

Addendum

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ADDENDUM REPORT FOR ITEM 8**UPDATE FOR CONSIDERATION AT PLANNING SUB-COMMITTEE Item No. 8**

Reference No: HGY/2018/2223	Ward: Tottenham Hale
Address: Strategic Development Partnership (SDP) Sites Welbourne, North Island, Ferry Island, Ashley Road East and Ashley Road West Station Road N17	
Proposal: Demolition works and clearance of existing site to provide a mixed-use development comprising 6 buildings up to 38 storeys in height, which together with pavilion and basement accommodation will provide up to 104,053m ² of floorspace (GIA), comprising residential (Use Class C3) (up to 1,030 units), retail (Use Class A1-A4), health centre (Use Class D1), office (Use Class B1), leisure (Use Class D2) parking and servicing areas, hard and soft landscaping (including the provision of a new public square), highways works, creation of new vehicular accesses and the realignment of Station Road, decentralised energy network works and other associated works.	

1.0 UPDATES – REPRESENTATIONS (received after publish of main report)

- 1.1 Haringey Citizens previously neither supported nor objected to the scheme (as per Page 31 to the committee report) however post-amendments, this group has elected to support the scheme. A letter from Haringey Citizens is attached as **Appendix AD1**.
- 1.2 The Right Honourable David Lammy, Member of Parliament for Tottenham, has added supplementary comments to his initial objection to the proposal. The comments note support for the progress in introducing Council homes to the scheme, but maintain reservations about the proposal. The supplementary letter is **Appendix AD2**.
- 1.3 The Council has received an objection from Paul Burnham. This objection is attached as **Appendix AD3**.
- 1.4 A representative of the Ferry Lane Action Group (FLAG) has made representations supporting the scheme. These comments are **Appendix AD4**. This group represents Ferry Lane Estate Residents and supports the provision of a new health centre.

2.0 UPDATES - CONDITIONS

- 2.1 The Environment Agency has agreed a technical re-wording of conditions relating to a Monitoring and Maintenance Plan.
- In Condition, A19, B19, C19, D19 and E19 following “may not commence” insert “other than for investigative work”

2.2 This change will allow the developer flexibility during site surveying and is supported by officers. There are no material planning impacts to this change.

2.3 Thames Water has agreed a technical rewording for conditions concerning a Source Water Protection Strategy for the Ferry Island Plot

- In Condition B33, following “Ferry Island Plot” insert “Development (excluding above ground demolition)”

2.4 This change will allow the developer flexibility during site surveys and is supported by officers.

3.0 CORRECTIONS TO TEXT

3.1 A Head of Term was omitted in error from the committee report. On Page 11, Head of Term 24 should be inserted:

24) Build to Rent Covenant

3.2 This Head of Term will address London Plan policy/guidance with respect to the Build to Rent element of the scheme.

3.3 Paragraphs 2.4 and 2.6 should cross refer to paragraph 2.3, not 2.2.

3.4 Paragraph 3.1.6 notes the council’s intention to purchase “shared ownership” units. This is a typographical error and should read “social rented” units. There is no intention for the Council to purchase any shared ownership units.

3.5 Section 3.1 provides details of the buildings but omits reference to a storey of non-habitable plant when noting the number of storeys in Buildings 1, 2 and 3. For clarity, the words “habitable” should be inserted at:

- Paragraph 3.1.10 Building 3 – Following “18”
- Paragraph 3.1.11 Building 1 – Following “20”
- Paragraph 3.1.11 Building 2 – Following “13”

3.6 For member’s information, the heights of the tall buildings proposed on the site are tabulated in full (including storey heights and AOD heights) on Page 63 of the Agenda Package at paragraph 6.5.13.

3.7 Paragraph 3.1.3 (Table Option B) notes the Residential Area figure to be 96,645m² however the correct figure is 97,274m². This is a typographical error. (The original table from the GLA’s Stage 1 report appears on Page 424 for member’s reference.)

- 3.8 Paragraph 6.6.15 states that “there are no north facing single aspect units in the scheme, and the total number of north facing single aspect units has been minimised to 35%, which is acceptable”. The second part of this sentence should read “...and the total number of ~~north facing~~ single aspect units has been minimised to 35%, which is acceptable”. This is a typographical error.
- 3.9 Paragraph 6.3.46 – Table 1.10 contains a typographical error. The total number of affordable habitable rooms should be “654” not “239”.
- 3.10 Paragraph 6.3.20 notes an additional 1600 residents would yield a need for the equivalent of 0.9 GPs. The figure of 1600 is taken from the applicant’s original July 2018 Environmental Statement (ES);
- 3.11 However with the scheme amendments in October 2018, the applicant submitted an addendum to the ES which states an increased projected population figure of 1650 due to the proposed tenure changes. The GP yield remains unchanged and there are no material planning impacts to this correction.
- 3.12 Members should note in planning terms, the addition of the health centre to the area will meet projected GP requirements for the new population and address a current deficit of GP capacity locally.
- 3.13 Paragraph 6.4.26 notes the Mayor’s Affordable Housing and Viability SPG is draft. This document has now been fully adopted – the word draft should be removed.
- 3.14 Paragraph 6.5.34, ‘Ferry Square’ is also a public space that will be created, on Ferry Island at the centre of the development.
- 3.15 Paragraph 6.11.16 suggests 1,817 is the total cycle parking figure for the site, however 1,817 is the total number of long stay cycle parking spaces. The number of additional short stay cycle parking spaces is 182. There are no material planning impacts to the correction.
- 3.16 Members should note that Condition 11 (as applied to each plot) will require cycle parking details, and the total number of short and long stay spaces is compliant with the London Plan.
- 3.17 The number of wind assessment locations noted in Paragraph 6.10.20 is listed as 309, whereas the correct number of assessments locations is 347. This is a typographical error.
- 3.18 At Paragraph 6.12.12 the total carbon offset is incorrectly stated as 536 Tonnes. The correct figure is 522 Tonnes. This is a typographical error and the carbon offset contribution remains unchanged.

3.19 Appendix 5 and Appendix 6 are transposed in the text of the committee report. Appendix 5 contains existing site images and Appendix 6 contains indicative images of the future scheme.

4.0 UPDATES – DAYLIGHT/SUNLIGHT

4.1 Section 6.10 addresses daylight and sunlight issues. While the conclusion remains unchanged, the following additional clarifications are provided:

- Where NSL test information is cited, it should be clear the test is on a room, not a window.
- Paragraph 6.10.10 suggests the only windows experiencing major impacts are the 18 windows at Hale Gardens. These are where there is a localised effect, however there are an additional 33 windows that experience major effects that are generally disaggregated throughout the site.
- In Paragraph 6.10.12, it should be clarified that of the 371 tested rooms, 329 comply fully with NLS criteria. Of the non-compliant rooms, 19 rooms experience minor effects, 21 experience moderate effects and 2 experience major effects. There are 42 rooms, below BRE Guidance criteria, not 23 as stated.
- The report omits reference to the cumulative scenario considered. When considering the impact of cumulative development schemes, the results closely mirror those in the completed development scenario above, demonstrating that the overall outcome will not be materially affected by cumulative schemes.

5.0 UPDATE - EMPLOYMENT

5.1 For members reference, the existing employment figure of 110 jobs in the applicant's Environmental Statement is based on an assessment of existing floorspace using Homes and Community Agency (HCA) guidance. This guidance assumes spaces are fully utilised.

5.2 This assessment also recorded Maplin being occupied as it was as the time of the assessment and 28 jobs were attributed to the Maplin floorspace. The 110 existing jobs on site assumes full-occupation and the actual existing jobs remaining on the site today is less than the HCA-based assessment.

5.3 The scheme is projected to create a range of between 175 and 500 jobs depending on the final uses of the commercial units. By subtracting 110 existing jobs from the gross job creation figure, the net job creation range is therefore **65 – 390 jobs**. The net job-creation figure cited in the Committee Report at Paragraph 6.3.15 (75-415 jobs) is incorrect and is

drawn from the applicant's original Environmental Statement (ES), not the addendum.

5.4 The correct net job creation figure is therefore **65 – 390** jobs. As noted in the report, officers expect this figure to fall towards the higher end of the range given the flexibility of floorplate and the developer's track-record.

5.5 Officers support the scheme in employment terms and consider the net job creation figure accords with the level of flexible employment floorspace and will make a contribution to a higher quality jobs offer oriented toward the service economy in Haringey.

6.0 UPDATE – PLAYSPLACE

6.1 For clarification, in the event that all 131 units on the Wellbourne site come forward as social rented the child yield estimate would rise to 187 across the site (124 on Wellbourne). This would result in the need for an additional 282sqm of under-5's playspace (on top of the 398sqm proposed).

6.2 In lieu of this additional space, the S106 makes provision for an additional payment (up to approx. £45,000) to fund off-site play within the vicinity of the site in this event. Both scenarios would therefore comply with policy. In addition the applicant will be required to submit a playspace plan by condition on a plot by plot basis and will seek to increase the playspace on the Wellbourne and the Council is committed to look for opportunities to introduce playspace, within 100m of the site in line with GLA guidance, into the Chesnut Phase 2 environmental improvements for the benefit of the Wellbourne and the wider estate.

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Haringey Citizens comments on Strategic Development Partnership (SDP) Sites Welbourne, North Island, Ferry Island, Ashley Road East and Ashley Road West Station Road N17. Reference No: HGY/2018/2223 Ward: Tottenham Hale

Haringey Citizens is a broad based alliance of civil society organisations in Haringey. We have been following the process of the proposed development closely for the past two years and have met with representatives Argent Related LLP on seven occasions and Haringey Council to discuss their plans for the area.

Affordability

We submitted comments to the first consultation round in September 2018. We raised serious concerns over the lack of genuinely affordable housing available across the sites, particularly in relation to shared ownership and to the Welbourne site. We do not consider shared ownership to be an 'affordable' housing model and struggle to see how people from Tottenham Hale will be able to afford to move into these new units.

We have consistently made the point to Argent and the Council that affordability should be linked to average incomes, not the market rate. Other products of genuinely affordable housing would be preferable - for example London Living Rent, Community Land Trusts or Social Rent - all of which can be affordable to local people and are supported by the Mayor of London.

We urged the Council and Argent to review its affordability offer for the development and for a new deal to be struck that recognises both the need for the new homes to be built but to be affordable for local residents.

We are therefore pleased to see the Council and Argent have come back with new plans which are a significant improvement in terms of affordability.

It is particularly encouraging to see the Welbourne site now includes 100% genuinely affordable housing (51 Council homes, 80 London Living Rent and the prospect of the % of social housing being increased). This will see 131 new homes that are genuinely affordable for the local area which is to be welcomed.

In an ideal world we would have liked to have seen a higher percentage of affordable housing across the whole five sites - ideally a minimum of 50% on public land. But given the restrictions of the SDP and the alternative being no new homes and investment on the site at all, we thus pragmatically can support the new genuinely affordable homes.

Community space & Public Realm

We did have concerns that the public spaces on offer were too close and exposed to busy road traffic and this remains broadly the case, although we understand the constraints and we are encouraged to see the addition of the pavilion on 'Ferry Square' to mitigate this.

We maintain that we would like to see existing and future local residents and the community play a more meaningful role in the management of the public spaces and public realm - such as the pavilion.

Health Centre

We are encouraged to see plans for a new health centre on the Welbourne site and recognise the importance of community health centres and how beneficial they are in providing care for increased numbers of local patients. There is a real shortage of provision locally and we are reassured that this complements and grows, and not replaces, the existing provision locally.

Rt. Hon. DAVID LAMMY MP

House of Commons
London SW1A 0AA

Member of Parliament for Tottenham



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Emma Williamson
Assistant Director, Planning Regeneration
Haringey Council
225 High Road
London
N22 8HQ

6 December 2018

Dear Emma,

Re: Argent development project (HGY/2018/2223)

I was pleased to hear that some progress has been made in respect of introducing council homes under this scheme and amending the types and tenures of the proposed residential units. However, I remain concerned about the viability of these plans and the project's impact on the local community. For these reasons, I still have serious reservations as detailed below.

I understand a consultation on the proposed changes ended on 19 November and that the planning sub-committee will meet again shortly to consider the application and its' revisions. I remain concerned about the intended genuinely affordable quota proposed for all sites - with 40% reserved for the Welbourne site and only a 25% provision planned for the remaining four sites. The proposed 25% quota sits well below the Council's own target for affordable homes. While I appreciate that attempts have been made to negotiate an increase in the percentage of social housing, I remain concerned about Haringey residents being priced out of the market, which would ultimately lead to higher levels of social inequality.

In my original representation to you, I expressed my concerns about the scheme's lack of affordability for Haringey residents and the increasing levels of housing needs. Given the sheer volume of households on Haringey's housing register alone, Argent's proposed social housing quota will not assist the average Haringey resident - who is on a low income, has limited savings and faces financial hardship. Coupled with this, the proposed height of the development and the impact on the environment remain contentious issues. Issues that have not only been raised repeatedly by local residents, but also by the London Fire Brigade.

With these points in mind, I would urge you to carefully consider what a project of this magnitude would mean for Haringey residents and for the future of housing in Haringey.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'D. Lammy'.

Rt Hon David Lammy MP
Member of Parliament for Tottenham

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Argles James

From: Planning Support
Subject: FW: Comment Received from Public Access

Application Reference No. : HGY/2018/2223 Site Address: Strategic Development Partnership (SDP) Sites Welbourne, North Island, Ferry Island, Ashley Road East and Ashley Road West Station Road London N17 London Comments by: Paul Burnham

From:
58 Newbury House
Partridge Way

London

N22 8DY

Submission: Objection

Comments: We believe that the following points should be taken into account when considering this application.

ONE ; The quality of Council social rent dwellings in this development

Part2 of the October 2018 Addendum to the Financial Viability Assessment tells us that building standards have been reduced at Welbourne since the Council social rent tenure was introduced into the plans:

<http://www.planningservices.haringey.gov.uk/portal/servlets/AttachmentShowServlet?ImageName=1170945>

Some of the savings shown may be because council rent homes are normally let unfurnished (with no furniture or white goods), however the other savings amount to a drastic reduction in quality standards.

Cheaper doors, cheaper wall and floor coverings, kitchens, cheaper communications (presumably meaning door entry systems), and a 14% saving on cheaper sanitary appliances (sinks, shower trays, basins and WCs):

- all of these changes have been introduced for the Council social rent homes, and none of them are acceptable.

The Welbourne block will have a larger number of children than the rest of the development. We say that robust, good quality finishes and fittings will be required; and that council tenants deserve no less.

TWO ¿ Suggestions for the management of Build to Rent housing

The market part of the development will be mostly or exclusively Build to Rent (BTR), in other words corporate private rented housing.

BTR is proposed as a tenant retention and community-building model, unlike the existing, highly transient private rented sector. However, all private renters are in a position of marked disadvantage vis-à-vis their landlords, because they have neither ownership rights nor social housing rights, and because the landlord can use no-fault Section 21 evictions.

BTR is a new and largely untried sub-tenure, and therefore some additional guarantees for tenants are appropriate.

Covenants signed by the corporate landlord could guarantee that tenancies of at least 5 years; with a covenanted protocol to provide agreed additional protections from eviction in the case of tenants falling ill or becoming unemployed, because Housing Benefit would never cover their full rent.

The risk to the landlord of this approach would be manageable, as they will have a mainly young and affluent target customer base.

We recommend that such a community-building strategy should be adopted within the Planning Obligations for this application.

THREE ¿ Inadequate Child play space, and inadequate developer contributions

On 16 October, we wrote to the Mayor of London, concerning unrealistically low child yields for new housing developments, including this one. Almost no provision seemed to be made for the children of market and intermediate residents.

Anna Turner, Senior Strategic Planner at the GLA, replied from mayor@london.gov.uk on 13 November, ref: MGLA181018-5403 to say that,

¿The Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance (September 2012) does use figures from the Wandsworth Child Yield calculator - however, the updated calculator (version 2.1) does not use this data¿. let me clarify that this calculator was updated and published on our GLA Intelligence website on the 6th of December 2017 (please click here to see this version 2.1 of the calculator).¿ This was very good news.

The Planning Sub-Committee Report for the present development para 6.8.2 states that 'The GLA child yield calculator provides an estimate of 133 children [and young people, 0-18 years], requiring 1,330m² of play space.'

This is based on the Wandsworth Child Yield calculator - which it is recommended should no longer be used.

The developer is offering to provide on-site play space for under 5s only. This is completely inadequate.

Still using the Wandsworth Child Yield calculator, if the Council exercised its option to amend the housing tenure, and all dwellings at Welbourne became council rented, there would be 187 children requiring 1,871m² of play space. In this situation, the developer offers only an increased S106 contribution. This is also completely inadequate.

However using the GLA's updated calculator (version 2.1) for Outer London, there would be 356 children requiring 3,560m² of play space. If all dwellings at Welbourne were to be social rented, there would be 389 children requiring 3,894m² of play space.

There needs to be adequate provision for the additional number of children and parents, with a developer contribution required for schools and additional school journeys, etc.

This scheme would not be a child-free development, instead it would be a place where families are overcrowded and where facilities are not provided, and needs are ignored.

The likely population yield of this scheme has been greatly underestimated by the developer and the Council. It is hoped that the development will not go ahead, until this issue has been resolved.

FOUR ' We need 50% Council social rent dwellings

The Council officers emphasise the portfolio approach, with 40% affordability across a range of Tottenham Hale sites. This however does not distinguish between different types of 'affordable' housing.

There are seven sites in Tottenham Hale which have planning permission, but which have not yet been built: Cannon Factory & Ashley House, One Station Square, Hale Wharf, Ashley Gardens, Berol Yard, Hale South West Plot, and Monument Way.

They include a total of 1,792 dwellings, of which the affordable component comprises 524 intermediate homes and only 156 affordable rent homes (8.7% of the total).

These latter are the only homes that can be accessed by households without savings and capital for deposits and advance payments.

Haringey's most recent housing needs survey (2013) shows that 48% of households have no saving, or are in debt.

61% of households of mixed heritage, 69% of black households, and 74% of Asian households in Haringey have no savings, or are in debt. The comparative figure is that 37% of White households have no savings, or are in debt.

The overprovision of market housing which local people cannot afford is itself a source of social exclusion, because the resultant increase in house prices and market rents drives out poorer people from the area, especially private renters.

This conflicts with paragraph 3.2.2 of Strategic Policies under the Local Plan: 'The Council will seek to ensure that everyone has the opportunity to live in a decent home at a price they can afford and in a community where they want to live'.

Even the 156 affordable rent homes on the seven sites with planning permission are not affordable to many households with low and uncertain incomes, and poorer families with children. On 13 November, Haringey Council's Cabinet decided to start consultation on revising its Housing Strategy so that Social Rent rather than 'affordable rent' becomes the preferred tenure and rent regime, for general needs rented housing applicants.

Even though the Tottenham Hale Centre proposal now has some Council rent housing, and even if the council makes all properties at the Welbourne site council rent, the unaffordable 899 market and shared ownership homes would still price local people out of the area.

100% council housing at one site out of five is good, but it is not good enough.

This site is 60% council owned, and we should have council homes built on council land.

Therefore we recommend that this scheme should be rejected in its present form, and amended so that one-half of all homes on the five Tottenham Hale Centre sites become council homes at council rent.

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From: Planning Support
Subject: FW: Comment Received from Public Access

Application Reference No. : HGY/2018/2223 Site Address: Strategic Development Partnership (SDP) Sites Welbourne, North Island, Ferry Island, Ashley Road East and Ashley Road West Station Road London N17 London

Comments by: Vicky Ladizhinskaya

From:
85
Kessock Close
London
N17 9PW

Submission: Support

Comments: My comments relate to the Welbourne site and are submitted on behalf of FLAG (Ferry Lane Action Group), the recognised residents association representing more than 2,000 residents of Ferry Lane estate. I support the application for the development of this site. We particularly wish this site to go ahead because of the desperate need for the health centre which forms part of the development. A report produced by the NHS for the Health and Wellbeing Board in June 2015 highlighted the acute need for more primary care services in Tottenham Hale. This was to meet the needs of the existing population as well as prepare for new residents. Our residents report to us regularly how difficult it is for them to register with a GP in the area, or if they were registered, how difficult it is to access a service. The opening of the temporary surgery in Hale Village, which FLAG championed, has helped considerably but this is a temporary portacabin and not a permanent proper service. Nearby Tynemouth Rd health centre has been put in Special Measures by the CQC whose report is terrifying. It seems that the only reason it has not been shut down is that there is nowhere to send the 10,500 registered with them. The councils' aspirations to reduce health inequality will come to nothing if this health centre cannot go ahead. The money which has been secured from the NHS is time-limited until March 2021 (for completion) and I fear that if there are delays then it will be transferred elsewhere in London

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