>The submitted plans envisage the demolition and replacement of the buildings, with no option given for their retention or relocation. This feels unimaginative and underappreciative of the present and potentially the future contributions they can make to the local built environment. The retention of designated heritage assets such as the Grade II listed Warmington House (744 High Road) across the High Road in the redevelopment of White Hart Lane stadium and its surroundings exemplifies how historic buildings can be retained and successfully repurposed in the context of local new development. The late 19th- or early 20th-century substation building, noted in the Conservation Area Appraisal to be of "vaguely gothic style" (paragraph 1.5.28), is of a very modest size that would facilitate its re-erection as an element of the new development; in one corner of the envisaged 'Moselle Square', for example.</p>	A planning condition is proposed to secure historic building recording.

Stakeholder	Comment	Response
	<p>In the event it is decided there is no advantage to be gained by the retention of the affected locally listed heritage assets in some form, the Committee asks that historic building recording to at least Historic England Level 2 (and preferably Level 3) be imposed as a condition of any planning consent granted. This recording exercise might also seek to capture the recent social histories of the buildings and areas that will be affected by redevelopment, especially given the application documents give an uncertain impression as to whether the present, wonderfully diverse array of businesses and activities accommodated by the locally listed buildings will not all find new homes in the High Road West development.</p>	
<p>London Overground Infrastructure Management</p>	<p>Thank you for your consultation.</p> <p>Rail for London (RfL) has no objection in principle to the above referenced planning application subject to a number of potential constraints on the development of the site situated close to RfL Infrastructure. Therefore, it will need to be demonstrated to the satisfaction of RfL that:</p> <ul style="list-style-type: none"> • the development will not have any detrimental effect on RfL Infrastructure & Operations in the short or long term • the design must be such that the loading imposed on RfL Assets is not increased or removed • we offer no right of support to the development or land <p>RfL requests that the grant of planning permission be subject to conditions to secure the following:</p> <p>The development hereby permitted shall not be commenced until detailed design, method statements & risk assessments for each stage of the development covering demolition, substructure and superstructure and all temporary works have been submitted to and approved in writing by the local planning authority (in consultation with RfL) which:</p> <ul style="list-style-type: none"> • provide details on all structures • provide details on the use of plant • accommodate the location of the existing RfL Assets / Infrastructure • accommodate RfL Operational and Maintenance requirements • accommodate ground movement arising from the construction thereof • mitigate the effects of noise, vibration & distractions arising from the adjoining operations to the RfL Infrastructure & Operations <p>In addition,</p> <ul style="list-style-type: none"> • RfL requires that the applicant enters into an Asset protection Agreement with RfL to ensure that the development is carried out safely and in accordance with RfL's requirements. • No maintenance regime for the proposed development elevations facing the railway should be permitted which compromises the safe, efficient and economic operation of the railway. • For all new developments adjacent to operational lines RfL accepts no liability in respect of noise and vibration. Developers should undertake their own investigations to establish any level of noise and vibration likely to originate from the operation of the railway, and design their mitigation measures accordingly. • Any additional fencing required on the railway boundary, for example for screening purposes, must be independent of RfL's fencing and allow room for maintenance of both fences. 	<p>Planning conditions and informative are proposed to ensure that the proposal does not have an adverse impact on existing rail infrastructure.</p>

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> • All drainage needs to be directed away from the railway and into local authority sewers, and it should be installed a minimum distance of two metres from the railway boundary. The use of soakaways is not favoured by RfL and therefore is unacceptable as they could have a detrimental effect on RfL land. The drainage system should be designed to take this into account. • RfL would be opposed to balconies and fully openable windows on the elevations facing the railway (applicable to those in close proximity of the railway). <p>The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.</p> <p>Reason: To ensure that the development does not impact on existing or proposed Rail for London transport infrastructure & operations, in accordance with London Plan 2015 Table 6.1, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012. This response is made as Rail for London Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering, operational and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.</p>	
London Fire Brigade	I've had a look at the documents provided and the fire fighting access highlighted within the documents would appear to meet our requirements subject to meeting them	Detailed fire safety statements will be secured by planning condition.
National Grid	No comment received.	
Natural England	<p>Following discussion and receipt of further information related to the proposal, Natural England is satisfied that the specific issues we have raised in previous correspondence relating to this development have been resolved.</p> <p>We therefore consider that the identified impacts on Epping Forest Special Area of Conservation (SAC) and underpinning Site of Special Scientific Interest (SSSI) can be appropriately mitigated with measures secured via planning conditions or obligations as advised and withdraw our objection.</p> <p>Natural England recommends that the Appropriate Assessment for this proposal is updated with regards to the final agreements between us and the Council on appropriate avoidance and mitigation measures for Epping Forest SAC, if it has not been already.</p> <p>We consider the following to provide appropriate avoidance and mitigation measures:</p>	A planning obligation is proposed to secure SANG's mitigation.

Stakeholder	Comment	Response
	<p>• Appropriate mitigation measures secured through a financial SANGs contribution, for improvements to Bruce Castle Park, as outlined in the draft AA shared with NE on the 4th of March, and to be fully determined by London Borough of Haringey in line with NE interim guidance to improve the accessibility and biodiversity of the park. We recommend that conditions or legal obligations are attached to any subsequent permissions to secure the above measures.</p> <p>In principle we would agree to this contribution to improve a local greenspace. However, as mitigation is now being provided the Habitats Regulations Assessment produced for the development will need to go to Appropriate Assessment (in line with the decision made at the People Over Wind ECJ). For this reason, and in order for the HRA to be secure from challenge, we would need to see a bit more detail in terms of the improvements that would be made to Bruce Castle Park, and how these would in turn lead to the site being a more accessible and desirable park to visit for the residents of the new development. It may be that Haringey Council are best placed to provide these details, rather than the developer of the High Road West site, but we feel that they would need to be included in the AA section of the HRA in order to ensure the security of the mitigation, and for us to be able to agree with the conclusion of no likely significant effect from the development on Epping Forest SAC.</p> <p>07.06.2022</p> <p>Natural England has no further comment on this application with regards to statutory designated sites.</p> <p>Natural England has not assessed this application for impacts on protected species. Natural England has published Standing Advice which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.</p> <p>It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.</p> <p>Your authority has a duty to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available here.</p>	
Network Rail	<p>Thank you for consulting with Network Rail regarding the following application. Network Rail strongly recommends the developer complies with the following comments and requirements to maintain the safe operation of the railway and protect Network Rail's infrastructure.</p> <p>Network Rail strongly recommends the developer contacts the Asset Protection Team on AngliaASPROLandClearances@networkrail.co.uk prior to any works commencing onsite, and also to agree an Asset Protection Agreement with us to enable approval of detailed works. More</p>	<p>Planning conditions and informatives are proposed to ensure that the development does not</p>

Stakeholder	Comment	Response
	<p>information can also be obtained from our website https://www.networkrail.co.uk/running-the-railway/looking-after-the-railway/asset-protection-and-optimisation/</p> <p>Section A identifies the main issues specifically derived from the application HGY/2021/3175 and Section B are generic comments from our Asset Protection (ASPRO) team which aim to ensure high standards of Network Rail's operation.</p> <p><u>Section A:</u></p> <ol style="list-style-type: none"> 1. Given the proximity of the proposal to our White Hart Lane Station, I have the following comments: 2. Access to and from the Station is to be maintained at all times for NR and the TOC. 3. Any impact to NR infrastructure and the Station is to be coordinated with ASPRO and presumably a APA/BAPA to be put in place. 4. Any access required to the Station for the purposes of surveys, etc are to be coordinated with the TOC. 5. Lighting to the Station should not be impacted, if it is this should be worked through with NR and the TOC. 6. As should construction noise, should not impact the operation of the Station. 7. If there are impacts to Station assets and or any services which shall pass through the Station lease area, this may be subject to regulatory consents such as Station Change, Minor Modifications and G6 consultations (in the case of wayleaves or easements which may be required) <p><u>Section B – ASPRO Comments:</u></p> <p>Item 1. Issues - Proximity of the proposed development to the Network Rail boundary and operational equipment.</p>	<p>adversely impact existing rail infrastructure.</p>

Stakeholder	Comment	Response
	<p><u>Reasons/Mitigations:</u></p> <p>The developer/ designer must ensure that they allow sufficient space from the Network Rail boundary fence so as not to import risk to the operation of the railway or impose risk to the occupants of the building or maintenance staff. A minimum of 2.5m should be allowed between the Network Rail boundary fence and any superstructure. A minimum of 3m must be allowed to any Network Rail electrification equipment.</p> <p>The developer must ensure any future maintenance intervention does not import risk to the operational railway. The applicant must ensure that the construction and subsequent maintenance of their development can be carried out without adversely affecting the safety of operational railway.</p> <p>Item 2. Issues - Demolition activities resulting in collapse onto the railway.</p> <p><u>Reasons/Mitigations:</u></p> <p>The applicant shall provide all demolition and construction methodologies to Network Rail for acceptance prior to commencing the works relating to all works that may import risk to the operational railway, potentially cause disruption to railway services or present risk to the infrastructure. A suitable designed hoarding must be erected near the boundary which will afford protection to the railway and railway assets.</p> <p>Item 3. Issues - Potential impact on the adjacent railway infrastructure from the construction activities.</p> <p><u>Reasons/Mitigations:</u></p> <p>The applicant shall provide all demolition and construction methodologies to Network Rail for acceptance prior to commencing the works relating to all works that may import risk to the operational railway, potentially cause disruption to railway services or present risk to the infrastructure.</p> <p>Item 4. Issues - Invasive plants near the railway.</p> <p><u>Reasons/Mitigations:</u></p> <p>The developer must determine the locations and extents of any invasive plant species (for example: Japanese Knotweed) which must be treated in accordance with the current codes of practice and regulations where it exists on site.</p> <p>Item 5. Issues - Piling/ deep excavation causing movement/ settlements to the railway infrastructure adversely affecting the track geometry or stability of operational infrastructure.</p> <p><u>Reasons/Mitigations:</u></p> <p>The developer must ensure that any piling or deep excavations adjacent to the railway do not have an impact on operational railway assets. An impact assessment must be conducted using information specific to the site and track and structure monitoring must be instigated in accordance with Network Rail standard NR/L2/CIV/177 where Piling/ deep excavation is proposed within the track support zone.</p>	

Stakeholder	Comment	Response
	<p>Item 6. Issues - Potential buried services crossing under the railway tracks. Some of the services may be owned by Network Rail or Statutory Utilities that may have entered into acontract with Network Rail.</p> <p><u>Reasons/Mitigations:</u></p> <p>The developer is responsible for a detailed services survey to locate the position, type of services, including buried services, in the vicinity of railway and development site. Any utilityservices identified shall be brought to the attention of Senior Asset Protection Engineer (SAPE) in Network Rail if they belong to railway assets. The SAPE will ascertain and specify what measures, including possible re-location and cost, along with any other asset protection measures shall be implemented by the developer.</p> <p>Item 7. Issues - Collapse of plant or cranes near or over the Network Rail boundary.</p> <p><u>Reasons/Mitigations:</u></p> <p>The operation cranes should comply with CPA Good Practice Guide ‘Requirements for Mobile Cranes Alongside Railways Controlled by Network Rail’ or the CPA Good PracticeGuide ‘Requirements for Tower Cranes Alongside Railways Controlled by Network Rail’. Use of piling rigs should comply with Network Rail standard ‘NR/L3/INI/CP0063 - Piling adjacent to the running line’.</p> <p>Note that where the compound collapse radius of a crane is within 3m of the Network Railboundary or asset, consultation with Network Rail must take place and a possession and isolation of the railway may be required.</p> <p>Item 8. Issues - Collapse of temporary works near or over the Network Rail boundary or infrastructure.</p> <p><u>Reasons/Mitigations:</u></p> <p>Any temporary structures which may have the potential to collapse within 3m metres ofthe Network Rail boundary or asset will require review by Network Rail asset protection. No temporary structure may be positioned within 3m of live railway electrification equipment without further consultation with Network Rail.</p> <p>This development must consider the constraints for construction in close proximity to an operation station. Adequate space must be specified for temporary works which do not require platform closure.</p> <p>Item 9. Issues - Trespasses and unauthorised access onto Network Rail land.</p> <p><u>Reasons/Mitigations:</u></p> <p>Where required, the developer should provide (at their own expense) and thereafter maintain a fence erected on the developers side of the existing boundary fence, to a suitable minimum height and containment in accordance with Network Rail standards</p> <p>. Adequate space must be provided for maintenance of both the existing Network Railboundary measures and the developers own fence.</p> <p>Item 10. Issues - Glare from light source or reflective surfaces – impact on train driver visionand visibility of signals.</p>	

Stakeholder	Comment	Response
	<p><u>Reasons/Mitigations:</u></p> <p>Any lighting which may originate from the development (including vehicle lights) must not interfere with the sighting of signaling apparatus and/or train drivers' vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signaling arrangements on the railway. The developers should obtain Network Rail's Asset Protection Engineer's approval of lighting proposals. Where glazing or reflective cladding is proposed a glare assessment must be completed to determine the impact on the railway.</p> <p>Item 11. Issues - Road Vehicle Incursion.</p> <p><u>Reasons/Mitigations:</u></p> <p>Where there is any risk of road vehicle incursion onto the railway the risk must be mitigated with an effective road vehicle incursion barrier or structure designed for vehicular impact to prevent vehicles accidentally driving or rolling onto the railway or boundary fence.</p> <p>Item 12. Issues - Interface with Network Rail Structures which support the railway.</p> <p><u>Reasons/Mitigations:</u></p> <p>Further consultation with Network Rail is required to capture a complete set of asset owner requirements in a comprehensive requirements document. The design proposal presented here must satisfactorily address fundamental safety and operational requirements. Assets identified but not limited to;</p> <p>HDT 7.0066 B/U 1947 Orchard Place - Owner NR HDT 7.0154 B/U 1948 Whitehall Street - Owner NR HDT 7.0176 B/S 1948A White Hart Lane Station Platform and Retaining Arches Down Side Arches 1 - 22 — Owner O/P</p> <p>HDT 7.0330 B/U 1949 WHITE HART LANE STATION SUBWAY - Owner NR HDT 7.0352 B/U 1950 WHITE HART LANE - Owner NR</p> <p>Item 13. Issues - Effects of electrical plant or transformers on Network Rail signals or communications systems due to electromagnetic compatibility. The impact on the occupants of the development located within close proximity to a high voltage overhead electrification lines.</p> <p><u>Reasons/Mitigations:</u></p> <p>The developer will be required to undertake an Electromagnetic Interference (EMC) risk assessment to determine the potential impact the project may have on Network Rail assets. Any projects that will be within 20m or any transmitter within 100m of the operational railway will require an electromagnetic</p>	

Stakeholder	Comment	Response
	<p>compatibility assessment, carried out in accordance with Network Rail standards 'NR/L1/RSE/30040 & 'NR/L1/RSE/30041' and NR/L2/TEL/30066'</p> <p>Item 14. Issues - Environmental pollution (Dust, noise etc.) on operational railway.</p> <p><u>Reasons/Mitigations:</u></p> <p>Contractors are expected to use the 'best practical means' for controlling pollution and environmental nuisance complying all current standards and regulations. The design and construction methodologies should consider mitigation measures to minimise the generation of airborne dust, noise and vibration in regard to the operational railway.</p>	
Newlon Housing Trust	No comment received	
Secretary of State	I confirm that we have no comments to make on the environmental statement.	
Statutory Societies	No comment received	
Sport England	<p>The Proposal and Assessment against Sport England's Objectives and the NPPF</p> <p>Community Sports Facility Provision</p> <p>Although not clear, it appears that the number of proposed units quoted in the description of development differs from that mentioned in the Design & Access Statement, schedules etc. seen by Sport England. Sport England's comments, therefore, are based on the total number proposed residential units stated in the description of development it was consulted on. The planning application proposes 2,929 residential units the occupiers of which will generate demand for sporting provision. The existing provision within the area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as the Council's Playing Pitch Strategy, Built Facility Strategy or another relevant robust and up-to-date needs assessment.</p> <p>Although there is floorspace proposed for uses falling within Use Class E (d) it is not clear what sport facilities would be provided, whether the facilities would meet existing or future local need and whether the</p>	<p>Officers are satisfied that there is adequate sports provision in reasonable proximity to the application site and that the proposed development will make a proportionate contribution to informal sports provision.</p>

Stakeholder	Comment	Response
	<p>space provided would be sufficient for the sport(s) it intends to accommodate. As a result, it would be unknown if any sport facilities provided would be sufficient to meet the sporting demands arising from the development.</p> <p>Changes to CIL Regulations in 2019 has resulted in the Council having the opportunity to seek contributions through CIL or via a S. 106 Agreement however it is not clear how, or if, the Council intends to mitigate the impact of the increase of sporting demand on local sport facilities.</p> <p>If provision for sports facilities is to be made by the CIL charge, it is acknowledged that there is no requirement to identify where those CIL monies will be directed as part of the determination of any application. That said, Sport England would encourage the Council to consider the sporting needs arising from the development as well as the needs identified in its Playing Pitch Strategy and/or any other robust borough wide sport facility strategy and direct those funds to deliver new and improved facilities for sport based on the priorities identified in those documents.</p> <p>In the event that the Council decides to seek provision for sports facility provision through a S. 106 agreement rather than the CIL charge then Sport England would be happy to provide further advice. To assist the Council, an estimate of the demand generated for outdoor sports provision can be provided by Sport England's Playing Pitch Calculator strategic planning tool. Team data from the Council's Playing Pitch Strategy can be applied to the Playing Pitch Calculator which can then assess the demand generated in pitch equivalents (and the associated costs of delivery) by the population generated in a new residential development. It can also calculate changing room demand to support the use of this pitch demand.</p> <p>In relation to built sport facilities, Sport England's established Sports Facilities Calculator (SFC) can help to provide an indication of the likely demand that will be generated by a development for certain sports facility types. The SFC indicates that a population of 7,030 (calculated by multiplying the number of residential units by the average occupation rate of 2.4) in the London Borough of Haringey would generate a demand for 0.53 sports halls (£1,732,292), 0.37 swimming pools (£1,847,279), 0.23 artificial grass pitches (£305,569 if 3G or £277,930 if sand) and 0.07 rinks of an indoor bowls centres (£33,173). Consideration should be given by the Council to using the figures from the Sports Facility Calculator for informing the level of any financial contribution if indoor sports provision was to be made through a S.106 agreement.</p> <p>Active Design</p> <p>Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the</p>	

Stakeholder	Comment	Response
	<p>guidance in the master planning process for new residential developments. The document can be downloaded via the following link:</p> <p>https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/activedesign</p>	
Transport for London	<p>Thank you for consulting TfL. As previously indicated, the development site is located directly adjacent to White Hart Lane Station and immediately to the west of the A1010 High Road, which forms part of the Strategic Road Network (SRN). While the Local Planning Authority is the Highway Authority for this road, TfL is the Traffic Authority and has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN.</p> <p>After reviewing the updated case documents, TfL make the following comments. These are additional to any responses you may have previously received from my colleagues in infrastructure or asset protection and from TfL as a party with a property interest. Please also note that these comments should be read in conjunction with TfL's detailed comments made on 10th February 2022. Considering that the applicant has already responded to TfL's detailed comments, it should be further noted that I will send a follow-up email setting out any specific aspects of our response in due course.</p> <ul style="list-style-type: none"> • For TfL is very important to keep track of the cumulative impact of development on the local and wider transport network. The applicant's commitment to ensure appropriate information about cumulative development in the area is included, specifically development in the wider context of the HRW masterplan area, is welcomed. • The accompanying 'Chapter 15, Transport & Access ES' addendum report suggests that there will be no change to the methods used in the proposed assessment. As set out by the addendum report, TfL acknowledges this chapter has been informed by the original ES and corresponding Transport Assessment, as well as the Outline Delivery and Servicing Plan; Residential Travel Plan; Framework Travel Plan; and Outline Construction Environmental Management Plan. Existing requirements relating to the preparation of all these documents are to remain unchanged. <p>Public transport service frequencies should be consistent with those agreed through pre-application communications with TfL, including the TfL Strategic Modelling team. This includes London Overground (LO) train and bus service frequencies. The applicant must ensure this assessment and analysis reflect representative/agreed public transport conditions.</p> <p>The London Plan Policy T5, sets out cycle parking standards to help remove barriers to cycling and create a healthy environment in which people choose to cycle. Considering the detailed element of the scheme and submitted plans for Plot A, TfL has concerns about the cycle parking, specifically building A1 and the lack of provision of spaces for larger cycles for long-stay cyclists. Given that the schedule of accommodation sets out that all wheelchair accessible homes will be contained within building A1, TfL encourage the applicant to review the cycle parking and incorporate adequate provision within building A1 to cater specifically for non-standard bicycles. This should consider riders of certain type of bicycles, including people who use handcycles, tricycles, tandems and models adapted to suit the rider's specific needs, as well as cargo cycles. Further consideration should also be given to short-stay cycle parking provision for</p>	<p>Planning conditions and obligations are proposed to ensure that the proposal does not have an adverse impact on transport infrastructure.</p>

Stakeholder	Comment	Response
	<p>buildings A2 and A3, as spaces for visitors located in the landscape, adjacent to building A1's entrance are too remote from other user destinations, particularly building A3's entrance. All cycle parking is required to be designed and laid out in accordance with the London Cycling Design Standards (LCDS).</p> <p>Subject to the above comments and issues raised being addressed satisfactorily, the updated case documents appear acceptable from a Spatial Planning perspective. Therefore, TfL have no further comments on this application.</p> <p>I write to provide detailed strategic transport comments on this application reference HGY/2021/3175. These provide more detail on the matters raised in the GLA Stage 1 Planning Report GLA/2021/1215/S1/01 dated 7th February 2022. Please note that these are additional also to any response you may have received from my colleagues in infrastructure or asset protection and from TfL as a party with a property interest.</p> <p>This response relates to a hybrid planning application for the '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 60 residential units (Use Class C3) together with landscaping, parking and other associated works'.</p> <p>Please note that the following comments represent the view of TfL and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. In addition, these comments do not necessarily represent the views of the GLA.</p> <p>Site Description and Context</p> <p>The site comprises three portions of multiple land ownership, situated on both sides of the Lea Valley railway line. The two larger portions (Outline element), which are separated by White Hart Lane, are bounded by the railway viaduct to the west, the A1010 High Road to the east (beyond which lies Tottenham Hotspur Football Club Stadium), Brereton Road to the south and Brook House Primary School to the north. A smaller portion (Detailed element) to the west of the railway tracks is also included, comprising Whitehall Lodge and the Whitehall and Tenterden Community Centre.</p> <p>The nearest points of vehicular access to the TLRN from the site are the A10 Bruce Grove / A1010 High Road junction and the A406 North Circular Road / A1010 Fore Street junction, located approximately 1km to the south and north respectively. The A1010 High Road, which forms part of the Strategic Road Network (SRN), is located directly adjacent to the site.</p> <p>White Hart Lane station (London Overground and Greater Anglia services) is located adjacent to the site, approximately 200m distance from the Whitehall Mews scheme. Northumberland Park station (National Rail services)</p>	

Stakeholder	Comment	Response
	<p>and Seven Sisters station (London Underground Victoria Line and London Overground) are located approximately 1km to the east and 3km south of the site respectively. Bus routes in vicinity of the site include five daytime bus routes with bus stops along the A1010 High Road, White Hart Lane and Northumberland Park. The site has varying PTALs with values ranging between 3 on the north and the southwestern edges of the site and 5 on the interior of the site near White Hart Lane.</p> <p>Cycleway 1 (From Tottenham to Liverpool Street) is located approximately 400m south of the development site.</p> <p>This application comprises a detailed element (also known as 'Plot A') which represents the first phase of development of the comprehensive regeneration of High Road West and consists of 60 residential dwellings, comprising entirely of decanted residents; together with landscaping, parking and other associated works and for which no matters are reserved; and an outline element for which all matters except access into the High Road West site (also known as 'The Site') are reserved. This development proposal is part of a comprehensive regeneration of High Road West that will deliver up to 2,929 residential dwellings and 36,000 sqm of non-residential floorspace, including new retail, office, leisure and community uses.</p> <p>Access and Delivery and Servicing Arrangements</p> <p>Access by all modes will be accommodated via Tenterden Road, Church Road, White Hart Lane and the A1010 High Road. This includes vehicular access routes through a series of one-way restricted (residents only) and unrestricted access and servicing streets, as well as residential streets. The proposals for the outline element also include a new north-south cycleway through the development site on the eastern side of the railway line and key pedestrian routes, namely, Moselle Walk, which connects Brereton Road to the new Moselle Square, leading into the Tottenham Hotspur Football Club (THFC) stadium; and a major pedestrian route running through the centre of the northern site, which then would also connect through to the southern site via William Street, Moselle Square and Coombes Lane.</p> <p>Pedestrian access to the detailed element is taken from Whitehall Street, Headcorn Road and Tenterden Road. The primary access route to the residential blocks of the detailed element will be accommodated through Whitehall Mews, which is to be pedestrianised. Whilst proposals for the internal street network are subject to detailed approval, the applicant is encouraged to identify any improvements, no matter how small, in order to make a possible contribution to the delivery of Healthy Streets and Vision Zero policies, specifically the route under the bridge along Whitehall Street to support the detailed element. Development proposals should enhance permeability and connectivity between the residential dwellings to the west of the railway tracks and non-residential components and provide for safe and secure movement, particularly for people walking and cycling. Improvements could consider possible techniques to rebalance priorities and increase active travel awareness along this route, including well designed lighting, opportunities for soft landscaping, potential surface treatment and wayfinding.</p> <p>The majority of the development will be serviced through a series of public two-way and one-way streets within the proposed internal network. However, a number of designated shared surface lanes are proposed, allowing restricted access to servicing routes to accommodate service, emergency and larger vehicles along routes otherwise only open</p>	

Stakeholder	Comment	Response
	<p>to pedestrians and cyclists. Stage 1 Road Safety Audit (RSA) along all shared surface lanes should be completed prior to determination.</p> <p>TfL welcomes the applicant's approach to safeguard potential future links along the northern edge of the outline element and the neighbouring Cannon Road.</p> <p>Healthy Streets, Vision Zero, Walking and Cycling</p> <p>The development proposals will see an increase in pedestrian and cycle trips to/from the site and the local area, as well as public transport trips. The Active Travel Zone (ATZ) section appropriately includes a casualty analysis of clusters of KSIs along key routes and destinations and potential improvements. However, there is limited detail on how the new major pedestrian route, which will predominantly be pedestrian focused throughout the day following a key desire line between White Hart Lane station and the stadium, will impact on the bus stop (T) on High Road, including its current location, bus stop environment and passenger waiting area.</p> <p>Whilst the TA provides some useful detail in relation to Moselle Square spatial requirements in the context of crowd flow and major event operations, which is welcomed, full consideration of the implications specifically for users of the bus stop under all anticipated operating conditions along the new pedestrian route should be incorporated. This should include matchdays and non-football events, as well as operations of this route under normal conditions.</p> <p>Whilst the internal street network and how different components of this network will tie up into the surrounding streets are subject to a future Reserved Matters Application (RMA), clarification is required in relation to how this major pedestrian route achieves a seamless interface, particularly with the A1010 High Road. In addition, full consideration should be given to walking and cycle connectivity between areas to the north and the south of White Hart Lane, including White Hart Lane Station. Consistent with TfL's pre-application advice, Healthy Streets Check for Designers (HSCD) needs to be completed for both the base and future situation for routes being wholly or mainly delivered as part of the RMA. The applicant is recommended to complete Road Safety Audits (RSA) whenever there is clear potential for conflict between vehicles and vulnerable road users.</p> <p>In line with policies T2 Healthy Streets and T3 Transport Capacity, Connectivity and Safeguarding of the London Plan, development proposals should connect to local/wider walking and cycling networks, and enable and deliver improvements to provide safe, inclusive and convenient connections for people. This includes ensuring the bus network can operate efficiently to, from and within the development, giving priority to buses, all passengers and supporting infrastructure as needed.</p> <p>Subject to a future RMA, wayfinding, possibly Legible London, is to be provided. The principle of providing wayfinding and adopting layouts that prioritise pedestrian and cycle movements, including new walking and cycling routes is welcomed. However, the proposals should provide sufficient on-site space for safe, convenient, direct and accessible access/routes for pedestrians and cyclists, particularly when considering one-way streets and related traffic arrangements from a cyclist perspective. As part of the RMA, the applicant is recommended to review proposed primary and secondary pedestrian routes together with the north-south cycle route arrangement to ensure the</p>	

Stakeholder	Comment	Response
	<p>proposals promote simple and more convenient means of accessing public transport networks and create a safer and more direct environment that is easier to navigate and move around by walking and cycling at all times, especially by disabled people.</p> <p>Car Parking</p> <p>Whilst there is no car parking provision within the detailed element boundary, a permit allocation scheme will operate for residents to park within the Tottenham North Controlled Parking Zone (CPZ), as the detailed element consists solely of decanted residents. However, this proposal excludes parking bays along Headcorn Road and Tenterden Road, where residents will not be permitted to park. Development proposals restrict new residents to accessible spaces only.</p> <p>Two on-street disabled persons' car parking spaces (three per cent) will be provided along Whitehall Street, immediately to the south-east of the proposed buildings. Additional disabled persons' car parking spaces, equivalent to seven per cent of the dwellings could be provided should the initial provision be insufficient. A point of concern is raised over the distance additional spaces are from residential dwellings. However, this is due to the highway constraints in this location so is largely acceptable, subject to the provision of a safe, convenient, direct and accessible access route. Disabled persons parking bays should be positioned to minimise the travel distance from the vehicle to the main entrance of buildings. In addition, there are concerns over the access route under the bridge and safety, specifically for disabled users. The applicant should ensure that on street parking, particularly along Whitehall Street, is not dominant in the street scene nor disrupt desire lines. Clarification on the proposed pedestrian amenity/mitigation is required.</p> <p>Based on the outcome of a telephone survey of existing residents, the estimated ratio of vehicle ownership within the site equates to approximately 0.43 spaces per residential unit. Therefore, forecast demand for the detailed element is estimated to be at around 26 car parking spaces. Subject to a future RMA, the development proposals will provide car club provision of up to ten spaces, which should be secured by legal agreement. In line with the Mayor's Transport Strategy (MTS) and the London Plan, clarification is necessary to demonstrate how the overall car parking provision/supply is being capped, as a result of the creation of car club spaces, allowing the local area to reduce its future dominance on private cars.</p> <p>Electric vehicle charging provision will be afforded in excess of the London Plan requirement that dictates 20% active provision and the remaining spaces fitted with passive provision. This proposal, which is welcomed in line with London Plan policy T6.1, must be applied and secured by condition. It should be noted that physical infrastructure should not negatively affect pedestrian amenity in line with policy T6 Car Parking of the London Plan. This is particularly important, given the need to re-provide car parking spaces through a combination of on street spaces on public and private roads, and within plots; and a noticeable increase in pedestrian trips to/from the site and the local area, as well as the proximity to the stadium. Therefore, clarification is necessary to demonstrate where on-street charging points will be located and how the proposals will achieve the safe and efficient use of the pedestrian amenity.</p>	

Stakeholder	Comment	Response
	<p>As per TfL's pre-application advice, any replacement car parking needs to be provided for the occupancy of the returning resident only and be secured by legal agreement along with the requirement to produce a Car Parking Management Plan (CPMP), which will detail how the spaces will be monitored, managed and enforced. After that, a permit-free obligation should be secured to prevent any new occupier access to the on-street car parking provision within the CPZ, other than the disabled spaces as agreed.</p> <p>For the outline element, car parking is proposed via mix of on-street perpendicular and parallel arrangement, ground floor podium structures, parking courts and basements. Whilst TfL supports the principle that the parking strategy will minimise the impact of on street parking through the provision of spaces that are limited to small groups of vehicles to allow planting and street trees between groups, the applicant is recommended to design out the requirement for turning and reversing manoeuvres of motorised vehicles, specifically linked to perpendicular car parking spaces. Further work is required to address TfL's concerns.</p> <p>Cycle Parking</p> <p>As part of the detailed element a total of 119 long-stay and 4 short-stay cycle parking spaces is proposed to be situated within residential block podiums in formal cycle stores and the public realm respectively. Whilst this number accords with the London Plan minimum cycle parking standards, further details on the cycle parking provision is required, which could be secured by condition. This includes the total number and the exact location of cycle parking provision for all uses (i.e. scaled drawings). This provision needs to consider a variety of stands suitable for all users and all types of cycles.</p> <p>All cycle parking must be in accordance with the London Cycling Design Standards (LCDS), including at least 20% Sheffield stands and a further 5% wider spaces for non-standard bicycles.</p> <p>Trip Generation and Highway and Public Transport Impact Assessment</p> <p>Whilst TfL welcomes the assessment is largely consistent with pre-application advice, a detailed justification for the selection of residential sites from TRICS is missing from the TA. TfL has concerns about the assumptions and proposed bus trip generation figures. Clarification of the trip generation (Chapter 5) and public transport (Chapter 7) sections is required, as set out in the detailed response. Further work is required to address TfL concerns.</p> <p>Whilst not agreeing entirely with the proposed selection of residential sites to help inform the assessment of the trip generation for the proposed development, which exclusively mirrors a previous application within the Goods Yard site, specifically PTALs and survey years, person trip rates identified from the TRICS database appear to be within a reasonable range.</p> <p>Clarification is required on the trip generation section, as the total number of residential dwellings used for this assessment appears to vary between paragraphs 5.1.1.2 (i.e. 2,977 residential units, which are noted to be in excess of the proposed maximum of 2,929 units to be delivered and the 2,612 residences as part of the illustrative scheme information and set out in Table 4.3,) and 5.1.2.3 (i.e. 2,680 residential units that are used to estimate total person trip</p>	

Stakeholder	Comment	Response
	<p>generation figures). The application needs to state parameters and assumptions clearly. This includes the precise number of additional residential dwellings assumed for the transport assessment, taking into account new housing, replacement, preservation or a combination.</p> <p>Clarification is also required on the proposed bus trip generation figures, as a number of bus frequencies in Table 2.2 are incorrect. Therefore, the applicant is required to provide updated bus trip generation figures with re-allocated trips based on the following considerations. Whilst route W3 runs at 10 bph, during peak hours route 149 runs at 9 bph, route 259 runs at 6 bph, route 279 runs at 11 bph and route 349 runs at 6 bph. For reference, route 318 runs at 5 bph.</p> <p>Table 7.21 provides bus trip generation figures by bus route and direction. However, a number of the routes in Table 7.21 are not within a reasonable distance of the development. New trip numbers would therefore be negligible and should be excluded as follows:</p> <ul style="list-style-type: none"> • Routes 123 and 243: The nearest bus stops are located on Bruce Grove at a walking distance of approximately 930m from the site boundary – with a greater distance for much of the development site. High frequency same-stop interchange is available between routes 123 and 243 – and routes 149, 259, 279 and 349. As such, it is expected that the trips forecast for the 123 and 243 would be made on the latter four routes. • Routes 341 and 476: The nearest bus stops are located on Tottenham High Road south of Lansdowne Road at a walking distance of approximately 630m from the site boundary – with a greater distance for much of the development site. High frequency same-stop interchange is available between routes 341 and 476 – and routes 149, 259, 279 and 349. As such, it is expected that the trips forecast for the 341 and 476 would be made on the latter four routes. • Routes 444 and 491: The nearest bus stop is located on Bridport Road at a walking distance of up to approximately 850m from the site boundary – with a greater distance for much of the development site. It is reasonable for these trips to be discounted and reallocated to the closer bus network. <p>In terms of LO service frequencies, clarification is also required on the frequency applied during the AM peak hour (7 tph in total, as set out in Table 2.3), as this frequency is not representative and in fact it is only achieved between 06:44 and 07:38 (Timed at White Hart Lane), which is before the time at which the peak hour flow is observed on this route. This point of concern is particularly important, as a service frequency reflecting the standard peak service pattern needs to be assumed for the AM peak hour capacity assessment - i.e. 6 tph, equivalent to 4 and 2 tph to Enfield Town and Cheshunt respectively.</p> <p>Notwithstanding the outcome of the applicant's clarifications, TfL recognises that a more robust uplift in residential trips generated by this development, based on the most relevant and latest multi-modal data available, is unlikely to make a noticeable difference on the net impact of development proposals and to have a significant impact on the strategic road network. Given the effect of a recent congestion relief project completed at White Hart Lane station and TfL's own analysis, based on planning permissions sought since Summer 2020, it is confirmed that the proposals will not require mitigation on the LO network. However, the applicant is required to provide updated bus trip generation</p>	

Stakeholder	Comment	Response
	<p>figures. Subject to the outcome of any additional assessment, TfL may seek mitigation towards enhancing bus priority measures and/or fund infrastructure upgrades.</p> <p>TfL Technical Approval and Infrastructure Protection</p> <p>Given the proximity of the site to Rail for London (RfL) infrastructure and operations, the applicant needs to consider the importance of identifying the risks associated with working on/near the railway and ways of mitigating those risks. This includes our design preference to avoid balconies or fully opening windows facing the railway and the associated risk of items falling or being thrown onto the railway; proposed maintenance arrangements for the future development (i.e. window/façade cleaning proposals requiring inherently risky access techniques such as abseiling); drainage (i.e. water management should operate away from the railway); any additional fencing required on the railway boundary, which must be independent of RfL's fencing and allow room for maintenance of both fences; use of scaffolding and the requirement to submit a Crane/Lifting Management Plan for approval by the Council in consultation with RfL. This requirement that is normally dealt with by Network Rail should be secured by condition. Whilst TfL have no objection in principle to the proposed development in relation to the site's adjacency to the railway lines, the future planning consent should include appropriate infrastructure and operational protection measures. TfL requires that the applicant enters into an Asset protection Agreement with RfL.</p> <p>Travel Plan</p> <p>The submitted outline residential Travel Plan (TP) and Framework Travel Plan (FTP) for the non-residential uses are generally acceptable. The focus on active travel is welcomed. The final TP and FTP and all agreed measures should be secured, enforced, monitored and reviewed through the Section 106 agreement, in accordance with Policy T4 Assessing and mitigating transport impacts of the London Plan.</p> <p>Delivery and Servicing and Construction Logistics</p> <p>The outline Delivery and Servicing Plan (DSP) and outline Construction Environmental Management Plan (CEMP) along with the Operational Waste Management Strategy are welcomed and the contents of these documents are found to be broadly acceptable. Due to the phased nature of this development proposal (within a multiple land ownership site) with this detailed element being the first phase of a long-term and comprehensive regeneration of High Road West to be delivered by the applicant, this application will require the adoption of a coherent wayfinding strategy to enable people to access and find the stadium and other key local attractor destinations. The RMA should make clear how the development and construction operations will be managed alongside the continuation of the operations of the stadium and other key local attractors.</p> <p>The full DSP and CEMP, which needs to include infrastructure protection measures in respect of the adjacent railway lines, should be produced in accordance with TfL guidance and secured by condition. This is particularly important, as High Road is a key bus corridor and safe site access during construction should fully consider the impact on the surrounding community, including the stadium and St. Francis de Sales Catholic Infant and Junior School.</p>	

Stakeholder	Comment	Response
	<p data-bbox="360 169 510 201">04.02.2022</p> <p data-bbox="360 236 1890 400">Thank you for consulting TfL. As previously indicated, the development site is located directly adjacent to White Hart Lane Station and immediately to the west of the A1010 High Road, which forms part of the Strategic Road Network (SRN). While the Local Planning Authority is the Highway Authority for this road, TfL is the Traffic Authority and has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN.</p> <p data-bbox="360 424 1890 624">After reviewing the updated case documents, TfL make the following comments. These are additional to any responses you may have previously received from my colleagues in infrastructure or asset protection and from TfL as a party with a property interest. Please also note that these comments should be read in conjunction with TfL's detailed comments made on 10th February 2022. Considering that the applicant has already responded to TfL's detailed comments, it should be further noted that I will send a follow-up email setting out any specific aspects of our response in due course.</p> <ul data-bbox="409 647 1890 1493" style="list-style-type: none"> <li data-bbox="409 647 1890 775">• For TfL is very important to keep track of the cumulative impact of development on the local and wider transport network. The applicant's commitment to ensure appropriate information about cumulative development in the area is included, specifically development in the wider context of the HRW masterplan area, is welcomed. <li data-bbox="409 815 1890 1015">• The accompanying 'Chapter 15, Transport & Access ES' addendum report suggests that there will be no change to the methods used in the proposed assessment. As set out by the addendum report, TfL acknowledges this chapter has been informed by the original ES and corresponding Transport Assessment, as well as the Outline Delivery and Servicing Plan; Residential Travel Plan; Framework Travel Plan; and Outline Construction Environmental Management Plan. Existing requirements relating to the preparation of all these documents are to remain unchanged. <li data-bbox="409 1054 1890 1182">• Public transport service frequencies should be consistent with those agreed through pre-application communications with TfL, including the TfL Strategic Modelling team. This includes London Overground (LO) train and bus service frequencies. The applicant must ensure this assessment and analysis reflect representative/agreed public transport conditions. <li data-bbox="409 1222 1890 1493">• The London Plan Policy T5, sets out cycle parking standards to help remove barriers to cycling and create a healthy environment in which people choose to cycle. Considering the detailed element of the scheme and submitted plans for Plot A, TfL has concerns about the cycle parking, specifically building A1 and the lack of provision of spaces for larger cycles for long-stay cyclists. Given that the schedule of accommodation sets out that all wheelchair accessible homes will be contained within building A1, TfL encourage the applicant to review the cycle parking and incorporate adequate provision within building A1 to cater specifically for non-standard bicycles. This should consider riders of certain type of bicycles, including people who use handcycles, tricycles, tandems and models adapted to suit the rider's specific needs, as well as cargo cycles. 	

Stakeholder	Comment	Response
	<p>Further consideration should also be given to short-stay cycle parking provision for buildings A2 and A3, as spaces for visitors located in the landscape, adjacent to building A1's entrance are too remote from other user destinations, particularly building A3's entrance. All cycle parking is required to be designed and laid out in accordance with the London Cycling Design Standards (LCDS).</p> <p>Subject to the above comments and issues raised being addressed satisfactorily, the updated case documents appear acceptable from a Spatial Planning perspective. Therefore, TfL have no further comments on this application.</p> <p>16.03.2022</p> <p>Following my email on the 3rd March 2022, I write to provide additional comments in relation to the above planning application and more specifically the applicant's response to TfL's stage 1 detailed comments and issues that were raised. These comments are additional to any responses you may have previously received from my colleagues in infrastructure or asset protection and from TfL as a party with a property interest.</p> <p>This response to the applicant relates to proposals, which comprise a detailed element (also known as 'Plot A') that consists of 60 residential dwellings and an outline element for which all matters except access are reserved. As previously indicated, the proposals are part of a comprehensive regeneration of High Road West that will deliver up to 2,929 residential dwellings and 36,000 sqm of non-residential floorspace.</p> <p>Please note that following a review of the 'Report for Consideration at Planning Sub-Committee', in respect to bus services, I would like to draw to your attention that the presumption that 'the level of [bus passenger] intensification would not have a significant detrimental impact on the operations of the local bus network' is incorrect. Whilst TfL is satisfied that the proposals are unlikely to have a significant impact on the strategic road network and we also accept the verdict of the Transport Assessment that no mitigation is required at White Hart Lane station, given the effect of the recent congestion relief project that was completed at this station, updated bus trip generation figures reveal a significant uplift, and this is likely to require service enhancement to accommodate new demand. As a result, it is expected that a S106 total contribution of £2,275,000 would be required. However, TfL is open to discuss appropriate trigger points that fit with the phasing of this development. Please refer to additional details below.</p> <p>It should be further noted that these comments represent the view of TfL and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. In addition, these comments do not necessarily represent the views of the GLA.</p> <p>Ref 17 – Highway Impact – Completed Development</p> <p>Whilst TfL recognises that: 'a more robust uplift in residential trips generated by this development is unlikely to make a noticeable difference on the net impact of development proposals and to have a significant impact on the strategic</p>	

Stakeholder	Comment	Response
	<p>road network', our position is that the applicant's team needs to demonstrate that highway modelling is not required. As previously indicated: 'a net reduction / zero increase in car trips and / or no significant changes to the street network need to be demonstrated [by the applicant] to assess the need for highway modelling'. It should be further emphasised that full consideration of the implications of the quantum of car parking to be delivered / car parking arrangements, should be incorporated. Furthermore, the application should consider the need to look at the overall net additional impact at each of the access points to determine if a capacity/modelling exercise (e.g. capacity of right turn bays on the highway) is required. This should be assessed in conjunction with the total number of servicing trips and cycle movements. This should be confirmed with the Council.</p> <p>Ref 20 – Access and Delivery & Servicing Arrangements</p> <p>These matters are resolvable when the reserved matters applications come forward.</p> <p>Ref 21 – Healthy Streets, Vision Zero, Walking and Cycling</p> <p>The clarification on the 10m offset between the building line and High Road is noted. Whilst it is accepted that this will contribute positively to improving pedestrian capacity and changing the sense of place along the High Road, TfL's observation primarily seeks to draw your attention to the importance of striking the right balance of objectives, particularly the transport and place-making objectives where there are large numbers of people. TfL welcomes that the applicant's team offers reassurance in relation to improved pedestrian capacity, landscape and public realm improvement that can be afforded and secured through future reserved matters stages. Notwithstanding this, consideration of the implications of a new desire line for high flows of people at certain times and future recommendations to protect the operation of the public transport infrastructure from new/conflicting movement routes, should be incorporated as part of future RMA(s). As previously alluded to, this should achieve seamless interface for sports fans with the A1010 High Road and consider connections to the stadium. These and other matters raised by TfL are resolvable when the reserved matters applications come forward.</p> <p>Ref 22 – Car Parking (1)</p> <p>Taking into consideration site conditions and London Plan requirements, subject to the implementation of the lighting strategy and necessary improvements/pedestrian amenity being secured, the provision of on-street disabled persons' car parking spaces along Whitehall Street for the detailed element together with the access route under the bridge would be considered acceptable by TfL on this occasion. As the LB of Haringey is the local planning and highway authority, the Council should determine the acceptability of this approach. This matter is resolvable by condition.</p> <p>Ref 23 – Car Parking (2)</p> <p>The clarification on charging facilities to be delivered through future RMA(s) is noted. TfL is pleased that the applicant has further acknowledged the requirements to comply with the London Plan policy T6. Electric Vehicle Charging</p>	

Stakeholder	Comment	Response
	<p>Points including passive provision is expected to be secured by condition. These matters are resolvable when the reserved matters applications come forward and/or with an appropriate legal agreement.</p> <p>Ref 24 – Cycle Parking</p> <p>Consistent with TfL’s comments submitted via email on the 3rd March 2022, please see below. ‘The London Plan Policy T5, sets out cycle parking standards to help remove barriers to cycling and create a healthy environment in which people choose to cycle. Considering the detailed element of the scheme and submitted plans for Plot A, TfL has concerns about the cycle parking, specifically building A1 and the lack of provision of spaces for larger cycles for long-stay cyclists. Given that the schedule of accommodation sets out that all wheelchair accessible homes will be contained within building A1, TfL encourage the applicant to review the cycle parking and incorporate adequate provision within building A1 to cater specifically for non-standard bicycles. This should consider riders of certain type of bicycles, including people who use handcycles, tricycles, tandems and models adapted to suit the rider’s specific needs, as well as cargo cycles. Further consideration should also be given to short-stay cycle parking provision for buildings A2 and A3, as spaces for visitors located in the landscape, adjacent to building A1’s entrance are too remote from other user destinations, particularly building A3’s entrance. All cycle parking is required to be designed and laid out in accordance with the London Cycling Design Standards (LCDS).’ These issues are resolvable by planning condition and/or an appropriate legal agreement.</p> <p>Ref 25 – Trip Generation and Highway and Public Transport Impact Assessment</p> <p>These clarifications are helpful. Whilst matters relating to trip generation inputs and the London Overground assessment are solved, updated bus trip generation figures reveal a significant uplift, and this is likely to require service enhancement to accommodate new demand. Subsequently, bus trip generation figures for the High Road West development proposal have been reviewed by TfL to determine where bus service improvements, including but not limited to capacity enhancements, are expected to be required in the future. Please refer to the following details.</p> <p>Route W3: Recent loading data shows that the busiest point in the AM peak is westbound between White Hart Lane and Wood Green. In the PM peak the busiest point is eastbound approaching White Hart Lane. TfL will continue to review the bus network, as demand changes in response to the pandemic and will aim to optimise capacity at the busiest point. The development is forecast to generate an additional 97 westbound trips in the AM peak hour and 72 eastbound trips in the PM peak hour. These figures exceed the planning capacity of 70 passengers per bus for double deck buses. Therefore, it is expected that a S106 contribution of £950,000 would be required to cover the cost of 2 additional return journeys on route W3 for a period of 5 years (£95,000 per return journey per annum). While new demand is expected to be greater in the counter-peak direction in both the AM and PM peak hours, it is expected that there would be sufficient capacity to accommodate the increase.</p> <p>Route 149: Recent loading data shows that the busiest point in the AM peak is southbound on Tottenham High Road south of White Hart Lane. In the PM peak the busiest point is northbound in Haggerston. However, the load at a busy northbound point on Tottenham High Road in the PM peak has approximately only 40 fewer passengers than at the</p>	

Stakeholder	Comment	Response
	<p>busiest point. If TfL optimises capacity based on the busiest point in the PM peak hour, assuming a similar difference in load, there would be surplus capacity of approximately 30 spaces close to the development. The development is forecast to generate an additional 94 southbound trips in the AM peak hour and 70 northbound trips in the PM peak hour. Therefore, it is expected that a S106 contribution of £850,000 would be required to cover the cost of 1 additional return journey and 1 additional single journey on route 149 for a period of 5 years (£75,000 per single journey and £95,000 per return journey per annum). While new demand is expected to be greater in the counter-peak direction in both the AM and PM peak hours, it is expected that there would be sufficient capacity to accommodate the increase.</p> <p>Route 259: Recent loading data shows that the busiest point in the AM peak is southbound at Woodberry Down. However, the load at the busiest point is approximately only 35 passengers higher than at the busy point on Tottenham High Road. In the PM peak the busiest point is northbound on Tottenham High Road. The development is forecast to generate an additional 74 southbound trips in the AM peak hour and 55 northbound trips in the PM peak hour. Therefore, it is expected that a S106 contribution of £475,000 would be required to cover the cost of 1 additional return journey for a period of 5 years (£95,000 per return journey per annum). While new demand is expected to be greater in the counter-peak direction in both the AM and PM peak hours, it is expected that there would be sufficient capacity to accommodate the increase.</p> <p>Routes 279 and 349: It is forecast that the development will generate demand for both routes; and while it is entirely possible that service enhancements may be required in the longer term, it is accepted that there is greater uncertainty about the requirement for additional capacity given the forecast peak hour demand being less than that of the planning capacity for a single bus. Therefore, no contributions are being requested for either route at this stage. Based on the outcome of this bus impact assessment review, it is expected that a S106 total contribution of £2,275,000 would be required. It should be noted that contributions should not be route specific as TfL is continuing to review the network and route numbers may be subject to change.</p> <p>Ref 26 – TfL Technical Approval and Infrastructure Protection</p> <p>These clarifications are helpful. This matter is resolved.</p> <p>Ref 27 – Travel Plan</p> <p>This matter is resolvable with an appropriate legal agreement.</p> <p>Ref 28 – Delivery and Servicing and Construction Logistics</p> <p>This matter is resolvable with an appropriate legal agreement.</p>	
Themes Water	<p>Waste Comments</p> <p>As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent</p>	<p>Planning conditions and informatives are proposed to</p>

Stakeholder	Comment	Response
	<p>reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section</p> <p>Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>The application indicates that SURFACE WATER (North of White Hart Lane) will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority. Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position.</p> <p>There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes.</p> <p>Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.</p> <p>As per Building regulations part H paragraph 2.21, Drainage serving kitchens in commercial hot food premises should be fitted with a grease separator complying with BS EN 1825-:2004 and designed in accordance with BS EN 1825-2:2002 or other effective means of grease removal. Thames Water further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses. Please refer to our website for further information: www.thameswater.co.uk/help</p> <p>Water Comments</p>	<p>ensure that the proposal does not have an adverse impact on water infrastructure.</p>

Stakeholder	Comment	Response
	<p>Thames Water are currently working with the developer of application HGY/2021/3175 - additional info to identify and deliver the off site water infrastructure needs to serve the development. Thames Water have identified that some capacity exists within the water network to serve 99 dwellings but beyond that upgrades to the water network will be required. Works are on going to understand this in more detail and as such Thames Water feel it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development doesn't outpace the delivery of essential infrastructure. There shall be no occupation beyond the 99th dwelling until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or- a development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to low / no water pressures and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues."Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.</p> <p>There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.</p> <p>https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes</p> <p>The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scaleddevelopments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk</p>	
Tottenham Civic Society	No comment received	
UK Power Networks	No comment received	

Stakeholder	Comment	Response
Tree Trust for Haringey	No comment received	
Metropolitan Police Service Design Out Crime Officer	<p><u>Detailed Element</u></p> <p><u>Section 1 - Introduction:</u></p> <p>Thank you for allowing us to comment on the above planning proposal, please note that due to the nature of a Hybrid Application and the breadth of information required, this response will be in 2 parts. This response will focus on the detailed element of Block A within the application under police reference NE4188. Part one (1) was dealt under police reference NE6136.</p> <p>With reference to the above application we have had an opportunity to examine the details submitted and would like to outline the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.</p> <p>It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1).</p> <p>We have met with the project Architects to discuss Crime Prevention and Secured by Design (SBD) for Block A and have discussed our concerns around the design and layout of Block A. The Architects have made mention in the Design and Access Statement with reference to design out crime or crime prevention and have stated that they will be working in close collaboration with DOCOs to ensure that the development is designed to reduce crime at detailed design stage. At this point it can be difficult to design out fully any issues identified. At best crime can only be mitigated against, as it does not fully reduce the opportunity of offences.</p> <p>Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions and an informative. The comments made can be easily be mitigated early if the Architects ensure the ongoing dialogue with the department continues throughout the design and build process. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity.</p> <p>The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.</p> <p><u>Section 2 - Secured by Design Conditions and Informative:</u></p> <p>In light of the information provided, we request the following Conditions and Informative:</p>	<p>Planning conditions are proposed to ensure that the proposal meets secure by design accreditation.</p>

Stakeholder	Comment	Response
	<p><u>Conditions:</u></p> <p>A. Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve 'Secured by Design' Accreditation. Accreditation must be achievable according to current and relevant Secured by Design guide lines at the time of above grade works of each building or phase of said development.</p> <p>The development shall only be carried out in accordance with the approved details.</p> <p>B. Prior to the first occupation of each building or part of a building or its use, 'Secured by Design' certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained.</p> <p>C.</p> <p><u>Informative:</u></p> <p>The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.</p> <p><u>Section 3 - Conclusion:</u></p> <p>We would ask that our department's interest in this planning application is noted and that we are advised of the final Decision Notice, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind.</p> <p>Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices please do not hesitate to contact us at the above office.</p> <p><u>Outline Element</u></p> <p><u>Section 1 - Introduction:</u></p> <p>Thank you for allowing us to comment on the above planning proposal, please note that due to the nature of a Hybrid Application and the breadth of information required, this response will be in 2 parts. This response will focus on the Outline element of the application in Part (One) 1 and the detailed response for Plot A will follow in Part (Two) 2 under NE 4 reference.</p> <p>With reference to the above application we have had an opportunity to examine the details submitted and would like to outline the following comments, observations and recommendations. These are based on relevant information to this site (Please</p>	

Stakeholder	Comment	Response
	<p>see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.</p> <p>It is in our professional opinion that crime prevention and community safety are material considerations because of the mix of use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have received in relation to Crime Prevention (Appendices 1).</p> <p>We have met with the project Architects to discuss Crime Prevention and Secured by Design (SBD) for the overall masterplan and have discussed concerns around counter terrorism & crowd control. The Architects have made mention in the Design and Access Statement with reference to design out crime or crime prevention and have stated that they will be working in close collaboration with DOCOs and CTSA's to ensure that the development is designed to reduce crime at detailed design stage. At this point it can be difficult to design out fully any issues identified. At best crime can only be mitigated against as it does not fully reduce the opportunity of offences.</p> <p>Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions and an informative. The comments made can be easily be mitigated early if the Architects ensure the ongoing dialogue with the police department continues throughout the design and build process. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity.</p> <p>The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.</p> <p><u>Section 2 - Secured by Design Conditions and Informative:</u></p> <p>In light of the information provided, we request the following Conditions and Informative:</p> <p><u>Conditions:</u></p> <p>D. Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve 'Secured by Design' Accreditation. Accreditation must be achievable according to current and relevant Secured by Design guide lines at the time of above grade works of each building or phase of said development.</p> <p>The development shall only be carried out in accordance with the approved details.</p> <p>E. Prior to the first occupation of each building or part of a building or its use, 'Secured by Design' certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained.</p>	

Stakeholder	Comment	Response
	<p>F. Commercial aspects of the development must achieve the relevant Secured by Design Accreditation at the final fitting stage, prior to residential occupation of such building in accordance with condition B (Secured by Design) and commencement of business. Details shall be submitted to and approved, in writing, by the Local Planning Authority</p> <p>G. Measures to mitigate against counter terrorism activities plus crowd control during events must be implemented according to Metropolitan Police Guidelines and advice during the lifetime of the development and upon final development completion. (Note - this information will not be shared in the public domain once provided).</p> <p><u>Informative:</u></p> <p>The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.</p> <p><u>Section 3 - Conclusion:</u></p> <p>We would ask that our department's interest in this planning application is noted and that we are advised of the final Decision Notice, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind.</p> <p>Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices please do not hesitate to contact us at the above office.</p> <p>Yours sincerely,</p> <p>Lee Warwick 463TP Designing Out Crime Officer Metropolitan Police Service</p> <p>This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the</p>	

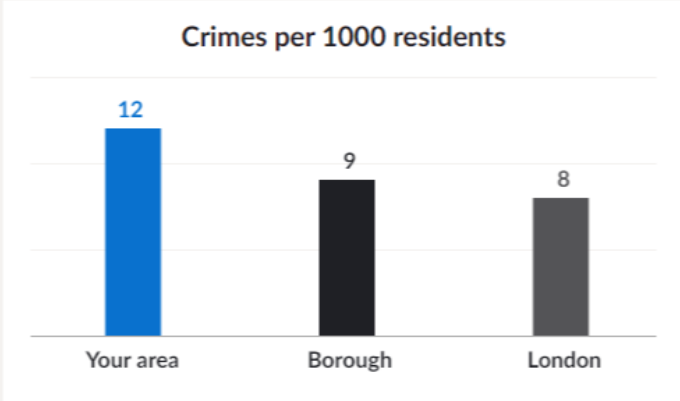
Stakeholder	Comment	Response
	<p>intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to.</p> <p>Appendix 1: Concerns and Comments</p> <p>In summary we have overall site specific comments in relation to the following items. This list is not exhaustive and acts as initial observations on the masterplan based on the available plans from the architect and local authority planning portal.</p> <p>Site specific advice may change depending on further information provided or site limitations as the project develops:</p> <p>In summary we have site specific comments and concerns in relation to the following items.</p> <p>This list is not exhaustive and acts as initial observations from the Plans.</p> <p>Site specific advice may change depending on further information or site limitations as the project develops:</p> <p>General CTSA measures – Evidence supporting the implementation of CT measures should be further discussed with the CTAs as the development progresses. This can be ensured via an appropriately worded CT condition in conjunction with the CTSA. Anything installed must meet the security needs for the site and adaptable for future events and or concerns.</p> <p>Crowd control measures – Physical measures to assist control of large crowds should be implemented during the building phase and for the completion of the development.</p> <p>Lighting – It is unclear exactly what levels of illumination is provided for the external aspects at this time. A lux plan should be provided to encourage overall uniformity of lighting and reduce the likelihood of hiding places or dark spots and make public walkways as visually open and safe as possible. This should be to the latest BS 5489 standard and the design engineer should have a competency to level 3 and 4 of the Institution of Lighting Professionals (ILP) Scheme shown. Dusk till dawn photoelectric cells with ambient white lighting via directional down-lighting columns is advised for best lighting practice. Bollard lighting as a primary light source is not supported as it does not provide suitable illumination and creates an “up lighting effect” making it difficult to recognise facial features and thus increase the fear of crime.</p> <p>CCTV – Data logging and CCTV will be paramount for the site to assist management when dealing with any issues during events and the day to day running of development. A CCTV strategy for the site should be reviewed at the earliest opportunity to not only protect the different buildings within the design, but the main walkways/pathways that run through the design. This should be installed to BS EN 50132-7:2012+A1:2013 standard, co-ordinated with the</p>	

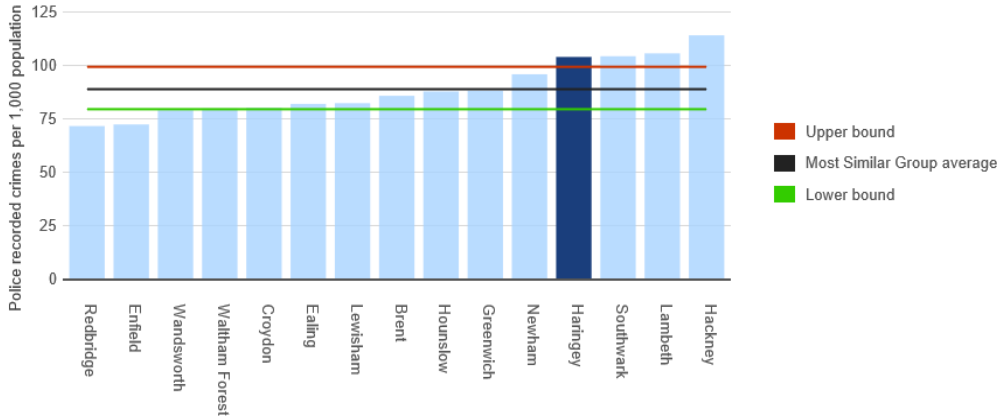
Stakeholder	Comment	Response
	<p>planned lighting system, contained within vandal resistant housing, to record images of evidential quality (including at night time) that are stored for a minimum of 30 days on a locked and secure hard drive or a remote cloud system. Appropriate signage should also be included highlighting its use.</p> <p>Cycle Storage – We recommend that there should be 3 points of locking for the bikes and signage for residents advising lock their bikes appropriately. The bike store should not be advertised from the outside to further deter opportunistic crime and access should only be provided to those who register with the Managing Agency. Bike stands should have three points of locking and signage put up advising people to lock them securely. External signage should not advertise the usage of this space to try and reduce opportunistic theft. External cycle racks should be positioned to avoid usage as seating or located.</p> <p>Vehicle Routes – It is important to ensure that routes into and around the site not only meet SBD/CT requirements, but that the Police Traffic Management Unit (TMU) have reviewed the measures and are satisfied.</p> <p>Doors and windows - SBD Approved Doors and windows (as recommended by the DOCO) are advised to ensure this and will need to be reviewed across the site once a final design has been agreed by the Local Authority. This will also need to be reviewed against any Heritage requirements for the site which could impact on certified products being installed.</p> <p>Pathways/Walkways – As the concept of the design is to provide safe spaces for people to walk and cycle at all times, it will be important to ensure all pathways allow good visibility, are wide, are as straight as possible, are well lit and are covered by adequate CCTV.</p> <p>Climbing Aids – Whilst climbing aids on the whole are not within the design, every effort should be made to ensure that the design does not inadvertently create opportunities to climb up to roof, balcony or amenity spaces. Review of the distances and materials should be taken into account across the site and designed in such a way that it cannot become a climbing aid.</p> <p>Access Control Strategy – The reduction in routes into any building and floor by floor access control to the different uses (including upper level garden spaces) is supported. As the project develops further, further discussions into ensuring that this is appropriate for the site (considering its complex and multi-use functions) will be important to avoid permeability issues. Ongoing discussions are recommended in case of any changes to the floor layouts and functions that may affect original advice</p> <p>Residential and Commercial Outline Application – The design concepts show basic plans for the layouts of the buildings, but are likely to go through alterations to layouts as their design progresses. Whilst the general layouts appear on the whole suitable, the below comments are to aid the design teams to fine tune their proposals in line with SBD Guidance.</p>	

Stakeholder	Comment	Response
	<p>Compartmentation – The design currently allows access for a high volume of residents into multiple cores within multiple Blocks and the necessity of compartmentation and level by level access control will be extremely important considering the aspects of giving legitimacy for people to have immediate access. A robust access control system should be put in place to reduce excessive permeability through the design and to aid compartmentation this may include the use of access controlled lifts to control the movement of both residents and their visitors. It is recommended that data logged access control is installed at the earliest opportunity within the build to limit access of non-residents and those who have limited access rights. It is recommended that all lifts/doors leading out of the staircases onto the upper residential floors have data logged access control to help the Management Agency monitor usage of the different spaces and in turn help them to identify misusers in particular areas. This should work in tandem with CCTV to make it easier for the Managing Agency to deal with offences and via the tenancy agreements. This would be a requirement for the scheme to achieve SBD accreditation.</p> <p>Defensible Space – Across the design there is a proposal for ground level properties to activate the street frontage which is supported. However to protect these properties (as they are more vulnerable to crime and ASB), it is important to ensure that they are provided with low-level defensible zones around the property.</p> <p>Bin Storage – Bin storage is likely to be core specific and in close proximity to the building entrances for each of Waste Collection which is supported. It is strongly recommended that access to the bins are externally accessed by residents only and with the corridor removed to avoid creating a method of bypass into the residential aspects.</p> <p>In order to control these spaces as best as possible it is recommended that data logged SBD approved doorsets are used and are single sized large doors to eliminate the weaknesses of passive leaf manual locking systems. If double doors are required, then the passive leaf needs to be locked in such a way that Maintenance only can open the door. To help the Management Agency monitor the spaces and to help prevent against potential drug dealing, rough sleeping and assaults, CCTV should ideally be implemented both within and outside the stores.</p> <p>Commercial/Residential mixed use – It is strongly recommended that commercial and residential aspects of a build are always kept separate wherever possible and that there is no excessive permeability through each space.</p> <p>Adjoining Balconies – Adjoining balconies leave the residents more vulnerable to crime and ASB. Where possible it is recommended that balconies are suitably separated to ensure that climbing between them is not possible. Where this cannot be designed out it is advised that the doors and windows are to an enhanced standard to mitigate the risk.</p> <p>Postal Strategy – In order to prevent against postal theft, it is recommended that post be delivered into an airlock created through the Compartmentation requirements. These areas should be covered by CCTV that shows the post boxes for evidential purposes. A strategy for bulky package delivery and where this will be stored securely should also be reviewed against the number of residents who potentially may use this feature daily.</p> <p style="text-align: center;">Appendix 2: Planning Policy</p>	

Stakeholder	Comment	Response
	<p>London Plan 2021 Policy D11: Safety, Security and Resilience to Emergency This policy links design out crime, counter terrorism prevention measures and acknowledges fire safety issues.</p> <p>Section B of policy D11 Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire Commissioner, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Policies and any site allocations, where locally justified, should be set out in Development Plans.</p> <p>Section C of policy D11 These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area. The policy considers not just crime, but also a wide range of hazards, such as fire, flood, extreme weather and terrorism. New buildings should therefore be resilient to all of these threats.</p> <p>Paragraph 3.11.3 Measures to design out crime, including counter terrorism measures, should be integral to development proposals considered early in the design process, taking into account the principles contained in guidance such as the Secured by Design Scheme published by the Police.... This will ensure development proposals provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat of the risk of an attack and the likely consequences of one.</p> <p>Paragraph 3.11.4 The Metropolitan Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain appropriate design solutions, which mitigate the potential level of risk whilst ensuring the quality of life is maximised.</p> <p>Paragraph 3.12.10 Fire safety and security measures should be considered in conjunction with one another, in particular to avoid potential conflict between security measures and means of escape or access of the fire and rescue service. Early consultation between the London Fire Brigade and the Metropolitan Police Service can successfully resolve any such issues.</p> <p>MM4 (Policy DM2) Part A(d) "Have regard to the principles set out in 'Secured by Design'"</p>	

Stakeholder	Comment	Response
	<p>MM5: Para 2.14 - "Proposals will be assessed against the principles of secured by design'. The latest published guidance in this respect should be referred."</p> <p>An Independent Sustainability report by AECOM on Tottenham area action plan states: <i>"Crime is high in Tottenham with many residents concerned about safety, gang activity and high crime rates. Issues are particularly associated with Northumberland Park and Tottenham Hale"</i>.</p> <p>2.3 of same report states:</p> <ul style="list-style-type: none"> • Crime rates are relatively high across the borough and crime is particularly prevalent in Northumberland Park. There is a need to design schemes in order to reduce levels of crime, fear of crime and anti-social behaviour. Since unemployment is strongly correlated with acquisitive crime, there may also be a link to wider economic development. • There are no references to crime in the overarching policies, although it is recognised that housing and economic policies aim to support a very significant level of regeneration in the area. This could indirectly lead to reduced crime / fear of crime in the medium term through creating more high quality environments and more stable communities. AAP 06 includes requirements on urban design and character and seeks to maximise opportunities to create legible neighbourhoods, which may assist in creating safe, modern and high quality places. • There are no references to crime in the neighbourhood area sections; however they do set out key objectives which include considerations for safe and accessible environments. Furthermore, as noted above, the scale of regeneration proposed should indirectly lead to reductions in crime and fear of crime. Crime is particularly high in Northumberland Park and Tottenham Hale, hence this issue might be explicitly addressed in these sections; however, it is recognised that the DM Policies DPD includes Borough wide requirements in this regard. Also, AAP 06 sets out the Council's commitment to preparing Design Code Supplementary Planning Documents (SPDs) for Tottenham's Growth Areas, where opportunities for secure by design principles can be investigated. • In conclusion, the plan is likely to result in positive effects on the crime baseline if there is large scale regeneration (including jobs growth) and robust implementation of safer streets and other measures to design out crime in Tottenham, including particularly in Northumberland Park where crime levels are highest. <p style="text-align: center;">Appendix 3 : Crime Figures</p> <p>The crime figures provided below are publicly available on the Internet at http://www.met.police.uk/. The figures can at be considered as indicative as they do not include the wide variety of calls for police assistance which do not result in a report. Many of these calls involve incidents of anti-social behaviour and disorder both of which have a negative impact on quality of life issues.</p>	

Stakeholder	Comment	Response								
	<p>Haringey is one of 32 London Boroughs policed by the Metropolitan Police Service. It currently has crime figures above average for the London Boroughs and suffers from high levels of crime and disorder to its residents and business communities.</p> <p>The following figures relate to recorded crime data from Police.uk for the below area:</p> <div><p>Crime rate comparison ⓘ</p><p>for November 2021</p><table><caption>Crimes per 1000 residents</caption><thead><tr><th>Area</th><th>Crimes per 1000 residents</th></tr></thead><tbody><tr><td>Your area</td><td>12</td></tr><tr><td>Borough</td><td>9</td></tr><tr><td>London</td><td>8</td></tr></tbody></table></div>	Area	Crimes per 1000 residents	Your area	12	Borough	9	London	8	
Area	Crimes per 1000 residents									
Your area	12									
Borough	9									
London	8									

Stakeholder	Comment	Response																																
	<div><div>Crime in Haringey compared with crime in other similar areas</div><div><div>All crime</div><div></div></div><div><p>In the year ending June 2017, the crime rate in Haringey was higher than the average crime rate across similar areas.</p><table><caption>Police recorded crimes per 1,000 population (Year ending June 2017)</caption><thead><tr><th>Borough</th><th>Crimes per 1,000 population</th></tr></thead><tbody><tr><td>Redbridge</td><td>~70</td></tr><tr><td>Enfield</td><td>~70</td></tr><tr><td>Wandsworth</td><td>~75</td></tr><tr><td>Waltham Forest</td><td>~75</td></tr><tr><td>Croydon</td><td>~75</td></tr><tr><td>Ealing</td><td>~80</td></tr><tr><td>Lewisham</td><td>~80</td></tr><tr><td>Brent</td><td>~85</td></tr><tr><td>Hounslow</td><td>~85</td></tr><tr><td>Greenwich</td><td>~85</td></tr><tr><td>Newham</td><td>~90</td></tr><tr><td>Haringey</td><td>~105</td></tr><tr><td>Southwark</td><td>~105</td></tr><tr><td>Lambeth</td><td>~105</td></tr><tr><td>Hackney</td><td>~115</td></tr></tbody></table><div><div>Upper bound</div><div>Most Similar Group average</div><div>Lower bound</div></div></div></div>	Borough	Crimes per 1,000 population	Redbridge	~70	Enfield	~70	Wandsworth	~75	Waltham Forest	~75	Croydon	~75	Ealing	~80	Lewisham	~80	Brent	~85	Hounslow	~85	Greenwich	~85	Newham	~90	Haringey	~105	Southwark	~105	Lambeth	~105	Hackney	~115	
Borough	Crimes per 1,000 population																																	
Redbridge	~70																																	
Enfield	~70																																	
Wandsworth	~75																																	
Waltham Forest	~75																																	
Croydon	~75																																	
Ealing	~80																																	
Lewisham	~80																																	
Brent	~85																																	
Hounslow	~85																																	
Greenwich	~85																																	
Newham	~90																																	
Haringey	~105																																	
Southwark	~105																																	
Lambeth	~105																																	
Hackney	~115																																	
Waltham Forest LB	No comment received																																	
Greater London Authority	See Appendix 4																																	
Greater London Archaeological Advisory Service	<p><i>Re-consultation received 03/02/2022: addendum to ES; and documents & plans relating to Plot A</i></p> <p>The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter.</p> <p>NPPF section 16 and the London Plan (2021 Policy HC1) make the conservation of archaeological interest a material planning consideration. NPPF paragraph 194 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.</p> <p>The planning application lies in an area of archaeological interest.</p>	Suitable planning conditions are proposed to ensure the proposal does not have an adverse impact archaeological assets.																																

Stakeholder	Comment	Response
	<p>The updated 2022 archaeology ES chapter better recognises the archaeological potential of the Roman road alignment through the site and the potential of the Moselle as well as the expected river crossing point, to preserve significant archaeological remains within the site boundaries. It does not go on to identify these assets as EIA receptors which is a strange decision, one which means that the presence of the heritage assets has still not effectively fed into mitigation and design decisions as the EIA process intends.</p> <p>The application continues to consider archaeological investigation to be a mitigation response. Archaeological investigation does not mitigate harm to receptors. It is a destructive process that has a negative impact on them. Further, the application proposes that archaeological work take place after demolition and remediation works on site, both of which have great scope to harm buried remains.</p> <p>Improved public understanding can be argued to be an offsetting of impact. The applicants have offered a modest suite of temporary outreach work during archaeological excavations but have not set out any ways that the archaeological heritage of the site might become an asset for the benefit of residents and visitors through presentation and interpretation.</p> <p>It remains GLAAS' advice to you that a successful and policy-compliant scheme should take further account of identifying and sympathetically managing important archaeological heritage assets in order to harness them to create a characterful and maximally beneficial development that meets local and national policy objectives for both heritage and design.</p> <p>If the LPA chooses to grant the scheme in its current form, I recommend that the steps outlined above are carried out before detailed design matters are considered, in order to inform them.</p> <p>To this end, I recommend that the appended archaeological condition wordings be placed on any consent of the current application, should the LPA deem the material provided so far to be sufficient to base a decision on.</p> <p>I have looked at this proposal and at the Greater London Historic Environment Record. I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.</p> <p>NPPF paragraphs 190 and 197 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.</p> <p>Without prejudice to our advice that the scheme should be determined and designed based on further archaeological assessment four (4) related conditions are listed below.</p>	

Stakeholder	Comment	Response
	<p>These would create a staged process of archaeological investigation, historic buildings recording (where appropriate), detailed development design work and then asset enhancement and public benefit.</p> <p>Recommend amendments and updates to archaeology submission</p> <p>No reserved matters shall be submitted, nor shall any demolition or development take place in any phase until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing, in consultation with GLAAS. For land that is included within the WSI, no reserved matters application shall be submitted or demolition or groundworks begun other than in accordance with the agreed WSI, and the programme and methodology of a site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.</p> <p>If heritage assets of archaeological interest are identified by stage 1, then for those parts of the site which have archaeological interest, a stage 2 excavation and mitigation WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:</p> <p>A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works</p> <p>B. Details of a programme for delivering archaeological outreach during the project.</p> <p>C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.</p> <p><i>Informative: Written schemes of investigation will need to be prepared and implemented by a suitably Qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London.</i></p> <p>Condition 2 (Building recording)</p> <p>No reserved matters shall be submitted, nor shall any demolition take place in any phase until the applicant has secured the implementation of a programme of recording, research and historic analysis of the standing buildings in each phase, one which considers social history, building structure, architectural detail and archaeological evidence. This shall be undertaken in accordance with a written scheme of investigation for each phase, submitted by the applicant and approved by the local planning authority.</p> <p><i>Informative: Locally listed buildings are present on the site. Accordingly, the planning authority wishes to secure the provision of historic building recording prior to development, in accordance with Historic England guidance.</i></p> <p>Condition 3 (Foundation and below ground design):</p> <p>No reserved matters shall be submitted nor shall any development in any phase shall take place, other than archaeological work, within the proposed development site until the applicant has produced a detailed scheme</p>	

Stakeholder	Comment	Response
	<p>showing the complete scope and arrangement of the foundation design and other below ground works in each phase, which has been submitted to and approved by the local planning authority for each phase.</p> <p><i>Informative The development of this site is likely to damage heritage assets of archaeological interest. The applicant should therefore submit detailed foundation and other below ground designs for approval that demonstrate reduced harm to buried remains.</i></p> <p>Condition 4 (Presentation):</p> <p>No reserved matters shall be submitted for any phase until a scheme of permanent heritage interpretation, landscaping and display at the site has been agreed, in accordance with a research, materials, design and long-term maintenance proposal and the results of the recommended historic and archaeological research and investigation. The proposal for the work is to be approved in advance in writing by the Local Planning Authority in consultation with GLAAS. The scheme shall be displayed in the public realm of the site and should be integrated uniformly with the site's other public realm, design and landscape proposals.</p> <p><i>Informative: The LPA wishes that the rich history of the site and its surroundings be conveyed to the public. These include the heritage of Ermine Street Roman road, the Moselle, any river crossing by the Roman road, and any other significant remains encountered during fieldwork. The interpretation scheme should be researched, designed and implemented by a recognised historical or archaeological interpretation specialist with appropriate experience of the periods involved.</i></p> <p>Thank you for your consultation received on 18 November 2021.</p> <p>The Greater London Archaeological Advisory Service (GLAAS) give advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.</p> <p>NPPF Section 16 and the London Plan (2021 Policy HC1) make the conservation of archaeological interest a material planning consideration. NPPF section 194 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest. A field evaluation may also be necessary.</p> <p>I have looked at this proposal and at the Greater London Historic Environment Record but I need more information before I can advise you on the effects on archaeological interest and their implications for the planning decision. If you do not receive more archaeological information before you take a planning decision, I recommend that you include the applicant's failure to submit that as a reason for refusal.</p> <p>The submitted study has focused on post-mediaeval remains and had not unfortunately carried out the geoarchaeological modelling work recommended in the scoping response or consulted the Corcoran et al Lower Lea Valley Model towards establishing the potential for earlier periods. Questions about harm and significance are not well</p>	

Stakeholder	Comment	Response
	<p>explored in the submission. It is regrettable that the DBA authors did not consult GLAAS for advice on relevant sources.</p> <p>Of greater concern, the EIA considers archaeological investigation to be a mitigation response, indeed the only mitigation response. Further, it proposes this work take place after demolition and remediation works on site, both of which have great scope to harm buried remains. Archaeological investigation does not mitigate harm to receptors. It is a destructive process that has a negative impact on them.</p> <p>Improved public understanding can be argued to be an offsetting of impact, but the applicants have not considered how they might create public understanding or other heritage benefits in their submission. No proposals are put forward to avoid harm through design or programming of development and no proposals are put forward for public heritage benefits that could offset harm and which would assist in creating a sense of place and celebration of local history and character in a final scheme. This was a key recommendation at scoping and has also not been acknowledged.</p> <p>The proposals do not comply with London Plan or Local Plan policies about heritage display and interpretation and are also not underpinned by thorough assessment. I recommend that the heritage submissions be updated and that the applicants liaise with GLAAS during this process.</p> <p>If the applicants are not able to do this, then I recommend that this advice forms part of a formal Reg 25 request.</p> <p>Because of this, I advise the applicant completes these studies to inform the application: Desk Based Assessment and ES Chapter revisions</p> <p>Desk-based assessment produces a report to inform planning decisions. It uses existing information to identify the likely effects of the development on the significance of heritage assets, including considering the potential for new discoveries and effects on the setting of nearby assets. An assessment may lead on to further evaluation and/or mitigation measures.</p> <p>The DBA and the relevant ES Chapter should be updated in line with the recommendations above.</p> <p>I will need to agree the work beforehand and it should be carried out by an archaeological practice appointed by the applicant. The report on the work must set out the significance of the site and the impact of the proposed development. I will read the report and then advise you on the planning application.</p> <p>NPPF paragraphs 199 - 202 place great weight on conserving designated heritage assets, including non-designated heritage assets with an archaeological interest equivalent to scheduled monuments. Non- designated heritage assets may also merit conservation depending upon their significance and the harm caused (NPPF paragraph 203). Conservation can mean design changes to preserve remains where they are.</p>	

Stakeholder	Comment	Response
	<p>NPPF paragraphs 190 and 197 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Applicants should therefore expect to identify appropriate enhancement opportunities.</p> <p>If preservation is not achievable then if you grant planning consent, paragraph 205 of the NPPF says that applicants should record the significance of any heritage assets that the development harms.</p> <p>You can find more information on archaeology and planning in Greater London on our website.</p> <p>This response only relates to archaeology. You should also consult Historic England's Development Management team on statutory matters.</p>	