

NOTICE OF MEETING

PLANNING SUB COMMITTEE

Monday, 11th July, 2022, 7.00 pm - George Meehan House, 294 High Road, N22 8JZ (watch the live meeting [here](#), watch the recording [here](#))

Councillors: Barbara Blake (Chair), Reg Rice (Vice-Chair), Nicola Bartlett, John Bevan, Lester Buxton, Luke Cawley-Harrison, George Dunstall, Ajda Ovat, Yvonne Say, Matt White and Alexandra Worrell

Quorum: 3

1. FILMING AT MEETINGS

Please note this meeting may be filmed or recorded by the Council for live or subsequent broadcast via the Council's internet site or by anyone attending the meeting using any communication method. Although we ask members of the public recording, filming or reporting on the meeting not to include the public seating areas, members of the public attending the meeting should be aware that we cannot guarantee that they will not be filmed or recorded by others attending the meeting. Members of the public participating in the meeting (e.g. making deputations, asking questions, making oral protests) should be aware that they are likely to be filmed, recorded or reported on. By entering the meeting room and using the public seating area, you are consenting to being filmed and to the possible use of those images and sound recordings.

The Chair of the meeting has the discretion to terminate or suspend filming or recording, if in his or her opinion continuation of the filming, recording or reporting would disrupt or prejudice the proceedings, infringe the rights of any individual, or may lead to the breach of a legal obligation by the Council.

2. PLANNING PROTOCOL

The Planning Committee abides by the Council's Planning Protocol 2017. A factsheet covering some of the key points within the protocol as well as some of the context for Haringey's planning process is provided alongside the agenda pack available to the public at each meeting as well as on the Haringey Planning Committee webpage.

The planning system manages the use and development of land and buildings. The overall aim of the system is to ensure a balance between enabling development to take place and conserving and protecting the environment and local amenities. Planning can also help tackle climate change and overall seeks to create better public places for people to live, work and play. It is important that the public understand that the committee

makes planning decisions in this context. These decisions are rarely simple and often involve balancing competing priorities. Councillors and officers have a duty to ensure that the public are consulted, involved and where possible, understand the decisions being made.

Neither the number of objectors or supporters nor the extent of their opposition or support are of themselves material planning considerations.

The Planning Committee is held as a meeting in public and not a public meeting. The right to speak from the floor is agreed beforehand in consultation with officers and the Chair. Any interruptions from the public may mean that the Chamber needs to be cleared.

3. APOLOGIES

To receive any apologies for absence.

4. URGENT BUSINESS

The Chair will consider the admission of any late items of urgent business. Late items will be considered under the agenda item where they appear. New items will be dealt with at item 10 below.

5. DECLARATIONS OF INTEREST

A member with a disclosable pecuniary interest or a prejudicial interest in a matter who attends a meeting of the authority at which the matter is considered:

- (i) must disclose the interest at the start of the meeting or when the interest becomes apparent, and
- (ii) may not participate in any discussion or vote on the matter and must withdraw from the meeting room.

A member who discloses at a meeting a disclosable pecuniary interest which is not registered in the Register of Members' Interests or the subject of a pending notification must notify the Monitoring Officer of the interest within 28 days of the disclosure.

Disclosable pecuniary interests, personal interests and prejudicial interests are defined at Paragraphs 5-7 and Appendix A of the Members' Code of Conduct

6. PLANNING APPLICATIONS

In accordance with the Sub Committee's protocol for hearing representations; when the recommendation is to grant planning permission, two objectors may be given up to 6 minutes (divided between them) to make representations. Where the recommendation is to refuse planning permission, the applicant and supporters will be allowed to address the Committee. For items

considered previously by the Committee and deferred, where the recommendation is to grant permission, one objector may be given up to 3 minutes to make representations.

7. HGY/2022/0752 - COUNCIL DEPOT, ASHLEY ROAD, N17 9DP (PAGES 1 - 208)

Proposal: Full planning application for the erection of 272 homes including 50% socially rented homes extending 4-13 storeys, 174sqm of flexible Use Class E floorspace along with a new vehicular access to the site, car parking and two pedestrian north south routes. The proposal also includes both private and public hard and soft landscaping throughout the site.

Recommendation: GRANT

8. PRE-APPLICATION BRIEFINGS

The following items are pre-application presentations to the Planning Sub-Committee and discussion of proposals.

Notwithstanding that this is a formal meeting of the Sub-Committee, no decision will be taken on the following items and any subsequent applications will be the subject of a report to a future meeting of the Sub-Committee in accordance with standard procedures.

The provisions of the Localism Act 2011 specifically provide that a Councillor should not be regarded as having a closed mind simply because they previously did or said something that, directly or indirectly, indicated what view they might take in relation to any particular matter. Pre-application briefings provide the opportunity for Members to raise queries and identify any concerns about proposals.

The Members' Code of Conduct and the Planning Protocol 2016 continue to apply for pre-application meeting proposals even though Members will not be exercising the statutory function of determining an application. Members should nevertheless ensure that they are not seen to pre-determine or close their mind to any such proposal otherwise they will be precluded from participating in determining the application or leave any decision in which they have subsequently participated open to challenge.

9. PPA/2022/0006 - HORNSEY POLICE STATION, 98 TOTTENHAM LANE, N8 7EJ (PAGES 209 - 228)

Proposal: Retention of existing Police Station building (Block A) with internal refurbishment, rear extensions and loft conversions to create 6 terrace houses and 4 flats. Erection of two buildings comprising of Block C along Glebe Road and Harold Road to create 8 flats and erection of Block B along Tottenham Lane and towards the rear of Tottenham Lane to create 7 flats and 4 mews houses including landscaping and other associated works.

10. NEW ITEMS OF URGENT BUSINESS

To discuss items of urgent business presented at agenda item 8.

11. DATE OF NEXT MEETING

To note the date of the next meeting as Thursday, 21 July 2022.

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Fiona Alderman

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George Meehan House, 294 High Road, Wood Green, N22 8JZ

Friday, 01 July 2022

Planning Sub-Committee – Monday, 11 July 2022

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference No: HGY/2022/0752

Ward: Tottenham Hale

Address: Council Depot, Ashley Road, N17 9DP

Proposal: Full planning application for the erection of 272 homes including 50% socially rented homes extending 4-13 storeys, 174sqm of flexible Use Class E floorspace along with a new vehicular access to the site, car parking and two pedestrian north south routes. The proposal also includes both private and public hard and soft landscaping throughout the site.

Applicant: London Borough of Haringey

Ownership: Council

Officer contact: Christopher Smith

Date received: 16/03/2022

1.1 The application is being reported to the Planning Sub-Committee for determination as it is a major planning application where the Council is applicant.

1.2 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposed development would meet the requirements of Site Allocation TH7 by providing high-quality new housing on this vacant former Council depot site and would provide non-residential uses that would support the local community.
- The development would provide 272 new homes including 136 affordable homes (63% by habitable room) which will be delivered as affordable Council Rent properties. 92 (67%) of the Council Rent homes would have three or more bedrooms.
- The development would be of a high-quality design including very well-designed tall buildings which respect the visual quality of the local area, respond appropriately to the local context, and would not impact negatively on local heritage assets. The development is also supported by the Council's Quality Review Panel.
- The development would provide high-quality residential accommodation of an appropriate size, mix and layout within a well-landscaped environment that extends the character of the adjacent Down Lane Park, consisting of high-quality new public realm areas including an improved park edge, and would also provide new amenity and children's play spaces.
- The development has been designed to avoid any material adverse impacts on the amenity of nearby residential occupiers regarding a loss of sunlight and daylight, outlook or privacy and excessive levels of noise, light or air pollution.

- The development would provide 42 car parking spaces including eight (19%) wheelchair-accessible parking spaces which meets the requirements of the London Plan and would be supported by other sustainable transport initiatives including high-quality cycle parking.
- The development would include a range of measures to maximise its sustainability and minimise its carbon emissions. It would achieve an 84% reduction in carbon emissions. Block A has the potential to achieve Passivhaus certification. The development would achieve a suitable urban greening factor and ecology on and adjacent to the site would be protected and enhanced.
- The site's designated waste throughput has already been re-provided at an alternative site within Haringey.

2. RECOMMENDATION

- 2.1 That the Committee resolve to GRANT planning permission and that the Head of Development Management or the Assistant Director of Planning, Building Standards & Sustainability is authorised to issue the planning permission and impose conditions and informatives subject to the signing of a legal agreement providing for the obligations set out in the Heads of Terms below.
- 2.2 That delegated authority be granted to the Head of Development Management or the Assistant Director Planning, Building Standards and Sustainability to make any alterations, additions or deletions to the recommended heads of terms and/or recommended conditions as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice-Chair) of the Sub-Committee.
- 2.3 That the agreement referred to in resolution (2.1) above is to be completed no later than 31st August 2022 within such extended time as the Head of Development Management or the Assistant Director Planning, Building Standards & Sustainability shall in her/his sole discretion allow; and
- 2.4 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.3) above, planning permission be granted in accordance with the Planning Application subject to the attachment of the conditions.
- 2.5 Planning obligations are usually secured through a S106 legal agreement. In this instance the Council is the landowner of the site and is also the local planning authority and so cannot legally provide enforceable planning obligations to itself.
- 2.6 Several obligations which would ordinarily be secured through a S106 legal agreement will instead be imposed as conditions on the planning permission for the proposed development.
- 2.7 It is recognised that the Council cannot commence to enforce against itself in respect of breaches of planning conditions and so prior to issuing any planning permission measures will be agreed between the Council's Housing service and the Planning service, including the resolution of non-compliances with planning conditions by the Chief Executive and the reporting of breaches to portfolio holders, to ensure compliance with any conditions imposed on the planning permission for the proposed development.

2.8 The Council cannot impose conditions on planning permission requiring the payment of monies and so the Director of Placemaking and Housing has confirmed in writing that the payment of contributions for the matters set out below will be made to the relevant departments before the proposed development is implemented.

2.9 Summary of the planning obligations for the development is provided below:

- Affordable housing – 136 homes at Council rents
- Parking permit restrictions
- TMO amendments (£5,000)
- Travel plan monitoring (£10,000)
- CPZ review and amendments (£20,000)
- Car club contributions
- Off-site highway works
- Improvements to public realm east and west of Down Lane Park (£120,000)
- Improvements to Park View Road underpass, including lighting (£140,000)
- Contribution towards North Tottenham Low Traffic Neighbourhood (£50,000)
- Monitoring of construction works (£20,000)
- Community-led site hoarding design (£5,000)
- Community plant growing initiatives (£10,000)
- Carbon offsetting contribution (£145,350)
- Play space contribution (£172,738.50)
- Metropolitan Police contribution (£21,296.42)
- Employment and Skills plan and measures
- Employment and Skills management and apprenticeship support contribution (£76,923.59)

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- Appendix 2 Plans and Images
- Appendix 3 Consultation Responses – Internal and External Consultees
- Appendix 4 Consultation Responses – Greater London Authority Stage 1 Response
- Appendix 5 Consultation Responses – Summary of Representations from Residents
- Appendix 6 Quality Review Panel Reports
- Appendix 7 Development Forum Minutes
- Appendix 8 Pre-application Committee Minutes

3. PROPOSED DEVELOPMENT AND SITE LOCATION DETAILS

3.1 Proposed development

3.2 This is a planning application for the redevelopment of the former Council depot site to provide 272 new homes (Use Class C3) within a range of buildings from four to thirteen storeys in height, 174sqm of commercial space (Use Class E), new pedestrian and cycle routes through the site, vehicle access, car and cycle parking and new hard and soft landscaping.



3.3 The development is split into three distinct blocks (A, B and C). Each block would have its own courtyard or podium amenity space area. They are each separated by new north-south routes through the site and are surrounded by new soft landscaped public realm areas onto Park View Road and Down Lane Park.

3.4 The development would include 63% Council rent homes by habitable room. 34% of the total number of homes would have three or more bedrooms. A full breakdown of the housing tenure and mix is provided in the '*Housing Provision, Affordable Housing and Housing Mix*' section below. The development would be 'tenure-blind' with the market housing spread throughout the development. The majority of homes would have double or triple aspect.

3.5 42 car parking spaces and 512 high-quality cycle parking spaces would be provided. The new vehicle access from Ashley Road would provide a through-route to Park View Road for pedestrians and cyclists.

3.6 The development would have high levels of energy efficiency, low carbon heat sources and generate renewable energy on site. The development is a contemporary design, the buildings would be finished in light cream, dark cream and dark brown brick, cream pre-cast concrete and light and dark green ceramic materials.

3.7 Site and Surroundings

- 3.8 The application site is a former Council depot to the south and east of Park View Road, at the northern end of Ashley Road, and to the north of Down Lane Park. There are no buildings that currently occupy the site, which is essentially clear. Immediately to the east of the site is the Harris Academy school and its associated outdoor sports facility. The local land use character is residential to the north and west, with the park and education facilities to the south and east of the site.
- 3.9 The application site forms the northern part of Site Allocation TH7 of the Tottenham Area Action Plan 2017 (TAAP) which has been identified for new residential development and the extension of Ashley Road to form a pedestrian and cycle route through to Park View Road. Part of the site is a Safeguarded Waste Site (Park View Road Reuse and Recycle Centre) as identified by the Site Allocations DPD 2017.
- 3.10 The site is located within a Growth Area, the Upper Lee Valley Opportunity Area and the Tottenham Hale Housing Zone. The maximum PTAL of the site is calculated as ranging from 4-5. The site is within Flood Zone 2 and the Lea Valley Tier 3 Archaeological Priority Area. Part of the site is identified as an existing waste management site HAR9 within the emerging North London Waste Plan.
- 3.11 There are no conservation areas or listed buildings in proximity to the site there is a locally listed buildings within 300 metres of the site.
- 3.12 The site is 470 metres from the Lee Valley Special Protection Area (SPA), the Lee Valley Ramsar site and the Walthamstow Wetlands Site of Special Scientific Interest (SSSI). The site is also 4.25 kilometres from the Epping Forest Special Area of Conservation (SAC).
- 3.13 Relevant Planning History**
- 3.14 *Application Site*
- 3.15 The most recent and relevant planning history for this site is described below.
- 3.16 HGY/2022/0569. EIA Screening Opinion for the proposed development at the Ashley Road Depot. Under assessment.
- 3.17 HGY/2021/3411. Prior notification: Demolition. Prior Approval Issued 26/01/2022.
- 3.18 *Harris Academy (Adjacent to Site)*
- 3.19 HGY/2019/0111. Variation of condition 2 (approved drawings) attached to planning permission HGY/2018/0745 (which approved variations to original permission HGY/2015/3096) to make minor alterations to the approved drawings list, in order to make minor amendments to omit the inclusion of the existing public footpath to the east of the site at Harris Academy Tottenham. Permission granted 09/04/2019.
- 3.20 HGY/2018/0745. Variation of condition 2 (approved drawings) attached to planning permission HGY/2015/3096 to make minor alterations to the approved drawings list, in order to make minor amendments to the footprint, layout and massing of approved Block

5 (sports hall) and amendments to the footprint, layout and massing of approved Block 4 and the link bridge attaching approved Block 4 to the existing building previously approved by HGY/2017/0140. Permission granted 22/05/2018

- 3.21 HGY/2015/3096. Demolition of existing buildings on the Ashley Road Depot site in association with the change of use from sui generis to Class D1 (school) and construction of sports hall, sports pitches and floodlights. Construction of infill extensions at first and second floor levels of existing building (previously converted to D1 (school) use using permitted development), construction of a three-storey extension to provide additional educational floor space and other minor works. Permission granted 01/04/2016.

4. CONSULTATION RESPONSE

4.1 Quality Review Panel

- 4.2 The scheme has been presented to Haringey's Quality Review Panel on two occasions. The Panel's written responses are attached in Appendix 6.

4.3 Planning Committee Pre-Application Briefing

- 4.4 The proposal was presented to the Planning Sub-Committee at a Pre-Application Briefing on 6th December 2021. The minutes are attached in Appendix 7.

4.5 Development Management Forum

- 4.6 A DM Forum was held on 8th December 2021. The main topics raised related to management of deliveries, site management, loss of existing buildings, highway works, trees and ecological improvements. Details and summaries of the comments made and how they were addressed are available in Appendix 8.

4.7 Planning Application Consultation

- 4.8 The following were consulted regarding the application:

Internal

- 4.9 LBH Design: Supports the design of the development including the siting of the tall buildings.
- 4.10 LBH Conservation: No objections.
- 4.11 LBH Housing: No objections.
- 4.12 LBH Transportation: No objections, subject to conditions and obligations.
- 4.13 LBH Carbon Management: No objections, subject to conditions and obligations.
- 4.14 LBH Regeneration: No objections.
- 4.15 LBH Nature Conservation: No objections, subject to conditions.
- 4.16 LBH Tree Officer: No objections, subject to conditions.

- 4.17 LBH Building Control: No objections.
- 4.18 LBH Flood and Water Management: No objections, subject to conditions.
- 4.19 LBH Waste Management: No objections.
- 4.20 LBH Pollution: No objections, subject to conditions.
- 4.21 LBH Parks: No objections, subject to further clarifications.
- 4.22 LBH Policy: No objections
- 4.23 LBH Street Lighting: No objections, subject to lighting equipment meeting the required technical specifications.

External

- 4.24 Greater London Authority (GLA): Stage 1 comments can be viewed in full in Appendix 4. The GLA's summary comments are provided below:

London Plan policies on safeguarded waste sites; commercial use; housing; affordable housing; urban design; heritage; environmental issues; sustainability; page 19 and transport are relevant to this application. The application does not fully comply with these policies, as summarised below:

- *Land use principles:* Any loss of this waste site without compensatory re-provision equal to the maximum throughput of the site is contrary to Policy SI9. As proposed the waste that had been processed by the Park View facility on site would be absorbed by the existing Western Road Recycling Centre without interventions to increase its relative throughput capacity. Clarifications are sought to determine whether Western Road could meet its emerging waste plan waste capacity apportionment, in conjunction with that of Park View, over the plan period. Following this, compliance with Policy SI9 will be assessed at the Mayor's decision making stage.
- *Affordable housing:* The affordable housing offer is 63% by habitable room, which exceeds the 50% Fast Track Route threshold for industrial/ publicly owned sites. The affordable housing offer comprises entirely social rent homes. The Council planning officers have confirmed that this is acceptable in this instance due to housing need.
- *Urban design:* The design and layout of the scheme is supported. The site is identified as suitable for the development of tall building, therefore the scheme complies with Policy D9. The applicant has responded well to comments made at pre-application stage and takes full advantage of its park side location. Overheating would need to be addressed, and the Fire Strategy Statement must be revised to provide further information and justification. The provision of wheelchair accessible and adaptable homes should be secured via condition in addition to the provision of evacuation lifts.
- *Sustainable development:* The energy strategy is exemplary, however, further information is required in respect of overheating; evidence of correspondence

for Edmonton Energy from Waste potential and the applicant should continue to engage with the council; the provision of on site network and future connection drawings; further information on ASHP (plan B); and details of PHPP would be welcomed. Furthermore, 'Be Seen' monitoring provisions and an appropriate carbon offset payment would need to be captured in any legal agreement. A Whole Life Cycle Carbon Statement has not been prepared, one must be provided in accordance with Policy SI12 in accordance with GLA guidance. The Circular Economy Statement lacks sufficient detail and a revised statement should be provided including the required information. The production of post construction statements would need to be secured by condition. Digital connectivity has not been addressed within the submission.

- *Environmental issues:* A UGF score of 0.45 is welcomed. However, a landscape drawing setting out how the UGF score has been reached should be provided. The mitigation measures required to ensure no adverse impacts on the adjacent SINC should be secured via condition. A biodiversity net gain of 104% is sought, which is welcomed. Further clarification on the SuDS proposed is required and every effort should be made to include rainwater harvesting, or appropriate justification if it is not proposed. An updated drainage strategy plan should also be provided. Further information is required including providing further evidence to justify the conclusions of construction dust risk assessment, and to inform the appropriate level of mitigation. Furthermore, an Air Quality Neutral assessment should be carried out and conditions secured regarding the use of machinery.
- *Transport:* All streets and public realm within and around the site should be designed in line with the healthy streets approach. The design of the public realm should reduce vehicle dominance and improve safety for pedestrians and cyclists. The relationship between the development and the adjacent park should be improved with greater permeability. There are concerns with vehicle dominance along the extension of Ashley Road due to the location of the servicing bays and the position of the proposed car parking bays, both blue badge and additional car parking. Further information on trip generation is required. All cycle parking should accord with LCDS requirements. Management Plans should also be secured.

- 4.25 Health & Safety Executive: Content with the proposed development and satisfied with the information provided with the application.
- 4.26 London Fire Brigade: No comments received.
- 4.27 Network Rail: No objections, subject to informatives.
- 4.28 Environment Agency: No comments to make.
- 4.29 Natural England: No objections.
- 4.30 Thames Water: No objections, subject to conditions and informatives.
- 4.31 Greater London Archaeological Advisory Service: No objections, subject to conditions.
- 4.32 Metropolitan Police Designing Out Crime Officer: No objections, subject to conditions.

4.33 Metropolitan Police: No objections, subject to the provision of a contribution towards local policing.

5. LOCAL REPRESENTATIONS

5.1 The application has been publicised by way of a press notice, several site notices which were displayed in the vicinity of and around the site and 187 individual letters sent to surrounding local properties. The number of representations received from neighbours, local groups, etc in response to notification and publicity of the application were as follows:

No of individual responses: 18

Objecting/Commenting: 14

Supporting: 4

5.2 The following local groups/societies (other than those consulted above) made representations

- None

5.3 The following Councillor(s) made representations:

- None

5.4 The following issues were raised in representations that are material to the determination of the application and are addressed in the next section of this report:

- Out of keeping with character of area
- Negative impact on character and appearance of area
- Excessive development density
- Excessive height
- Increased overlooking
- Increased overshadowing
- Loss of privacy
- Loss of day/sunlight
- Increased vehicular traffic
- Increased on-street parking
- Increased air, noise and litter pollution
- Insufficient public realm improvements
- Insufficient cycling/walking improvements
- Inappropriate highway works
- Lack of local community facilities
- Lack of local retail/café facilities
- Increased pressure on local services
- Increased anti-social behaviour
- Trees must be protected
- Increased pressure on local green space

5.5 The following issues raised are not material planning considerations:

- Loss of a private view (officer comment: this is a private matter and therefore not a material planning consideration).

- Loss of rights to light (officer comment: this is a private matter and therefore not a material planning consideration).
- Insufficient environmental assessment (officer comment: relevant environmental matters have been considered in detail as part of this application)
- Submission of application is premature (officer comment: the application has been assessed on the basis of the context at the time of submission)

6 MATERIAL PLANNING CONSIDERATIONS

Statutory Framework

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with policies of the statutory Development Plan unless material considerations indicate otherwise.

Considerations

- 6.2 The main planning considerations raised by the proposed development are:

1. Principle of Development
2. Tall Buildings
3. Housing Provision, Affordable Housing & Housing Mix
4. Design and Appearance
5. Heritage impact
6. Residential Quality
7. Impact on Neighbouring Amenity
8. Transport and Parking
9. Ecology and Urban Greening
10. Carbon Reduction and Sustainability
11. Flood Risk and Drainage
12. Land Contamination
13. Fire Safety

Principle of development

National Policy

- 6.3 The National Planning Policy Framework 2021 (NPPF) establishes the overarching principles of the planning system, including the requirement of the system to “drive and support development” through the local development plan process. It advocates policy that seeks to significantly boost the supply of housing and requires local planning authorities to ensure their Local Plan meets the full, objectively assessed housing needs for market and affordable housing.

Regional Policy – The London Plan

- 6.4 The London Plan 2021 Table 4.1 sets out housing targets for London over the coming decade, setting a 10-year housing target (2019/20 – 2028/29) for Haringey of 15,920, equating to 1,592 dwellings per annum.

- 6.5 London Plan Policy H1 'Increasing housing supply' states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, including through the redevelopment of surplus public sector sites.
- 6.6 London Plan Policy H4 requires the provision of more genuinely affordable housing. The Mayor of London expects that residential proposals on public land should deliver at least 50% affordable housing on each site.
- 6.7 London Plan Policy D6 seeks to optimise the potential of sites, having regard to local context, design principles, public transport accessibility and capacity of existing and future transport services. It emphasises the need for good housing quality which meets relevant standards of accommodation. London Plan Policy D9 states that tall buildings should only be developed in locations that are identified as suitable in Local Plans.
- 6.8 London Plan Policy S9 states that existing waste sites should be safeguarded and retained in waste management use and the loss of a waste site will only be supported where appropriate compensatory capacity is made within London. Policy SD7 states that take a town centres first approach to new non-residential development.

Sub-Regional Policy

- 6.9 The North London Waste Plan (NLWP) is a document produced by the North London Boroughs of Haringey, Barnet, Camden, Enfield, Hackney, Islington and Waltham Forest which aims to ensure that there is adequate provision of suitable land to accommodate waste management facilities of the right type in the right place and at the right time, up to 2036, in order to manage waste generated in North London. It also provides policies against which planning applications for waste-related development will be assessed.
- 6.10 The NLWP was found to be sound by an Inspector in October 2021 and some of the Boroughs referenced above have now adopted the document. Haringey's Cabinet supported the adoption of the NLWP on 21 June 2022 and a report to its Full Council on 18 July 2022 will recommend formal adoption of the NLWP. As such whilst the document will not be part of the Development Plan until formally adopted, it has significant weight as a material consideration in the decision-making process until that point. NPPF paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to various factors including the stage or preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given).
- 6.11 Policy 1 of the NLWP states that applications for non-waste uses on safeguarded waste sites will only be permitted where it is clearly demonstrated by the developer that compensatory capacity will be delivered on a suitable site in North London that must meet and, if possible, exceed the maximum achievable throughput of the site proposed to be lost. Part of the site, namely the Park View Road Reuse and Recycling Centre, is identified as an existing waste management site HAR9 in the NLWP.

Local Policy

- 6.12 The Haringey Local Plan Strategic Policies DPD 2017 (hereafter referred to as Local Plan) sets out the long-term vision of the development of Haringey by 2026 and also sets out the Council's spatial strategy for achieving that vision.

- 6.13 Local Plan Policy SP2 states that the Council will aim to provide homes to meet Haringey's housing needs and to make the full use of Haringey's capacity for housing by maximising the supply of additional housing to meet and exceed the minimum target including securing the provision of affordable housing. Local Plan Policy SP6 states that the Council will safeguard existing waste sites unless compensatory provision is made. Policy SP11 states that applications for tall buildings will be assessed against the area action plan within which they are located and shall be supported by a characterisation study or other supporting evidence.
- 6.14 The Development Management DPD 2017 (hereafter referred to as the DM DPD) supports proposals that contribute to the delivery of the strategic planning policies referenced above and sets out its own criteria-based policies against which planning applications will be assessed. Policy DM10 seeks to increase housing supply and seeks to optimise housing capacity on individual sites. Policy DM13 makes clear that the Council will seek to maximise affordable housing delivery on all sites. Policy DM41 states that proposals for new retail uses outside of town centres should demonstrate that there are no suitable town or edge-of-centre sites available in the first instance and demonstrate that they would not harm nearby town centres.
- 6.15 Policy DM6 states that tall buildings will only be acceptable in designated areas as per Table 2.2 of the DM DPD. The area around Tottenham Hale station is one of these designated areas. It also states that tall buildings should represent a landmark which by its distinctiveness must: be a way-finder or marker drawing attention to areas of high visitation; be elegant and well-proportioned and; positively engage with the street environment.
- 6.16 Policy SA4 of the Site Allocations DPD 2017 (SADPD) identifies several existing waste sites within Haringey and states that these will be safeguarded for waste use until alternative provision has been made. The Park View Road Reuse and Recycling Centre is identified as a Safeguarded Existing Waste Site within Table 2 of the SADPD.
- 6.17 The application site forms part of site allocation TH7 'Ashley Road North' in the Tottenham Area Action Plan 2017 (TAAP). TH7 is identified as being suitable for new residential development and the extension of Ashley Road as a pedestrian and cycling connection through to Park View Road. It also requires the creation of a new educational facility. This objective has already been met through the provision of a Harris Academy on the eastern side of the site since the TAAP was drafted.
- 6.18 TH7 has the following Site Requirements and Development Guidelines:

Site Requirements

- A new pedestrian and cycle route will be created extending the line of Ashley Road north to Park View Road, and through an improved foot tunnel, improving access into the Lee Valley Regional Park.
- Vehicular access to the site will be from Ashley Road/Burdock Road or Park View Road, but there will not be a link from one to the other.
- The site will contain part of the Harris Academy. Residential will be the primary use on the remainder of the site.
- The site's existing licensed waste capacity will be replaced prior to any redevelopment taking place.

Development Guidelines

- Paths connecting Watermead Way, Ashley Road and Park View Road should be rationalised, and made safer and more welcoming to resolve local safety concerns, and make the routes more direct, and thus better used.
- The mature trees on site, and in the park should be protected and incorporated into any future design. The amenity of Down Lane Park should be protected and improved.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- This site is identified as being as being in an area with potential for being part of a Decentralised Energy (DE) network. Development proposals should be designed for connection to a DE network and seek to prioritise/secure connection to existing or planned future DE networks, in line with Policy DM22.
- This site is in an area of flood risk, and a Flood Risk Assessment should accompany any planning application.

- 6.19 The TAAP also identifies a range of area-wide policies. Policy AAP1 states that all development proposals within the TAAP should come forward comprehensively to meet the wider objectives of the document, with masterplans provided where development forms only part of a site allocation. It also states that development proposals will be expected to provide a range of types and sizes of homes and create inclusive and mixed communities. Policy AAP3 states that the Council will seek the delivery of 10,000 new homes across the TAAP area.
- 6.20 Policy AAP3 supports the Housing Zone's "Portfolio Approach" to housing delivery. This approach balances housing tenures and dwelling mixes across Housing Zone areas with each site within Tottenham Hale making its own specific contribution based on its characteristics.
- 6.21 Policy AAP6 states that the significant change planning for Tottenham's Growth Areas provides the opportunity to establish a new urban character for these areas. Retained suburban areas will be protected from inappropriate development with taller buildings being permitted only where it can be demonstrated that the existing character of the area will not be compromised.
- 6.22 The Council at the present time is unable to fully evidence its five-year supply of housing land. The 'presumption in favour of sustainable development' and paragraph 11(d) of the NPPF should be treated as a material consideration when determining this application, which for decision-taking means granting permission unless the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusal or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole. Nevertheless, decisions must still be made in accordance with the development plan (relevant policies summarised in this report) unless material considerations indicate otherwise (of which the NPPF is a significant material consideration).

Assessment

- 6.23 Site Allocation and Masterplanning

- 6.24 Policy DM55 of the DM DPD states that where developments form only a part of allocated sites a masterplan shall be prepared to demonstrate that the delivery of the site allocation and its wider area objectives would not be frustrated by the proposal.
- 6.25 This application covers the north-western part of site allocation TH7 only. The remaining land within TH7 is occupied by the Harris Academy, which recently erected a sports hall and outdoor sports pitches on the land immediately to the east of the application site. This proposal completes the development of the site allocation in compliance with DM55.
- 6.26 This proposed development would also meet all other necessary site allocation objectives. Ashley Road would be extended north through the site to connect to Park View Road creating a route for cycles and pedestrians only. The applicant will provide a financial contribution to improve the foot tunnel access from Park View Road to the Lee Valley Regional Park as required by the site allocation. The public realm on Ashley Road and Park View Road would also be significantly improved in quality and safety terms through this proposal. The high quality trees on site and nearby within Down Lane Park would be protected where appropriate and the development will be designed to connect to the Council's District Energy Network in the future.
- 6.27 As such, it is considered that the proposed development would deliver the remaining requirements of Policy DM55 and Site Allocation TH7 not already met by the Harris Academy development.
- 6.28 Provision of New Housing
- 6.29 London Plan Policy H1 states that boroughs should optimise the potential for housing delivery on all suitable brownfield sites. Local Plan Policy SP2 states that the Council will aim to provide homes to meet Haringey's housing needs and will make the full use of Haringey's capacity for housing by maximising the supply of additional housing.
- 6.30 Policy DM10 of the DM DPD states that the Council will support proposals for new housing on sites allocated for residential development. This site is designated as being suitable for new residential development by Site Allocation TH7.
- 6.31 The site is located within the Tottenham Hale Housing Zone where the provision of 5,000 homes is expected in the ten-year period up to 2025.
- 6.32 The Council's Housing Strategy 2017-2022 states that the Council's first preference is that new affordable housing should be developed by the Council for provision as social rented homes at Council rents, with an aim of 40% of all new homes across the borough (by habitable room) being provided within affordable tenures. The site is one of several that the Council has identified as being suitable for new Council housing as part of its commitment to delivering three thousand (3,000) new Council homes at Council rents by 2031.
- 6.33 This proposed development would provide 272 new homes including 136 new affordable homes which will be delivered as Haringey Council Rent properties on a vacant brownfield site. This equates to 50% affordable housing on a unit basis and 63% on a habitable room basis (due to the large proportion of family-sized homes

provided within the affordable homes). Upon delivery, Haringey Council will be responsible for the on-going management and maintenance of the affordable homes.

- 6.34 This is a substantial contribution to the Council's affordable housing objectives as described above and would help meet the stated need for low-cost Council rented housing in the Borough.

Portfolio Approach

- 6.35 The site is located within the boundaries of a Housing Zone. The Housing Zone programme is explicitly designed to encourage developers, boroughs and other key partners to consider innovative and flexible approaches to accelerate sustainable development and increase housing delivery.
- 6.36 The Housing Zone and Tottenham AAP3 policy also seeks a portfolio approach to housing delivery to better align public sector resources. This approach also balances housing tenures and dwelling mixtures across Housing Zone areas. The Housing Zone programme is explicitly designed to encourage developers, boroughs and other key partners to consider innovative and flexible approaches to accelerate sustainable development and increase housing delivery.
- 6.37 This approach sets out that various sites may each contribute a higher or lower proportion of affordable housing in line with an overall Zone-wide target. The contribution will depend on individual site characteristics and viability. As part of this approach this site has been expected to contribute to a high level of affordable housing to achieve the overall aims of the portfolio approach. This site's contribution to housing in the area will result in an overall portfolio approach that achieves affordable housing at 34% by unit, and 39% by hab room across the new developments in Tottenham Hale.
- 6.38 This proposal would therefore contribute to the creation of a mixed and balanced community in this area.
- 6.39 In summary, the proposed residential development of this underutilised brownfield site is supported in land use terms and would deliver on the objectives and aspirations of the Site Allocation TH7. The principle of a residential development with predominantly low-cost affordable housing on the site is strongly supported by national, regional, and local policies. The provision of 272 new homes would make a substantial contribution towards meeting the Council's housing target in line with Policies H1, SP2 and DM10 and would also make an important contribution towards the Borough-wide target of 40% affordable housing.
- 6.40 Loss of Depot Facilities
- 6.41 The application site was formerly used as a Council depot. In this regard TH7 states that the site's existing licensed waste capacity will be replaced prior to any redevelopment taking place. The depot operations have recently moved north to a dedicated new facility accessed from Watermead Way, which opened in early 2022. The depot land to the north of Ashley Road is therefore now vacant.
- 6.42 The site forms the north-western part of Site Allocation TH7 which is identified for residential and education uses only. Depot facilities are not required to be retained on

site. Therefore, the removal of depot uses from this site is acceptable in principle in land use terms.

6.43 Loss of Designated Waste Site

6.44 A small part of the application site is identified as a safeguarded existing waste management site in the draft North London Waste Plan 2022 (HAR9) and the Site Allocations DPD (Table 2 under Policy SA4).

6.45 The North London Waste Plan Policy 1 states that applications for non-waste uses on safeguarded waste sites will only be permitted where it is clearly demonstrated that compensatory capacity will be delivered on a suitable site in North London. Policy SA4 of the Site Allocations DPD states that waste sites will be safeguarded for waste use until alternative provision has been made. Policy SI9 of the London Plan further supports this position.

6.46 The former Park View Road Reuse and Recycling Centre (PVRRC) covers a very small part of this application site – approximately 0.1ha (6%) of a 1.63ha site. It was formerly used as a storage facility for recycling and was not used for waste processing. The facility ceased operations in 2018. These recycling activities were moved to and consolidated at the Western Road site in Wood Green. The safeguarded waste capacity of the PVRRC facility is a volume of 6,326 tonnes per annum as described in Table 2 of the Site Allocations DPD.

6.47 The Western Road site is also used for storage of recycling and is not a waste processing facility. Western Road has managed a maximum volume in recent years of 11,478 tonnes of waste, recorded in 2014/15, with the site's waste throughput having been on a general downward trend since. This trend has continued downward even since PVRRC was closed and its waste throughput moved to the Western Road site. The volume of waste managed at Western Road has fallen steadily to 5,273 tonnes in the year 2021/22, which is well below the 2014/15 waste throughput levels.

6.48 In the potential worst-case scenario that PVRRC was still operational, was closed now and its full safeguarded waste capacity of 6,326 immediately shifted to Western Road, the maximum volume of waste throughput that could be expected at Western Road (11,599 tonnes per annum) would only marginally exceed the previously reported maximum volume of waste (11,478 tonnes per annum) processed at the Western Road site. However, the reality is that the Western Road site would not be required to manage that volume of waste throughput because the PVRRC has already been transferred to Western Road and there are no other waste activities to move from the safeguarded PVRRC site which has been closed for several years.

6.49 The Council's Waste Management team has confirmed, with the support of the North London Waste Authority, that another 6,000 tonnes of waste (above the recorded 2021/22 levels) could be managed at Western Road and that the operational efficiencies provided by a new digital booking system has the potential to increase the waste tonnage handling potential of that waste site even further.

6.50 Therefore, it is considered that there is capacity for the Council's Western Road waste site to process both its existing waste throughput and the maximum waste throughput attributed to the safeguarded PVRRC site before it closed. As such, the loss of this safeguarded waste site is acceptable.

6.51 Provision of Non-Residential Uses

6.52 In accordance with London Plan Policy SD7 and Policy DM41 of the DM DPD new non-residential development should be located in town centres where appropriate.

6.53 Two non-residential units are proposed to support the emerging new residential neighbourhood in this area. These units are relatively small, totalling 198sqm, and would be located adjacent to the park edge, enabling maximum visibility from public areas and providing natural surveillance across the park. Flexible Class E uses are proposed, which enables a range of uses including shops and cafes.

6.54 The uses are intended to support the residents of the development, provide facilities for the local community and activate local streets. These relatively small units are not expected to compete with existing and proposed uses within the emerging Tottenham Hale District Centre or other local non-residential facilities.

6.55 As such, the provision of non-residential activities is considered acceptable in this location.

6.56 Suitability of Site for Tall Buildings

6.57 London Plan Policy D3 states that all development must make the best use of land by following a design-led approach that optimises site capacity.

6.58 London Plan Policy D9 states that local development plans should define what is considered a tall building, and that buildings should not be considered 'tall' where they are less than six storeys (or 18 metres) in height. Policy D9 also states that boroughs should determine the locations where tall buildings may be an appropriate form of development and that tall buildings should be located in areas identified as suitable in local development plans.

6.59 The Tottenham AAP Policy AAP6 states that the significant change planned for Growth Areas such as Tottenham Hale provides an opportunity to establish a new urban character for the area. It also states that the appropriate height of development in these areas shall be guided by the principles of Policies DM1 and DM6 of the Development Management DPD.

6.60 Policy SP11 of the Local Plan states that tall buildings should be assessed in accordance with area action plans, characterisation studies and the policy criteria of the DM DPD. The council prepared a borough-wide Urban Characterisation Study (UCS) in 2016.

6.61 Policy DM6 of the DM DPD states that tall buildings will only be acceptable within identified areas. Figure 2.2 of the DM DPD identifies the area around Tottenham Hale station, south of Down Lane Park, as being suitable for tall buildings. It also prescribes a range of requirements for tall buildings. As well as being located in suitable areas and being acceptable in design terms, tall buildings should be a way finder or marker building indicating areas of civic importance and high visitation, should be well proportioned and visually interesting from any distance or direction and should positively engage with the street environment. Tall buildings should also consider their ecological and microclimate impacts. Clusters of tall buildings should also demonstrate

how they collectively contribute to the delivery of the vision and strategic objectives for an area.

- 6.62 The DM DPD defines 'tall' buildings as being those which are ten storeys or greater in height and 'taller' buildings as those which generally project above the prevailing height of the surrounding area and are lower than ten storeys.
- 6.63 The proposed development would include five buildings that are six storeys or greater in height. These buildings are all located on the southern side of the site, adjacent to the park and away from the majority of existing residential properties on Park View Road. Three of these buildings, those between six and seven storeys in height, are considered 'taller' buildings by the Local Plan.
- 6.64 The two 'tall' buildings (i.e. ten storeys or greater in height) are both located in the south-eastern corner of the site on either side of the extended Ashley Road.
- 6.65 The location of the proposed tall buildings is outside of the areas designated as being suitable for tall buildings area as identified in Table 2.2 of the DM DPD and the UCS also does not state that tall buildings would be acceptable in this location. The emerging Tottenham Hale District Centre is an area designated as being suitable for tall buildings area and is a short walk to the south of the site.
- 6.66 The site shares many of the characteristics of the designated tall building area in Tottenham Hale District Centre. It is located within the Tottenham Hale Growth Area and the Lee Valley Opportunity Area which are identified for significant amounts of new housing and jobs, and it benefits from easy access to public amenities including open green spaces at Down Lane Park and the Lee Valley Regional Park and a superb range of public transport options at Tottenham Hale train, underground and bus stations. The emerging Tottenham Hale district centre will also provide a range of commercial and community amenities to support new high-density development. There are also further commercial and community amenities a short walk to the west of the application site on Tottenham High Road.
- 6.67 This location has a strong relationship with the permitted cluster of tall buildings within the emerging Tottenham Hale District Centre, which has permissions for buildings up to 38 storeys, with a gradual and transitional 'stepping down' of building heights from the district centre to Ashley Road, across Down Lane Park and towards the lower scale buildings residential neighbourhood to the north.

- 6.69 As such, the siting of tall buildings would be suitable in this location due to their close proximity to the designated tall building area in Tottenham Hale, the strong connectivity and amenity attributes of the site, the public benefits of providing a gateway for cyclists and pedestrians to the north and east and improving local wayfinding, and in providing a connection between the large-scale emerging district centre at Tottenham Hale and the existing residential neighbourhood to the north.
- 6.70 Although the siting of two tall buildings of ten and thirteen storeys in this location which has not previously identified as being suitable for tall buildings is contrary to Policy D9 of the London Plan and Policy DM6 of the DM DPD, it is considered that on balance this conflict with policy would not result in any harm.
- 6.71 The GLA's Stage 1 comments state that, notwithstanding the proposed development's non-compliance with the locational criteria of Policy D9 (specifically the site's location outside of an area identified as suitable for a potential tall building) GLA Officers will have regard to the level of compliance with Policy D9 as a whole when considering the suitability of tall buildings in this location, with reference to the visual, functional, environmental and cumulative impacts of the tall buildings, assessed below, and in conjunction with an assessment of all other material considerations.
- 6.72 The consideration of the tall buildings as a function of the overall development design and its impact on local character, protected views, local climatic conditions, neighbouring amenity, ecology and all other relevant matters will be assessed in the sections below.
- 6.73 **Tall Buildings**
- Townscape*
- 6.74 Policy D9 of the London Plan states that where suitable tall buildings must be acceptable in terms of their visual, functional, environmental and cumulative impacts.
- 6.75 Policy DM5 of the DM DPD states that obstructions to locally significant views should be minimised.
- 6.76 Policy DM6 of the DM DPD states that that all proposals for taller and tall buildings must be accompanied by an appropriate urban design analysis that explains how the buildings would fit into the local context.
- 6.77 The site is considered to be a transitional location in terms of building heights relative to the cluster of tall buildings which are currently emerging from the centre of Tottenham Hale and along Ashley Road and Watermead Way. The heights of buildings that have received planning permission in this area range from a peak of 38 storeys close to Tottenham Hale station stepping down to 22 storeys on Watermead Way then to 12 storeys on Ashley Road. There is a gentle stepping down of heights from the Tottenham Hale station area as can be seen in the image above.
- 6.78 On the southern side of Down Lane Park buildings have been permitted that would frame the park at heights of 11 and 12 storeys.
- 6.79 The 10 and 13 storey buildings proposed would be of a similar height to those 11 and 12 storey buildings. These two buildings would provide a visual connection between

the cluster of buildings on the southern part of Ashley Road and this proposed development at its northern end. The siting of these tall buildings at the entrance to the development from Ashley Road provides a visual indicator of the end of the existing Ashley Road, the termination of the park, and the start of the new route through the site to the north (and on to the adjacent residential neighbourhood and Lee Valley Regional Park). The tall buildings would be clearly visible from within the park and from the south on Ashley Road and thus would function as the principal gateway to both the development and the pedestrian and cycle route through the site, as well as improving local wayfinding.

- 6.80 The tall buildings would be sited in a location that is as far away as possible from existing residential properties and would not be located close to any listed or locally listed building or any conservation area.
- 6.81 The applicant has submitted a *Heritage Townscape & Visual Impact Assessment* (HTVIA) with the application which has assessed the visual and cumulative impacts of tall buildings in this location. The HTVIA document concurs with the paragraphs above in respect of the suitability of long, medium and immediate views of the tall buildings. In terms of cumulative impact, the tall buildings are considered to sit comfortably within the emerging wider spatial hierarchy in this area, which includes many tall buildings of a similar height and scale on Ashley Road and the southern side of Down Lane Park, and larger scale developments both nearby at Tottenham Hale and further afield at Tottenham Hotspur Stadium and the emerging High Road West Masterplan area (all of which are within the wider area of the Tottenham Area Action Plan).
- 6.82 The HTVIA also confirms that locally significant view 20 (Watermead Way railway bridge to Alexandra Palace) would not be adversely affected by tall buildings in this location. The Council's Design Officer has reviewed the HTVIA and agrees with this assessment, and the consideration that in all locally important views the proposed tall buildings would have either a minor beneficial, minor neutral or no impact.
- 6.83 The GLA's Stage 1 comments have raised no objection to the impact of the proposed tall buildings in terms of their overall height or impact on townscape views. The Council's Design and Conservation Officers also raise no objections to the height and townscape impact of the tall buildings.
- 6.84 Therefore, the proposed development would have a beneficial impact on the townscape and visual amenity of Tottenham Hale. The scale, form and detailed design of the proposed tall buildings would integrate well within the emerging character of this growth area and would provide an appropriate transitional development between the existing district centre in Tottenham Hale and the residential neighbourhood to the north as well as a visual marker and wayfinding building within the local area.

Microclimate

- 6.85 Policy DM6 states that proposals for tall buildings should consider the impact on microclimate and that tall buildings within close proximity to each other should avoid a canyon effect and consider the cumulative climatic impact of the buildings.
- 6.86 A Microclimate Analysis has been submitted with the application, which has simulated how the new buildings would respond to expected climatic conditions within the existing surrounding environment and assessed the model against the Lawson Comfort Criteria. The Lawson Comfort Criteria identifies six categories of pedestrian

activities that are deemed to be suitable in a given area, ranging from sitting outdoors, through standing and strolling, to the least suitable category of uncomfortable (i.e. unsuitable for all pedestrian activities).

- 6.87 The model has considered three scenarios – the existing, the post-development and potential future cumulative development options. Each scenario features balconies without screens and trees without substantial foliage, whereas in a more realistic scenario balcony screens and mature tree planting of the development would contribute to slowing down wind speeds.
- 6.88 The Microclimate Analysis concludes that throughout the year, including during winter months when wind levels are expected to be highest, wind conditions within and near to the site would be suitable for sitting, standing and strolling activities. No uncomfortable or unsafe conditions were found through the analysis undertaken. The Microclimate Analysis confirms that the wind conditions anticipated would have a negligible impact (i.e. no demonstrable effect) on the users of the surrounding roads and pavements, entrances and amenity areas.
- 6.89 The Microclimate Analysis document has been reviewed on the Council's behalf by a qualified third party (Senior Engineer at RWDI) to ensure its robustness and the accuracy of its conclusions. RWDI has stated that the wind assessment is indeed robust, and its results and conclusions are satisfactory and as expected for a scheme of this size and massing at a site with these characteristics.
- 6.90 As such, it is considered that the proposal would be acceptable in terms of its impact on the local microclimate.

Housing Provision, Affordable Housing and Housing Mix

Housing and Affordable Housing Provision

- 6.91 The Council's housing target as set by the London Plan is 1,592 dwellings per annum. London Plan Policy H1 states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, including through the redevelopment of surplus public sector sites. Policy DM10 of the DM DPD seeks to increase housing supply and seeks to optimise housing capacity on individual sites.
- 6.92 Policy AAP3 of the Tottenham AAP states that to improve the diversity and choice of homes and to support sustainable communities in Tottenham the Council will seek the delivery of 10,000 new homes across the AAP area.
- 6.93 The NPPF 2021 states that where it is identified that affordable housing is needed, planning policies should expect this to be provided on site in the first instance. The London Plan also states that boroughs may wish to prioritise meeting the most urgent needs earlier in the Plan period, which may mean prioritising low-cost rented units. Policy DM13 of the DM DPD states that developments with capacity to accommodate more than ten dwellings should provide affordable housing and highlights a preference for social and affordable rented accommodation.
- 6.94 The proposed development provides 272 new dwellings including 136 new affordable homes in Council rented tenure which is 50% (63% by habitable room) of the total number of homes. The homes would be provided in a 'tenure blind' manner by ensuring the affordable homes are indistinguishable from the market homes. Council

rented properties would be located in the lower-rise blocks, with family-sized units on ground floors, for ease of access to communal and play areas and the adjacent park.

- 6.95 Market homes would generally be located within blocks accessed by a single core for ease of management. These blocks would be located in the south-west and north-east sides of the site.
- 6.96 This proposal forms part of the Council's Housing Delivery Programme which seeks to optimise the provision of affordable accommodation for Council rent to meet local need. It aims to address the Council's housing waiting list through the provision of a wide range of housing typologies and to address issues relating to the over and under occupation of the existing housing stock to ensure the effective use of public assets and funding. Therefore, it is considered that the proposed provision of affordable housing units for Council rent would meet an identified need.

ASHLEY ROAD DEPOT SUMMARY						
		1B	2B	3B	4B	Total Homes
SOCIAL	Homes	10	34	67	25	136
	%	7%	25%	49%	18%	50%
	Habitable rooms	20	102	335	150	607
	%	3%	17%	56%	24%	63%
PRIVATE	Homes	56	80	/	/	136
	%	41%	59%	/	/	50%
	Habitable rooms	112	240	/	/	352
	%	32%	68%	/	/	37%
TOTAL	Homes	66	114	67	25	272
	%	24%	42%	25%	9%	100%
	Habitable rooms	132	342	335	150	959
	%	14%	36%	35%	15%	100%

Housing Mix

- 6.97 Policy DM11 of the DM DPD states that the Council will not support proposals which result in an over concentration of 1 or 2 bed units overall unless they are part of larger developments.
- 6.98 92 (50%) of the overall number of units would have three bedrooms or more and are therefore suitable for families. All of the family-sized housing would be provided in

Council rented tenure. As such, 67% of the Council rented housing would also be suitable for families. This provision includes a significant proportion (18%) of larger four-bedroom homes.

- 6.99 This substantial provision of family-sized homes would avoid an overconcentration of smaller units in the area and would significantly contribute towards meeting the demand for family housing locally and in the Borough generally. The development as a whole would provide a mix of residential units that would contribute towards the creation of mixed and balanced neighbourhoods in this area.
- 6.100 As such, the proposed development would be acceptable in terms of its provision of new housing stock generally, the provision of a large proportion of affordable housing in Council rent tenure including a substantial proportion of family housing for Council rent, and in terms of its overall housing mix.

Design and appearance

National Policy

- 6.101 Chapter 12 of the NPPF 2021 states that that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 6.102 It states that, amongst other things, planning decisions should ensure that developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, and should be visually attractive due to good architecture, layouts, and appropriate and effective landscaping.

Regional Policy – London Plan

- 6.103 The London Plan 2021 Policy D3 emphasises the importance of high-quality design and seeks to optimise site capacity through a design-led approach. Policy D4 of the London Plan notes the importance of scrutiny of good design by borough planning, urban design, and conservation officers as appropriate. It emphasises the use of the design review process to assess and inform design options early in the planning process (as has taken place here).
- 6.104 Policy D6 concerns housing quality and notes the need for greater scrutiny of the physical internal and external building spaces and surroundings as the density of schemes increases due the increased pressures that arise. It also requires development capacity of sites to be optimised through a design-led process.

Local Policy

- 6.105 Policy SP11 of the Haringey Local Plan requires that all new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use.
- 6.106 Policy DM1 of the DM DPD requires development proposals to meet a range of criteria having regard to several considerations including building heights; forms, the scale and massing prevailing around the site; the urban grain; and a sense of enclosure. It requires all new development to achieve a high standard of design and contribute to the distinctive character and amenity of the local area.

6.107 DPD Policy DM6 expects all development proposals for tall and taller buildings to respond positively to local context and achieve a high standard of design in accordance with Policy DM1.

Quality Review Panel (QRP)

6.108 The development proposal has been presented to the QRP twice prior to the submission of this application. The most recent review took place on 19th January 2022. The Panel’s summarising comments of this latest review are provided below.

6.109 *“The Quality Review Panel welcomes the opportunity to consider the proposals for the Ashley Road Depot as they continue to evolve. The panel thanks the project team for their comprehensive presentation and the work done to date. It supports the aspirations for the site, in terms of tenure mix, housing size, typology mix and sustainability, and thinks that the proposals have the potential to become an exemplar for future development within the borough. It welcomes the response to the comments made at the previous review and thinks the improvements to the plan have been very successful. The panel is broadly supportive of the current proposals but would encourage further refinements to give greater distinctiveness to key buildings. It feels that the ambitions for sustainability are laudable and would like to see mechanisms in place to ensure that these ambitions are delivered in practice. Further details of the panel’s views are provided below.”*

6.110 Since the date of the second review the proposal has been amended to address the most recent comments from the QRP. The table below provides a summary of key points from the most recent review, with officer comments following:

Panel Comments	Officer Response
Building heights and massing	
The panel supports the approach to massing and building heights as revised from the previous presentation.	Comments noted.
It welcomes the reduction of Building B1 from five storeys to four storeys fronting onto Park View Road (north), and notes that the shift to a pitched / mansard roofline will also improve the relationship with the street.	Comments noted.
It supports the massing of the taller buildings, Building B2 (13 storeys) and Building C2 (10 storeys), and welcomes the elegant proportions of both. However, comprehensive testing of the microclimate effects of these buildings will be required, along with appropriate mitigation measures, such as tree planting.	Comments noted. Microclimate assessment has been undertaken and reviewed by a third party and found to be acceptable. Tree planting would be provided throughout the proposed development.
Place-making, public realm and landscape design	
The panel feels that the work undertaken on the public realm and landscape	Comments noted. A high proportion of play space for younger children is

<p>design has been successful and has the potential to create an important asset for residents and neighbouring communities. It feels that facilities like table tennis tables would further enhance the landscaped spaces.</p>	<p>provided on site. Other sports facilities would be provided in Down Lane Park as part of the upcoming comprehensive improvement scheme for the park.</p>
<p>The landscape proposals rely heavily on herbaceous planting; consideration of what the landscape will look like in winter may suggest inclusion of some more robust species. In this regard, indigenous evergreen 'marker' plants could also be used to articulate character areas.</p>	<p>The landscaping scheme has been designed to achieve a number of goals, including good site drainage, biodiversity improvements and visual amenity benefits. Details of landscaping would be secured by condition and the inclusion of evergreen species can be considered at this point.</p>
<p>Shadow diagrams should also be used to inform the landscape strategy at a detailed level.</p>	<p>The landscaping is not anticipated to be excessively overshadowed. The landscaped areas will be effectively managed to ensure their long-term quality. This matter will be secured through condition.</p>
<p>The panel welcomes the inclusion of rain gardens and is pleased to hear that management strategies are being carefully considered, as these can become unkempt and littered.</p>	<p>Comments noted. Management of drainage features would be secured by condition.</p>
<p>The panel would support greater clarity on the hierarchy of entrances and accesses to the buildings and courtyard spaces, to ensure that natural desire lines are defined and reinforced.</p>	<p>Building entrances are located on main routes through and around the site for clarity of access. Courtyards are located in private areas behind blocks that provide play and amenity space for residents. Desire lines would be re-enforced and respected.</p>
<p>Opportunities for horticulture and community growing should be explored; establishing management systems so that the community is in control of the growing spaces would be welcomed.</p>	<p>The courtyard gardens are community focussed spaces that have been designed to include spaces suitable for communal activities such as the growing of food.</p>
<p>At a detailed level, there may be potential to strengthen parts of the landscape by grouping some of the smaller planting areas together, for example in the front garden areas of adjacent dwellings.</p>	<p>The principles of the landscape provision have been designed in detail as shown in Section 8 of the Design and Access Statement. Seven landscaped 'character areas' have been identified based on street and housing typologies. Each would provide a different layout and type of planting.</p>
<p>The panel welcomes the decision to avoid having waste and recycling bins in front gardens.</p>	<p>Comments noted.</p>
<p>As there are pedestrian-only streets within the development, a management</p>	<p>Development servicing has been considered in detail. There two dedicated</p>

<p>strategy will be needed to allow access for essential vehicles, such as removal vans, to all parts of the new neighbourhood.</p>	<p>'drop off' service bays provided on the eastern and western sides of the development. Storage lockers are provided for parcel deliveries. Waste trucks can access the internal roads through a bollard-controlled access system. Removal vans would use the same service bays and may be permitted to access the new residential lanes and the park edge route subject to a management plan to be secured by condition.</p>
<p>The panel also notes that the western blocks of accommodation are at a distance from the parking provision, and it would encourage the design team to ensure that there is equitable access to parking and car club provision from all parts of the development.</p>	<p>Car use on the site is expected to be low. The main car park is within the podium under Block C. Four car parking spaces would be provided off Park View Road (north) between Blocks A and B. The car club spaces would be provided on Ashley Road. Homes on the western side of the site would be closer to existing car club spaces on Mafeking Road.</p>
<p>The panel feels that the design of the pedestrian and cycle-only route at the southern boundary of the site, adjacent to Down Lane Park, should mitigate potential problems with security and surveillance. It highlights that generous pathways, effective lighting strategies, good levels of surveillance and overlooking from adjacent flats, and avoiding the creation of hiding places are key ingredients of safe places.</p>	<p>Comments noted. The 'park edge' route has been designed to create an active and attractive interface between the site and Down Lane Park and improve security through the provision of low-level lighting, passive surveillance from residential front doors and upper floor windows and balconies.</p>
<p>Architectural expression</p>	
<p>The panel welcomes the approach to the architectural expression throughout the scheme. At a detailed level, it highlights some opportunities for further refinement.</p>	<p>Comments noted. Detailed design has advanced since the QRP review and further refinement and detailing is now included in the scheme design.</p>
<p>It feels that there is scope to introduce greater differentiation in the architectural character of key buildings within the scheme, such as buildings A4 and A1. A more distinctive design for Block A4 would celebrate the corner and bookend the view from the park, while Block A1 plays an important role in closing the view down Havelock Road.</p>	<p>Buildings A4 (by the north-western entrance to the park) and A1 (opposite Havelock Road) are now markedly different in their detailed design and materiality than the remainder of the development. Block A4 includes a dark brown brick and a chamfered corner feature neither of which are found elsewhere in the proposed development. The use of green ceramic tiles is also prominent on the ground floor of A4. Block A1 is more restrained in its finishing materials but has rich brick detailing so the building would appear as a high quality terminating feature at the end of Havelock Road.</p>

<p>The panel accepts that it is not possible to retain the Victorian park keepers' cottage at this important corner location and would encourage the design team to explore how Building A4 can be further refined to elegantly turn the corner as a 'marker' building while also reflecting and referencing the nearby Victorian streetscape.</p>	<p>Comments noted. The corner A4 building would be finished with elegant and characterful decorative tiles which increase its prominence in the street scene and emphasise its status as a marker building for the adjacent entrance to the park.</p>
<p>Building A5 might benefit from some further consideration of the upper floors, which currently look weak and apologetic when set against the strong colonnade below.</p>	<p>Building A5 has been completely redesigned to remove the former colonnade, along with a number of other changes to the detailed design, which officers consider present a much more convincing elevation. This building now presents a highly domestic scale, which responds to the two storey houses opposite. The upper maisonettes and their access balcony act as a set-back, rooftop element, behind the high parapet of the lower maisonettes, which retain a horizontal rhythm and individual house-by-house expression through the inclusion of pilasters.</p>
<p>The panel would also encourage greater differentiation between the balconies and access decks that sit next to each other at the junction of Buildings A1 and A5, to avoid an awkward juxtaposition.</p>	<p>Whilst the balconies on the second floor of these two buildings may appear similar on elevation drawings, in plan form there is a clear forward step between the balconies on building A1 and the access deck on A5. This is sufficient to provide a clear differentiation between these two areas once the buildings are built.</p>
<p>Inclusive and sustainable design</p>	
<p>The panel welcomes the clarity of the analysis and strategic decisions that have been taken so far to integrate sustainable design principles into the design. In particular, it feels that the ambition to achieve an exemplar Passivhaus scheme is laudable.</p>	<p>Comments noted.</p>
<p>It also supports the biodiversity targets proposed, as well as the approach adopted towards sustainable urban drainage.</p>	<p>Comments noted.</p>
<p>The commitment to achieving LETI targets within the scheme is also welcomed, but the panel would encourage the design team to push even harder and aim for the 2030 LETI target of 300 kgCO₂/m².</p>	<p>Comments noted. The applicant's design team has pushed for the highest level of carbon reduction throughout the lifetime of the development and are restricted in part by site layout and buildability. The development would meet all GLA whole-life carbon targets and some LETI targets</p>

	and further work towards improving carbon reduction would be undertaken prior to commencement of development and secured by condition.
While these commitments are all extremely positive, the panel would like to see mechanisms in place to ensure that the identified standards for each individual building are 'locked in' during the onward detailed design and construction phases.	Commitments would be secured by condition through a detailed finishing materials condition and the requirement for the architects to be kept on as overseers of the development through the RIBA design stages.

6.111 As set out above, the applicant has sought to engage with the QRP during the pre-application stage. The development proposal submitted as part of this application has evolved over time to respond to the detailed advice of the panel. It is considered the points raised by the QRP have been addressed to an appropriate extent.

6.112 *Assessment*

6.113 Height, Bulk and Massing

6.114 The existing depot site is surrounded mostly by brick and concrete walls, barbed wire, high level wooden screening panels and metal fencing. As such, the site has a highly utilitarian appearance in the local area, which to the north and west has an otherwise highly residential character. The existing depot site turns its back to surrounding streets as its sole entrance for vehicles and staff is located on Ashley Road. A former vehicle access on Park View Road (west) has been disused since the recycling centre closed in 2018. As such, the site has a very poor relationship with surrounding streets and offers minimal visual amenity when viewed from the surrounding residential neighbourhood.

6.115 The proposed development is formed of three main blocks that would be separated by new routes through the site on a north-south axis. Each block incorporates multiple buildings of differing heights. Buildings would be mostly four and five storeys in height with a notable increase in proposed building height on the southern boundary addressing the adjacent park where heights step up to six, seven, ten and thirteen storeys. As such, this development would include both tall and taller buildings on its southern edge only. The suitability of the site for tall buildings and their townscape impact has been considered in the relevant section above and thus is not repeated here.

6.116 The other blocks of the development generally rise above the prevailing buildings heights in the surrounding area but to an extent that can be reasonably justified. The northern and western sides of the development are mostly four storeys in height and would be constituted of a two-storey frontage with access deck above, a set-back upper floor and an angled habitable roof level. This is only a single storey above the existing dwelling houses opposite on Park View Road which are two storeys plus roof in height.



6.117 These four storey rows of homes would be terminated at each end by a taller block with a strong form, which would contribute to articulating key features in the existing and proposed street scenes such as road junctions, the entrance to the park and the new north-south routes through the site. Block A1, for example, at the junction of Park View Road and Havelock Road would provide a suitable terminating for views along Havelock Road.



6.118 The 'taller' six and seven storey buildings, which are a significant step down in height from the ten and thirteen storey tall buildings, face onto the park and would contribute towards framing the park as an important local amenity area. The park would already be framed on its southern side by the emerging and permitted eleven and twelve storey buildings on Ashley Road. The proposed six and seven storey buildings would reinforce this framing as well as contributing towards the general 'stepping down' in scale and massing of the built form from Tottenham Hale towards the existing residential neighbourhood to the north.

6.119 The scale and massing of the six and seven storey blocks would be reduced through the integration of vertically proportioned glazing, double-height apertures forming entrances to the internal courtyard gardens and sizeable separation gaps between the blocks.



6.120 Therefore, as the proposed building heights represent a gentle increase over the heights of existing buildings in the immediate surroundings, and given that their detailed designs have been carefully considered within the local context, it is considered that the proposed development would be of a scale, bulk and massing that would not appear out of keeping with the wider urban context.

6.121 Architectural Expression, Fenestration and Materiality

6.122 The detailed design of the tall buildings reads successfully in medium and long-distance views due to the significant contrast between the base, middle and top of these buildings. The particularly distinctive top would act as a 'crown' by finishing with a raised parapet and sawtooth brick detailing, which reinforces its wayfinding characteristic. The tall buildings would have a strong resemblance to the tall buildings in the Tottenham Hale cluster, which employ a similar gridded elevational composition topped by a crown-like element.

6.123 The proposed tall buildings would appear as smaller versions in comparison to those at the heart of Tottenham Hale, would be striking and distinctive in their design and would appear as appropriate features within the character and appearance of the surrounding area.

6.124 The development would achieve a distinct character through a differentiation between the residential street-type properties in a more traditional domestic brick and fenestration, the park-side mansion blocks with facades that echo those on the south side of the park, the glazed brick of the 'park gateway' building on the south-west corner of the development with its non-residential ground floor, and the two tall

buildings towers with their gridded facades and double-height glazed brick base elements.



6.125 The 'stacked maisonette' typology of the buildings that would front onto the Park View Road on the northern and western edges of the site have been designed in detail to ensure that the ground and first floor maisonettes read as two storey terraced houses, with a strong horizontal rhythm, provision of traditional front doors and front gardens. The upper maisonettes have been designed to be set further back behind a parapet wall that hides their access balcony, and with a pitched roof disguising the top floor.

6.126 The locations where blocks and maisonettes meet, at the corners of blocks and streets, have been carefully designed to turn their respective corners comfortably. Gable ends would be animated through the provision of sensitively located windows that provide overlooking and passive surveillance to gap spaces whilst avoiding overlooking and privacy concerns between homes.

6.127 The materials chosen would be robust, durable, attractive and appropriate to the local context.

6.128 Public Realm Improvements

6.129 The development proposal provides a fantastic opportunity to improve local access to Down Lane Park and create a stronger link to the wider Lee Valley to the east. The continuation of Ashley Road improves connectivity for pedestrians and cyclists significantly. The alignment of the secondary 'residential lane' through the centre of the site is strongly supported as a means of further improving connectivity for local residents to the park and as a means through which to provide a sensitively designed and characterful 'mews style' residential street. The proposed landscaped strips along the northern and western edges of Park View Road would integrate the proposed

development into the existing street grid whilst retaining existing mature trees, improving landscaping to those streets and providing a more spacious streetscape, and therefore are strongly supported.

- 6.130 The proposed park street would provide east-west pedestrian and cycle connectivity as well as a much improved and planted setting for Down Lane Park. The new routes have clear and unambiguous boundaries between public and private spaces, with the proposed blocks enclosing private communal courtyard gardens, and with ground floors animated with regularly spaced, frequent front doors to ground floor properties. The street layout is therefore considered to be an exemplary provision of robust and comprehensible spaces in accordance with current best practice.



- 6.131 Both the public streets and private communal courtyards would be provided with attractive, robust and durable hard and soft landscaping. The overwhelming majority of existing trees, many of which are fine mature samples, would be retained and protected. New street trees would supplement the retained trees to provide a continuous street tree lining to the Park View Road and Down Lane Park edges.
- 6.132 The new streets and paths through and around the site would be appropriately landscaped, accommodating mixtures of herbaceous and evergreen plants to provide year-round greenery and street furniture to support clear routes to front doors.
- 6.133 The public realm improvements around this site would be substantial and would add further to the high design quality of this proposed development.

6.134 Summary

- 6.135 The proposed development would replace a former Council depot site which is no longer required in this location, and which currently has a highly limited and low quality relationship with the surrounding area, with a series of buildings of high-quality contemporary design within a highly landscaped setting that are reflective of local characteristics, bring activity onto surrounding streets and enable greater permeability for local pedestrians and cyclists.
- 6.136 The building heights, and the scale and massing of the development overall, would contribute to optimising the development of the site and would not appear out of keeping with the surrounding area. The overall development would have a positive visual impact on the local built environment and would bring significant improvements to the local public realm including the adjacent park.
- 6.137 The development is supported by the Quality Review Panel. The Council's Design Officer also supports the development by stating that: *"These proposals are well designed and appropriate to the site."* The Design Officer also states that the development proposal: *"will provide high quality homes at a reasonable density that marks a transition between the lower form and density, almost suburban two storey terraced housing of the existing residential streets to the north and west, and the new, very high density, high rise heart of Tottenham Hale. The proposed streets and private courtyards promise to be superb quality public and private realms, with great landscaping and framed by buildings of logical layout, clear fronts and backs, elegant proportions and attractive, durable, robust materials and details. They will fit into their context, animate the edge of the park and provide better connections between existing neighbourhoods, the new district centre and local parks."*
- 6.138 As such, it is considered that the development is acceptable in design terms.

Heritage Impact

- 6.139 There are no conservation areas, listed buildings or locally listed buildings close to the site. The nearest listed or locally listed building is more than 300 metres away to the south at the other end of Ashley Road (Berol House). The Tottenham High Road Conservation Area is the nearest to the site and is more than 400 metres away to the east.
- 6.140 *Policy Context*
- 6.141 London Plan Policy HC1 seeks to ensure that development proposals affecting heritage assets and their settings, should conserve their significance. This policy applies to designated and non-designated heritage assets. Local Plan Policy SP12 and Policy DM9 of the DM DPD set out the Council's approach to the management, conservation and enhancement of the Borough's historic environment, including the requirement to conserve the historic significance of Haringey's heritage assets and their settings.
- 6.142 DPD Policy DM9 states that proposals affecting a designated or non-designated heritage asset will be assessed against the significance of the asset and its setting, and the impact of the proposals on that significance; setting out a range of issues which will be taken into account. It also states that buildings projecting above the

prevailing height of the surrounding area should conserve and enhance the significance of heritage assets, their setting, and the wider historic environment that could be sensitive to their impact.

6.143 *Legal Context*

6.144 There is a legal requirement for the protection of Conservation Areas. The legal position on the impact on these heritage assets is as follows, Section 72(1) of the Listed Buildings and Conservation Areas Act 1990 provides: "In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area." Among the provisions referred to in subsection (2) are "the planning Acts".

6.145 Section 66 of the Act contains a general duty as respects listed buildings in exercise of planning functions. Section 66 (1) provides: "In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."

6.146 The *Barnwell Manor Wind Farm Energy Limited v East Northamptonshire District Council* case tells us that "Parliament in enacting section 66(1) intended that the desirability of preserving listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given "considerable importance and weight" when the decision-maker carries out the balancing exercise."

6.147 The judgment in the case of the Queen (on the application of *The Forge Field Society*) v *Sevenoaks District Council* says that the duties in Sections 66 and 72 of the Listed Buildings Act do not allow a Local Planning Authority to treat the desirability of preserving listed buildings and the character and appearance of conservation areas as mere material considerations to which it can simply attach such weight as it sees fit. If there was any doubt about this before the decision in *Barnwell*, it has now been firmly dispelled. When an authority finds that a proposed development would harm the setting of a listed building or the character or appearance of a conservation area or a Historic Park, it must give that harm considerable importance and weight.

6.148 The Authority's assessment of likely harm to the setting of a listed building or to a conservation area remains a matter for its own planning judgment but subject to giving such harm the appropriate level of weight and consideration. As the Court of Appeal emphasised in *Barnwell*, a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted. The presumption is a statutory one, but it is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. An authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the strong statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering.

6.149 In short, there is a requirement that the impact of the proposal on the heritage assets be very carefully considered, that is to say that any harm or benefit needs to be assessed individually in order to assess and come to a conclusion on the overall

heritage position. If the overall heritage assessment concludes that the proposal is harmful then that should be given "considerable importance and weight" in the final balancing exercise having regard to other material considerations which would need to carry greater weight in order to prevail.

6.150 *Assessment of Impact on Heritage Assets and their Setting*

6.151 The setting of a heritage asset is defined in the glossary to the NPPF as: "The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral". There is also the statutory requirement to ensure that proposals 'conserve and enhance' the conservation area and its setting.

6.152 There are no designated or non-designated built heritage assets within 300 metres of the application site. The Tottenham High Road Historic Corridor extends along the High Road, including Bruce Grove Conservation Area, approximately 450m to the west of the site. The locally listed Berol House is located approximately 350m south of the site, while Down Lane and Parkhurst School is located approximately 380m north-west of the site.

6.153 These distances of the proposed development from any heritage assets are significant. With due consideration to the intervening townscape and the changing context around Tottenham Hale and Ashley Road, it is considered that the proposed scheme would not result in any adverse impacts on any built heritage assets. The new buildings would not appear prominent or overwhelming in views relating to the historic environment and they would not affect the way any built heritage assets are appreciated and experienced. Therefore the development can be considered to preserve the setting of the Conservation Area and result in no harm to the non-designated heritage asset at Berol House. The Council's Conservation Officer has reviewed the proposal and concurs with this view and therefore has raised no objection from a conservation perspective.

6.154 *Archaeology*

6.155 Policy HC1 of the London Plan states that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Policy DM9 of the DM DPD states that all proposals will be required to assess the potential impact on archaeological assets and follow appropriate measures thereafter in accordance with that policy.

6.156 The site is located within the Lea Valley Tier 3 Archaeological Priority Area. An *Archaeological Desk-Based Assessment* has been submitted with the application.

6.157 The Greater London Archaeological Advisory Service (GLAAS) has been consulted on this application. GLAAS advises that the development proposal is in an area of archaeological interest and as such could cause harm to archaeological remains. A field evaluation is therefore required to determine appropriate mitigation.

6.158 GLAAS recommends that a condition securing a two-stage investigation process would provide an appropriate safeguard for the proposed development. This would ensure that an initial site evaluation is undertaken and following this, if heritage assets

of archaeological interest are found, a 'stage 2' investigation shall take place prior to the commencement of works on site.

- 6.159 As such, with the imposition of a condition on any grant of planning permission requiring details of a two-stage investigation process to be submitted for assessment, the proposed development would be acceptable in terms of its impact on heritage assets.

Residential Quality

- 6.160 The Nationally Described Space Standards set out the minimum space requirements for new housing. The London Plan 2021 standards are consistent with these. London Plan Policy D6 requires housing developments to be of high-quality design, providing comfortable and functional layouts, benefiting from sufficient daylight and sunlight, maximising the provision of dual aspect units and providing adequate and easily accessible outdoor amenity space. It provides qualitative design aspects that should be addressed in housing developments.
- 6.161 The Mayor of London's Housing SPG seeks to ensure that the layout and design of residential and mixed-use development should ensure a coherent, legible, inclusive and secure environment is achieved. Standard 29 of the SPG requires the number of single aspect homes to be minimised, with north-facing single aspect properties avoided. Policy DM1 requires developments to provide a high standard of amenity for its occupiers.
- 6.162 In general terms, the development is of a very high-quality layout and residential standard, having been through a rigorous design process including assessment by the Quality Review Panel.

General Residential Quality

- 6.163 All homes would meet the internal space standards requirements of the London Plan. 86% of the proposed homes would be dual or triple aspect. Of the single aspect homes none are north facing. Only one of the social rent homes would be single aspect (less than 1% of the total). All homes would have a private amenity space in the form of a projecting balcony or rear garden that meets the requirements of the Mayor's Housing SPG Standard 26. None of the balconies would be north facing. All homes would also have access to all three of the proposed communal courtyards, as well as the adjacent park.
- 6.164 All buildings would have centrally located building cores to reduce walking distances to flats. Entrances would be glazed to enable good levels of sun and daylight with views through to rear amenity areas providing a welcoming sense of arrival. The majority of buildings have eight homes or less per core in line with Standard 12 of the Housing SPG and the average for the development as a whole is six homes per core. Five floors of the buildings with deck access have nine units per floor. This is only marginal exceedance of the guidance and is offset by the quality of the deck access arrangements which includes the provision of well-lit and well-ventilated dwelling entrances and avoid a long internal corridor.
- 6.165 The applicant has also confirmed that all homes would be able to access full fibre broadband connectivity in accordance with Policy SI6 of the London Plan.

Daylight, Sunlight and Overshadowing

- 6.166 The BRE guidelines for day/sunlight in proposed developments was updated in June 2022. On the date this application was submitted the former BRE guidelines from 2011 were still relevant. The *Daylight & Sunlight* report submitted with the application has modelled the development against the 2011 guidelines. Although these have now been replaced it is considered that they still provide an appropriate guide against which to assess levels of residential amenity in new residential development in accordance with adopted policy.
- 6.167 The Mayor's Housing SPG states that BRE guidelines for daylight and sunlight need to be applied flexibly and that the guidelines should be applied sensitively to higher density development in opportunity areas and accessible locations, taking into account the need to optimise housing capacity and for the character of an area to change over time.
- 6.168 In terms of daylight 72% of the rooms meet the BRE guidelines for daylight quantum (average daylight factor) and 78% meet the guidelines for sky visibility (no sky line). Many rooms far exceed the guidelines and the development has been designed with an emphasis on providing greater levels of daylight to main living areas, rather than to lesser-used spaces such as kitchen/dining rooms. Furthermore, the proportion of rooms that have only a minor shortfall against the BRE guidelines rise to 91% for daylight quantum and 93% for sky visibility.
- 6.169 In relation to sunlight 66% of rooms meet the BRE guidelines in terms of the recommended levels of sunlight (annual probable sunlight hours) and 79% of rooms meet the guidelines for winter (winter probably sunlight hours). Many rooms fall below the criteria to only a marginal extent which is still considered adequate for an urban area. 93% of the rooms would therefore have adequate levels of sunlight annually and 91% of the rooms would have adequate sunlight in winter.
- 6.170 The lower levels of day and sunlight for some homes in this development are the result of a combination of factors including development orientation, the siting of these units on the lower floors of the development and in the corners of courtyards, and the existence of shading from balconies on upper floors. An efficient development layout provided on a constrained site in an urban area will inevitably include some homes that fail to meet the day and sunlight guidelines. Furthermore, homes on the ground floor and adjacent to courtyards would instead have other benefits including easier access to shared amenity spaces and the adjacent park where excellent day and sunlight levels are available.
- 6.171 The BRE guidelines for overshadowing have been applied to the development's proposed amenity spaces. The podium space on Block C exceeds the recommended target of 50% of the space receiving two or more hours of sunlight on 21st March (spring equinox) and the courtyard for Block B falls very marginally below it. The courtyard to Block A falls 15% below the stated target. This is partially a result of the layout of the courtyard which is triangular, and which means sunlight is less able to reach its corners. The *Daylight & Sunlight* document states that both courtyards to Blocks A and B would still have good levels of sunlight in late spring and summer months when they are most likely to be used.

Outlook and Privacy

6.172 Many homes, including a substantial number of social rented properties, would have good quality outlook across the adjacent park. Buildings that face one another directly are generally separated by at least 18 metres, other than the distance across the route between Block A and Block B (14 metres) which has been carefully designed in the form of a residential lane with a 'mews type' character.



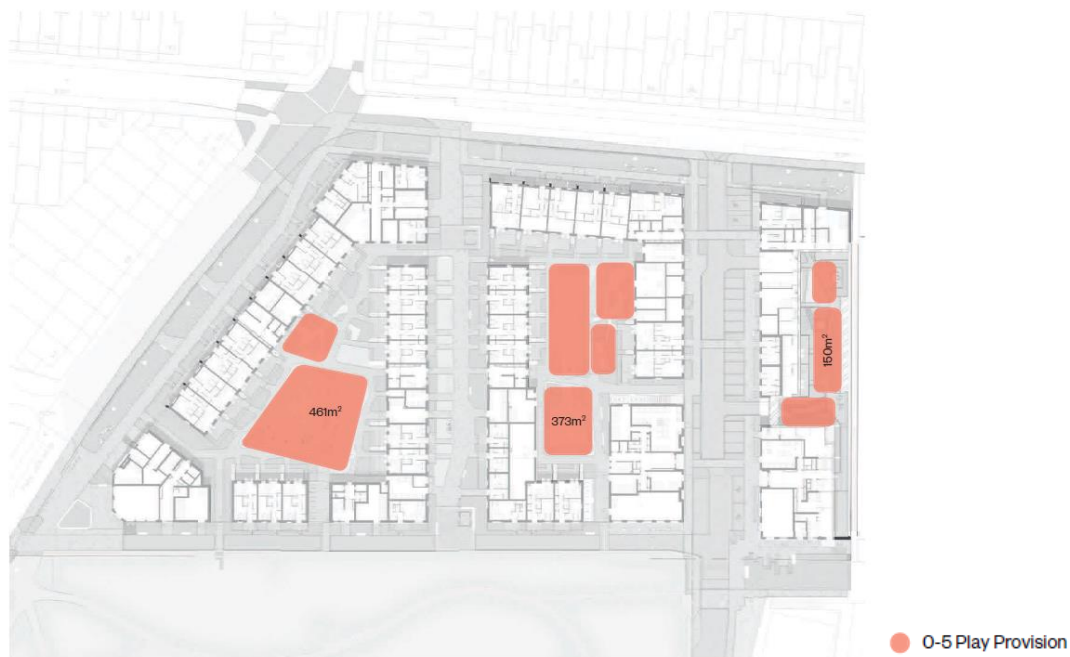
6.173 In the case of these 'mews' buildings the main habitable rooms are located at the rear at ground floor to ensure there is adequate private amenity for the residents. Kitchens and hallways would be located fronting onto the new route. Where buildings are otherwise closer than the 18 metres one of the buildings would be set at an angle to avoid direct overlooking between windows, or alternatively windows have been sensitively located to achieve the same objective. Balconies have been carefully designed with the inclusion of bespoke screening features to minimise overlooking and maximise the privacy of all residents. Exact details of the boundary designs would be secured by condition.

Children's Play Space

6.174 Policy S4 of the London Plan seeks to ensure that all children and young people have safe access to good quality play and informal recreation space, which is not segregated by tenure. At least 10 sqm per child should be provided to all qualifying developments. The Mayor's Child Play Space calculator estimates a total of 280 children will occupy the development which creates a requirement of 2,802.3sqm of play space.

6.175 984sqm of play space would be provided within the new courtyard and podium areas, which is marginally below the 1,030sqm play space estimate for under 5s as indicated by the Play Space Calculator. These play spaces are designed to accommodate

children up to five years old and as such are located close to the new homes. Residents will be able to access each of the three play areas provided throughout the development without restriction. Additional 'play on the way' features not included in the figure above would be provided on key public routes through and around the development, which means the play space target for younger children would be exceeded for this development.



6.176 Play space for children over the age of five is available within existing parks in the local area, such as Down Lane Park and Hartington Park, with the Lee Valley Regional Park also available for recreational activities. All of these public amenity spaces are within a five-minute walk of the proposed development. Down Lane Park and Hartington Park include playground facilities for younger children plus sports facilities and open spaces for older children.

6.177 An improvement programme for the play and open space areas within Down Lane Park is under consultation with the local community and this application will contribute towards those improvements through a financial contribution secured through a planning obligation which would offset the shortfall of on-site play space.

Access and Security

6.178 NPPF paragraph 97 states that planning decisions should promote public safety and should take into account wider security requirements.

6.179 London Plan Policy D5 requires all new development to achieve the highest standard of accessible and inclusive design, and seek to ensure new development can be used easily and with dignity by all. London Plan Policy D7 requires that 10% of new housing is wheelchair accessible and that the remaining 90% is easily adaptable for residents who are wheelchair users. DPD Policy DM2 also requires new developments to be designed so that they can be used safely, easily and with dignity by all.

6.180 10% (28) of the proposed homes have been designed to meet wheelchair user home standards in accordance with Building Regulations requirement M4(3). All other

dwelling would meet the accessible and adaptable homes requirements of M4(2). Blocks B1, B2 and C1, where the wheelchair user homes are located, would be accessible by two lifts. The wheelchair homes would be split between social rent and market tenures in accordance with the proportions of the overall housing tenure split. Wheelchair homes would be located within a short distance of the wheelchair accessible parking spaces.

- 6.181 General pedestrian and cycle access to the site would be improved through the provision of two new pedestrian and cycle priority routes through the site and additional public realm including new pathways around the development on the northern, western and southern sides. All main residential entrances have been designed to be accessed directly from adjacent pedestrian routes and to be easily identifiable.
- 6.182 The development has been designed with input from the Designing Out Crime Officer of the Metropolitan Police. Windows have been carefully positioned to maximise natural surveillance over the public realm areas. The development would also improve natural surveillance over Down Lane Park. Residential cores would be fitted with audio-visual identification measures and all blocks would have two layers of fob access control. Windows and doors that could be accessed from public areas would have to meet the Police's additional security requirements. Lighting would be provided to all footpaths, courtyards, entrances, refuse and cycle store areas. Cycle parking would be secure and covered.
- 6.183 As the development would provide a significant number of new homes the Metropolitan Police have stated that the proposed population growth would require resources towards additional policing in order to ensure that safety and security in the local area is maintained. A financial contribution towards local policing is therefore provided and secured by planning obligation.
- 6.184 The development would include defensible space, located between footways and front elevations, throughout that would provide a clear identification of private and public space, improve the visual quality of the public realm and would be designed to discourage climbing and anti-social behaviour.
- 6.185 The Designing Out Crime Officer has reviewed this application and raised no objections subject to conditions.

Air, Noise and Light Pollution

- 6.186 The proposed development is in a suitable location for residential development in respect of the existing local air quality and noise conditions. To the north and south of the site are a large park and a residential street which do not currently have high levels of noise or air pollution. Park View Road to the west is a busier street than that to the north in terms of vehicle movements. The Air Quality Assessment submitted with the application states that the background pollution levels in this area are significantly below objective limits. The buildings on the western side of the proposed development would be set back from the road by 12 metres which would further reduce the impact of noise and vehicle pollution.
- 6.187 The Harris Academy school on the eastern side of the site is not considered to be a significantly noise creating use. The school grounds include multi-use games areas (MUGAs) on their western side. The MUGAs and their associated lighting are not

permitted to be used after 10.30pm Monday to Friday and 9pm on all other days (restriction imposed by conditions of planning permission ref. HGY/2019/0111 for the construction of the school). These hours were considered sufficient to protect the amenity of existing residential properties on Park View Road and as such are also considered suitable to protect the amenity of the future residents of this proposed residential development.

- 6.188 As such, the residential quality of the proposed development is of a very high quality and in accordance with the policies referenced above and is therefore considered to be acceptable.

Impact on Neighbouring Amenity

- 6.189 London Plan Policy D6 outlines that design must not be detrimental to the amenity of surrounding housing, and states that proposals should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context, while also minimising overshadowing. London Plan Policy D14 requires development proposals to reduce, manage and mitigate noise impacts.
- 6.190 Policy DM1 of the DM DPD states that development proposals must ensure a high standard of privacy and amenity for a development's users and neighbours. Specifically, proposals are required to provide appropriate sunlight, daylight and aspects to adjacent buildings and land, and to provide an appropriate amount of privacy to neighbouring properties to avoid material levels of overlooking and loss of privacy and detriment to amenity of neighbouring resident.

Day and Sunlight Impact

- 6.191 The proposed development is well-separated from existing residential properties. To the north the separation distance to dwelling houses on the northern side of Park View Road is greater than 20 metres, and to the west the houses on Park View Road are 27 metres away. Dwellings on Havelock Road are also close to the site and thus have been assessed as part of the *External Daylight & Sunlight Report (EDSR)* submitted with the application. There are no other residential properties in the immediate vicinity of the site that could be affected by the proposed development in terms of a loss of day/sunlight.
- 6.192 In terms of daylight 'vertical sky component' (VSC) and 'no sky line' (NSL) are the relevant tests as set by the Building Research Establishment (BRE) guidelines. The guidelines would not be met if a room is modelled to have a proportional reduction of more than 20% of its former daylight value against either of the VSC or NSL tests.
- 6.193 The EDSR results indicate that only 1 and 2 Havelock Road, and 66-93 (consecutive), 95 and 96 Park View Road have the potential to be impacted by the proposed development in terms of changes to their daylight and sunlight conditions.
- 6.194 30 (85%) of 35 windows for the properties on Havelock Road indicated above would meet the BRE's VSC guidelines and the remaining five are shown to have relatively minor transgressions against the guidance of no greater than 32% reductions. In terms of NSL, 18 (90%) of the 20 rooms assessed would meet the guidance requirements and one of the remaining windows would have just a minor transgression. Room R4 at 1 Havelock Road is shown to have a significant reduction in NSL of 48.8%. Floor plans for a recent ground floor extension at that property (application ref. HGY/2017/2467)

indicate that R4 is one of several windows to an open plan kitchen and living space to the rear of the property at ground floor level. As such, it is considered that any loss of daylight to this specific window would be mitigated by the daylight provided from other windows to the same habitable space and therefore the overall loss of daylight to the associated room would not be significant.

- 6.195 77 (47%) of the 163 windows modelled for the properties on Park View Road would meet the VSC guidelines and the majority of the remaining windows would have relatively minor transgressions against the VSC guidelines of no greater than 35%. The only window affected to a greater extent is a secondary side window to 67 Park View Road. There is a primary window available to the same room which would meet the BRE VSC targets and therefore it is considered that this room would receive sufficient daylight from the main window. In terms of NSL, 79 of 83 windows (95%) meet BRE guidelines and the four remaining windows have minor transgressions no greater than 30% of their former value.
- 6.196 In terms of sunlight, 'annual probable sunlight hours' (APSH) is the relevant test as set by the BRE guidelines. The BRE guide recommends that main living room windows should receive at least 25% of the total probable sunlight hours throughout the year and also recommends that at least 5% of the APSH should be received during winter months (i.e. the period between 21st September and 21st March).
- 6.197 The EDSR results indicate that all windows modelled would meet the APSH sunlight guidelines with the exception of one secondary window at 67 Park View Road, which is otherwise sufficiently sunlit by its primary window, and two windows at 2 Havelock Road which have marginal transgressions against the target guidelines in winter only of 4% of probable sunlight hours rather than the guideline of 5%.
- 6.198 In summary, most windows to affected properties on Havelock Road and Park View Road would meet the BRE guidelines for daylight. The BRE sunlight guidelines are also met for almost all windows to affected properties. The remaining windows would not fall significantly below the BRE day and sunlight thresholds. Therefore, it is considered that as the majority of windows would not lose material levels of daylight or sunlight and therefore the development would be acceptable in terms of its impact on the light to nearby residential properties.

Outlook and Privacy

- 6.199 The separation distance between existing homes and proposed buildings is at least 20 metres in all cases. This is a good separation distance for an urban area and would ensure existing homes in the area retain good levels of outlook. Most private amenity spaces for the proposed development face towards the park, internal courtyards or the development's internal pathways and streets. Further screening between the new and existing properties is also provided by existing tree planting, which would be retained. As such, any loss of privacy to existing residential properties would be minimal.

Air Quality, Noise and Light Impact

- 6.200 Policy S11 of the London Plan states that development proposals should be air quality neutral. Policy DM23 states that developments should not have a detrimental impact on air quality, noise or light pollution.

- 6.201 There would be a significant reduction in vehicle movements from the development in comparison with the previous use of the site as a Council depot. The development would be heated through low-carbon measures. Boilers would not be installed other than as a short-term temporary measure.
- 6.202 The new homes are not expected to create a significant amount of noise disturbance in the local environment.
- 6.203 The development would include new lighting throughout to ensure public realm areas are safe and secure. This lighting would be designed sensitively to maximise safety whilst minimising unnecessary light spill. This matter can be adequately controlled by condition.
- 6.204 As such, the air quality, noise and light impact on neighbouring properties and the adjacent school would not be significant.

Construction Impact

- 6.205 Any dust, noise or other disturbances relating to demolition and construction works would be temporary nuisances that are typically controlled by non-planning legislation. The demolition of the former Council depot buildings has already been completed. The construction methodology for the development would be controlled by condition to minimise its impact on existing residential properties and the adjacent school.
- 6.206 Therefore, it is considered that the impact of the proposed development on the amenity of neighbouring properties and the neighbouring school is acceptable.

Transport and Parking

- 6.207 London Plan 2021 Policy T1 requires all development to make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and to ensure that any impacts on London's transport networks and supporting infrastructure are mitigated. Policies T4, T5 and T6 of the same document set out key principles for the assessment of development impacts on the highway network in terms of trip generation, parking demand and cycling provision.
- 6.208 Local Plan Policy SP7 states that the Council aims to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by promoting public transport, walking and cycling and seeking to locate major trip generating developments in locations with good access to public transport. This is supported by DPD Policy DM31. Policy DM32 states that the Council will support proposals for new development with limited on-site parking where the site PTAL is at least 4, where a controlled parking zone exists, where public transport is available, where parking is provided for disabled people and where the development can be designated as 'car capped'.
- 6.209 The site was occupied until recently by a Council depot with operational parking for 75 refuse collection vehicles and 75 car parking spaces. The site has a maximum PTAL of 5 and is located within the Tottenham Hale North Event Day Controlled Parking Zone operating Monday-Friday 08:30-18:30, Monday-Friday (Event Days) 08:00-20:30, Saturday-Sunday 08:00-20:00 and Public Holidays 12:00-20:00.

6.210 A Stage 1 Road Safety Audit was carried out to assess the proposed development's impact on the local highway and recommended changes were integrated into the design and layout of the scheme.

6.211 *Assessment*

6.212 Access

6.213 Ashley Road would be extended into the site to enable pedestrians and cyclists to connect to Park View Road. The northern and southern ends of this street would be controlled by bollards, which enables residents with parking spaces within the development to reach those spaces but provides no through-route for private vehicle traffic.

6.214 Another pedestrian and cycle pathway would be provided through the centre of the development on a north-south axis. On the southern boundary of the development, adjacent to the park, would be another pedestrian and cycle route that is also bollard controlled. Management and maintenance of all bollards throughout this development would be secured by condition. Pedestrian pathways would be provided around the development adjacent to Park View Road as part of the proposed public realm improvements.

6.215 Footways would be included on both sides of the Ashley Road highway extension to ensure pedestrian movements are separated from vehicle traffic. Swept path plans have been submitted with the application which show that cars and delivery vehicles would be able to manoeuvre into, out and within the development without difficulty.

6.216 Highway works are proposed to connect an existing pathway located within the northern part of the park across Ashley Road via the provision of a raised table crossing. This can be secured through a planning obligation. The interaction of the proposed park edge route on the southern side of the development with this new crossing on Ashley Road must be considered further as part of a separate condition.

6.217 Transport Impact – Road Network

6.218 The site PTAL of 5 enables a low level of parking to be provided which would limit the impacts on proposed development on the highway network. The development would result in a reduction of vehicle trips on the local highway network due to the substantial reduction in the available parking spaces on site (from 75 spaces to 42 spaces).

6.219 Transport Impact – Public Transport Network

6.220 The analysis provided with the application indicates that the number of additional bus trips per service would be negligible for the bus services most likely to be used by occupiers of and visitors to the proposed development.

6.221 An assessment of the potential impact on the rail network shows that the operational capacity of the local London Underground, Overground and National Rail services would not be significantly affected with no perceptible impact expected to London Underground services (0.1% increase in usage). Network Rail has raised no objections to the proposed development, subject to informatives.

6.222 Car Parking

- 6.223 42 car parking spaces would be provided, of which 8 (19%) would be wheelchair accessible parking spaces. This is an overall parking ratio of 0.15 for the development which is compliant with the London Plan. The wheelchair accessible parking provision would far exceed London Plan requirements (10%). Two car club bays would also be provided on Ashley Road. Car parking would be managed in accordance with a parking management plan to be secured by condition. The management plan will prioritise access to parking for disabled occupiers and residents with families.
- 6.224 The proposed development would qualify for a car-capped status in accordance with Policy DM32 of the DM DPD, which prevents occupiers of the development from being given on-street parking permits.
- 6.225 All parking spaces would be fitted with electric vehicle charging infrastructure, with 20% of parking spaces having access to active charging points. This will be secured by condition.
- 6.226 Ten on-street parking spaces on Park View Road (north) and Ashley Road would be lost as the result of the new access points required to facilitate the proposed new north-south routes, due to the provision of the new raised table crossing on Ashley Road and as the result of two parking spaces on Ashley Road being converted to car club bays. An additional seven on-street parking spaces would be lost as the result of off-site highway improvements schemes which would improve highway safety in the vicinity of the site. Noting that parking stress surveys of the local area have shown that parking capacity is at approximately 70% and given that occupiers of the new housing would not be permitted to apply for on-street parking permits, it is considered that the loss of seventeen existing parking spaces can be accommodated on existing streets and is therefore acceptable.
- 6.227 The availability of potential parking in the local area for visitors to the development has been assessed through the provision of a parking stress survey with this application, which shows that the low expected number of visitors could be adequately accommodated in surrounding streets.
- 6.228 Cycle Parking
- 6.229 Cycle parking would be provided throughout the site in dedicated secure cycle stores. Additional 'short stay' publicly accessible cycle parking would be available within the public realm areas. The amount of cycle parking would include 5% cycle parking for larger cycles and would be in accordance with London Plan minimum cycle standards. Cycle parking is also provided for staff of the commercial units. Details of the exact layout and arrangement of the cycle stores would be secured by condition.
- 6.230 Deliveries and Servicing
- 6.231 Up to 22 delivery/service vehicles would visit the development each day. Peak demand is expected to be between 11am and midday which would avoid conflict with the School Street that has been implemented on Ashley Road.
- 6.232 Dedicated loading bays would be provided on Ashley Road and Park View Road (west). These would be located close to dedicated and secure parcel storage facilities integrated within the development. This system should speed up the parcel delivery

drop-off process and prevent failed delivery attempts. A detailed delivery and servicing plan would be secured by condition.

6.233 Waste stores of an appropriate size would be available throughout the development. Waste vehicles would be permitted to enter the site to collect bins from these stores. Waste and emergency vehicles are the only vehicles permitted to access through the site. The new routes have been designed to allow waste vehicles to pass through unhindered.

6.234 Two of the waste stores would have their collections taken from Park View Road (west). These collections would require the waste vehicles to temporarily block the highway road for a brief period. The Council's Transportation Officer has assessed this situation and stated that the low traffic flows on Park View Road would result in only a very limited and short-term impact from this brief road obstruction.

6.235 The Council's Waste Management Officer has not raised any objections to these waste collection arrangements.

6.236 Highway and Public Realm Improvements

6.237 The applicant has submitted an Active Travel Zone assessment with the application. Amendments to the local road layout are recommended to improve road safety and encourage pedestrian movements in the local area. These recommendations include upgrades to Havelock Road/Park View Road junction and improvements to the underpass between Park View Road and Tottenham Marshes.



6.238 It is also proposed that a raised table crossing would connect Down Lane Park with Tottenham Marshes by improving connectivity across Ashley Road. The development would result in an increase in pedestrian and cycle activity in the vicinity of the site through significant qualitative and quantitative improvements to the public realm around the site and the provision of substantial financial contributions towards cycle and walking infrastructure improvements.

6.239 Highway improvement works will be secured by planning obligation as part of this application.

6.240 Construction Works

6.241 Construction works are generally controlled by non-planning legislation. An Outline Construction Logistics Plan has been submitted as a chapter of the Transport Assessment. It is estimated that there would be 25 construction vehicle movements per day during the first three months of the construction process with four movements per day during the remainder of the programme. Routes for construction traffic would be allocated to avoid conflict with the Council's School Street opening hours on Ashley Road. The construction staff would be encouraged to travel to site using public transport and bicycles. A Detailed Construction Logistics Plan would be secured by condition.

6.242 *Summary*

6.243 The Council's Transportation Officer has assessed this application and raises no objections subject to conditions. Parking provision at a ratio of 0.15 is supported in this area with high public transport accessibility. This level of parking would be supported by sustainable travel measures including parking permit restrictions, high quality cycle parking, car club spaces and travel plans. The number of vehicle movements from the development would be much fewer than the former Council depot activities on the site. The impact on on-street parking and local modes of public transport is expected to be low.

6.244 As such, it is considered that the application is acceptable in transport and parking terms, and in terms of its impact on the public highway.

Ecology and Urban Greening

Policy Context

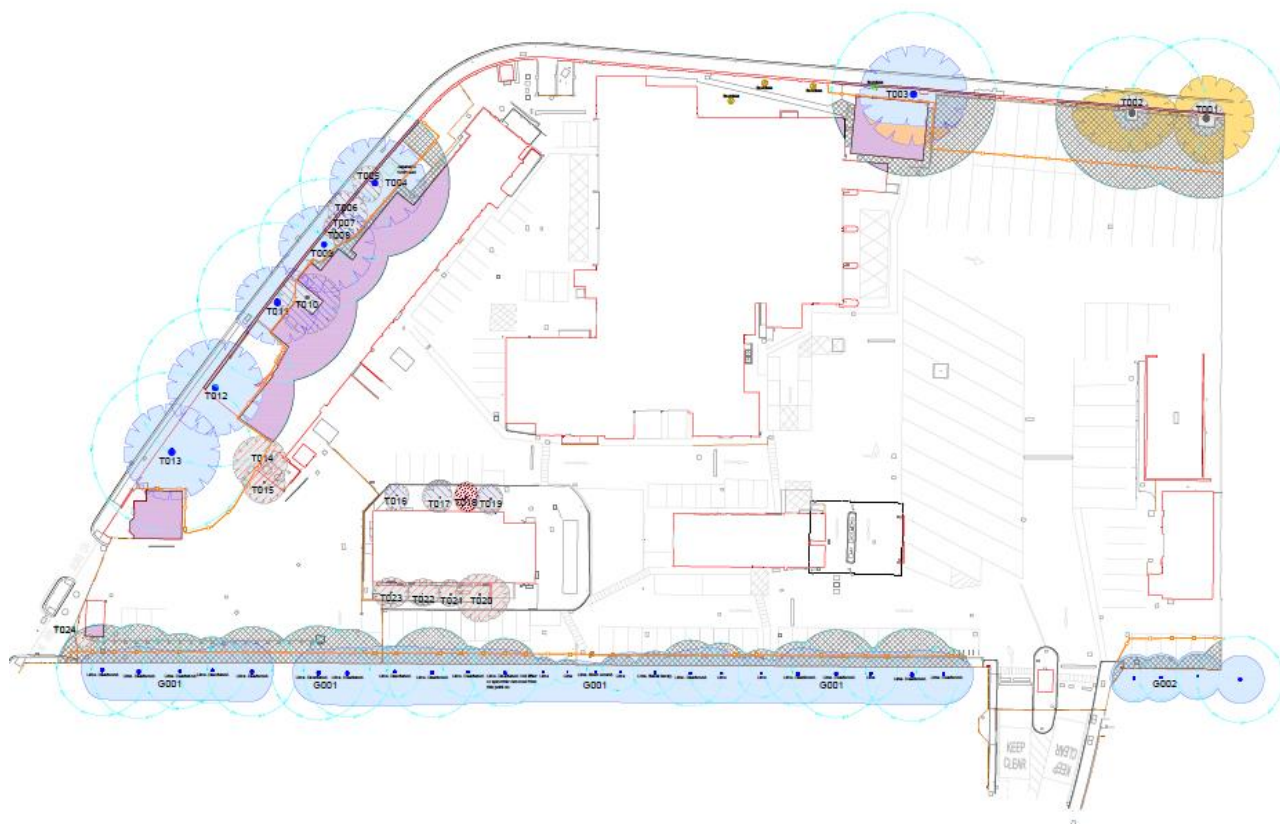
6.245 London Plan Policy G4 states that development proposals should not result in the loss of open space. Policy G5 requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design. Predominantly residential developments should meet a target urban greening score of 0.4. Policy G6 states that Sites of Importance for Nature Conservation (SINCs) should be protected, seeks to manage impacts on biodiversity and seeks secure biodiversity net gain. Policy G7 states that existing trees of value should be retained and replacement trees should be shown to be adequate through an appropriate tree valuation system.

6.246 Policy SP13 of the Local Plan seeks to protect and improve open space and provide opportunities for biodiversity and nature conservation. Policy SP11 promotes high quality landscaping on and off-site.

6.247 DPD Policy DM1 requires proposals to demonstrate how landscape and planting are integrated into the development and expects development proposals to respond to trees on or close to a site. Policy DM19 states that developments adjacent to SINCs should protect or enhance the nature conservation value of the designated site. Policy DM20 states that development that protects and enhances Haringey's open spaces will be supported. Policy DM21 expects proposals to maximise opportunities to enhance biodiversity on-site.

Trees

6.248 None of trees on the site fall within the highest Category 'A'. All of the mature Category 'B' and 'C' Lime and London Plane trees around the northern, southern and western boundaries of the site would be retained (see below). 15 Category 'C' trees must be removed to facilitate the development proposal and its related landscaping improvements. These would be replaced with a total of 74 new trees, which is a substantial net increase in the number of trees on site and as such tree cover would be significantly enhanced. A condition will ensure the value of the proposed trees outweighs that of the trees removed.



6.249 The alignment of the proposed buildings and proposed hardstanding works would encroach slightly into the root protection areas of some trees. No damage is expected to occur to these existing trees if 'no dig' or other specialist construction techniques are utilised in these areas, as appropriate. Limited pollarding of two London Plane trees on the northern side of the site is also required. Limited root pruning is also likely to occur and is not expected to cause damage to the affected trees.

6.250 The Council's Tree Officer has confirmed that the approach to tree protection, management and replacement as described above is acceptable, subject to an arboricultural method statement for works within root protection areas to be secured by condition in accordance with the recommendations of the submitted *Tree Survey, Arboricultural Impact Assessment, Preliminary Arboricultural Method Statement & Tree Protection Plan*. Further details of exact tree species and a five-year management regime must also be secured by condition.

Ecology and Biodiversity

- 6.251 The development proposal would be sited adjacent to Down Lane Park which is a designated Local SIN. The site is within two kilometres of the Lee Valley Special Protection Area (SPA), the Lee Valley Ramsar site and the Walthamstow Wetlands Site of Special Scientific Interest (SSSI). The site is also within 4.2 kilometres of the Epping Forest Special Area of Conservation (SAC).
- 6.252 An *Ecological Impact Assessment* (EclA) has been submitted with the application. The EclA states that the Epping Forest SAC, Lee Valley SPA and Ramsar sites, and the Walthamstow Wetlands SSSI are all designated ecological sites of international and national importance. The site is more than 500 metres from these designated sites. The EclA states that, in terms of impact on the Epping Forest SAC from recreational pressure associated from this development proposal, there would be no significant impact. The EclA continues to state that, in terms of impact on the Lee Valley SPA and Ramsar (including the Wetlands SSSI) from recreational pressure, construction activities, urbanisation, atmospheric pollution, water abstraction and water quality, there would also be no significant impact. Natural England has been consulted on this application and raise no objections to the proposed development.
- 6.253 The EclA has assessed the site's suitability for bats and found that only the former residential cottage on the site has a greater than low or negligible suitability for bat roosts. No roosts were found on site during surveys. Some bat commuting activity was noted in the area, which is likely to result from the use of Down Lane Park as a foraging resource. Other species were noted during surveys including bird nests. The EclA states that none of the species found were sufficiently important to be considered as important ecological features.
- 6.254 Japanese knotweed was found on site and is an invasive species. This must be dealt with in an appropriate manner before works can commence, which can be secured by condition.
- 6.255 The development proposal would include retained trees and native wildflower grasslands on the southern side of the site, providing resources for the local wildlife that uses the park. Flowering species and the proposed green roofs within the development would support birds, bats, small mammals and invertebrates. Bat and bird boxes would be provided. Bee bricks would also be integrated into the development.



- 6.256 The landscaping that would be provided on site would offset the potential impact on ecology from the additional recreational usage of Down Lane Park. There would be a biodiversity net gain of 103% as part of the development which is significantly above the mandated 10% provision as required by the Environment Act 2021 and which would significantly benefit the designated SINC area.
- 6.257 The Council is in the process of undertaking public consultations for significant improvements to Down Lane Park which will deliver wide-ranging landscaping, infrastructure and other improvements to the park which will also benefit its ecology.
- 6.258 Construction works could impact negatively on the SINC and bats through noise and dust emissions and works to trees. Therefore, a construction environmental management plan must be secured by condition to ensure these potential impacts are mitigated.
- 6.259 It is possible that lighting from the proposed development could impact on bat commuting routes associated with the line of mature Lime trees on the southern side of the site. To mitigate this risk a sensitive lighting strategy must be secured by condition to ensure that lighting-related impacts to these protected species are minimised. The strategy should ensure that new bat roosting features delivered as biodiversity enhancements to the scheme are not directly lit and the recommendations of the EclA must be followed in this regard.
- 6.260 A landscape and ecology management plan (LEMP) is also recommended to ensure that the development landscaping is suitable for foraging and commuting bats.
- 6.261 The Council's Nature Conservation Officer has confirmed that the ecological measures and proposed mitigation and enhancement measures are supported subject to conditions.

Urban Greening Factor

6.262 Prior to the demolition of buildings on site it was predominantly covered in hardstanding. The proposed development would provide large areas of tree planting, semi-natural vegetation, flower rich planting, green and blue roofs and sustainable drainage measures, amongst other green and planted features, that would significantly increase the ecology and biodiversity on site. The landscaping provision can be secured by condition to secure a high-quality scheme with effective long-term management.



6.263 An assessment of the Urban Greening Factor (UGF) has been provided by the applicant based on the surface cover types as described above. The proposal delivers an UGF of 0.45, which is greater than the policy requirement for predominantly residential development of 0.4 as described in London Plan Policy G5.

6.264 Therefore, it is considered that the proposed development is acceptable in terms of its impact on trees (a net increase of 59 trees), its ecology and biodiversity impact, and its provision of urban greening, subject to conditions.

Carbon Reduction and Sustainability

6.265 The NPPF requires development to contribute to the transition to a low carbon future, reduce energy consumption and contribute to and conserve the natural environment.

6.266 London Plan Policy SI2 states that major developments should be zero carbon, and in meeting the zero-carbon target a minimum on-site reduction of at least 35 per cent beyond Building Regulations is expected. Local Plan Policy SP4 requires all new developments to introduce measures that reduce energy use and carbon emissions. Local Plan Policy SP11 requires all development to adopt sustainable design and construction techniques to minimise impacts on climate change and natural resources.

- 6.267 DPD Policy DM1 states that the Council will support design-led proposals that incorporate sustainable design and construction principles and Policy DM21 expects new development to consider and implement sustainable design, layout and construction techniques.
- 6.268 The proposed development has sought to adopt a progressive approach in relation to sustainability and energy to ensure that the most viable and effective solution is delivered to minimise carbon emissions.

Carbon Reduction

- 6.269 Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon. The London Plan 2021 further confirms this in Policy S12.
- 6.270 The applicant has submitted an *Energy and Sustainability Statement* in support of this application. Photovoltaic panels would be provided on building roofs. The development is expected to connect to the Council's district energy network, which will provide heating and hot water to the proposed dwellings. If the development cannot connect to the energy network it will instead be heated through the provision of air source heat pumps.
- 6.271 The development would use no fossil fuel combustion and would be close to zero carbon. The fabric efficiency of the buildings would be exceptional. The majority of buildings within the development, including the entirety of Block A, would be capable of achieving Passivhaus certification and the remaining buildings would have a very low demand for comfort heating of habitable spaces.
- 6.272 The overall predicted reduction in carbon dioxide emissions for the proposed development shows a substantial reduction of 84% from the 2013 Building Regulations baseline model. This represents an annual saving of approximately 275 tonnes of carbon per year. 51 tonnes a year must be offset through a financial contribution of £145,350 which can be secured through a planning obligation.

Whole Life Carbon and Circular Economy

- 6.273 Policy S12 of the London Plan requires development proposals referable to the Mayor of London to calculate carbon emissions over the lifetime of the development and demonstrate that appropriate actions have been taken to reduce life-cycle carbon emissions.
- 6.274 S17 of the London Plan states that referable applications should promote circular economy outcomes and should aim to be net zero-waste.
- 6.275 The analysis undertaken in the *Energy and Sustainability Statement* submitted with the application indicates that the operational energy strategy for the development would significantly reduce carbon emissions in its later stages and the up-front emissions i.e. those used during the build stage will form the majority of the development's carbon footprint. The applicant's structural design team have worked hard to minimise carbon in the building materials. Further carbon reductions would be secured prior to the start of construction works by condition.

- 6.276 The development would meet the GLA's whole life carbon benchmarking requirements and would meet some of the more aspirational LETI (London Energy Transformation Initiative) 2020 design targets.
- 6.277 The applicant has submitted a *Circular Economy Statement* which confirms a range of circular economy principles have been used for this development including reusing and upcycling materials from the existing buildings and infrastructure as appropriate including in proposed building elements and foundations, diversion from landfill, processing waste locally, minimising construction waste and designing for longevity, adaptability, flexibility and disassembly at end of life. Materials from the perimeter fence will be reused in the landscaping. Reporting of the achievement of circular economy targets would be secured by condition.

Overheating

- 6.278 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.
- 6.279 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 report has modelled 62 homes (out of 272 homes, 23%) and 6 corridors under the London Weather Centre files. All rooms pass the overheating requirements for 2020s climate model predictions with the features including natural ventilation, high g-value glazing, external shading of south-facing windows, internal blinds, mechanical ventilation for some homes and active cooling for some homes.
- 6.280 Future overheating scenarios have also been considered and can be addressed through the future integration of comfort cooling and ceiling fans if needed. The Council's Climate Change Officer supports the overheating modelling undertaken and the mitigation measures proposed.

Summary

- 6.281 The proposal satisfies development plan policies and the Council's Climate Change Officer supports this application subject to the conditions and planning obligations. As such, the application is considered acceptable in terms of its carbon reduction and sustainability.

Flood Risk and Drainage

- 6.282 London Plan Policy SI12 states that flood risk should be minimised and Policy SI13 states that development proposals should aim to achieve greenfield run-off rates with water managed as close to source as possible.
- 6.283 Local Plan Policy SP5 and Policy DM24 of the DM DPD seek to ensure that new development reduces the risk of flooding and provides suitable measures for drainage.
- 6.284 The site is located within Flood Zone 2 which has a medium risk of flooding. The application has therefore been submitted with a *Flood Risk Assessment and Drainage Strategy (FRADS)*. The FRADS points out that the site has no history of flooding and

is at low risk from fluvial and surface water flooding. The site is also outside of identified critical drainage areas.



6.285 The development proposal includes a range of sustainable urban drainage systems and features to manage surface water on-site. The development is expected to achieve the required greenfield run-off rates. These include green and blue roofs, bio-retention areas, swale planting and a detention basin to mitigate surface water overflow, all of which would contribute towards the attenuation of surface water as well as contributing towards improving water quality and providing public amenity and biodiversity benefits.

6.286 The Council's Flood & Water Management Lead Officer has indicated that the drainage proposals are acceptable in principle subject to conditions for a detailed surface water drainage scheme and drainage calculations to be submitted and for confirmation of long-term management and maintenance. The Environment Agency have reviewed this application and have no comments to make.

6.287 The development would connect into the existing Thames Water sewer network. Thames Water has no objections to this proposal, subject to conditions.

6.288 As such, the proposed development is considered acceptable in terms of its risk of flooding and water management arrangements.

Land Contamination

- 6.289 Policy DM23 of the DM DPD requires proposals to demonstrate that any risks associated with land contamination can be adequately addressed to make the development safe.
- 6.290 A *Desk Study and Ground Investigation Report* has been submitted with the application. The report acknowledges the former depot use of the site and its provision of potential ground contaminants including a fuel filling station, oil tanks and asbestos buildings. Vehicle washing and repair facilities were also formerly provided at the site. The site also formerly included a reuse and recycling centre that has now closed. The site is largely covered by concrete and tarmac hardstanding. 33 samples were recovered for testing which found elevated levels of a range of contaminants.
- 6.291 The Council's Pollution Officer has reviewed the submitted documentation and states that further site investigations must be undertaken before construction work commences in accordance with the advice and recommendations of the report. This can be secured by condition. The Environment Agency has reviewed this application and have no comments to make.
- 6.292 Therefore, the proposed development is considered acceptable in terms of its land contamination risks, subject to conditions.

Fire Safety

- 6.293 In 2021 the Government introduced Planning Gateway One (PG1) for all 'relevant' developments i.e. those that contain two or more dwellings and which are 18 metres (or seven storeys) or greater in height. PG1 requires a fire statement to be submitted with planning applications for these relevant developments and also establishes the Health and Safety Executive as a statutory consultee for relevant development.
- 6.294 Policy D12 of the London Plan states that all development proposals must achieve the highest standards of fire safety. To this effect major development proposals must be supported by a fire statement.
- 6.295 The *London Plan Fire Statement* submitted with the application confirms that all external walls and any attachments such as balconies, soffits and balustrades would be constructed of fire-safe materials of Class A2-s1, d0 or higher. The masonry and metal frame of the proposed development would have the same high level of fire-rating.
- 6.296 All blocks would be fitted with sprinkler systems. Fire service vehicles would be able to reach the development via Park View Road, Ashley Road and the new park edge route, as necessary. The buildings over 18 metres in height would be provided with firefighting shafts, lobbies and lifts which would enable fire service personnel to access the building from ground floor level. All buildings lower than 18 metres in height would be fitted with a dry riser located within the stair enclosure which provides acceptable levels of access for firefighters and their equipment.
- 6.297 The covered car park has open sides, would be fitted with smoke control measures and would be further protected by an automatic fire suppression system.

- 6.298 The Health and Safety Executive has been consulted on this application and has confirmed that it is content with the proposal and satisfied with the information provided with the application, including the fire statement.
- 6.299 The GLA has stated that the *Fire Statement* measures and additional details including the provision of evacuation lifts should be secured by conditions.
- 6.300 As such, the proposed development is considered acceptable in respect of its fire safety provision.

Conclusion

- 6.301 The proposed development would meet the requirements of Site Allocation TH7 by providing high-quality new housing on this vacant former Council depot site and would provide non-residential uses that would support the local community.
- 6.302 The development would provide 272 new homes including 136 affordable homes (63% by habitable room) which will be delivered as Council Rent properties. 92 (67%) of the Council Rent homes would have three or more bedrooms.
- 6.303 The development would be of a high-quality design including very well-designed tall buildings which respect the visual quality of the local area, respond appropriately to the local context, and would not impact negatively on local heritage assets. The development is also supported by the Council's Quality Review Panel.
- 6.304 The development would provide high-quality residential accommodation of an appropriate size, mix and layout within a well-landscaped environment that extends the character of the adjacent Down Lane Park, consisting of high-quality new public realm areas including an improved park edge, and would also provide new amenity and children's play spaces.
- 6.305 The development has been designed to avoid any material adverse impacts on the amenity of nearby residential occupiers regarding a loss of sunlight and daylight, outlook or privacy and excessive levels of noise, light or air pollution.
- 6.306 The development would provide 42 car parking spaces including eight (19%) wheelchair-accessible parking spaces which meets the requirements of the London Plan and would be supported by other sustainable transport initiatives including high-quality cycle parking.
- 6.307 The development would include of a range of measures to maximise its sustainability and minimise its carbon emissions. It would achieve an 84% reduction in carbon emissions. Block A has the potential to achieve Passivhaus certification. The development would achieve a suitable urban greening factor and ecology on and adjacent to the site would be protected and enhanced.
- 6.308 The site's designated waste throughput has already been re-provided at an alternative site within Haringey.
- 6.309 All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted for the reasons set out above. The details of the decision are set out in the RECOMMENDATION

7. COMMUNITY INFRASTRUCTURE LEVY

7.1.1 Based on the information given on the submitted CIL form (and excluding the social housing for which it is expected social housing relief from CIL would be sought) the Mayoral CIL charge will be £1,335,501.22 (22,125.6sqm x £60.36) and the Haringey CIL charge will be £461,097.50 (22,125.6sqm x £20.84).

7.1.2 The CIL charge will be collected by Haringey from commencement of the development and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the RICS CIL Index. An informative will be attached advising the applicant of this charge.

8. RECOMMENDATION

GRANT PERMISSION subject to conditions in Appendix 1

Registered No. HGY/2022/0752

Applicant's drawing No.(s):

3742A-LB-XX-00-DP-A-120000-P3, 3742A-LB-ZZ-00-DP-A-120200-P3, 3742A-LB-ZZ-01-DP-A-120201-P3, 3742A-LB-ZZ-02-DP-A-120202-P3, 3742A-LB-ZZ-03-DP-A-120203-P3, 3742A-LB-ZZ-04-DP-A-120204-P3, 3742A-LB-ZZ-13-DP-A-120214-P3, 3742A-LB-B-XX-DE-A-130201-P3, 3742A-LB-B-XX-DE-A-130202-P3, 3742A-LB-B-XX-DE-A-130203-P3, 3742A-LB-C-XX-DE-A-130301-P3, 3742A-LB-C-XX-DE-A-130302-P3, 3742A-LB-BA-00-DP-A-120100-P3, 3742A-LB-BA-01-DP-A-120101-P3, 3742A-LB-BA-02-DP-A-120102-P3, 3742A-LB-BA-03-DP-A-120103-P3, 3742A-LB-BA-04-DP-A-120104-P3, 3742A-LB-BA-05-DP-A-120105-P3, 3742A-LB-A-XX-DE-A-130101-P3, 3742A-LB-A-XX-DE-A-130102-P3, 3742A-LB-A-XX-DE-A-130103-P3, 3742A-LBA-00-00-DP-L-20001, 3742A-LBA-00-00-DP-L-20000, 3742A-LBA-00-00-DP-L-20002, 3742A-LBA-00-00-DP-L-20003, 3742A-LBA-00-00-DP-L-20004, 3742A-LBA-00-04-DP-L-20005, 3742A-LBA-00-04-DP-L-20006, 3742A-LB-A-XX-DE-A-140000-GA, 3742A-LB-A-XX-DE-A-140001-GA, 3742A-LB-BA-06-DP-A-120106, 3742A-LB-BA-07-DP-A-120107, 3742A-LB-XX-XX-DP-A-100010, 3742A-LB-XX-XX-DP-A-100020, 3742A-LB-ZZ-05-DP-A-120205, 3742A-LB-ZZ-06-DP-A-120206, 3742A-LB-ZZ-07-DP-A-120207, 3742A-LB-ZZ-08-DP-A-120208, 3742A-LB-ZZ-09-DP-A-120209, 3742A-LB-ZZ-10-DP-A-120210, 3742A-LB-ZZ-11-DP-A-120211, 3742A-LB-ZZ-12-DP-A-120212, 3742A-LB-ZZ-13-DP-A-120213, 3742A-LB-ZZ-B1-DP-A-120199, 3742A-LB-ZZ-ZZ-DE-A-100030, 3742A-LB-ZZ-ZZ-DE-A-100031, 3742A-LB-ZZ-ZZ-DE-A-100040, 3742A-LB-ZZ-ZZ-DE-A-100041; 3230-1100-T-031-B, 3230-1100-T-032-B, 3230-1100-T-033-B.

Supporting documents also approved:

Energy and Sustainability Report Rev. H, Drainage calculations dated 12th April 2022, Air Quality Neutral Assessment dated March 2022, Sustainability requirements for small non-residential spaces document dated June 2022, Circular Economy Statement Rev. C, Ecological Impact Assessment, Tree Survey, Arboricultural Impact Assessment, Preliminary Arboricultural Method Statement & Tree Protection Plan, Biodiversity Net Gain calculations, Urban Greening Factor calculations, Design and Access Statement, London Plan Fire Statement, Fire Statement Form, Flood Risk Assessment and Drainage Strategy, Heritage Townscape & Visual Impact Assessment, Transport Assessment, Planning Utilities Assessment, Outline Site Waste Management Plan, Operational Waste Management Strategy.

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Appendix 1 – Conditions and Informatives

Conditions

- 1) The development hereby authorised must be begun not later than the expiration of three years from the date of this permission, failing which the permission shall be of no effect.

Reason: This condition is imposed by virtue of Section 91 of the Town and Country Planning Act 1990 and to prevent the accumulation of unimplemented planning permissions.

- 2) The development hereby permitted shall be carried out in material compliance with the following approved plans and specifications:

3742A-LB-XX-00-DP-A-120000-P3, 3742A-LB-ZZ-00-DP-A-120200-P3, 3742A-LB-ZZ-01-DP-A-120201-P3, 3742A-LB-ZZ-02-DP-A-120202-P3, 3742A-LB-ZZ-03-DP-A-120203-P3, 3742A-LB-ZZ-04-DP-A-120204-P3, 3742A-LB-ZZ-13-DP-A-120214-P3, 3742A-LB-B-XX-DE-A-130201-P3, 3742A-LB-B-XX-DE-A-130202-P3, 3742A-LB-B-XX-DE-A-130203-P3, 3742A-LB-C-XX-DE-A-130301-P3, 3742A-LB-C-XX-DE-A-130302-P3, 3742A-LB-BA-00-DP-A-120100-P3, 3742A-LB-BA-01-DP-A-120101-P3, 3742A-LB-BA-02-DP-A-120102-P3, 3742A-LB-BA-03-DP-A-120103-P3, 3742A-LB-BA-04-DP-A-120104-P3, 3742A-LB-BA-05-DP-A-120105-P3, 3742A-LB-A-XX-DE-A-130101-P3, 3742A-LB-A-XX-DE-A-130102-P3, 3742A-LB-A-XX-DE-A-130103-P3, 3742A-LBA-00-00-DP-L-20001, 3742A-LBA-00-00-DP-L-20000, 3742A-LBA-00-00-DP-L-20002, 3742A-LBA-00-00-DP-L-20003, 3742A-LBA-00-00-DP-L-20004, 3742A-LBA-00-04-DP-L-20005, 3742A-LBA-00-04-DP-L-20006, 3742A-LB-A-XX-DE-A-140000-GA, 3742A-LB-A-XX-DE-A-140001-GA, 3742A-LB-BA-06-DP-A-120106, 3742A-LB-BA-07-DP-A-120107, 3742A-LB-XX-XX-DP-A-100010, 3742A-LB-XX-XX-DP-A-100020, 3742A-LB-ZZ-05-DP-A-120205, 3742A-LB-ZZ-06-DP-A-120206, 3742A-LB-ZZ-07-DP-A-120207, 3742A-LB-ZZ-08-DP-A-120208, 3742A-LB-ZZ-09-DP-A-120209, 3742A-LB-ZZ-10-DP-A-120210, 3742A-LB-ZZ-11-DP-A-120211, 3742A-LB-ZZ-12-DP-A-120212, 3742A-LB-ZZ-13-DP-A-120213, 3742A-LB-ZZ-B1-DP-A-120199, 3742A-LB-ZZ-ZZ-DE-A-100030, 3742A-LB-ZZ-ZZ-DE-A-100031, 3742A-LB-ZZ-ZZ-DE-A-100040, 3742A-LB-ZZ-ZZ-DE-A-100041; 3230-1100-T-031-B, 3230-1100-T-032-B, 3230-1100-T-033-B.

Supporting documents also approved:

Energy and Sustainability Report Rev. H, Drainage calculations dated 12th April 2022, Air Quality Neutral Assessment dated March 2022, Sustainability requirements for small non-residential spaces document dated June 2022, Circular Economy Statement Rev. C, Ecological Impact Assessment, Tree Survey, Arboricultural Impact Assessment, Preliminary Arboricultural Method Statement & Tree Protection Plan, Biodiversity Net Gain calculations, Urban Greening Factor calculations, Design and Access Statement, London Plan Fire Statement, Fire Statement Form, Flood Risk Assessment and Drainage Strategy, Heritage Townscape & Visual Impact Assessment, Transport Assessment, Planning Utilities Assessment, Outline Site Waste Management Plan, Operational Waste Management Strategy.

Reason: In order to avoid doubt and in the interests of good planning.

- 3) Notwithstanding the provisions of the Town & Country Planning (Use Classes) Order 1987, or any provision equivalent to that Class in any statutory instrument revoking

and re-enacting that Order, the ground floor non-residential units hereby approved shall be used for activities within Use Class E only and shall not be used for any other purpose unless approval first is obtained to a variation of this condition through the submission of a planning application.

Reason: In order to restrict the use of the premises to those compatible with the surrounding area.

- 4) Notwithstanding the provisions of the Town & Country Planning General Permitted Development Order 2015 or any Order revoking or re-enacting that Order, no roof extensions, rear extensions, means of enclosure (walls/fences), shall be carried out without the grant of planning permission having first been obtained from the Local Planning Authority.

Reason: To safeguard the visual amenities of the area and to prevent overdevelopment of the site by controlling proposed extensions and alterations consistent with Policy D6 of the London Plan 2021 and Policy DM1 of the Development Management DPD 2017.

- 5) Prior to the commencement of above ground works detailed drawings (including sections) to a scale of 1:20 to confirm the detailed design and materials of the:
- a) Detailed elevational treatment;
 - b) Detailing of roof and parapet treatment;
 - c) Windows and doors (including plan, elevation and section drawings indicating jamb, head, cill, reveal and surrounds of all external windows and doors at a scale of 1:10), which shall include a recess of at least 115mm;
 - d) Details of entrances and porches which shall include a recess of at least 115mm;
 - e) Details and locations of down pipes, rainwater pipes or foul pipes and all external vents;
 - f) Details of balustrading;
 - g) Facing brickwork: sample panels of proposed brickwork to be used showing the colour, texture, pointing, bond, mortar, and brickwork detailing shall be provided;
 - h) Details of cycle, refuse enclosures and plant room; and
 - i) Any other external materials to be used;

together with a full schedule of the exact product references for all materials shall be submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be carried out solely in accordance with the approved details.

Reason: To safeguard and enhance the visual amenities of the locality in compliance with Policies DM1, DM8 and DM9 of the Development Management Development Plan Document 2017.

- 6) All residential units on site shall be built to Part M4(2) 'accessible and adaptable dwellings' of the Building Regulations 2013 (as amended), and at least 10% (eight dwellings) shall be wheelchair accessible or easily adaptable for wheelchair use in accordance with Part M4(3) of the same Regulations, unless otherwise agreed in writing in advance with the Local Planning Authority.

Reason: To ensure that the proposed development meets the Council's standards for the provision of wheelchair accessible dwellings in accordance with Local Plan 2017 Policy SP2 and London Plan Policy D7.

- 7) The placement of a satellite dish or television antenna on any external surface of the development is precluded, with an exception provided only for a communal solution(s). Details of any communal dish/antenna must be submitted to the Local Planning Authority for its written approval prior to the first occupation of any residential unit within the development hereby approved. The communal dish/antenna solutions provided shall thereafter be retained as installed.

Reason: To protect the visual amenity of the locality in accordance with Policy DM1 of the Development Management Development Plan Document 2017.

- 8) Prior to the first occupation of each building or part of a building or use, a 'Secured by Design' accreditation shall be obtained for such building or part of such building or use and thereafter all features are to be permanently retained. Accreditation must be achieved according to current and relevant Secured by Design guidelines at the time of above grade works of each building or phase of said development. Confirmation of the certification shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In the interest of creating safer, sustainable communities.

- 9) The commercial aspects of the development must achieve the relevant Secured by Design certification at the final fitting stage, prior to the commencement of business and details shall be submitted to and approved, in writing, by the Local Planning Authority.

Reason: In the interest of creating safer, sustainable communities.

- 10) Prior to first occupation of the development hereby approved details of all external lighting to approved building facades, street furniture, communal and public realm areas shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the Council's Senior Lighting Engineer and Nature Conservation Officer. Such details shall include location, height, type and direction of sources and intensity of illumination, demonstrated through a lux plan. Due regard shall be had to the recommendations of the approved Ecological Impact Assessment. The agreed lighting scheme shall be installed as approved and retained/maintained as such thereafter.

Reason: To ensure the design, ecological and environmental quality of the development is protected and enhanced and also to safeguard residential amenity in accordance with Policies DM1, DM19 and DM23 of the Development Management Development Plan Document 2017.

- 11) Prior to the first occupation of the development hereby approved full details of both hard and soft landscape works shall be submitted to and approved in writing by the Local Planning Authority, and these works shall thereafter be carried out as approved.

Details shall include information regarding, as appropriate:

- a) Proposed finished levels or contours;
- b) Means of enclosure;

- c) Hard surfacing materials including details of tonal contrasts between pedestrian, cycle and vehicle priority areas;
- d) Minor artefacts and structures (e.g. Furniture, play equipment, refuse or other storage units, wayfinding measures, signs, lighting etc.); and

Soft landscape works shall be supported by:

- e) Planting plans including a CAVAT assessment of existing and proposed trees;
- f) Written specifications (including details of cultivation and other operations associated with plant and/or grass establishment);
- g) Schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate; and
- h) Implementation and long-term management programmes (including a five-year irrigation plan for all new trees).

The soft landscaping scheme shall include detailed drawings of:

- i) Existing trees to be retained;
- j) Existing trees which will require thinning, pruning, pollarding or lopping as a result of this consent; and
- k) Any new trees and shrubs, including street trees, to be planted together with a schedule of species;
- l) Annotated plans and details on what measures will be delivered to the external amenity areas that will help adapt the development and its occupants to the impacts of climate change through more frequent and extreme weather events and more prolonged droughts;
- m) detailed final urban greening factor plan showing that a factor of greater than 0.4 has been achieved.

The approved scheme of planting, seeding or turfing comprised in the approved details of landscaping shall be carried out and implemented in strict accordance with the approved details in the first planting and seeding season following the occupation of the building or the completion of development (whichever is sooner). Any trees or plants, either existing or proposed, which, within a period of five years from the completion of the development die, are removed, become damaged or diseased shall be replaced in the next planting season with a similar size and species. The landscaping scheme, once implemented, is to be retained thereafter.

Reason: In order for the Local Planning Authority to assess the acceptability of any landscaping scheme, thereby ensuring a satisfactory setting for the proposed development in the interests of the visual amenity of the area consistent with Policy DM1 of the Development Management DPD 2017 and Policy SP11 of the Local Plan 2017.

- 12) Noise arising from the use of any plant and associated equipment shall not increase the existing background noise level (LA90 15mins) when measured (LAeq 15mins) 1 metre external from the nearest residential or noise sensitive premises. The applicant shall also ensure that vibration/structure borne noise derived from the use of any plant or equipment does not cause nuisance within any residential unit or noise sensitive premises.

Reason: To protect residential amenity in accordance with Policy DM1 of the Development Management DPD 2017.

- 13) Prior to the commencement of above ground works for the development hereby approved scaled drawings with details of the location and dimensions of secure and covered cycle parking facilities have been submitted to and approved in writing by the Local Planning Authority. The cycle parking spaces shall be provided in accordance with the London Cycling Design Standards. Such spaces shall be retained thereafter for this use only.

Reason: To promote travel by sustainable modes of transport and to comply with the London Plan 2021 minimum cycle parking standards and the London Cycling Design Standards.

- 14) The approved development shall not be occupied until a Delivery and Servicing Plan (DSP) has been submitted to and approved in writing by the Local Planning Authority. The DSP shall be updated in writing and re-submitted to the Local Planning Authority within the first six months of occupation or at 75% occupancy, whichever comes first. The development shall thereafter be implemented in accordance with the approved details and retained as such thereafter.

Reason: To enable safe, clean and efficient deliveries and servicing. In accordance with Policy DM21 of the Development Management DPD 2017.

- 15) (a) Prior to the commencement of above ground works for the development hereby approved, the following documents shall be submitted for the written approval of the Local Planning Authority, in accordance with the Ecological Impact Assessment hereby approved:

- i. Construction Environmental Management Plan
- ii. Sensitive Lighting Strategy
- iii. Landscape and Ecology Management Plan

(b) Prior to the first occupation of development, photographic evidence and a post-development ecological field survey and impact assessment shall be submitted to and approved by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures is in accordance with the approved measures.

Development shall accord with the details as approved and measures shall be retained for the lifetime of the development.

Reason: To ensure that the development provides the maximum provision and protection of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with Policies G1, G5, G6, S11 and S12 of the London Plan (2021) and Policies SP4, SP5, SP11 and SP13 of the Haringey Local Plan (2017).

- 16) Notwithstanding any provisions to the contrary, the 136 of the residential units within the development hereby approved shall be provided for rent at Council social-rent levels within the C3 use class, and for no other tenure or use unless otherwise agreed in writing in advance by the Local Planning Authority.

Reason: To define the scope of this permission in relation to the provision of affordable housing.

- 17) The development hereby approved shall not be occupied until the associated highway works, as set out in the approved plans and details, have been completed.

Reason: To ensure that the development includes accessible parking and does not prejudice the free flow of vehicular and pedestrian traffic or the conditions of highway safety generally.

- 18) The approved development shall not be implemented unless and until verified estimates of the 'Be Seen' energy performance indicators have been submitted to the GLA via their online portal and evidence of this, plus a metering strategy, has been submitted to the Local Planning Authority for its written approval.

Reason: To contribute towards sustainable development, energy reduction measures and climate change mitigation.

- 19) All parking spaces shall be provided with electric vehicle charging infrastructure. Details of the charging infrastructure shall be submitted to the Local Planning Authority for its written approval prior to installation. 20% of the spaces shall have 'active' charging points. The infrastructure shall be installed in accordance with the approved documentation and retained as such thereafter.

Reason: In order to ensure low carbon and low air quality impact of the development.

- 20) The applicant must ensure that the project architect (Levitt Bernstein Associates of 2-4 Thane Studios, Thane Villas, Islington, London, N7 7PA) continues to be employed as the project architect through the whole of the construction phase for the development except where the architect has ceased trading. The applicant shall not submit any drawings relating to details of the exterior design of the development that are required to be submitted pursuant to conditions of the planning permission unless such drawings have been prepared or overseen and agreed by the project architect.

Reason: In order to retain the design quality of the development in the interest of the visual amenity of the area and consistent with Policy SP11 of the Local Plan 2017.

- 21) In the event that the land within the red line (as per drawing no. 3742A-LB-XX-XX-DP-A-100020 Rev. P1) is sold and the parties with a legal interest in the land within the red line change, the new owners of the land shall enter into an agreement pursuant to Section 106 of the Town and Country Planning Act 1990 (as amended) prior to the commencement of above ground works, for planning obligations which shall otherwise be committed (as the Council is sole landowner) through a letter between the Assistant Director of Planning, Building Standards and Sustainability and the Director of Housing, Regeneration and Planning (attached to this application).

Reason: In the interests of proper planning and to ensure the adequate enforcement of planning obligations which are required to make the development acceptable in planning terms.

- 22) Before development commences other than for investigative work: Using the information already provided in sections 7 (Advice and Recommendations) and 8 (Outstanding Risks & Issues) of the submitted Desk Study & Ground Investigation Report Revision 1 with reference J21294 prepared by GEA Ltd dated March 2020, the applicant shall undertake: a. A further site investigation which 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 the remediation requirements. 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 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.

Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.

- 23) 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.

Reasons: 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 174 of the National Planning Policy Framework.

- 24) The site or Contractor Company shall 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 above ground level.

Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality.

- 25) Above ground works for the development hereby approved shall not commence until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).

i. A construction method statement which identifies the stages and details how works will be undertaken; 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; iii. Details of plant and machinery to be used during demolition/construction works; iv. Details of an Unexploded Ordnance Survey; v. Details of the waste management strategy; vi. Details of community engagement arrangements; vii. Details of any acoustic hoarding; viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance); ix. Details of external lighting; and, x. Details of any other standard environmental management and control measures to be implemented.

c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on: i. Dust Monitoring and joint working arrangements during the demolition and construction work; ii. Site access

and car parking arrangements; 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 of facilities such as concrete batching.

d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include: 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 the event of Local Authority Inspection; iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on 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.

The development shall be carried out in accordance with the approved details as well as in accordance with the approved Air Quality Assessment and/or Air Quality Neutral reports, as appropriate.

Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality.

26) No development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works. 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 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:

(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;

(B) Where appropriate, details of a programme for delivering related positive public benefits;

(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.

Reason: To comply with the requirements of paragraph 194 of the NPPF 2021 and Policy DM9 of the Development Management DPD 2017.

- 27) No development above ground level shall take place until a detailed Surface Water Drainage scheme for site has been submitted and approved in writing by the Local Planning Authority. The detailed drainage scheme should also accompany a detailed drainage plan appropriately cross-referenced to supporting calculations for the development and they should clearly indicate the location of all proposed drainage elements demonstrating that the surface water generated by this development (For all the rainfall durations starting from 15 min to 10080 min and intensities up to and including the climate change adjusted critical 100 yr storm) can be accommodated and disposed of without discharging onto the highway and without increasing flood risk on or off-site.

Reason: To ensure that the principles of Sustainable Drainage are incorporated into this proposal and maintained thereafter.

- 28) Prior to first occupation of the development hereby approved, a detailed drainage management and 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 scheme throughout the lifetime of the development. The development shall be constructed in accordance with the approved details and thereafter retained.

Reason: To prevent increased risk of flooding to improve water quality and amenity to ensure future maintenance of the surface water drainage system

- 29) Prior to commencement of above ground works for the development hereby approved, a construction phase fire strategy, to include: details of access for firefighting personnel and equipment; that there is sufficient firefighting water supply; and details of the evacuation strategy and assembly points in the event of a fire, should be provided to and approved by the Local Planning Authority. Once approved the development shall be completed in accordance with the approved details.

Reason: In line with Policy D12 of the London Plan 2021.

- 30) Prior to the first occupation of the development hereby approved, an updated Fire Strategy Statement to include the following additional details: where fire and rescue service pumping appliances are to be sited; the location of fire evacuation assembly points and mitigation measures to ensure they are kept clear of obstructions; evacuation strategy including provisions for the evacuation of mobility impaired residents and details of how the strategy would be communicated to residents; adequate firefighting water supply; how the FSS would be managed, updated and monitored as required, should be submitted to and approved by the Council. Once approved the development shall be completed in accordance with the approved details and retained as such thereafter.

Reason: In line with Policy D12 of the London Plan.

- 31) An updated Air Quality Assessment, including an Air Quality Neutral report, shall be submitted to the Local Planning Authority for its written approval prior to the commencement of above ground works for the development hereby approved. Once approved the development shall be completed in accordance with the approved details.

Reason: To Comply with the GLA Sustainable Design and Construction SPG.

- 32) Prior to the commencement of above ground works for the development hereby approved a Stage 2 Road Safety Audit based on the scope of the Stage 1 Road Safety Audit shall be submitted to the Local Planning Authority for its written approval. The recommendations of the Stage 2 RSA shall be taken up and followed in the design of the development as appropriate, and retained as such thereafter.

Reason: In order to protect amenity and the safety of the public highway.

- 33) Prior to the first residential or commercial occupation of the development (whichever occurs first) hereby approved a Car Parking Management Strategy (CPMS) shall be submitted in writing to and for approval by the Local Planning Authority. The CPMS shall confirm availability and management of all approved parking before occupation. The CPMS shall be implemented as approved and maintained thereafter.

Reason: In order to protect amenity, the safety of the public highway and to promote sustainable travel.

- 34) No piling shall take place until a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water. Any piling must thereafter be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground sewerage and water utility infrastructure.

- 35) Prior to the first occupation of the development hereby approved details of Vehicular Access Control Arrangements describing the detailed management of the access controls (e.g. raising bollards) and appropriate safeguards in case of damage or lack of functionality shall be submitted to the Local Planning Authority for its written approval. Details shall include information on bollard design, layout, spacing to enable larger cycles to pass through, management, maintenance, and rapid repairs and replacement in case of damage. One approved works shall be implemented in accordance with the approved details and retained as such thereafter.

Reason: To ensure suitable access controls for vehicles are provided and to ensure the safety of the public highway.

- 36) Prior to the first occupation of the development hereby approved details of the proposed junction of the park edge route with the new raised crossing on Ashley Road entrance, including details of the legibility of the pedestrian and cyclist environment, desire lines, accompanying signage, lining, tonal contrast and material choices, shall be submitted to the Local Planning Authority for its written approval. Once approved works shall be implemented in accordance with the approved details and retained as such thereafter.

Reason: To ensure the safety of the public highway.

- 37) Prior to the first occupation of the development hereby approved exact details of the play space to be installed within the development, around it and in other open spaces nearby shall be submitted to the Local Planning Authority for its written approval. Once approved works shall be implemented in accordance with the approved details and retained as such thereafter.

Reason: To meet the play space requirements of Policy S4 of the London Plan 2021.

- 38) Prior to the commencement of above ground works for the development hereby approved details of evacuation lifts for each block shall be submitted to the Local Planning Authority for its written approval. Once approved works shall be implemented in accordance with the approved details and retained as such thereafter.

Reason: In accordance with the requirements of Policy D5 of the London Plan 2021.

- 39) The development hereby approved shall be constructed in accordance with the Energy and Sustainability Statement and Appendices prepared by Etude (dated June 2022, Rev H) delivering a minimum 84% improvement on carbon emissions over 2013 Building Regulations Part L, with SAP10 emission factors, Passivhaus-level fabric efficiencies, connection to the Decentralised Energy Network with a centralised air source heat pump (ASHP) system as a backup solution, and a minimum 350 kWp solar photovoltaic (PV) array.

- (a) Prior to above ground construction, an updated 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 to achieve a minimum 30% reduction, including details to reduce thermal bridging;
 - Location, specification and efficiency of the proposed Plan B ASHP system (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures;
 - Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR) with and without cooling coils, with plans showing the rigid MVHR ducting and location of the unit;
 - 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.

(d) Within one year of first occupation, evidence shall be submitted to and approved by the Local Planning Authority to demonstrate how the development has performed against the approved Energy Strategy and to demonstrate how occupants have been taken through training on how to use their homes and the technology correctly and in the most energy efficient way and that issues have been dealt with. This should include energy use data for the first year and a brief statement of occupant

involvement to evidence this training and engagement.

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.

40) Prior to the above ground commencement of construction work, details relating to the future connection to the DEN must be submitted to and approved by the local planning authority. This shall include:

- Further detail of how the developer will ensure the performance of the DEN 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.);
- Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification.
- Detail of the pipe design, pipe sizes and lengths (taking account of flow and return temperatures and diversification), insulation and calculated heat loss from the pipes in Watts, demonstrating heat losses have been minimised together with analysis of stress/expansion;
- A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings should cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation;
- Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection is accessible by the area wide DEN, detailed proposals for installation for the route that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts;
- Details of the space allowance for the DEN main passing through the site from Park View Road to Ashley Road;
- Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals;
- Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DEN supply including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue;
- Details of a future pipework route from the temporary boiler location to the plant room.

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.

41) At least six months prior to the occupation of each non-residential unit, 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 of time 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 2020s, 2050s and 2080s for the CIBSE TM49 central London 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, 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.

Rason: 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.

42) (a) Prior to above ground works, an updated Overheating Report modelling future weather files shall be submitted to and approved by the Local Planning Authority. This assessment shall be based on the TM59 modelling undertaken by Etude (Energy and Sustainability Statement dated June 2022). This revised strategy shall include:

- Modelling of dwellings based on CIBSE TM59, using the CIBSE TM49 London Weather Centre files DSY1 for the 2020s, high emissions, 50% percentile;
- Modelling of mitigation measures required to pass the mandatory weather files, clearly setting out which measures will be delivered before occupation in line with the Cooling Hierarchy;
- Updated as-designed heat loss calculations from heat interface units and pipework.

(b) Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development:

- Natural ventilation, with openable areas including fixed louvred side panel for accessible bedrooms and secure night latch for other accessible habitable rooms;
- Glazing g-value of 0.50 or lower;
- External shading to south-facing windows on top floors (min. 1m depth);
- Brise soleil for other windows without balcony shading on south façades (1m full height, 0.8m for punched windows)
- External shutters for west-facing bedrooms (perforated/slatted shutters for airflow)
- Internal blinds on all façades (light-coloured, solar transmittance of 0.11);
- MVHR with summer bypass (min. 0.55ach);
- Minimal heat losses from heat interface units (HIU) and pipework;

- Active cooling with 1.5 kW cooling coil only for 19 dwellings with habitable rooms facing south-east;
- Any further mitigation measures identified as required in part (a).

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.

- 43) Prior to occupation of the residential dwellings, a Building User Guide for new residential occupants shall be submitted in writing to and for approval by the Local Planning Authority. The Building User Guide will advise residents how to operate their property during a heatwave, setting out a cooling hierarchy in accordance with London Plan (2021) Policy SI4 with passive measures being considered ahead of cooling systems. The Building User Guide will be issued to residential occupants upon first occupation.

Reason: In the interest of reducing the impacts of climate change and mitigation of overheating risk, in accordance with London Plan (2021) Policy SI4, and Local Plan (2017) Policies SP4 and DM21.

- 44) Prior to the commencement of construction works to Buildings A1-5, B2-3 and C2 only, a Design Stage Passivhaus Strategy shall be submitted to and approved by the Local Planning Authority. This should show that a Passivhaus level space heating demand target of 15 kWh/m²/year is achieved, accompanied by Passive House Planning Package (PHPP) calculations.

Within one month of completion of Buildings A1-5, B2-3 and C2, a Passivhaus Certificate will be submitted for approval demonstrating that Buildings A1-5, B2-3 and C2 meet the Passivhaus Standards, awarded by a suitably qualified independent Passivhaus Certifier.

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.

- 45) Prior to the commencement of construction works to Buildings B1 and C1, a Design Stage Passivhaus Strategy shall be submitted to and approved by the Local Planning Authority. Passive House Planning Package (PHPP) calculations should show that the design follows the Passivhaus methodology and achieve the highest level of energy efficiency that is technically feasible on this site, achieving a space heating demand target of 20 kWh/m²/year.

Within one month of completion of Buildings B1 and C1, air tightness certificates should be submitted to demonstrate that the development achieves the level of air tightness targeted in the PHPP model at pre-commencement stage. The dwellings are to achieve a maximum 20 kWh/m²/year space heating demand target, evidenced with a PHPP spreadsheet.

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.

- 46) Prior to the occupation of any building or development, 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 in accordance with London Plan (2021) Policies D3, SI2 and SI7, and Local Plan (2017) Policies SP4, SP6, and DM21.

- 47) 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 in accordance with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM21.

- 48) (a) At least two months prior to the occupation of the commercial units, the employer requirements setting the sustainability requirements for the non-domestic units should be submitted to and approved by the planning authority. This should achieve the highest possible standard through measurable outputs to demonstrate how environmental sustainability has been integrated into the development, seeking to deliver as a minimum the credits as outlined in the BREEAM Pre-Assessment. These measures shall be maintained thereafter for the lifetime of the development.

(b) Within six months after occupation, evidence of implementing the sustainability measures on site shall be submitted to the Local Planning Authority.

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.

- 49) (a) Prior to the commencement of above ground works, details of the living and blue roofs 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:

- i) A roof plan identifying where the living and blue roofs will be located;
- ii) A section demonstrating 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);
- iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roof, annotating contours of the varying depths of substrate
- iv) Details of the proposed type of invertebrate habitat structures 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;
- v) 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 the amount of 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);
- vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and
- vii) Management and maintenance plan, including frequency of watering arrangements.
- viii) A section showing the build up of the blue roofs and confirmation of the water attenuation properties, and feasibility of collecting the rainwater and using this on site;

(b) Prior to the occupation of 90% of the dwellings, evidence must be submitted to and approved by the Local Planning Authority that the living and blue roofs 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 has not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living and blue roofs 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, S11 and S12 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.

- 50) (a) At least 12 months prior to occupation of development, details of ecological enhancement measures and ecological protection measures shall be submitted to and approved in writing by the Council. This shall detail the biodiversity net gain, plans showing the proposed location of ecological enhancement measures, a sensitive lighting scheme, justification for the location and type of enhancement

measures by a qualified ecologist, and how the development will support and protect local wildlife and natural habitats.

(b) Prior to the occupation of development, photographic evidence and a post-development ecological field survey and impact assessment shall be submitted to and approved by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures is in accordance with the approved measures and in accordance with CIEEM standards.

Development shall accord with the details as approved and retained for the lifetime of the development.

Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.

51) The detailed design of the balconies, including screening features as appropriate, for the development hereby approved shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of above ground works. Once approved the details shall be implemented and retained as such thereafter.

Reason: To ensure the high-quality design and amenity of the development in accordance with Policy DM1 of the Development Management DPD 2017.

52) Prior to the first occupation of the development hereby approved a scheme of digital connectivity infrastructure shall be submitted to the Local Planning Authority for its written approval that shows how full fibre connectivity shall be facilitated to all residential and non-residential units. Once approved the details shall be implemented and retained as such thereafter.

Reason: In accordance with Policy SI6 of the London Plan 2021.

53) Prior to the commencement of works on site an Arboricultural Method Statement, in accordance with the tree protection measures shown in the approved Tree Survey, Arboricultural Impact Assessment Preliminary Arboricultural Method Statement & Tree Protection Plan shall be submitted to the Local Planning Authority for its written approval. Once approved the details shall be followed thereafter.

Reason: To protect trees in accordance with Policy DM1 of the Development Management DPD 2017.

54) Prior to the commencement of above ground works for the development hereby approved an existing condition survey will need to be carried out in collaboration with the Council with respect to the public highway along the site with particular reference to the carriageway, footway and crossovers. Prior to the first occupation of the development (and again on completion of the development if this occurs after first occupation) a similar final condition survey shall be undertaken. The applicant shall ensure that any damages caused by the construction works and highlighted by the before-and-after surveys are addressed and the condition of the public highway reinstated to the satisfaction of the Council. All costs to undertake the surveys and carry out any highway works should be paid in full by the applicant.

Reason: To ensure the construction works do not result in the deterioration of the condition of the public highway along the site.

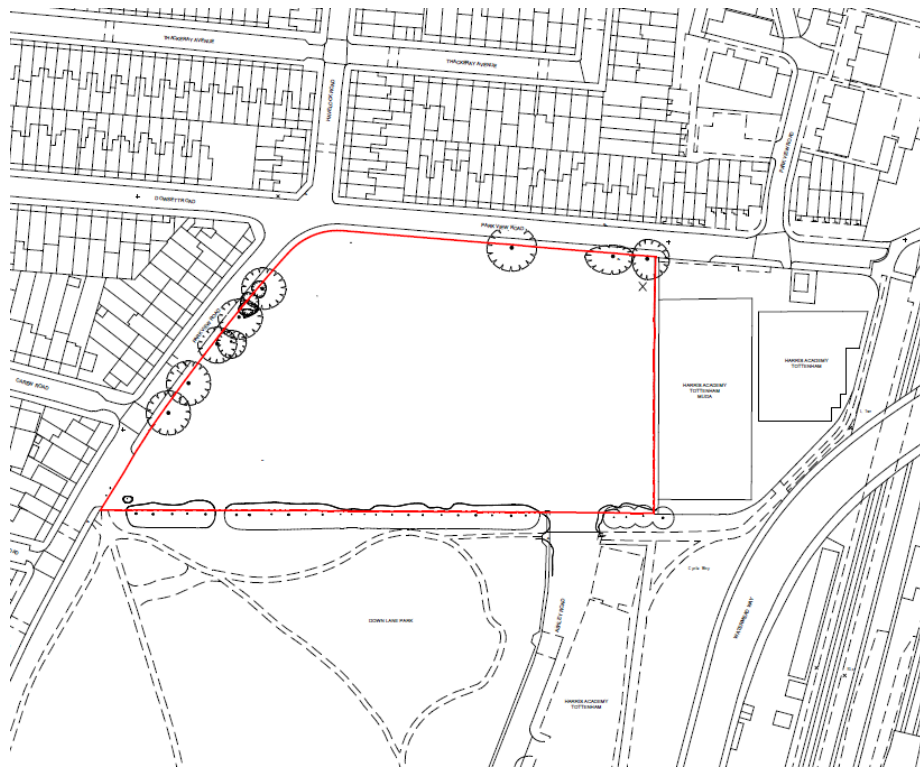
Informatives

1. In dealing with this application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our development plan comprising the London Plan 2021, the Haringey Local Plan 2017 along with relevant SPD/SPG documents, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably. In addition, where appropriate, further guidance was offered to the applicant during the consideration of the application.
2. Based on the information given on the plans, the Mayoral CIL charge will be £1,335,501.22 (22,125.6sqm x £60.36) and the Haringey CIL charge will be £461,097.50 (22,125.6sqm x £20.84). Social housing relief has been included in these calculations.
3. The applicant is reminded that this planning permission does not infer consent for any signage that may be attached to the development hereby approved and separate advertisement consent may need to be sought.
4. The new development will require numbering. The applicant should contact Haringey Local Land Charges at least six weeks before the development is occupied (tel. 020 8489 3797 / email: street.naming@haringey.gov.uk) to arrange for the allocation of a suitable address.
5. Prior to demolition of 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.
6. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
7. The applicant must seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to 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.
8. 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. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.
9. The design and siting of installations should take into account possible effects of noise, vibration and generation of airborne dust in regard to the operational railway. 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. Demolition work shall be carried out behind hoardings and dust suppression systems are to be employed to risk to the operational line.

10. Glint and Sunlight glare assessment should be carried out to demonstrate the proposed development does not import risk of glare to the train drivers which can obstruct in the visibility of the signals.
11. Operation of mobile cranes should comply with CPA Good Practice Guide 'Requirements for Mobile Cranes Alongside Railways Controlled by Network Rail'. Operation of Tower Crane should also comply with CPA Good Practice Guide 'Requirements for Tower Cranes Alongside Railways Controlled by Network Rail'. Operation of Piling Rig should comply with Network Rail standard 'NR-L3-INI-CP0063 - Piling adjacent to the running line'. Collapse radius of the cranes should not fall within 4m from the railway boundary unless possession and isolation on NR lines have been arranged or agreed with Network Rail.
12. Any Soakaways / attenuation ponds / septic tanks etc, required for the proposed scheme as a means of storm/surface water disposal should not be constructed within 10 metres of Network Rail's boundary or at any point which could adversely affect the stability of Network Rail's property/infrastructure. Storm/surface water must not be discharged onto Network Rail's property or into Network Rail's culverts or drains. Network Rail's drainage system(s) are not to be added to nor compromised by any proposed work(s). Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run-off onto Network Rail's property / infrastructure. Proper provision must be made to accept and continue drainage discharging from Network Rail's property. (The Land Drainage Act) is to be complied with. Suitable foul drainage must be provided separate from Network Rail's existing drainage. Once water enters a pipe it becomes a controlled source and as such no water should be discharged in the direction of the railway.
13. Any Outside Party projects that will be within 20m and/or any transmitter within 100m of the operational railway will be required to undertake an Electromagnetic Compatibility assessment to be carried out in accordance with Network Rail standards 'NR/L1/RSE/30040 & 'NR/L1/RSE/30041' and 'NR/L2/TEL/30066'.
14. Network Rail strongly recommends the developer contacts the Asset Protection Team AssetProtectionAnglia@networkrail.co.uk prior to any works commencing on site, and also to agree an Asset Protection Agreement with us to enable approval of detailed works. More information can also be obtained from our website <https://www.networkrail.co.uk/running-the-railway/looking-after-the-railway/assetprotection-and-optimisation/>

Appendix 2 – Plans and Images

Existing Site Location Plan



Aerial Image of Proposed Development



Proposed Block A Typical Upper Floor Plan



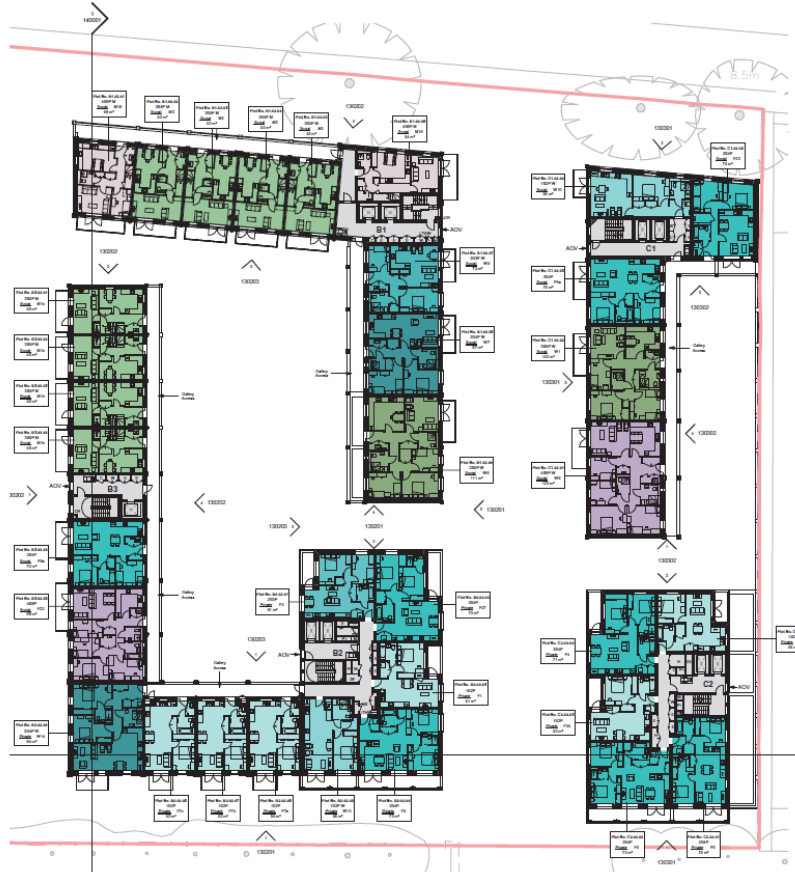
Proposed Block A Typical Upper Floor Plan



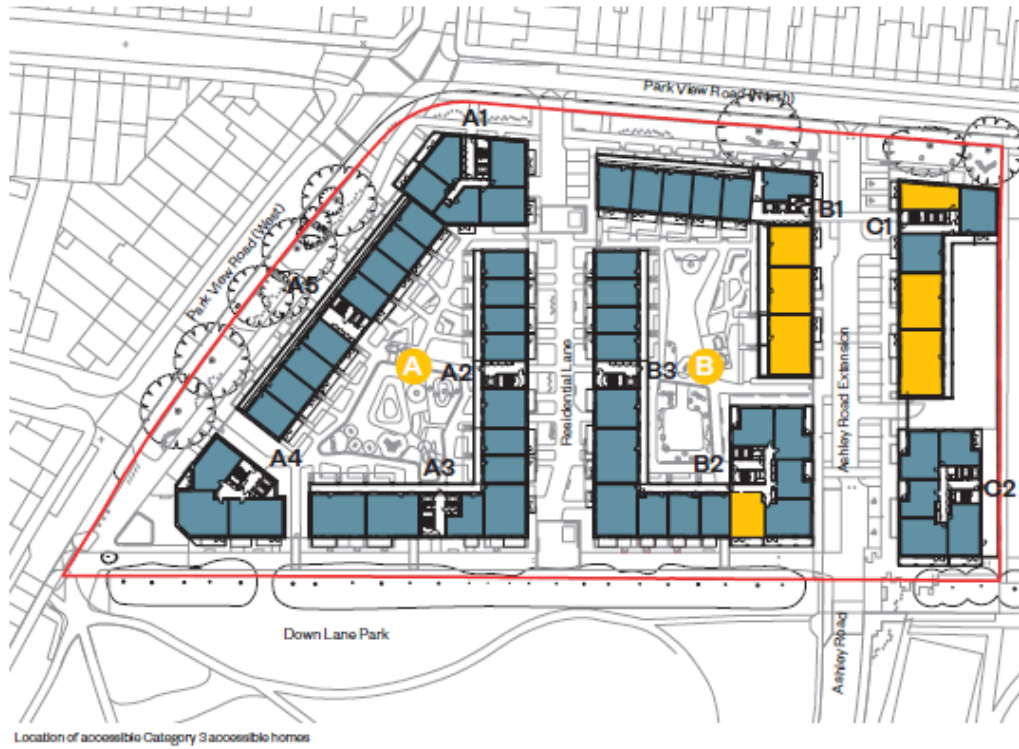
Proposed Block B & C Ground Floor Plan



Proposed Block B & C Typical Upper Floor Plan



Proposed Plan Showing Location of Wheelchair Units



Proposed Tenure Layout Plan



Proposed View from South on Down Lane Park



Proposed View from North-West Corner of Down Lane Park



Proposed View of Tall Buildings from Within Down Lane Park



Proposed View of Block C within Ashley Road Extension



Proposed View of Park View Road (west)



Proposed View from Havelock Road



Image from North on New Residential Lane



Image of Proposed Public Realm Landscaping on Park View Road (west)

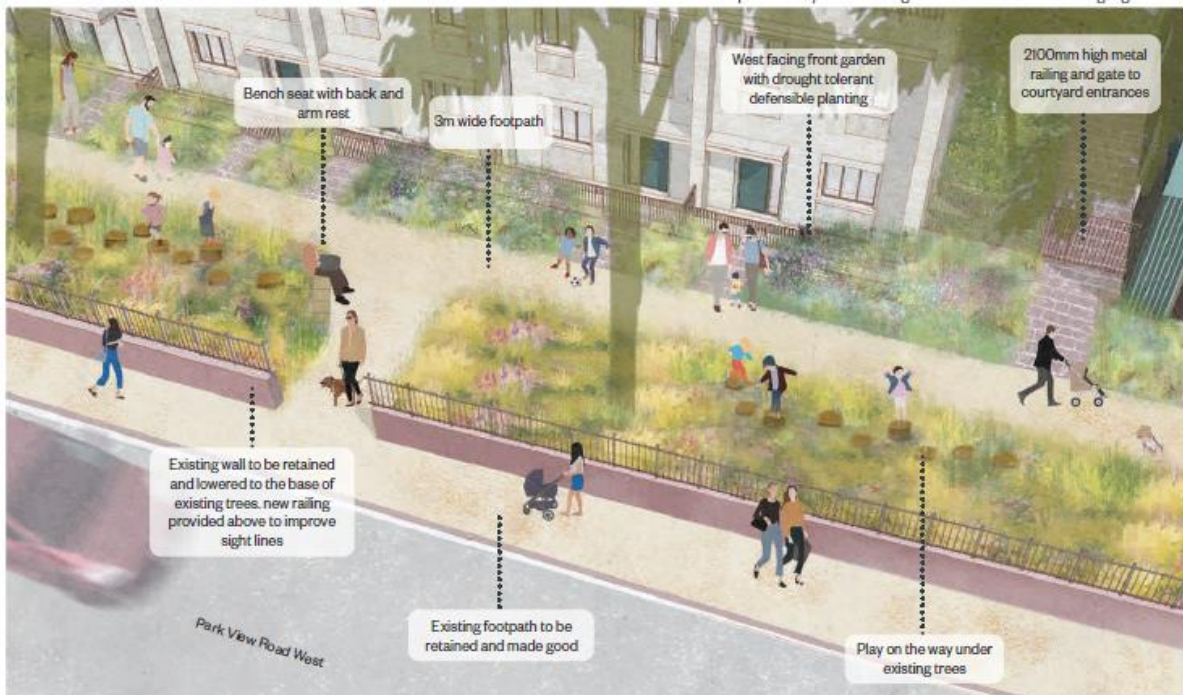


Image of Proposed Public Realm Landscaping at North-West Park Entrance

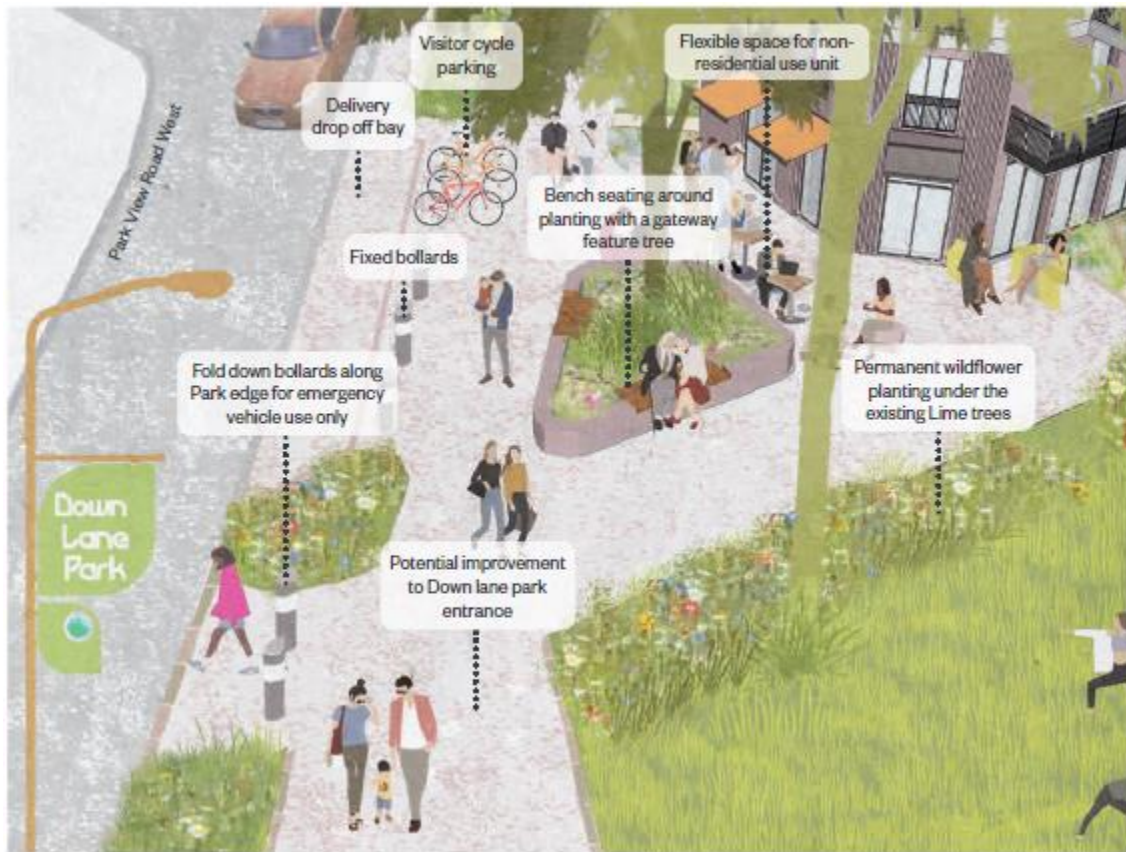


Image of Proposed Public Realm Landscaping at on New Park Lane



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Appendix 3 – Consultation Responses from Internal and External Agencies

Stakeholder (LBH)	Comments	Response
<p>Design Officer</p>	<p>The Council’s Quality Review Panel (QRP) agrees with officers that the proposals have “potential to become an exemplar for future development within the borough”, going on further in this, their second review to welcome the response to their previous review, at which “the panel supported many of the strategic decisions that have been made to date, including the broad layout, the network of routes and connections beyond the site, the hierarchy of streets and spaces and the configuration of the housing... [and] the increase of building heights”. Further refinements, including “greater distinctiveness to key buildings” requested at the final review have been secured and officers are confident these proposals represent an exemplary scheme to provide excellent, high quality housing and to significantly improve the quality and liveability of the neighbourhood into which they will comfortably fit.</p> <p><u>Masterplanning and Principal of Development</u></p> <ol style="list-style-type: none"> 1. This proposal represents one of the last developments envisaged in the Tottenham Hale District Centre Framework (DCF; adopted by the Council, November 2015, further adopted as planning policy in the Tottenham Area Action Plan DPD, July 2017), that envisaged the transformation of Tottenham Hale into a high-rise, high-density new district centre clustered tightly around the transport interchange. Specifically the DCF envisaged development of houses, maisonettes and flats on this site, at lower heights than the sites clustered around the transport interchange, “<i>which would reflect the grain of the existing housing streets in the area with higher density park-side apartments</i>”. The DCF goes into considerable detail on guidance and parameters for this site, and officers considered these proposals broadly follow them, if not precisely in detail. 2. The site also forms part of a Site Allocation in the Tottenham Area Action Plan Development Plan Document (AAP DPD), which has considerable weight as adopted 	<p>Comments have been taken into account. Materials to be controlled by condition.</p>

Stakeholder (LBH)	Comments	Response
	<p>planning policy (adopted July 2017). This, which also covers the neighbouring Harris Academy school site (completed 2018), designates the site as suitable for “<i>New residential development complementing the amenity of Down Lane Park, and the extension of Ashley Road as a pedestrian and cycling connection north through to Park View Road. Creation of new educational facility</i>”. The site allocation is considerably less detailed than the DCF, and the site requirements and development guidelines attached to the site allocation are all satisfied in this application.</p> <p>3. Therefore the principle of development and form of the overall masterplan is established by the District Centre Framework (DCF) and Area Action Plan (AAP).</p> <p><u>Tall Buildings, especially Height, Form and Composition</u></p> <p>4. Proposed heights range from four and five storeys along the existing street of Park View Road which forms the northern and western edge of the site, and along the two new streets proposed to run north-south across the site, with six storey linear blocks and three taller “point” blocks along the southern edge of the site, where it borders Down Lane Park; a seven storey corner block at the south-western corner and two tall blocks of ten and thirteen storeys, at the south-eastern corner, where the existing Ashley Road is proposed to be extended through the site, as the eastern of the two new streets.</p> <p>5. Therefore the height of the tallest two blocks meet the definition of Tall Buildings in the council’s adopted Local Plan: “<i>those which are substantially taller than their neighbours, have a significant impact on the skyline, or are of 10 storeys and over or are otherwise larger than the threshold sizes set for referral to the Mayor</i>” (paragraph 6.1.16 of the Strategic Policies, supporting text to SP11: Design), albeit only just. Yet they are outside of the zones defined as suitable “Potential Locations Appropriate for Tall Buildings (DM DPD, policy DM6)”. Nevertheless, the site is close to the large Tottenham Hale zone of suitability for tall buildings, where a significant cluster of tall buildings, rising to 36 storeys at the centre of the cluster, has been given planning approval, with many now built or under construction, including the tallest. Officers</p>	

Stakeholder (LBH)	Comments	Response
	<p>agree with the applicant and the QRP that the case has been made to consider this a suitable tall building proposal, that meets the other, more detailed criteria as itemised below and can be considered sufficiently close to the established tall building zone and of a sufficiently modest height to act as a transition between the tall building cluster and other, lower rise context.</p> <p>6. Considering each criterion from Haringey's tall building policy is set in SP11 of our Strategic Polices 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 District Centre Framework; • The council prepared a borough-wide Urban Characterisation Study (UCS) in 2016. The principle of tall buildings is not specifically endorsed in this location, but the UCS underestimated the demand for tall buildings in Tottenham Hale, blanketing the whole of this site, along with all the other sites around the eastern and southern sides of Down Lane Park for "mid-rise buildings" (12 – 21metres approx., 3-5 storeys). Development currently being built on the south side of the park range between 7 – 11 storeys, rising rapidly to a vibrant new tall buildings cluster at the heart of Tottenham Hale, around the new station square, rising to very tall buildings of up to 36 storeys; • Very high quality design of buildings and public realm is promised in these proposals, as detailed in later sections below; • The site is not close to any London wide strategic views corridors. It is close to only one Locally Significant View; View 20, "Watermead Way railway bridge - - - - > Alexandra Palace", which is considered in the applicants Heritage, Townscape and Visual Impact Assessment, which finds that the distant view of Alexandra Palace would not be obstructed, and assesses this proposal's impact on that view would be negligible, with which officers agree; 	

Stakeholder (LBH)	Comments	Response
	<ul style="list-style-type: none"> • Heritage assets and their settings are covered by the Conservation Officer's comments; • The proposal will be capable of being considered a "Landmark" by being a wayfinder and a marker for the route of Ashley Road continuing north from the park when viewed from the south, and marking the corner of the park and of the route of Ashley Road leading to the heart of Tottenham Hale, when glimpsed over rooftops or in vistas from the residential streets to the north and west and from the open spaces of Tottenham Marshes to the east; • It will also be capable of being considered a "Landmark" by being elegant, well proportioned and visually interesting when viewed from any direction as discussed below; • Consideration of impact on ecology and microclimate encompasses daylight, sunlight and wind, examined in detail below, which explain the impact is not significant. 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, woodland or an open waterway, which this is not. <p>7. The detailed design of the tower has undergone refinement, in conjunction with workshops with Officers and review by the QRP, during the course of this application, making the towers more slender and elegant. For the design to be successfully "read" in more distant views, there has to be a significant contrast between the base, middle and top, with a particularly distinctive to acting as a crown. In this the crown is formed by extending the vertical grid by two more floors than lower down. In this it will have a strong family resemblance to tall buildings in the Tottenham Hale cluster, which employ similar gridded elevational composition topped by a "crown".</p> <p>8. Therefore, the proposed tall buildings, really mini-towers in comparison to those at the heart of Tottenham Hale, but landmarks in the context of the two and three storey terraces of the existing residential streets close by, are considered appropriate in this location, legible as a landmark and as part of a wider context, striking and distinctive in design, capable of being seen as beautiful.</p>	

Stakeholder (LBH)	Comments	Response
	<p><u>Local, Wider & Strategic Views</u></p> <p>9. The applicants discussed suitable locations for local and more distant potential views of the site with officers from early in pre-application discussions and agreed a range of views to be modelled and assessed, which are found in their Heritage, Townscape and Visual Impact Assessment. These included the one potentially affected Locally Significant View from the council's adopted Development Management DPD policy DM5; View 20, "Watermead Way railway bridge - - - > Alexandra Palace", views of the site across Down Lane Park, from further down Ashley Road, from a range of residential streets to the north and west, from Tottenham Marshes and two points within the nearest Conservation Area on Tottenham High Road. Assessments were made of both the proposals alone and, where appropriate the cumulative affect of the proposals and other permitted or masterplanned nearby developments.</p> <p>10. Officers agree with the applicants' consultants' assessment in their Heritage, Townscape and Visual Impact Assessment that the assessed views are all minor beneficial, minor neutral or of no impact. In views which were of minor beneficial impact, the proposal would act as a wayfinder and a marker for the route of Ashley Road continuing north from the park when viewed from the south, and marking the corner of the park and of the route of Ashley Road leading to the heart of Tottenham Hale, when glimpsed over rooftops or in vistas from the residential streets to the north and west and from the open spaces of Tottenham Marshes to the east. The two conservation area views were amongst those where the assessment shows the proposals would not be visible.</p> <p><u>Place-making, Street Layout, Public Realm and Landscape Design</u></p> <p>11. Officers agree with the QRP's assessment that the street layout, public realm and landscape design is successful, and will be a fantastic opportunity to improve local access to Down Lane Park and create a stronger link to the wider Lee Valley to the east. In particular, officers agree with the QRP that the continuation of Ashley Road as a north-south route through the site is very positive. Officers consider the</p>	

Stakeholder (LBH)	Comments	Response
	<p>alignment of the second new street through the site as parallel to the continuation of Ashley Road, providing a second connection from the park to the residential streets to the north, to be more successful than an east-west street, parallel to the streets to the north and west, as shown in the DCF, would have been, and officers agree with the QRP that the “parkway” landscaped strips along the Park View Road the northern and western edges of the site are an excellent way of integrating the proposed development into the existing street grid whilst retaining existing mature trees, improving landscaping to those streets and providing a more spacious streetscape.</p> <p>12. Streets form the public realm in this proposal. They provide access to the new dwellings and routes for both new and neighbouring existing, including much improved routes to and setting for Down Lane Park. They also create a clear unambiguous boundary between public and private, with blocks lining those streets enclosing private communal courtyard gardens shared by all the blocks surrounding them, and with ground floors animated with regularly spaced, frequent front doors to ground floor flats and maisonettes. Ground floor flats and maisonettes generally also have private gardens; front gardens onto streets providing defensible space and approach to the front door, also accommodating bins and bikes, as well as back gardens onto private communal courtyards. The courtyards, though private, also contribute to the streetscene through strategic gaps and archways allowing glimpses from the public street of their bucolic paradise, as well as more prosaic service access. All in all, the street layout is exemplary in its robust, comprehensible, believable, best practice.</p> <p>13. Both public streets and private communal courtyards are proposed to be well landscaped with attractive, robust and durable hard and soft landscaping. The overwhelming majority of existing trees, many of which are fine mature samples, are retained and protected, and new street trees will supplement them to provide continuous street tree lining to the boundary Park View Road and Down Lane Park edges. The new streets and paths through and around the site are convincingly landscaped to restrict and reduce the dominance of vehicular traffic whilst</p>	

Stakeholder (LBH)	Comments	Response
	<p>accommodating necessary parking and servicing, with safe, well lit paths, raingardens with convincing management plans, accommodating mixtures of herbaceous and evergreen plants to provide year round greenery and street furniture to support clear robust routes to front doors. Courtyard landscaping is informed by sun shading to accommodate childrens’ play, sitting areas and communal growing areas in the right places. All the QRP points raised about landscaping have been successfully accommodated.</p> <p><u>Architectural Expression, Fenestration & Materiality</u></p> <p>14. Officers agree with the QRP’s welcoming of the architectural expression throughout the scheme, which promises to be elegant, well proportioned, composed and attractive. Distinct character is achieved through greater differentiation, as requested by the QRP, between the standard residential street properties in a more traditional, domestic brick and fenestration, park-side mansion blocks whose facades echo those on the south side of the park, the glazed brick of the “gateway” building on the south-west corner, with its non-residential ground floor, and the two mini-towers with their gridded facades.</p> <p>15. As well as the landmark towers and corners, great attention has been paid in design development, in response to officers and QRP concerns, to the “stacked maisonettes” that will line the Park View Road frontages on the northern and western edges of the site, so that the ground and first floor maisonettes will read as two storey terraced houses, with a strong rhythm, front doors and front gardens, with the upper maisonettes a further floor set behind a parapet hiding their access balcony, and with a pitched roof disguising their 4th floor. Additionally, all the situations where flat blocks and maisonettes meet or get close, at the corners of blocks and streets, have been carefully designed to turn corners comfortably, animate gable ends, provide overlooking and passive surveillance to gap spaces whilst avoiding overlooking and privacy concerns between homes, and provide all homes with attractive outlooks and good, secure private outdoor amenity space.</p>	

Stakeholder (LBH)	Comments	Response
	<p>16. Materials chosen promise to be robust, durable, appropriate to context and attractive of appearance, although they will of course be subject to condition.</p> <p><u>Residential Quality; Flat, Room & Private Amenity Space, Shape, Size, Quality, Aspect, Daylight and Sunlight</u></p> <p>17. As is to be expected, room, flat and amenity standards meet or exceed nationally set minima and indeed generally significantly exceed to meet the council’s higher housing standards. A great deal of thought has been put into layout and aspect to ensure all the proposed new homes have good practical and attractive relationships to their street, amenity space, day and sunlight and neighbours, whilst providing passive surveillance to all spaces within and around the site.</p> <p>18. 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>19. These find that the overwhelming majority of relevant habitable rooms within the proposed development will meet or exceed the BRE Guide recommended levels for daylight and sunlight. Of those that fall short of the recommendations, some living-dining-kitchens fall short of the higher kitchen standard but exceed the standard for living rooms, which is considered good, some living rooms and bedrooms fall just short, some rooms, generally second bedrooms, and fall more short where their windows have had to prioritise solar shading as part of the Passivhaus exemplary energy standard met. Sunlight to open spaces is good for public streets, but the three courtyard/podiums just fall short, inevitably due to the courtyard layout that prioritises to some extent good street layout over sunlit amenity space, but due to the high standard of landscaping proposed, including thoughtful placing of different landscape elements to best prioritise those most reliant on good sunlight, such as</p>	

Stakeholder (LBH)	Comments	Response
	<p>seating areas, the courtyard private communal amenity spaces should be very usable spaces, containing well sun lit areas.</p> <p>20. The applicants' consultants' assessment of the effect of the development on existing residential neighbours finds that with this proposed development, generally only minor losses of day and sun light will occur to an isolated number of windows and rooms. One window to the nearest end property on the west side of Havelock Street (running north from the north-west corner of the site) and 4 windows to the end property on the east side, would receive noticeable losses of daylight and/or sunlight, whilst a few windows to properties on the north side of Park View Road would receive noticeable losses, but generally the losses are minor, between 20 and 30% (where less than 20% loss is assessed by the BRE Report to not be noticeable), the occasional more affected window is usually a very much secondary window, such as in a side wall, and probably not vital to lighting an important habitable room. Where Vertical Sky Component (VSC) is calculated, and the recommended 27% is not achieved, generally at least 15% is retained. Officers agree that any loss in daylight and sunlight to existing neighbours is not considered significant.</p> <p>21. 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% 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><u>Summary</u></p>	

Stakeholder (LBH)	Comments	Response
	<p>These proposals are well designed and appropriate to the site. They are in accordance with the envisaged masterplan and will provide high quality homes at a reasonable density that marks a transition between the lower form and density, almost suburban two storey terraced housing of the existing residential streets to the north and west, and the new, very high density, high rise heart of Tottenham Hale. The proposed streets and private courtyards promise to be superb quality public and private realms, with great landscaping and framed by buildings of logical layout, clear fronts and backs, elegant proportions and attractive, durable, robust materials and details. They will fit into their context, animate the edge of the park and provide better connections between existing neighbourhoods, the new district centre and local parks.</p>	
Conservation Officer	<p>There are no designated or non-designated built heritage assets within the application site. The Tottenham High Road Historic Corridor extends along the High Road, including Bruce Grove Conservation Area, approximately 450m to the west of the site. The locally listed Berol House (no. 25 Ashley Road) is located approx. 350m south of the site, while Down Lane and Parkhurst School is located approx. 380 north-west of the site. The Locally Significant View 20, from Watermead Way to Alexandra Palace is outside of the site, to the south.</p> <p>A heritage assessment, including a heritage impact assessment and view assessment, has been undertaken in support of the proposed development.</p> <p>Due to the distance of the proposed development from any heritage assets and taking into consideration the intervening townscape and the changing context mainly around Tottenham Hale, it is not considered that the proposed scheme would result in any adverse impacts on any built heritage assets. The new buildings would not appear prominent or overwhelming in views relating to the historic environment and they would not affect the way any built heritage assets are appreciated and experienced. Therefore, there is no objection from a conservation perspective.</p>	Comments have been taken into account.

Stakeholder (LBH)	Comments	Response
Housing Officer	There are no objections from Housing Strategy and Policy team	Comments have been taken into account.
Transportation Officer	<p>I have reviewed this application, please find my comprehensive comments below. I have also set out a number of planning conditions and s.106 heads of terms, should planning permission be granted.</p> <p>Transport Assessment</p> <p><u>Development Proposals</u></p> <p>The proposed development is for the delivery of 272 new homes, of which 50% would be affordable dwellings, along with 174sqm of flexible use class E floorspace, new streetscape, landscaping, public realm and on-site parking. The site is currently occupied by an existing waste depot operated by Veolia on behalf of Haringey Council, with operational parking for 75 refuse collection vehicles and 75 staff car parking spaces. Access is currently gained from Ashley Road, in the southeastern corner of the site.</p> <p><u>Public Transport Accessibility Level (PTAL)</u></p> <p>The site's PTAL ranges from 2 to 5 according to TfL's WebCAT online tool. A manual recalculation has been undertaken at the Council's request, showing the actual PTAL ranges from 4 to 5 when taking into account all walking routes between future building entrances on site and all relevant local public transport nodes.</p> <p><u>Proposed Access Arrangements</u></p>	Comments have been taken into account. The recommended conditions and planning obligations will be secured.

Stakeholder (LBH)	Comments	Response
	<p>It is proposed to reduce the width of Ashley Road at its northern end and provide a raised crossing point for pedestrians and cyclists connecting Down Lane Park (to the south of the site) with the shared-use path east of the site. Two new north-south routes would be provided throughout the site, the extension of Ashley Road and a pedestrianised residential lane, for pedestrians, cyclists and limited motorised vehicle movements. Additionally, a new east-west route would be provided along the southern edge of the site, for pedestrians, cyclists, waste collection and emergency vehicles. Around the site, the existing footways along Park View Road to the west and north would also be improved. Although vehicle access would be gained via Ashley Road and Park View Road (North), there would be no-through route thanks to access controls, with emergency and waste collection vehicles exempted from such restrictions.</p> <p>A School Street on Ashley Road was launched in March 2022 and operates as the Harris Academy Tottenham Primary and Secondary (SS14) School Street, Monday to Friday 8:00-9:15 and 14:30-16:15 during term times. Access to the site between those hours would therefore be limited, during which residents would be able to access and egress the site from and onto Park View Road (North) only. Delivery and servicing vehicles would also access the site from Park View Road (North) only, whilst also being able to make use of the proposed loading bay on Park View Road (West).</p> <p>The extension of Ashley Road has been designed to accommodate 2m footways on both sides of carriageway and it is proposed to build it to Council's standards should it be adopted at a later date.</p> <p>The swept path drawings of cars and delivery and servicing vehicles (box vans) demonstrate that these vehicles would be able to manoeuvre into, within and out of the site (including parking spaces and the loading bays) with no difficulty.</p>	

Stakeholder (LBH)	Comments	Response
	<p>A standalone planning condition outlining the management of the access controls (e.g. raising bollards) and appropriate safeguards in case of damage or lack of functionality would be secured to ensure that general traffic would not be allowed to run freely between Ashley Road and Park View Road (North), to avoid creating a rat run, in line with a requirement within the Tottenham Area Action Plan TH7 Ashley Road North site allocation.</p> <p>TfL and the GLA have commented on the possibility of extending Park Edge further east to connect with the existing path running along the southern boundary of the site. Whilst there would be benefits in extending it to follow desire lines, there could also be additional highway safety risks associated with the presence of an extra crossing point, metres away from the proposed raised-table crossing located at the site's entrance on Ashley Road. Therefore, it has been agreed that no further link should be created, but we would seek a planning condition setting out the details of the crossing arrangements for pedestrians and cyclists at the site's entrance, including the interaction with Park Edge, which would include enhanced legibility of the environment to direct movements safely to the raised-table crossing.</p> <p><u>Road Safety Audit</u></p> <p>A Stage 1 Road Safety Audit has been carried out to assess the proposed and potential highway works, namely:</p> <ul style="list-style-type: none"> • the extension of Ashley Road to meet Park View Road North; • all streets internal to the site, two new accesses/crossovers onto Park View Road North; • proposed improvements to Ashley Road in the southeastern corner of the site (including a new pedestrian crossing and a realignment of the eastern kerb to narrow the carriageway); • a proposed loading bay on Park View Road West to the southwest of the site; 	

Stakeholder (LBH)	Comments	Response
	<ul style="list-style-type: none"> • potential junction improvements to the Dowsett Road/Park View Road junction, including a raised table, crossing facilities and a narrowed carriageway; • a potential loading bay along Park View Road North; and • a potential pedestrian crossing on Park View Road to the southwest of the site. <p>As a result of the findings of the RSA, a designer’s response has been prepared and a number of design changes have been made:</p> <ul style="list-style-type: none"> • visibility reviewed and increased along Park View Road (North); • removal of the proposed loading bay on Park View Road (North); and • extension of the raised table at the Ashley Road entry and exit point to be more effective in reducing oncoming vehicles’ speeds and mitigate any conflicts with pedestrian and cyclist movements along the public footpath running perpendicularly. <p>The raised-table informal crossing at the Ashley Road entrance would be covered by a S.278 highway works agreement. Any modifications to the existing on-street parking stock would be subject to s.278 agreement as well (including relining and resigning works), alongside a contribution to amend the Traffic Management Order.</p> <p>A Stage 2 RSA would be secured by planning condition and is expected to take account of the conclusions of the Stage 1 RSA.</p> <p>Please refer to the <u>On-Street Parking Impact</u> section for further details on the removal of parking spaces as a result of the findings of the RSA.</p> <p><u>Proposed Delivery, Servicing and Waste Collection Arrangements</u></p> <p>Delivery and servicing activity is proposed to be accommodated in dedicated loading bays both on the Ashley Road extension (private road) and on the western side of Park View Road (West) (public highway). Dedicated facilities for parcel storage are also proposed on</p>	

Stakeholder (LBH)	Comments	Response
	<p>site to help consolidate more deliveries onto fewer vehicles and reduce the number of failed delivery attempts. The primary access point would be via Ashley Road (outside the School Street's operational times), with a dedicated loading bay nearby. A turning area would be provided to assist vehicles in turning back and exiting the site as no-through access onto Park View Road (North) would be permitted. During the School Street's operational times, access would be gained via Park View Road (North).</p> <p>Waste collection would be undertaken from both the Ashley Road extension and the residential lane, with vehicles able to perform a loop within the site via Park Edge.</p> <p>Waste collection along the western side of the site (on Park View Road (West)) has been discussed at length with the applicant's team and it has been agreed that waste collection vehicles would be able to pull over along the double yellow lines, without the need for dedicated infrastructure (pavement parking was envisaged but is against the Council's policy; a footway setback to increase the carriageway width locally was also considered but the preservation of the existing trees on the eastern side of Park View Road (West) is non-negotiable and any highway works and change in layout could have an adverse impact on tree roots, which is also resisted by the Council).</p> <p>With this proposal, whilst vehicles would temporarily block the road for traffic, they would only cause a brief obstruction to traffic. The low traffic flows surveyed along Park View Road (West) demonstrate that waste collection vehicles briefly pulling over would likely not cause any queues. It is noted that the blocking of the carriageway most certainly already happens with waste collections from the opposite properties when the on-street parking bays on the other side of Park View Road (West) are in use.</p> <p>The swept path drawings of the waste collection and fire tender vehicles show that these vehicles would be able to manoeuvre into, within and out of the site with no difficulty.</p> <p><u>Proposed Cycle Parking</u></p>	

Stakeholder (LBH)	Comments	Response
	<p>Residential cycle parking is proposed to be provided in line with the London Plan (2021) minimum cycle parking standards, with long-stay parking provision broken down into the following systems:</p> <ul style="list-style-type: none"> • 5% as Sheffield stands for larger and adapted cycles; • 24% as Sheffield stands for regular cycles; and • 71% as two-tier stands. <p>The proposed aisle width in front of the two-tier racks is 2.5m. The London Cycling Design Standards state that <i>“A minimum aisle width of 2,500mm beyond the lowered frame is required to allow cycles to be turned and loaded”</i>, so the proposed layout seeks a departure from the standards. The transport consultant, upon further consultation, has clarified that the two-tier rack system chosen to be installed on site would be able to operate within these reduced aisle width constraints, and has provided examples of such systems able to function with a more limited depth.</p> <p>Residential short-stay cycle parking would be provided within the public realm across the site, in excess of the minimum London Plan requirements.</p> <p>Non-residential/retail cycle parking would be provided for 196sqm GEA. Due to the flexible use class E floorspace sought as part of this application, the most onerous cycle parking requirements derived from the London Plan (2021) minimum standards have been applied. It is stated that <i>“Given the small footprint of the proposed commercial space, it would be unpractical to accommodate these spaces within the unit”</i>. At the Council’s request, the transport consultant has explained that a single covered Sheffield stand with capacity for 2 cycles for use by employees of the non-residential floorspace. The stand would be accessed via a secure gate not open to the general public.</p> <p>The adequacy of the long-stay and short-stay cycle parking and access arrangements would be secured by planning condition. This would involve the provision of full details</p>	

Stakeholder (LBH)	Comments	Response
	<p>showing the parking systems to be used, access to them, the layout and space around the cycle parking spaces with all dimensions marked up on plans.</p> <p><u>Proposed Car Parking</u></p> <p>A total of 42 car parking spaces are proposed, equating to a car parking ratio of 0.15 spaces per dwelling, which is in line with the London Plan (2021) maximum car parking standards, with provision made for wheelchair users and families living in the proposed affordable dwellings, with an allocation strategy outlined in the Parking Design and Management Plan. Spaces would be located within a podium and on street within the site. No Parking Design and Management Plan has been provided although the Transport Assessment briefly touches upon general car parking management measures that would be enforced. A document would be secured by planning obligation as part of the s.106 agreement. Since there will be a substantial number of Council housing units, it is expected that strategy would be derived from existing estate parking management plans by Homes for Haringey.</p> <p>In accordance with the London Plan, a minimum provision for wheelchair users equating to 3% of dwellings would be available from the outset. Up to an extra 7% of dwellings could see disabled persons' parking provision delivered in future if demand arose, by the direct conversion of non-accessible spaces. Electric vehicle charging infrastructure would be fitted, with 20% of space benefitting from active charging points from the outset and the remainder, 80%, equipped with passive infrastructure, in line with London Plan policy.</p> <p>Due to the high site's PTAL (4/5), the inclusion of the site within the Hale Controlled Parking Zone, operating Monday-Friday 08:30-18:30, Monday-Friday (Event Days) 08:00-20:30, Saturday-Sunday 08:00-20:00 and Public Holidays 12:00-20:00, and the provision of accessible parking, the proposed development would qualify for a car-capped status in accordance with Policy DM32: Parking of the Development Management DPD.</p>	

Stakeholder (LBH)	Comments	Response
	<p>The Council would not issue any occupiers with on-street resident/business parking permits due to its car-free nature. The Council would use legal agreements to require the landowners to advise all occupiers of the car-capped status of the proposed development.</p> <p><u>Active Travel Zone Assessment</u></p> <p>An Active Travel Zone (ATZ) assessment has been carried out, with a number of routes to key travel destinations from the site assessed, with the following commentary:</p> <ul style="list-style-type: none"> • ATZ Route 1: Bruce Grove Overground station and Cycleway 1: The existing Havelock Road/Park View Road junction immediately northwest of the site is a wide crossroads with no formal pedestrian crossing point, with no dropped kerbs or tactile paving provided. It is recommended to provide formal crossings or Copenhagen-style crossings to link Park View Road with Dowsett Road, narrow the road or tighten kerb radii of the junction to slow traffic and prioritise pedestrians. The upgrade is also recommended as off-site improvements. • ATZ Route 1a: Harris Academy and Mulberry Primary School: Broken and uneven pavement on Parkhurst Road outside the medical centre, forming part of a vehicle crossover that appears unused. • ATZ Route 2: Tottenham Hale London Underground and National Rail station: The pavement on the west side of the Ashley Road adjacent to Down Lane Park is narrow and is surfaced either with pebbles in concrete or in compacted ground. Dropped kerbs could be provided to enable easier crossing across Ashley Road. • ATZ Route 3: Welbourne Primary School: Park View Road on the western side of Down Lane Park is punctuated by multiple crossovers which do not have dropped kerbs. The pavement could be restored to a continuous stretch of pavement along Park View Road using Copenhagen-style 	

Stakeholder (LBH)	Comments	Response
	<p>crossings. Alternatively, dropped kerbs and tactile paving could be installed side roads.</p> <ul style="list-style-type: none"> ATZ Route 4: Tottenham Marshes/Stonebridge Lock: The underpass that links Park View Road (North) to Tottenham Marshes could benefit from additional softer or coloured lighting to make the area look and feel more appealing. A scheme is currently being explored by the Council to install artwork in the underpass to improve the atmosphere in the area and discourage graffiti. Additional CCTV could also be introduced. <p>Additional off-site improvements have been identified:</p> <ul style="list-style-type: none"> New pedestrian crossing point to the west of Down Lane Park: A potential improvement could be the introduction of an informal raised-table crossing which would be expected to reduce vehicle speeds, make people crossing more visible, and make accessing the park more convenient. Upgraded Park View Road/Havelock Road/Dowsett Road junction: The existing junction has limited pedestrian crossing facilities, to be addressed through tightened carriageway radii, a raised table and additional crossing facilities (including a formal zebra crossing on the southern arm and Copenhagen-style crossings on the western and eastern arms). The need for an upgrade has also been identified as part of the review of ATZ Route 1 above. <p><u>Vision Zero/KSI Analysis</u></p> <p>A Vision Zero/Killed and Seriously Injured (KSI) analysis has been undertaken in conjunction with the ATZ assessment. The most recent 3-year data period has shown 5 serious collisions recorded along the key routes but no clusters of three or more have been identified.</p>	

Stakeholder (LBH)	Comments	Response
	<p><u>Proposed Multi-Modal Trip Generation</u></p> <p>The multi-modal trip generation methodology was discussed and agreed with Velocity during the pre-app consultations, involving a disaggregation of trips by journey purpose and specific modal splits applied to each journey purpose.</p> <p><u>Proposed Delivery and Servicing Trip Generation</u></p> <p>Up to 22 delivery and servicing vehicles a day are predicted to serve the proposed development, with a peak demand for 3 vehicles between 11:00 and 12:00. The loading bay requirements would therefore be met with the provision of two separate loading bays, one located on the Ashley Road extension within the site and another along Park View Road (West).</p> <p><u>Net Vehicular Traffic Generation</u></p> <p>The proposed development is predicted to result in a substantial decrease in vehicular movements, with 242 fewer two-way movements over the course of a day.</p> <p><u>Bus Impact Assessment</u></p> <p>The bus impact assessment is based on 2011 Census journey-to-work origin-destination and Google Maps journey planning software route allocation.</p> <p>Analysis of the number of additional bus trips per service does indicate that the impact would be negligible on the operation of the bus services likely to be used by site users, with a maximum average increase of 1.1 additional passengers on Route 243.</p> <p><u>Rail Impact Assessment</u></p>	

Stakeholder (LBH)	Comments	Response
	<p>The rail impact assessment shows that the proposed development would not adversely affect the operational capacity of the local London Underground, Overground and National Rail services. A gate line assessment at Tottenham Hale station has been undertaken at TfL's request and has found that, even with development trips, the existing numbers of gates serving the Victoria line and National Rail services would remain adequate in future. A line loading assessment for the Victoria line from Tottenham Hale station has also been carried out and it shows that London Underground services operate well within capacity, with the proposed development not having a perceptible impact (its demand would take up 0.1% of the existing capacity).</p> <p><u>Public Transport Impact Assessment</u></p> <p>It is concluded that the proposed development would not have any material impacts on existing local public transport capacities. A cumulative impact assessment is not considered necessary.</p> <p><u>Parking Stress Survey Analysis</u></p> <p>An overnight parking stress survey was undertaken on 13th and 14th July 2021 as per the Lambeth methodology. The findings of the survey are as follows:</p> <ul style="list-style-type: none"> - An average occupancy of 9% along Ashley Road; - An average occupancy of 57% along Park View Road (North); - An average occupancy of 69% along Park View Road (West); - Overall, average occupancies of resident permit-holder bays of 66% (5m parking bay length), 76% (5.5m parking bay length) and 83% (6m parking bay length); and - Overall, average occupancies of shared-use bays (resident permit-holder bays or Pay & Display) of 9% (5m parking bay length), 10% (5.5m parking bay length) and 11% (6m parking bay length). 	

Stakeholder (LBH)	Comments	Response
	<p>The above results show that there would be sufficient spare on-street parking capacity to accommodate any demand generated by the proposed development. Although it would be designated car-capped (whereby future residents would not allowed to obtain permits for themselves), a small amount of visitor parking would be generated (as car-capped agreements cannot prevent residents from applying for visitor permits, such as permits for carers).</p> <p><u>Car Club Spaces</u></p> <p>The applicant has consulted Zipcar who has advised that the local car club spaces located on Mafeking Road close to the site were utilised at a rate of 51.3% in 2021. From experience, Zipcar calculates usage levels over 24-hour periods, which may not necessarily reflect when cars are actually needed during the daytime. Therefore, it is assumed that the actual usage rates of the 2 bays on Mafeking Road is higher than reported.</p> <p>Zipcar has also advised that up to 2 additional bays are required as a result of the development proposals. It is suggested that one space be provided upon first occupation of the development, with the second space provided when demand exceeds 15% above the fleet average for 8 weeks. As we do not agree with the methodology used by Zipcar to calculate space usage, we would request that 2 car club bays be available from the outset.</p> <p>The transport consultant has advised that the applicant is willing to implement 2 bays from first occupation, which would be located on Ashley Road and cause the loss of 2 on-street parking spaces. The parking stress survey has shown that such a loss would not have any significant impact upon the residual on-street parking capacity along Ashley Road.</p> <p><u>On-Street Parking Impact</u></p>	

Stakeholder (LBH)	Comments	Response
	<p>At the Council's request, an on-street parking impact analysis has been undertaken to establish the number and locations of on-street parking spaces that would be lost as a result of the development proposals. A loss of 10 spaces on Park View Road (North) and Ashley Road would be associated with the need to increase visibility for vehicles coming out of the Ashley Road extension and the Residential Lane onto Park View Road (North), and the delivery of the raised-table pedestrian crossing and 2 car club spaces on Ashley Road. A further loss of 7 spaces would be attributable to the potential off-site highway improvement schemes at the Park View Road/Dowsett Road junction and the new pedestrian crossing on Park View Road (West).</p> <p>The residual on-street parking capacity in the vicinity of the site post-redevelopment would remain satisfactory, with Ashley Road predicted to have an average occupancy of 20% only. Both Park View Road (North) and Park View Road (West) would experience stress levels in the region of 80%-90%. Given that the proposed development would be designated car-capped, with the potential for car demand confined to the site and some demand for on-street parking likely to arise from visitor permits, and considering that the overall parking stress within 200m of the site would remain around 70%, we agree that the impact of the proposed development would be acceptable.</p> <p>Outline Construction Logistics Plan</p> <p>An Outline Construction Logistics Plan has been submitted as a chapter of the Transport Assessment. Early estimates indicate that there would be a total of 1,500 vehicle movements during the initial 3-month period, equating to 25 movements per day. During the remaining 27 months of the programme, the total vehicles movements would amount to 2,000, equating to 4 movements per day.</p> <p>Indicative construction traffic routes between the site and the Transport for London Road Network have been included and show access and egress routes both during and outside the School Street's controlled hours (07:45-08:45 and 15:00-16:45).</p>	

Stakeholder (LBH)	Comments	Response
	<p>Site workers would be encouraged to travel to and from the site by cycle and public transport. Cycle racks and a limited amount of car parking would be provided to support sustainable and active travel modes.</p> <p>A Detailed Construction Logistics Plan would be secured by planning condition.</p> <p>Delivery and Servicing Plan</p> <p>An Outline Delivery and Servicing Plan has been included and is acceptable. A Detailed Delivery and Servicing Plan would be secured by means of a planning condition. The document should set out the proposed access and loading strategy during the School Street's operational hours.</p> <p>Residential Travel Plan</p> <p>When setting modal share targets, choosing the AM peak-hour modal split, instead of a more general modal split across the day, is questioned. The AM peak-hour modal split has a very high walking mode share (as opposed to that of the PM peak hour), therefore it may not be representative. It would be preferable to use an average or weighted modal split derived from Table 6.10 of the Transport Assessment which is not associated with any particular time of the day.</p> <p>Ideally, with a revised baseline walking mode share (not as high as the suggested 41%), we should target an increase over time, ambitious yet realistic.</p> <p>The cycling mode share increase over the course of the 5-year monitoring period is really ambitious. Going from 2% to 8%, therefore a 300% increase, seems difficult as the leverage which the Travel Plan has on residents generally is limited.</p>	

Stakeholder (LBH)	Comments	Response
	<p>It is recognised that the baseline mode share set out in Table 5.1 would be revised upon completion of the baseline resident travel survey, with appropriate mode share targets set thereafter. No further action is required at this stage to address the aforementioned queries.</p> <p>Recommended Planning Conditions</p> <ul style="list-style-type: none"> - Cycle Parking Details – in line with London Plan standards and London Cycling Design Standards - Vehicular Access Control Arrangements (Ashley Road Extension, Residential Lane, Park Edge) – outlining the management of the access controls (e.g. raising bollards) and appropriate safeguards in case of damage or lack of functionality - Hard landscaping details of the proposed junction of Park Edge with Ashley Road Extension and proposed crossing at the Ashley Road entrance – including details of legibility of the pedestrian and cyclist environment, desire lines, accompanying signage, lining, tonal contrasts and material choices - Stage 2 Road Safety Audit – based on the scope of the Stage 1 Road Safety Audit - Detailed Delivery and Servicing Plan - Detailed Construction Logistics Plan - Public Highway Condition <p>Recommended Section 106 Heads of Terms / Planning Obligations</p>	

Stakeholder (LBH)	Comments	Response
	<ul style="list-style-type: none"> - Car-Capping – both residential and commercial, including £5,000 towards the amendment of the local Traffic Management Order (amount to cover all amendments to the local Traffic Management Order as a result of the highway works and alterations to on-street parking and other parking restrictions) - Car Club: <ul style="list-style-type: none"> o Car club provision (2No. off-site spaces on Ashley Road) subject to monitoring and revision if additional demand arises (to be managed through the Residential Travel Plan and Parking Design and Management Plan) 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 - Parking Design and Management Plan including but not limited to: <ul style="list-style-type: none"> o Operation during the School Street's operational hours o Vehicular access control arrangements o Provision of electric vehicle charging points – both active and passive o Space allocation strategy and priority order (wheelchair-accessible users, family dwelling residents etc) o Car club bay management - Residential Travel Plan (including Interim and Full documents, monitoring reports and a £10,000 monitoring contribution) including but not limited to: <ul style="list-style-type: none"> o Appointment of a Travel Plan Coordinator (to also be responsible for monitoring the Delivery Servicing Plan) o Provision of welcome induction packs containing public transport and cycling/walking information, map and timetables to every new household 	

Stakeholder (LBH)	Comments	Response				
	<ul style="list-style-type: none"> ○ Car club demand monitoring - CPZ contribution to the ongoing review and expansion of existing Controlled Parking Zones – £20,000 - Section 278 Highway Works – scope and extent of on-site and off-site works to be defined after obtaining detailed Section 278 drawings for costing estimate purposes - Transport Contributions towards the funding of Walking and Cycling Action Plan measures: <table border="1" data-bbox="470 715 1599 1238"> <thead> <tr> <th data-bbox="470 715 1599 756">Requested for this application</th> </tr> </thead> <tbody> <tr> <td data-bbox="470 756 1599 900"> <ul style="list-style-type: none"> ○ Walking routes along both sides of Down Lane Park – Improved accessibility and permeability to leisure routes – Dropped kerbs, tactile paving, signage, limited resurfacing - £120,000 </td> </tr> <tr> <td data-bbox="470 900 1599 1107"> <ul style="list-style-type: none"> ○ Lighting upgrade for the Park View Road (North) Underpass to Tottenham Marshes - £40,000 (subject to be revised upwards to include the contribution made by LBH Regeneration towards underpass improvements – the total would be £100,000 + £40,000 = £140,000) </td> </tr> <tr> <td data-bbox="470 1107 1599 1238"> <ul style="list-style-type: none"> ○ North Tottenham Low Traffic Neighbourhood - Planters, ANPRs, reducing rat running to improve walking and cycling environment - £50,000 </td> </tr> </tbody> </table>	Requested for this application	<ul style="list-style-type: none"> ○ Walking routes along both sides of Down Lane Park – Improved accessibility and permeability to leisure routes – Dropped kerbs, tactile paving, signage, limited resurfacing - £120,000 	<ul style="list-style-type: none"> ○ Lighting upgrade for the Park View Road (North) Underpass to Tottenham Marshes - £40,000 (subject to be revised upwards to include the contribution made by LBH Regeneration towards underpass improvements – the total would be £100,000 + £40,000 = £140,000) 	<ul style="list-style-type: none"> ○ North Tottenham Low Traffic Neighbourhood - Planters, ANPRs, reducing rat running to improve walking and cycling environment - £50,000 	
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Carbon Management Officer	<p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> • Energy and Sustainability Statement and Appendices prepared by Etude (dated June 2022, Rev H) 	Comments have been taken into account. The				

Stakeholder (LBH)	Comments	Response																																																																																											
	<ul style="list-style-type: none"> • Circular Economy Statement prepared by Etude (dated March 2021, Rev C) • Whole Life Carbon Spreadsheet Rev B • Circular Economy Statement Rev C <p>Energy Strategy The revised carbon reduction tables are noted below.</p> <table border="1" data-bbox="483 534 1597 1181"> <thead> <tr> <th colspan="7">DEN Connection Scenario (Plan A)</th> </tr> <tr> <th></th> <th colspan="2">Residential</th> <th colspan="2">Non-residential</th> <th colspan="2">Site wide</th> </tr> <tr> <td><i>(SAP10 emission factors)</i></td> <th>tCO₂</th> <th>%</th> <th>tCO₂</th> <th>%</th> <th>tCO₂</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Baseline emissions</td> <td>324</td> <td></td> <td>2</td> <td></td> <td>326</td> <td></td> </tr> <tr> <td>Be Lean savings</td> <td>96</td> <td>30%</td> <td>0.7</td> <td>35%</td> <td>97</td> <td>30%</td> </tr> <tr> <td>Be Clean savings</td> <td>116</td> <td>36%</td> <td>0.2</td> <td>10%</td> <td>116</td> <td>36%</td> </tr> <tr> <td>Be Green savings</td> <td>62</td> <td>19%</td> <td>0</td> <td>0%</td> <td>62</td> <td>19%</td> </tr> <tr> <td>Cumulative savings</td> <td>274</td> <td>85%</td> <td>0.9</td> <td>45%</td> <td>275</td> <td>84%</td> </tr> <tr> <td>Carbon shortfall to offset (tCO₂)</td> <td colspan="2">50</td> <td colspan="2">1.1</td> <td colspan="2">51</td> </tr> <tr> <td>Carbon offset contribution (+ 10% management fee)</td> <td colspan="6">£95 x 30 years x 51 tCO₂/year = £145,350</td> </tr> </tbody> </table> <table border="1" data-bbox="483 1217 1597 1366"> <thead> <tr> <th colspan="7">ASHP Scenario (Plan B)</th> </tr> <tr> <th></th> <th colspan="2">Residential</th> <th colspan="2">Non-residential</th> <th colspan="2">Site wide</th> </tr> <tr> <td><i>(SAP10 emission factors)</i></td> <th>tCO₂</th> <th>%</th> <th>tCO₂</th> <th>%</th> <th>tCO₂</th> <th>%</th> </tr> </thead> <tbody> </tbody> </table>	DEN Connection Scenario (Plan A)								Residential		Non-residential		Site wide		<i>(SAP10 emission factors)</i>	tCO₂	%	tCO₂	%	tCO₂	%	Baseline emissions	324		2		326		Be Lean savings	96	30%	0.7	35%	97	30%	Be Clean savings	116	36%	0.2	10%	116	36%	Be Green savings	62	19%	0	0%	62	19%	Cumulative savings	274	85%	0.9	45%	275	84%	Carbon shortfall to offset (tCO₂)	50		1.1		51		Carbon offset contribution (+ 10% management fee)	£95 x 30 years x 51 tCO ₂ /year = £145,350						ASHP Scenario (Plan B)								Residential		Non-residential		Site wide		<i>(SAP10 emission factors)</i>	tCO₂	%	tCO₂	%	tCO₂	%	recommended conditions and planning obligations will be secured.
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Stakeholder (LBH)	Comments						Response		
	Baseline emissions	324		2		326			
	Be Lean savings	110	34%	0.7	35%	111			
	Be Clean savings	111	34%	0	0%	111			
	Be Green savings	62	19%	0	0%	62			
	Cumulative savings	283	86%	0.7	35%	371			
	Carbon shortfall to offset (tCO₂)	41		1.3		42			
	Carbon offset contribution (+ 10% management fee)	£95 x 30 years x 42 tCO ₂ /year = £119,700							
	<p>Be Lean The total energy consumption from the MVHR cooling coils was modelled to be 1,009 kWh/year for all 19 dwellings, or 0.8 kWh/m²/year.</p> <p>Be Clean The report revised the carbon factors in line with the current GLA Energy Assessment Guidance requirements, under Part L 2013.</p> <p>Be Green The report has corrected the number of panels to 973 individual 360W solar panels, still with a total output of 350 kWp on a total roof area of 1,742 m².</p> <p>Whole Life Carbon The updated report, in summary, includes the whole life carbon emissions for the development.</p>								

Stakeholder (LBH)	Comments			Response
		Estimated carbon emissions	Meets GLA benchmark?	
	Modules A1-A5	691 kgCO _{2e} /m ²	Meets GLA benchmark (<800 kgCO _{2e} /m ²) but misses the aspirational target (<500 kgCO _{2e} /m ²)	
	Modules B-C (excl. B6 and B7)	116 kgCO _{2e} /m ²	Meets GLA target (<400 kgCO _{2e} /m ²) and aspirational benchmark (<300 kgCO _{2e} /m ²)	
	Module D	-110 kgCO _{2e} /m ²	N/A	
	<p>The development currently meets LETI embodied carbon rating C (2020 Design Target) for Modules A1-B5, C1-C4. It misses target for Modules A1-A5 (rating D).</p> <p>Sustainability – Non-domestic A draft set of Employer Requirements was submitted to illustrate how measurable sustainability benefits should be delivered.</p> <p>Planning Obligations Heads of Terms</p> <ul style="list-style-type: none"> - Connect to the DEN with an interim heating solution if phasing allows, this should be a communal gas boiler (Building Regulations Part L 2021 (para 2.7) allows dwellings to be completed on gas boilers as long as a low carbon alternative, in this case either the ASHP or DEN, is in course of being implemented by December 2027). If phasing does not allow, the development would need to be completed with a permanent solution (the DEN if connection has been resolved in time or the ASHP) - DEN connection and feasibility (and associated obligations) 			

Stakeholder (LBH)	Comments	Response
	<ul style="list-style-type: none"> - Submit justification and details of the backup ASHP heating solution if not connecting to the DEN - Re-calculation of the carbon offset contributions prior to commencement (which is one of the requirements of the Energy Plan) - Deferred offset contribution based on ASHP fallback option - A covenant to comply with the Council's standard DEN specification for the building DEN and for any components of the area wide DEN installed on site - Connection charge to be capped at the deferred offset contribution + the avoided costs of delivering an ASHP system, details of the avoided ASHP system costs should be agreed at an earlier stage - Be Seen commitment to uploading energy data - Energy Plan and Sustainability Review, to include confirmation that dwellings in Blocks B1 and C1 comply with a maximum average space heating demand of 20 kWh/m²/year within the block (calculated with PHPP software) and meets the same construction standards and methodology as the Passivhaus dwellings <p>Planning Conditions To be secured:</p> <p><u>Energy strategy</u> <i>The development hereby approved shall be constructed in accordance with the Energy and Sustainability Statement and Appendices prepared by Etude (dated June 2022, Rev H) delivering a minimum 84% improvement on carbon emissions over 2013 Building Regulations Part L, with SAP10 emission factors, Passivhaus-level fabric efficiencies, connection to the Decentralised Energy Network with a centralised air source heat pump (ASHP) system as a backup solution, and a minimum 350 kWp solar photovoltaic (PV) array.</i></p>	

Stakeholder (LBH)	Comments	Response
	<p>(a) <i>Prior to above ground construction, an updated Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:</i></p> <ul style="list-style-type: none"> - <i>Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;</i> - <i>Confirmation of the necessary fabric efficiencies to achieve a minimum 30% reduction, including details to reduce thermal bridging;</i> - <i>Location, specification and efficiency of the proposed Plan B ASHP system (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures;</i> - <i>Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR) with and without cooling coils, with plans showing the rigid MVHR ducting and location of the unit;</i> - <i>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);</i> - <i>A metering strategy.</i> <p><i>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.</i></p> <p>(b) <i>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.</i></p>	

Stakeholder (LBH)	Comments	Response
	<p><i>(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.</i></p> <p><i>(d) Within one year of first occupation, evidence shall be submitted to and approved by the Local Planning Authority to demonstrate how the development has performed against the approved Energy Strategy and to demonstrate how occupants have been taken through training on how to use their homes and the technology correctly and in the most energy efficient way and that issues have been dealt with. This should include energy use data for the first year and a brief statement of occupant involvement to evidence this training and engagement.</i></p> <p><i>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.</i></p> <p><u>DEN Connection</u> <i>Prior to the above ground commencement of construction work, details relating to the future connection to the DEN must be submitted to and approved by the local planning authority. This shall include:</i></p> <ul style="list-style-type: none"> <i>• Further detail of how the developer will ensure the performance of the DEN 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.);</i> <i>• Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification.</i> <i>• Detail of the pipe design, pipe sizes and lengths (taking account of flow and return temperatures and diversification), insulation and calculated heat loss from</i> 	

Stakeholder (LBH)	Comments	Response
	<p><i>the pipes in Watts, demonstrating heat losses have been minimised together with analysis of stress/expansion;</i></p> <ul style="list-style-type: none"> • <i>A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings should cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation;</i> • <i>Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection is accessible by the area wide DEN, detailed proposals for installation for the route that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts;</i> • <i>Details of the space allowance for the DEN main passing through the site from Park View Road to Ashley Road;</i> • <i>Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals;</i> • <i>Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DEN supply including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue;</i> • <i>Details of a future pipework route from the temporary boiler location to the plant room.</i> <p><i>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.</i></p> <p><u>Overheating (non-residential)</u></p>	

Stakeholder (LBH)	Comments	Response
	<p><i>At least six months prior to the occupation of each non-residential unit, 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 of time or will accommodate any vulnerable users, such as office/workspace, community, healthcare, or educational uses.</i></p> <p><i>The report shall be based on the current and future weather files for 2020s, 2050s and 2080s for the CIBSE TM49 central London dataset. It shall set out:</i></p> <ul style="list-style-type: none"> <i>- The proposed occupancy profiles and heat gains in line with CIBSE TM52</i> <i>- The modelled mitigation measures which will be delivered to ensure the development complies with DSY1 for the 2020s weather file.</i> <i>- A retrofit plan that demonstrates which mitigation measures would be required to pass future weather files, with confirmation that the retrofit measures can be integrated within the design.</i> <p><i>The mitigation measures hereby approved shall be implemented prior to occupation and retained thereafter for the lifetime of the development.</i></p> <p><i>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.</i></p> <p><u><i>Overheating (residential to confirm once pipework has been designed)</i></u></p> <p><i>(a) Prior to above ground works, an updated Overheating Report modelling future weather files shall be submitted to and approved by the Local Planning Authority. This assessment shall be based on the TM59 modelling undertaken by Etude (Energy and Sustainability Statement dated June 2022). This revised strategy shall include:</i></p> <ul style="list-style-type: none"> <i>- Modelling of dwellings based on CIBSE TM59, using the CIBSE TM49 London Weather Centre files DSY1 for the 2020s, high emissions, 50% percentile;</i> 	

Stakeholder (LBH)	Comments	Response
	<ul style="list-style-type: none"> - Modelling of mitigation measures required to pass the mandatory weather files, clearly setting out which measures will be delivered before occupation in line with the Cooling Hierarchy; - Updated as-designed heat loss calculations from heat interface units and pipework. <p>(c) Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development:</p> <ul style="list-style-type: none"> - Natural ventilation, with openable areas including fixed louvred side panel for accessible bedrooms and secure night latch for other accessible habitable rooms; - Glazing g-value of 0.50 or lower; - External shading to south-facing windows on top floors (min. 1m depth); - Brise soleil for other windows without balcony shading on south façades (1m full height, 0.8m for punched windows) - External shutters for west-facing bedrooms (perforated/slatted shutters for airflow) - Internal blinds on all façades (light-coloured, solar transmittance of 0.11); - MVHR with summer bypass (min. 0.55ach); - Minimal heat losses from heat interface units (HIU) and pipework; - Active cooling with 1.5 kW cooling coil only for 19 dwellings with habitable rooms facing south-east; - Any further mitigation measures identified as required in part (a). <p><i>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.</i></p> <p><u>Overheating Building User Guide</u> <i>Prior to occupation of the residential dwellings, a Building User Guide for new residential occupants shall be submitted in writing to and for approval by the Local Planning Authority. The Building User Guide will advise residents how to operate their property</i></p>	

Stakeholder (LBH)	Comments	Response
	<p>during a heatwave, setting out a cooling hierarchy in accordance with London Plan (2021) Policy SI4 with passive measures being considered ahead of cooling systems. The Building User Guide will be issued to residential occupants upon first occupation.</p> <p><i>Reason: In the interest of reducing the impacts of climate change and mitigation of overheating risk, in accordance with London Plan (2021) Policy SI4, and Local Plan (2017) Policies SP4 and DM21.</i></p> <p><u>Passivhaus Certification</u> <i>Prior to the commencement of construction works to Buildings A1-5, B2-3 and C2, a Design Stage Passivhaus Strategy shall be submitted to and approved by the Local Planning Authority. This should show that a Passivhaus level space heating demand target of 15 kWh/m2/year is achieved, accompanied by Passive House Planning Package (PHPP) calculations.</i></p> <p><i>Within one month of completion of Buildings A1-5, B2-3 and C2, a Passivhaus Certificate will be submitted for approval demonstrating that Buildings A1-5, B2-3 and C2 meet the Passivhaus Standards, awarded by a suitably qualified independent Passivhaus Certifier.</i></p> <p><i>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.</i></p> <p><u>Passivhaus Principles</u> <i>Prior to the commencement of construction works to Buildings B1 and C1, a Design Stage Passivhaus Strategy shall be submitted to and approved by the Local Planning Authority. Passive House Planning Package (PHPP) calculations should show that the design follows the Passivhaus methodology and achieve the highest level of energy efficiency that is technically feasible on this site, achieving a space heating demand target of 20 kWh/m2/year.</i></p>	

Stakeholder (LBH)	Comments	Response
	<p><i>Within one month of completion of Buildings B1 and C1, air tightness certificates should be submitted to demonstrate that the development achieves the level of air tightness targeted in the PHPP model at pre-commencement stage. The dwellings are to achieve a maximum 20 kWh/m²/year space heating demand target, evidenced with a PHPP spreadsheet.</i></p> <p><i>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.</i></p> <p><u>Circular Economy Post-Completion Report</u> <i>Prior to the occupation of any building or development, 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.</i></p> <p><i>Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials in accordance with London Plan (2021) Policies D3, SI2 and SI7, and Local Plan (2017) Policies SP4, SP6, and DM21.</i></p> <p><u>Whole-Life Carbon</u> <i>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</i></p>	

Stakeholder (LBH)	Comments	Response
	<p><i>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.</i></p> <p><i>Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM21.</i></p> <p><u>Sustainability standards for non-residential units</u> <i>(a) At least two months prior to the occupation of the commercial units, the employer requirements setting the sustainability requirements for the non-domestic units should be submitted to and approved by the planning authority. This should achieve the highest possible standard through measurable outputs to demonstrate how environmental sustainability has been integrated into the development, seeking to deliver as a minimum the credits as outlined in the BREEAM Pre-Assessment. These measures shall be maintained thereafter for the lifetime of the development.</i> <i>(b) Within six months after occupation, evidence of implementing the sustainability measures on site shall be submitted to the Local Planning Authority.</i></p> <p><i>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.</i></p> <p><u>Living roofs and blue roofs</u> <i>(a) Prior to the commencement of above ground works, details of the living and blue roofs must be submitted to and approved in writing by the Local Planning Authority. Living roofs</i></p>	

Stakeholder (LBH)	Comments	Response
	<p><i>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:</i></p> <ul style="list-style-type: none"> <i>i) A roof plan identifying where the living and blue roofs will be located;</i> <i>ii) A section demonstrating 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);</i> <i>iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roof, annotating contours of the varying depths of substrate</i> <i>iv) Details of the proposed type of invertebrate habitat structures 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;</i> <i>v) 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 the amount of 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);</i> <i>vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and</i> <i>vii) Management and maintenance plan, including frequency of watering arrangements.</i> <i>viii) A section showing the build up of the blue roofs and confirmation of the water attenuation properties, and feasibility of collecting the rainwater and using this on site;</i> <p><i>(b) Prior to the occupation of 90% of the dwellings, evidence must be submitted to and approved by the Local Planning Authority that the living and blue roofs have been delivered in line with the details set out in point (a). This evidence shall include</i></p>	

Stakeholder (LBH)	Comments	Response
	<p><i>photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roof has not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living and blue roofs shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.</i></p> <p><i>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, S11 and S12 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.</i></p> <p><u>Biodiversity</u></p> <p><i>(a) At least 12 months prior to occupation of development, details of ecological enhancement measures and ecological protection measures shall be submitted to and approved in writing by the Council. This shall detail the biodiversity net gain, plans showing the proposed location of ecological enhancement measures, a sensitive lighting scheme, justification for the location and type of enhancement measures by a qualified ecologist, and how the development will support and protect local wildlife and natural habitats.</i></p> <p><i>(b) Prior to the occupation of development, photographic evidence and a post-development ecological field survey and impact assessment shall be submitted to and approved by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures is in accordance with the approved measures and in accordance with CIEEM standards.</i></p> <p><i>Development shall accord with the details as approved and retained for the lifetime of the development.</i></p>	

Stakeholder (LBH)	Comments	Response
	<p><i>Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, S11 and S12 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.</i></p> <p><u>To be included within the landscape condition:</u> <i>Prior to the occupation of development, submit annotated plans and details on what measures will be delivered to the external amenity areas that will help adapt the development and its occupants to the impacts of climate change through more frequent and extreme weather events and more prolonged droughts.</i></p>	
Regeneration Officer	<p>We welcome this scheme and feel that this is a high-quality design which has responded to comments and input from Regeneration officers during the pre-application process and will make a positive contribution to the Tottenham Hale District Centre and surrounding area. It will be important to consider in the drafting of conditions, the need to retain some flexibility in the hard and soft landscaping details in order for this development and its public realm to successfully respond to the park, and the wider materials palette of the district centre area. As the co-designed park masterplan develops, this interface will be explored in more detail and materiality, lighting, planting and other treatments along this edge may need to respond.</p>	<p>Comments have been taken into account.</p>
Nature Conservation Officer	<p>Documents An Ecological Impact Assessment (4 March 2022) which considers potential for impacts upon the adjacent SINC); Biodiversity Metric & Urban Greening Factor have been prepared to current good practice guidance covering relevant legislation and policy.</p> <p>Conclusion</p>	<p>Comments have been taken into account. Appropriate conditions will be secured.</p>

Stakeholder (LBH)	Comments	Response
	<p>The report states that without mitigation measures to be set out in the CEMP, construction activities could have a negative impact at a local level. As such, the CEMP should be secured by condition with reference to the Ecological Impact Assessment mitigation measures and approved prior to construction.</p> <p>The development seeks to enhance ecological features and the proposed mitigation and enhancement measures are satisfactory.</p>	
Tree Officer	<p>From an arboricultural point of view, I hold no objections.</p> <p>An arboricultural tree report has been carried out, on behalf of Haringey Council, by Hayden's Arboricultural Consultants dated 14/03/2022. The report includes tree survey, arboricultural impact assessment (AIA), and preliminary arboricultural method statements (AMS).</p> <p>The report has been carried out to British Standard 5837:2012 Trees in relation to design, demolition and construction- Recommendations.</p> <p>I concur with all the findings, recommendations, and conclusions within the report including the tree quality assessment.</p> <p>15 category C trees have been highlighted to be removed with a net gain of 74 new trees to be planted.</p> <p>There is slight encroachment into the root protection areas (RPA) of T001, T002, T003, & T013. However, due to the condition of T001 and T002, further mechanical investigations were carried out in October and November 2021. Secondary reports were produced with recommendations to pollard these two London Plane trees to 8m. These works will change the root/shoot ratio.</p>	<p>Comments have been taken into account. Appropriate conditions will be secured.</p>

Stakeholder (LBH)	Comments	Response
	<p>Roots are notional and any encountered roots will be pruned carefully. London Planes can tolerate some disturbance and since this is on the edge of the RPA, with planned tree works, under existing hardstand, I do not see this as problematic.</p> <p>The report also highlights (4.4.1, 4.4.2 and 4.4.3) for a Structural Engineer, to determine foundation design.</p> <p>The site access & egress on Ashley Road has existing concrete hardstand and will not require the load bearing to be strengthened. AMS will be required for all works within the RPAs (ground protection and no dig designs.) G002 will have the hardstand removed and re landscaped with topsoil. This will improve the environment for this group of Lime trees' roots.</p> <p>There is a comprehensive Landscape strategy and masterplan. This will need to be finalised with species list, specifications, and a five-aftercare management plan will be required.</p> <p>The tree planting offers a wide range of interest, urban fitness, and diversity.</p> <p>Providing all sections within the Hayden's tree survey are adhered to, along with Drawing 8765-D-AIA being implemented prior to any development I hold no objections.</p>	
Building Control Officer	<p>No comments at this stage. Plans for the in scope buildings to be referred to the HSE under gateway 1. Detailed check to be carried out under the Building Regulations when the Building Control application is submitted, and any free pre-application advice can be sent to building.control@haringey.gov.uk</p>	Comments noted.
Flood and Water	<p>We will require a detailed drainage plan appropriately cross-referenced to supporting calculations for the development which clearly indicates the location of all proposed drainage elements. They are still not there 100% but obviously considering they provide at</p>	Comments have been taken into account.

Stakeholder (LBH)	Comments	Response
Management Officer	<p>least some calculations for different rainfall events, I am happy to add following conditions with any approval if you have to provide for this application: Surface Water Drainage condition No development shall take place until a detailed Surface Water Drainage scheme for site has been submitted and approved in writing by the Local Planning Authority. The detailed drainage scheme should also accompany a detailed drainage plan appropriately cross-referenced to supporting calculations for the development and they should clearly indicate the location of all proposed drainage elements demonstrating that the surface water generated by this development (For all the rainfall durations starting from 15 min to 10080 min and intensities up to and including the climate change adjusted critical 100 yr storm) can be accommodated and disposed of without discharging onto the highway and without increasing flood risk on or off-site. Reason : To ensure that the principles of Sustainable Drainage are incorporated into this proposal and maintained thereafter. Management and Maintenance condition: Prior to occupation of the development 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 scheme throughout the lifetime of the development. The Management Maintenance Schedule shall be constructed in accordance with the approved details and thereafter retained. 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>Appropriate conditions will be secured.</p>
Waste Management Officer	<p>A pre application meeting to discuss the operational waste management strategy (OWMS) for this development on the former council depot on Ashley Road took place on 8th March with representatives from the council's waste and housing team, Veolia waste collection managers, and Velocity, the transport and waste planning consultants for this development. The waste strategy was reviewed in part and the potentially contentious elements of this discussed. I attach an email detailing the outcome of the meeting. The elements covered have been worked into the final submitted OWMS.</p>	<p>Comments have been taken into account.</p>

Stakeholder (LBH)	Comments	Response
	<p>This is a comprehensive OWMS which acknowledges national guidance and LB Haringey specific requirements as set out in our SPD. Access across the site, bin store sizing, bin number, type/capacity, and drag distances, including that for block A5, are all acceptable. Given the involvement of the waste team in pre application discussions I can confirm that this can be supported without conditions required.</p>	
Pollution Officer	<p>Having considered all the submitted supportive information i.e. Design and Access Statement Revision A dated 2022 taken note of the proposal for the building to be connect to District Energy Network, Air Quality Assessment with reference A4538/AQ/03 prepared by ACCON UK Limited dated 3rd March 2022 taken note of sections 3 (Site Description & Baseline Conditions), 4 (Methodology and Assessment Criteria), 5 (Impacts and Constraints of Air Quality), 6 (Mitigations) and 7 (Conclusions) as well as Desk Study & Ground Investigation Report Revision 1 with reference J21294 prepared by GEA Ltd dated March 2020 taken note of sections 4 (Ground Conditions), 7(Advice and Recommendations) and 8 (Outstanding Risks & Issues), please be advise that we have no objection to the proposed development in relation to AQ and Land Contamination but the following planning conditions and informative are recommend should planning permission be granted. 1. Land Contamination Before development commences other than for investigative work: Using the information already provided in sections 7 (Advice and Recommendations) and 8 (Outstanding Risks & Issues) of the submitted Desk Study & Ground Investigation Report Revision 1 with reference J21294 prepared by GEA Ltd dated March 2020, the applicant shall undertake: a. A further site investigation which 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 the remediation requirements. 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</p>	<p>Comments have been taken into account. Appropriate conditions will be secured.</p>

Stakeholder (LBH)	Comments	Response
	<p>required, completion of the remediation detailed in the method statement shall be carried out and 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. Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety. 2. Unexpected Contamination 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. 2 Reasons: 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. 3. Updated Air Quality Assessment Whilst the submitted Air Quality Assessment with reference A4538/AQ/03 prepared by ACCON UK Limited dated 3rd March 2022 is noted, this is however not consider to be sufficient for us to make an inform decision regarding the site AQ especially with the applicant conducting only modelling of existing baseline monitoring results which were a bit farther away from the site despite the site closeness to a very busy road. In addition, the applicant has also fails to carry out any AQ neutral assessment in the submitted report nor modelling of the operational impact on the proposed building floors which we understand will be as high as thirteen storeys rather than the ground floor only. Moreover, the assessment in the submitted report has only focused on traffic emission without any consideration for the emission from the construction works as well as other development within the vicinity and other emission sources. Therefore, 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 is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people), • Applicant will need to provide us an addendum AQ assessment of the proposed development taken into consideration the likely operational impact of the development beyond the ground floor as</p>	

Stakeholder (LBH)	Comments	Response
	<p>submitted for the purposes of reaching a conclusion on the development significance effects in the actual site and overall local air quality. • Monitoring will need to be undertaken at or within a closer proximity of the site itself rather than relying purely on baseline monitoring modelling farther away from the site nor Defra mapped background concentrations. • Provision of a revised predicted concentrations. • Submission of an AQ neutral report. Reason: To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction. 4. NRMM 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 submitted to the Local Planning Authority prior to the commencement of any works on site. 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. Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ 5. Demolition/Construction Environmental Management Plans 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 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. The following applies to both Parts a and b above: 3 a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP). b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include: i. A construction method statement which identifies the stages and details how works will be undertaken; ii. Details of working hours,</p>	

Stakeholder (LBH)	Comments	Response
	<p>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; iii. Details of plant and machinery to be used during demolition/construction works; iv. Details of an Unexploded Ordnance Survey; v. Details of the waste management strategy; vi. Details of community engagement arrangements; vii. Details of any acoustic hoarding; viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance); ix. Details of external lighting; and, x. Details of any other standard environmental management and control measures to be implemented. c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on: i. Dust Monitoring and joint working arrangements during the demolition and construction work; ii. Site access and car parking arrangements; 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 of facilities such as concrete batching. d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include: 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 the event of Local Authority Inspection; iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on 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. The development shall be carried out in accordance with the approved details as well as on the applicant submitted proposed mitigation in the Air Quality Report following any addendum report. Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local</p>	

Stakeholder (LBH)	Comments	Response
	<p>Planning Authority prior to any works being carried out. Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality.” 6. Combustion and Energy Plant Whilst it is noted that it is proposed for the development to be connected to the District Energy Network however, where applicable, 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%). Reason: As required by The London Plan Policy 7.14. 4 7. Combined Heat and Power (CHP) Facility Whilst it is noted that it is proposed for the development to be connected to the District Energy Network however, where applicable, Prior to the commencement of the development, details of the NOx Natural Gas – Fired Boilers (CHP) facility of the energy centre or centralised energy facility or other centralised combustion process and associated infrastructure shall be submitted in writing to and for approval by the Local Planning Authority. The details shall include: 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 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. Reason: 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. Informative: 1. Prior to demolition of existing buildings where applicable, 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. 2. With contamination testing of ground water proposed to be carried out in the near future and results included in an updated report we suggest comment from Environment Agency be sought in this regard as well as that of water supply company to confirm their requirements</p>	

Stakeholder (LBH)	Comments	Response
	for water supply pipes as alluded in in sub-section 7.8.3 (Services) of the above contaminated land report.	
Parks Officer	<ul style="list-style-type: none"> • The park is currently undergoing a co-design process that will need to dovetail with the ARD scheme and vice versa • Where proposed further design work is required to improve the park entrances at Park View Road (major new gateway) and Ashley Road these should be discussed with the new Community Design Group along with the Council's Parks & Leisure and Regeneration teams. • Residents should not be allowed access via/across the park for the undertaking of any works or other access to their properties or for emergency access or egress etc • Any new more permeable boundary with the park should direct people to the park's existing or proposed (ie it is currently undergoing co-design) path network rather than create new desire lines across the grass (eg from Residential Lane and/or other places) <ul style="list-style-type: none"> ○ For example this would lead to people carrying on walking through the meadow strip onto the grass, so would need some rethinking.... • I couldn't tell for certain whether there were any communal bin stores located on the park edge...if it is this would not be supported • Further explanation plus Parks & Leisure approvals required regarding the 'stepping stones' shown in the visual below, which aren't shown on other plans... • Existing trees are to be retained and protected unless otherwise agreed with the Council's Tree team 	Comments have been taken into account. Appropriate conditions will be secured.
Policy Officer	<p><u>Principle of development</u></p> <p>Policy SP1 of the Local Plan Strategic Policies document sets out that the Council will promote development within Growth Areas. Haringey's Growth Areas are areas with the</p>	Comments taken into account.

Stakeholder (LBH)	Comments	Response
	<p>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. The site also falls within the Lee Valley Opportunity Area.</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 Tottenham Hale District Centre Framework gives further guidance on this, and envisages the transformation of this area into a high density new district centre and identifies this site as suitable for housing to achieve this vision. The site falls within the Ashley Road North site allocation (reference NT5). The allocation is expected to deliver a new residential development with an extension to Ashley Road to connect to Park View Road for pedestrians and cyclists comprising a minimum of 147 new residential units (net).</p> <p>The residential led development of the site generally accords with the Local Plan Strategic Policies document, the Tottenham AAP and Tottenham Hale District Centre Framework and the principle of the proposal is therefore considered acceptable.</p> <p><u>Masterplanning</u></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.</p> <p>The Council adopted a comprehensive Masterplan Framework for the District Centre area in 2015. 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 land uses proposed at the site accord with the masterplan framework and in general terms will support the creation of the District Centre.</p> <p><u>Quantum of development</u></p>	

Stakeholder (LBH)	Comments	Response
	<p>Policy SP1 of the Local Plan Strategic Policies document states that the Council expects development in Growth Areas to maximise site opportunities. The site is expected to contribute 272 homes against the overall target of a minimum of 147 residential units within the site allocation. Ashley Road Depot is within the Upper Lea Valley Opportunity Area in the London Plan. Policy SD1 of the London Plan supports regeneration in Opportunity Areas and ensure that they deliver the maximum affordable housing and create inclusive and mixed communities.</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 July 2021 the Mayor published the new London Plan. This 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. 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. The quantum of 272 residential use can therefore be supported in principle, subject to detailed comments on the form and massing from the Council's Design Officer.</p> <p><u>Safeguarded Waste Site</u></p> <p>Part of the Ashley Road Depot site is covered by a waste safeguarding designation which covers the former Park View Road Reuse and Recycling Centre, which is classified as a transfer station in waste management use classification. When the Park View Road Reuse and Recycle Centre closed, all activities on that site were transferred to the existing Western Road Recycling Centre which has a licenced maximum throughput capacity of 75,000 tonnes per annum. To accord with the North London Waste Plan (which was found sound and is awaiting adoption by the Council, anticipated in July 2022) and London Plan Policy SI9, the maximum throughput the site achieved needs to be</p>	

Stakeholder (LBH)	Comments	Response
	<p>replaced or secured elsewhere before this safeguarding designation can be overcome. The replacement capacity needs to be of the same type or higher in the waste hierarchy of waste management uses. The North London Waste Authority has confirmed that the throughput achieved on this site (6,326 tonnes) can be accommodated at Western Road Recycling Centre (over 6,326 tonnes) which is also a waste transfer station. Therefore the principle of the loss of a safeguarded waste site is satisfied by virtue of evidence being presented that the throughput of this site has been secured at Western Road Recycling Centre which is of the same waste use. The safeguarding of this site can therefore be overcome and redevelopment for other uses allowed.</p> <p><u>Mix of housing</u></p> <p>Policy DM11 of the Development Management DPD requires that proposals for new residential development should provide a mix of housing. The scheme will include 92 homes (34%) being three+ bedrooms. The unit mix is considered acceptable</p> <p><u>Affordable Housing</u></p> <p>The application documentation indicates the development will deliver a minimum of 63% affordable housing by habitable room, which exceeds the Council's target of 40%. 50% of the homes (136) will be social rent and 50% open market sale. The Council's target is for 60% of the affordable units to be intermediate products within this area and 40% to be affordable rent. All of the affordable homes would be for social rent. Given the SHMA and Council's Housing Strategy identify that social rent housing is the tenure most needed in Haringey, this quantum and mix can be supported.</p> <p><u>Class E Development</u></p>	

Stakeholder (LBH)	Comments	Response
	<p>The proposal seeks to include a small quantum of flexible Class E uses at the ground floor level adjacent to Downhills Park. This can be supported as it will provide small local shops or services to support the development and the wider area.</p> <p><u>Transport & Access</u></p> <p>We note that detailed comments will be provided by the Transport team in connection with the application. The creation of a pedestrian and cycle link through this site in accordance with the AAP site requirements is supported.</p> <p><u>Tall building</u></p> <p>It is noted that tall building are proposed within the site. This site is on the edge but not within the Tottenham Hale zones defined as suitable Potential Locations Appropriate for Tall Buildings (DM DPD, policy DM6). Within this area and in proximity to this site are a number of tall building either just completed or underway, the tallest being 36 storeys. The tallest element of this scheme is 13 storeys. In accordance with DM 6 and SP11 of the Local Plan, it can be considered that a taller building in this location could be appropriate and serve as a transition between the tall building cluster and other, lower rise context. The applicant has undertaken an assessment against protected views and no negative impacts have been found. This is concurred with. There are no in-principle policy objections to tall buildings in this location subject to the comments of the Council's Design Officer and Quality Review Panel.</p> <p><u>Amenity and Biodiversity</u></p> <p>It is noted that all residential units will achieve the minimum amenity provision required by London Plan Policy D4 and the Mayors Housing SPG standards, and that a net gain in biodiversity on site will also be achieved. There are therefore no in principal objections to the scheme on this basis.</p>	

Stakeholder (LBH)	Comments	Response
	<p><u>Flood Risk</u></p> <p>Comments on flooding and water management generally are reserved to the Council's drainage team.</p>	
Street Lighting Officer	<p>All equipment which is going to be maintained by LBH needs to meet with our design guide and current specification also the lighting levels need to meet BS5489 and should be stated, all equipment (if Adopted) should be controlled by our central management system(Exedra)</p>	<p>Comments have been taken into account. Appropriate condition will be secured.</p>

Stakeholder (External)	Comments	Response
<p>Health & Safety Executive</p>	<p>1. Substantive response for the local planning authority Thank you for consulting HSE about this application. Nature of Response HSE is satisfied with the information provided with the application (including the fire statement). Nature of Response 1.1 The above application relates to a development which consists of 10 residential buildings, arranged to form three private courtyards (A, B & C). Building heights range between 4 storeys to 13 storeys. 1.2 HSE is content with the fire safety characteristics of the design related to land use planning.</p> <p>2. Supplementary information for the applicant <i>The following points do not contribute to HSE's overall headline response and are intended only as advice for the applicant. These comments identify items that could usefully be considered now to reduce the risk of making changes to the design at a later stage, which could have planning implications.</i></p> <p>2.1 It is noted that some blocks are not relevant buildings as their height is under 18 m, however, they are within the curtilage of the relevant buildings. The following advice is offered with that context in mind.</p> <p>2.2 The plan drawings of Blocks B1, B3 and C1 illustrate dwellings with a deck access. It appears that the hose distance between the dry riser and the furthest point within the most remote apartment is extensive, at between 50 m to 65 m. The fire standard states that the length of balconies/decks should be such that no point in any flat or maisonette is more than 45 m from a rising main landing valve.</p>	<p>Comments have been taken into account.</p>

	<p>Resolving this issue may affect land use planning considerations such as design, layout and appearance of the building.</p> <p>2.3 The plan drawings of Blocks B1, B2 and C1 illustrate dwellings with a deck access. The doors giving access from the common corridors to the deck are in the close proximity (less than 1 m) and at right angles with the windows/doors of the adjoining flats. Further engineering analysis may be required to determine if the proposed design may allow the spread of fire or smoke from a flat to the common corridor and further to the single staircase. The results of such analysis may affect land use planning considerations such as the appearance of the development.</p> <p>2.4 The plan drawings of Blocks B2, C1 and C2 illustrate the single stairs connecting with ancillary areas such as the refuse stores, cycle stores and the sprinkler tank. The fire safety standard states that in buildings above 11 m in height and served by single stairs, the staircase should not connect with any ancillary areas. We note there is also direct access to the outside from these areas, however, there should be no connection with the single stairs.</p> <p>2.5 The planning statement proposes to include 20% active and 80% passive electric vehicle provision. However, it is not clear where these will be located. It would be advisable to consider the risk to fire safety by the presence of electrical vehicles (EVs) in a covered carpark. The nature of the lithium-ion batteries that are used in EVs makes them particularly dangerous in a fire scenario. Lithium-ion batteries may suffer thermal runaway and cell rupture if overheated or overcharged, and in extreme cases this can lead to combustion. If they burn, it is difficult to put out the fire which creates toxic fumes. A large amount of water is needed to flow on the batteries, as fire will continue to reignite even after it appears to be extinguished. Furthermore, there is a danger of electrical shock for firefighters tackling a fire due to the high voltage used in this type of vehicle. Any consequent design changes may affect land use planning considerations such as layout, appearance, and car parking provision of the development.</p>	
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London Fire Brigade	No comments to make.	Comments have been taken into account.
Network Rail	<p>Thank you for consulting Network Rail (NR) regarding the above planning application. Please see below the informative suggested by our Asset protection Team; Item 1. Issues - Environmental pollution (Dust, noise etc.) on operational railway. Reasons/Mitigations: The design and siting of installations should take into account possible effects of noise, vibration and generation of airborne dust in regard to the operational railway. 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. Demolition work shall be carried out behind hoardings and dust suppression systems are to be employed to risk to the operational line. Item 2. Issues - Interference with the Train Drivers' vision Reasons/Mitigations: Glint and Sunlight glare assessment should be carried out to demonstrate the proposed development does not import risk of glare to the train drivers which can obstruct in the visibility of the signals. Item 3. Issues - Collapse of lifting equipment adjacent to the NR boundary fence/line. Reasons/Mitigations: Operation of mobile cranes should comply with CPA Good Practice Guide 'Requirements for Mobile Cranes Alongside Railways Controlled by Network Rail'. Operation of Tower Crane should also comply with CPA Good Practice Guide 'Requirements for Tower Cranes Alongside Railways Controlled by Network Rail'. Operation of Piling Rig should comply with Network Rail standard 'NR-L3-INI-CP0063 - Piling adjacent to the running line'. Collapse radius of the cranes should not fall within 4m from the railway boundary unless possession and isolation on NR lines have been arranged or agreed with Network Rail.</p>	Comments have been taken into account. The recommended informatives will be secured.

	<p>Item 4. Issues - Collapse of temporary work. Reasons/Mitigations: Where, in the temporary condition, structural collapse of any temporary works which may be constructed which would include scaffolding and access towers could result in any element falling within 3m of the railway boundary or a NR asset. Item 5. Issues - Stability of railway infrastructure and potential impact on the services and drainage from Soakaways / attenuation ponds / septic tanks. Reasons/Mitigations: Any Soakaways / attenuation ponds / septic tanks etc, required for the proposed scheme as a means of storm/surface water disposal should not be constructed within 10 metres of Network Rail's boundary or at any point which could adversely affect the stability of Network Rail's property/infrastructure. Storm/surface water must not be discharged onto Network Rail's property or into Network Rail's culverts or drains. Network Rail's drainage system(s) are not to be added to nor compromised by any proposed work(s). Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run-off onto Network Rail's property / infrastructure. Proper provision must be made to accept and continue drainage discharging from Network Rail's property. (The Land Drainage Act) is to be complied with. Suitable foul drainage must be provided separate from Network Rail's existing drainage. Once water enters a pipe it becomes a controlled source and as such no water should be discharged in the direction of the railway. Item 6. Issues - EMC consideration near NR boundary fence/line Reasons/Mitigations: Any Outside Party projects that will be within 20m and/or any transmitter within 100m of the operational railway will be required to undertake an Electromagnetic Compatibility assessment to be carried out in accordance with Network Rail standards 'NR/L1/RSE/30040 & 'NR/L1/RSE/30041' and NR/L2/TEL/30066' Network Rail strongly recommends the developer contacts the Asset Protection Team AssetProtectionAnglia@networkrail.co.uk prior to any works commencing on site, and also to agree an Asset Protection Agreement with us to enable approval of detailed works. More information can also be obtained from our website https://www.networkrail.co.uk/running-the-railway/looking-after-the-railway/assetprotection-and-optimisation/</p>	
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<p>Environment Agency</p>	<p>We reviewed the documents when they came in and have no comments to make regarding the application. The plans are for more vulnerable use within Flood Zone 2 and as a result falls under our Flood Risk Standing Advice and outside of our consultation remit. I have attached our consultation checklist for more details relating to which applications we would wish to be consulted on.</p>	<p>Comments have been taken into account.</p>
<p>Natural England</p>	<p>Natural England has no comment on this application with regards to statutory designated sites. However, we note that the site is within the recreational pressure Zone of Influence for Epping Forest SAC. While we are not objecting to this application, we would like to have further discussions with the London Borough of Haringey with regards to developments of this size coming forward, and the potential for in-combination impacts on Epping Forest SAC, and possible mitigation options. We note that since responding to a similarly sized development within the borough of Haringey last week, Haringey have contacted Natural England with the intention of arranging a meeting, and we look forward to this work progressing.</p>	<p>Comments have been taken into account.</p>
<p>Thames Water</p>	<p>Waste Comments The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement." Reason: The proposed works will be in close</p>	<p>Comments have been taken into account. The recommended condition and informative will be secured.</p>

	<p>proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB 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. Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. 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. 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. Water Comments On the basis of information provided, Thames Water would advise that with regard to water network infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters</p>	
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	<p>pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p>	
<p>Historic England (GLAAS)</p>	<p>The site lies in an Archaeological Priority Area (Tier III) and is roughly 1.2ha in size. It is located close to the Mesolithic flint working site found near Tottenham Hale and geotechnical investigations suggest that brickearth survives across much of the site at less than 1m below ground level, although there are some much deeper areas of made ground suggesting localised truncation. The presence of brickearth, the nearby prehistoric finds and easy access to the River Lea suggest that the site would have been attractive for prehistoric settlement. The Corcoran et al Lower Lea Valley study puts the site on the Low Terrace of the river and raises the potential for this zone in this area to preserve Arctic Beds (which could contain Palaeolithic material), as well as noting that its same situation is very productive elsewhere for later periods and that absence of records nearby is more likely a result of an absence of investigation in the past. This potential, and a discussion of the survival and levels of brickearth on the site have not unfortunately been provided in the desk based assessment (Oxford Archaeology 2022). The DBA does include a useful figure showing areas of previous truncation, indicating that much of the site has been affected only by the construction of hard standing. could affect a heritage asset of archaeological interest. 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 twostage 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. NPPF paragraphs 190 and 197 and London Plan Policy HC1 emphasise the positive contributions heritage</p>	<p>Comments have been taken into account. The recommended condition will be secured.</p>

	<p>assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.</p> <p>I therefore recommend attaching a condition as follows:</p> <p>No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of 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 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 B. Where appropriate, details of a programme for delivering related positive public benefits. 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>Informative</p> <p>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. This condition is exempt from deemed discharge under schedule 6 of The Town</p>	
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	<p>and Country Planning (Development Management Procedure) (England) Order 2015.</p> <p>This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this precommencement condition please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 205.</p> <p>I envisage that the archaeological fieldwork would comprise the following:</p> <p>Evaluation</p> <p>An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.</p> <p>The desk based assessment has highlighted that extensive contamination is present on the site. However, a review of the intrusive ground investigation report (GEA 2022) suggests that much of the contamination is concentrated in hotspots and in the thicker made ground where archaeological deposits are likely to have been truncated. The evaluation WSI should therefore consider if any areas of the site will need to be avoided during trenching and propose appropriate health and safety mitigation for the remaining areas.</p>	
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<p>Metropolitan Police Designing Out Crime Officer</p>	<p><u>Section 1 - Introduction:</u></p> <p>Thank you for allowing us to comment on the above planning proposal.</p> <p>With reference to the above application we have had an opportunity to examine the details submitted and would like to offer 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 at both feasibility and pre-application stage and have discussed our concerns and recommendations around the design and layout of the development. The Architects have made mention in the Design and Access Statement referencing 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/Developers ensure the ongoing dialogue with our department continues throughout the design and build process.</p>	<p>Comments have been taken into account. The recommended conditions and informatives will be secured.</p>
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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.

The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.

Section 2 - Secured by Design Conditions and Informative:

In light of the information provided, we request the following Conditions and Informative:

Conditions:

- 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.

The development shall only be carried out in accordance with the approved details.

- 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.

- C. The Commercial aspects of the development must achieve the relevant **Secured by Design** certification at the final fitting stage, prior to the commencement of business and details shall be submitted to and approved, in writing, by the Local Planning Authority.

	<p><u>Informative:</u></p> <p>The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to 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>Metropolitan Police</p>	<p>I refer to the recent application at Council Depot, Ashley Road. As you may be aware Policing is a 24/7 service resourced to respond and deploy on an "on demand" and "equal access" basis, and is wholly dependent on a range of facilities for staff to deliver this.</p> <p>Where additional development is proposed the MPS aims to deploy additional staffing and additional infrastructure at the same level that is required to deliver Policing to the locality. It would be complacent not to do this because without additional support unacceptable pressure will be put on existing staff, and our capital infrastructure, which will seriously undermine our ability to meet the Policing needs of this development, and maintain the current level of Policing to the rest of Borough and the wider London area.</p>	<p>Comments have been taken into account. The recommended obligation will be secured.</p>

	<p>The impacts of the development are such that they cannot be met without additional staff deployed at a level consistent with the current Policing of the locality of the development.</p> <p>The following infrastructure is required for all Policing activities in London:</p> <p>Staff set up costs</p> <ul style="list-style-type: none"> • Uniforms • Radios • Workstation/Office equipment • Patrol vehicles • Mobile IT: The provision of mobile IT capacity to enable officers to undertake tasks whilst out of the office in order to maintain a visible presence. • CCTV technologies: Automatic Number Plate Recognition (ANPR) cameras to detect crime related vehicle movements. • Police National Database (PND): Telephony, licenses, IT, monitoring and the expansion of capacity to cater for additional calls. • The provision of police office accommodation. <p>Other capital infrastructure includes specialist equipment in use by Forensics, our tactical teams e.g. in firearms and dog handling, freestanding IT and data recording in relation to vulnerable groups, prisoner detention, transportation and processing including cells at core locations.</p> <p>The MPS has an active estates review function minimising our premises need, in order to meet existing Policing demand. We unfortunately just can't afford to have buildings under used and will dispose of surplus buildings wherever necessary using receipts to re-invest in the wider estate.</p> <p>The disposition of the Metropolitan Police Service as regards developments</p> <p>A primary issue for the MPS is to ensure that new development makes adequate provision for the future Policing needs that it will generate. Like some other public services our primary funding is insufficient to be able to fund additional capital infrastructure to support new development when and wherever this new development occurs. Further there are no bespoke capital funding regimes, e.g.</p>	
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	<p>like Building Schools for the Future or the Health Lift, to provide capital re-investment in our facilities. We fund capital infrastructure by borrowing. However, in a service where over 90% of our budget is staffing related, our capital programme can only be used to overcome pressing issues with our existing facilities, or to re-provide essential facilities like vehicles once these can no longer be used. This situation has been recognised by the Association of Chief Police Officers nationally for some time and there are public statements which explain our particular funding difficulties.</p> <p>Faced with unprecedented levels of growth being proposed across London, the Metropolitan Police Service have resolved to seek developer contributions to ensure that existing levels of service can be maintained as this growth takes place. We are a regular and constant participant in the statutory Planning process evidencing the impact of growth through work with local Councils in their Plan making, preparation of guidance, preparations for CIL and the consideration of individual Planning applications. Police nationally encourage this approach to offset the impact of growth on the Police service.</p> <p>The Policing impact of additional development at this site</p> <p>The proposed development will increase the population of this settlement by c542 people. It is a fact that additional dwellings will bring additional Policing demands. I do not doubt that there will be a corresponding increase in demand from new residents for Policing services across a wide spectrum of support and intervention, as they go about their daily lives at the site, in the locality, and across the Policing sub region.</p> <p>The National Policy position to support our request exists in the NPPF as securing sufficient facilities and services to meet local needs is a Core Planning Principle [p9 Section 3, paragraph 20]. In addition the NPPF specifically seeks environments where crime and disorder and the fear of crime do not undermine the quality of life and community cohesion [p27 Section 8, paragraph 92b] and sets out that Planning Policies and decisions should deliver this [p38, Section 8, paragraph 92b].</p> <p>The Police contribution request</p>	
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	<p>£21,296.42 is sought to mitigate the additional impacts of this development because our existing infrastructure does not have the capacity to meet these and because, like some other services, we do not have the funding ability to respond to growth whenever and wherever proposed. We anticipate using rates and Home Office revenues to pay for staff salaries and our day to day routine additional costs [e.g. call charges on telephony and radios, vehicle maintenance and so on]. As already confirmed these sources do not have the capacity to fund additional borrowing for the additional capital infrastructure necessitated by the development.</p> <p>It should be noted that the contributions for the MPS are only sought that are related in scale and kind to this development, and we confirm that the contribution will be used wholly to meet the direct impacts of this development and wholly in delivering Policing to it.</p> <p>Accordingly the development should make provision to mitigate the direct and additional Policing impacts it will generate and cannot depend on the Police to just absorb these within existing limited facilities and where Police have no flexibility in our funding to do this. This request is not forced by current spending reductions although strictures across the public sector re-enforce the need to ensure that developments do mitigate the direct impacts they cause.</p> <p>Is the contribution necessary to make the development acceptable in planning terms?</p> <p>Crime and community safety are Planning considerations and ensuring accessibility for the public to Policing is important to community safety, combating and reducing crime and the fear of crime.</p> <p>Without the necessary contribution the development will be unacceptable in Planning terms and permission should not be granted as indicated in NPPF Guidance. The lack of capacity in existing infrastructure to accommodate the population growth and associated demands occasioned by the development means that it is necessary for the developer of the site to provide a contribution so the situation might be remedied. The request is directly related to the development and the direct Policing impacts it will generate based on an</p>	
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	<p>examination of demand levels in the Borough in which it is situated, adjacent areas and existing Policing demands and deployment in relation to this. The request is wholly related to the scale and kind of the application development. Without the necessary contribution to meet Police needs there is a formal objection to the development on sustainability grounds and because the development is unacceptable without the necessary contribution.</p> <p>I refer to the Planning appeal decisions attached where the current approach of Police in seeking contributions was determined as compliant by Inspectors and the Secretary of State.</p> <p>I confirm that the methodology employed in this request is similar to that used in these appeals subject of course to local data about Policing demand and deployment to each development.</p> <p>Conclusion</p> <p>My conclusion at this stage is in several parts.</p> <p>a] the development will have impacts on Policing and these will need to be adequately mitigated if it is to be sustainable, and the safety of the local community assured. That has to be a mutual interest between the Borough and the Metropolitan Police Service.</p> <p>b] Necessary primary Policing infrastructure needs to be considered in the viability of the development alongside for example schools and medical facilities.</p> <p>Please do give this your consideration and I suggest that we meet at your earliest convenience to hear how the LPA will make adequate provision to meet Policing needs as a result of the development.</p>	
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Appendix 4 – Consultation Response from Greater London Authority (Stage 1)

GREATER**LONDON**AUTHORITY

Planning report GLA/2022/0237/S1/01

9 May 2022

Council Depot, Ashley Road

Local Planning Authority: Haringey

Local Planning Authority reference: HGY/2022/0752

<p>Strategic planning application stage 1 referral</p> <p>Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.</p>
<p>The proposal</p> <p>Full planning application for the erection of 272 homes within blocks ranging from 4 to 13 storeys, 174 sq.m. of flexible Use Class E floorspace along with a new vehicular access to the site, car parking and two pedestrian north south routes.</p>
<p>The applicant</p> <p>The applicant is London Borough of Haringey and the architect is Levitt Bernstein</p>
<p>Strategic issues summary</p> <p>Land use principles: Any loss of this waste site without compensatory re-provision equal to the maximum throughput of the site is contrary to Policy S19 of the London Plan. As proposed the waste that had been processed by the Park View facility on site would be absorbed by the existing Western Road Recycling Centre without interventions to increase its relative throughput capacity. Clarifications are sought to determine whether Western Road could meet its emerging waste plan waste capacity apportionment, in conjunction with that of Park View, over the plan period. Following this, compliance with Policy S19 will be assessed at the Mayor's decision making stage.</p> <p>Affordable housing: The affordable housing offer is 63% by habitable room, which exceeds the 50% Fast Track Route threshold for industrial/ publicly owned sites. The affordable housing offer comprises entirely social rent homes. The Council planning officers have confirmed that this is acceptable in this instance due to housing need.</p> <p>Other issues on urban design, sustainable development, environmental issues and transport also require resolution prior to the Mayor's decision making stage.</p>
<p>Recommendation</p> <p>That Haringey Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 99. Possible remedies set out in this report could address these deficiencies.</p>

Context

1. On 28 March 2022 the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following Categories of the Schedule to the Order 2008:
 - 1A "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats"; and,
 - 1Cc "Development which comprises or includes the erection of a building of one or more of the following descriptions - the building is more than 30 metres high and is outside the City of London".
3. Once Haringey Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
4. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>

Site description

5. The site measures approximately 1.6 hectares and is located within the London Borough of Haringey, in Tottenham Hale, within the Lea Valley Opportunity Area. It is bounded by Park View Road to the north and west, Down Lane Park to the south and Harris Academy school to the east.
6. The site was previously home to the Park View Road Reuse and Recycling Centre, which is a safeguarded site in the North London Waste Plan. The site is also occupied by offices, garages, warehousing and a terraced house all of which are currently vacant. The site is also part of a wider local site allocation TH7 for a residential-led development of indicative capacity of 147 residential units, as well as 5,100sq.m of 'other' uses. The allocation also requires the site's existing licensed waste capacity to be replaced prior to any redevelopment taking place.
7. Down Lane Park is a designated Site of Importance for Nature Conservation (SINC). To the east is beyond Watermead Road is an area of Strategic Industrial Land (SIL). There are a number of conservation areas (CA) some distance to the west of the site converging on Bruce Grove Station along Tottenham High Road the closest being Bruce Grove CA and Scotland Green CA as well as several listed buildings.

8. The nearest parts of the Transport for London Road Network (TLRN) are the A10 High Road which is approximately 600m west of the site and Monument Way which is around 600m south of the site. The site is located within close proximity to multiple rail services, including National Rail, London Underground and London Overground services. Tottenham Hale interchange is located around 600m south which provides access to Victoria Line, national rail services, a bus station serving 6 routes and a 24-hour taxi rank. The nearest bus routes to the site are the 318 to the west and the 192 on Watermead Way. The public transport accessibility level (PTAL) has been calculated as ranging between 2-5. Non-segregated cycle routes run throughout and around the site. Cycle Superhighway 1 is just over 1 kilometre west of the site.

Details of this proposal

9. The proposal is for the demolition of the existing buildings on site to provide 272 new homes. Two non-residential units are proposed one to the south west marking the existing entrance to Down Lane Park and the other at the new junction where Ashley Road meets the site.
10. Buildings on the site range from 4 to 13 storeys in height that are arranged around two new north-south routes through the site.

Case history

11. The proposal has been subject to a pre-application meeting in principle on 15 September 2021 (Ref. 2021/0846/P1). The principle of redevelopment for residential led mixed uses was supported. A further pre-application meeting with GLA and TfL officers was held on 3 December 2021 (Ref. 2021/0953/P21). Meeting discussion centred around land use principles, housing, urban design and heritage, transport and energy.
12. The pre-application report concluded that subject to the relocation of the safeguarded waste site complying with Policy SI9, the introduction of residential units on the site would be supported and the 61% affordable housing offer, all at Social Rent level, would be strongly supported in strategic terms. In addition, other issues in relation to design, transport, sustainable development and environmental matters would need to be addressed in the future application.
13. The proposal has been presented to the Haringey Council's Quality Review Panel (QRP) twice. According to the submission, the height and massing was generally considered acceptable in principle. However, concerns were raised about the southeast portion of the site. This led to a reduction in height along Park View North and Buildings A3 and B2 were also reduced in height to improve their relationship with the park. These changes were subsequently supported at the follow-up QRP meeting. They were also generally supportive of the landscaping proposals. Other comments were made in respect of the hierarchy of entrances, production of a vehicular management strategy; encouraging further differentiation of architectural expression, particularly key buildings; and exploring the potential to push the sustainability credentials of

the development. The submission details how each of the comments has been addressed within the final scheme.

Strategic planning issues and relevant policies and guidance

14. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Haringey Strategic Policies DPD (2017), Development Management Policies DPD (2017), Site Allocations DPD (2017) and Tottenham Area Action Plan (2017); and the London Plan 2021.
15. The following are also relevant material considerations:
 - The National Planning Policy Framework and National Planning Practice Guidance;
 - The National Design Guide; and
 - North London Waste Plan (NLWP) and Main Modifications.
16. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:
 - Good Growth - London Plan;
 - Opportunity Area - London Plan;
 - Industrial land - London Plan;
 - Housing - London Plan; Housing SPG; the Mayor's Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG; Good Quality Homes for All Londoners draft LPG;
 - Affordable housing - London Plan; Housing SPG; Affordable Housing and Viability SPG; the Mayor's Housing Strategy;
 - Commercial uses - London Plan;
 - Waste - London Plan; the Mayor's Environment Strategy;
 - Urban design - London Plan; Character and Context SPG; Public London Charter draft LPG; Play and Informal Recreation SPG; Housing Design Standards draft LPG; Optimising Site Capacity: A Design-led Approach draft LPG; Fire Safety draft LPG;
 - Heritage - London Plan;
 - Inclusive access - London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG

- Sustainable development - London Plan; Circular Economy Statements LPG; Whole Lifecycle Carbon Assessments LPG; 'Be Seen' Energy Monitoring Guidance LPG; Urban Greening Factor draft LPG; London Environment Strategy;
- Air quality - London Plan; the Mayor's Environment Strategy; Control of dust and emissions during construction and demolition SPG; Air Quality Neutral draft LPG;
- Transport and parking - London Plan; the Mayor's Transport Strategy; Sustainable Transport, Walking and Cycling draft LPG;
- Crossrail - London Plan; Mayoral Community Infrastructure Levy; Crossrail Funding SPG; Use of planning obligations in the funding of Crossrail and the Mayoral Community infrastructure levy SPG;
- Biodiversity - London Plan; the Mayor's Environment Strategy; Preparing Borough Tree and Woodland Strategies SPG;
- On 24 May 2021 a Written Ministerial Statement (WMS) was published in relation to First Homes. To the extent that it is relevant to this particular application, the WMS has been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation. Further information on the WMS and guidance in relation to how the GLA expect local planning authorities to take the WMS into account in decision making can be found [here](#). (Link to practice note)

Land use principles

17. Part of the application site is occupied by the Park View Road Reuse and Recycling Centre, albeit the centre closed in 2018. This facility remains a safeguarded waste site in the adopted and emerging North London Waste Sites Local Plan. As previously stated, the relocation of the waste facility is also a condition of the site allocation. As stated at pre-application stage, the redevelopment of the site for residential led mixed uses would only be supported if the relevant waste plan is adopted before considering the loss of waste sites. Furthermore, the proposed loss of an existing waste site would only be supported where appropriate compensatory capacity is made within London that must be at or above the same level of the waste hierarchy and at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost in accordance with Policy SI9 of the London. As identified in Table 2 in Haringey's Local Plan, any compensatory provision would need to be capable of processing the same maximum throughput of the Park View waste facility, namely 6,326 tonnes of waste per annum.
18. The Park View Road Reuse and Recycling Centre waste facility on the site is identified as a safeguarded waste site in the North London Waste Plan (NLWP). Although it is not adopted, it has completed the examination process and is due to be adopted by Summer 2022. In general it is noted that the post examination NLWP identifies that additional waste management capacity is

required for recycling and recovery over the plan period, with the greatest need identified within the boroughs of Enfield and Barnet. The draft NLWP proposes that additional capacity should be provided via intensification of existing sites, and/or new facilities. Notwithstanding this, should the applicant provide appropriate compensatory capacity as per London Plan Policy SI9, the loss of this waste site could be considered acceptable on balance.

19. The submission states that compensatory re-provision is to be provided in association with a development recently granted planning permission at the Marsh Lane Refuse Depot. Planning permission was granted at this site (LPA Ref HGY/2019/1278) for the erection of a two storey office and workshop building, gatehouse and other ancillary buildings/stores, repositioning of existing storage buildings, provision of new vehicle access onto Watermead Way, and provision of vehicle parking and circulation areas.
20. The associated committee report states that the proposal would replace the existing Council depot operations that currently take place at Ashley Road and that this would enable the release of the Council's Ashley Road site. However, from further conversations with Council officers it is understood that this stated release relates to the activities previously carried out at the Ashley Road depot to the south of the site rather than those undertaken by the Park View Road Refuse and Recycling Centre, on the application site. See Figure 1 below for the avoidance of doubt.



Figure 1: Location of safeguarded waste sites

21. For the avoidance of doubt, the Ashley Road site was previously used as a depot for the waste/cleansing service, essentially for parking vehicles and staff deployment not a waste handling/processing site and it is these activities that are to transfer to Marsh Lane.

22. From further discussions with Council officers, it is understood that when the Park View Road Reuse and Recycle Centre closed, all activities on that site were transferred to the existing Western Road Recycling Centre which, it is understood, has a licenced maximum throughput capacity of 75,000 tonnes per annum. However, whilst there may be scope for reasonable intensification of this facility, it is noted that the maximum licenced capacity is unlikely to ever be reached due to safety/ site constraint reasons.
23. The maximum throughput capacity of Western Road Recycling Centre is not proposed to increase to provide the necessary compensatory capacity resulting from the loss of Park View as required by London Plan Policy SI9. Therefore, whilst the displaced Park Road capacity could be absorbed at Western Road (refer below), based on current understandings the proposed development would effectively result in the permanent loss of the Park View waste facility and its associated waste capacity. This is not in accordance with the London Plan.
24. The below table records the amount of waste processed by the Borough at their Western Road and Park View sites per annum including the volume of waste processed since Park View was closed.

	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21
Number of recycling centres	2	2	2	2	2	1	1	1	1
Recycling	5,574	6,798	7,672	7,405	7,446	6,831	5,970	3,609	3,042
Residual	3,955	4,356	3,806	2,933	3,203	2,263	2,387	1,646	1,453
Total	9,529	11,154	11,478	10,338	10,649	9,094	8,350	5,255	4,495

Table 1: Waste being processed within Haringey per annum

25. Whilst waste processing in the borough has been on a downward trend since 2014/15, the relatively recent marked decline in waste being processed has been mainly attributed to the effect of COVID-19 amongst and reduction in packaging waste due to an increased awareness of environmental impacts.
26. Notwithstanding this, it is noted that the licenced headroom of maximum throughput capacity of the existing Western Road facility has and is continuing to far outstrip the quantum of waste it is currently processing even when taking into account the additional maximum throughput of Park View of 6,326 tonnes per annum. Nevertheless, in view of site constraints at Western Road, and noting that the draft NLWP identifies an overall shortfall in recycling and recovery capacity in response to forecast growth, GLA officers seek assurance that Western Road could meet its waste plan apportionment, combined with that assumed for Park View, over the plan period. Accordingly, GLA officers seek confirmation of the respective plan period waste capacity apportionments for Park View and Western Road within the draft NLWP, as well as clarification on the maximum achievable throughput at Western Road. Following confirmation of these figures, and any necessary further discussions, an assessment of compliance with Policy SI9 will be concluded at the Mayor's decision making stage.

Commercial use

27. The proposals also include the development of two small flexible commercial (Use Class E) units measuring 198 sq.m in total, one on the far eastern side of the site and one on the western edge. Both sites are adjacent to the park. It is understood the full range of Class E uses are being sought, with the exception of bar/ drinking establishment use. This should be secured via condition. Given the very limited size of these units, it is not considered that the use of these units for retail or other town centre uses in this location would have an adverse impact on the viability of nearby town centres in line with Policy SD7 and a sequential test or retail impact assessment would therefore not be warranted.

Housing

28. There is an existing single dwelling-house on the site. Under the provisions of Policy H8 of the London Plan, any redevelopment of sites containing existing housing must be replaced at existing or higher densities than before with at least the equivalent level of overall floorspace. In this regard the proposals would provide 272 new homes, a net increase of 271 homes, on a publicly owned and underutilised brownfield land in accordance with Policies H1 and H8 of the London Plan.
29. The proposals would comprise the following mix:

	1 bed	2 bed	3 bed	4 bed	Total units	Hab. rooms
Market	56	80	0	0	136	352
Social Rent	10	34	67	25	136	607
	66	114	67	25	272	959

30. London Plan Policies H4 and H5 and the Mayor's Affordable Housing and Viability SPG set out the 'threshold approach' to planning applications. The threshold level of affordable housing is a minimum of 35%, or 50% on public land and industrial land suitable for residential uses where the scheme would result in a net loss of industrial capacity. As the site is both publicly owned and an industrial site, the threshold for following the Fast Track Route would be 50%. Such applications must also meet the requirements of Policy H5 Part C and Policy H6 of the London Plan to be eligible for the Fast Track Route.
31. The applicant proposes to meet this threshold by delivering 63% affordable housing by habitable room over the entire scheme. This would include a total of 136 affordable homes all of which will be social rent. On a habitable-room basis, this equates to 607 rooms, against a total of 959 habitable rooms.

32. Based on the above offer, and subject to the Council's acceptance of the proposed tenure, the scheme is expected to meet with the Fast Track Threshold Route requirements.
33. With regards to tenure, London Plan Policy H6 and the Mayor's SPG sets out a preferred tenure split for market housing schemes of at least 30% low cost rent (social or affordable rent, significantly less than 80% of market rent), at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined by the local planning authority taking into account relevant Local Plan policy.
34. As a mono-tenure offer, it does not provide the minimum of 30% intermediate homes required by Policy H6. Local Plan Policy DM13 seeks to secure 40% affordable housing which is split 60% social/affordable and 40% intermediate. However, it also states that the Council may seek to alter the tenure and/or mix of affordable provision to be secured on a case-by-case basis to avoid affordable housing of a certain tenure or size being over or under represented in an area. Part B of Policy H6 allows applicants to provide low-cost rented homes in place of intermediate homes. It is understood that local planning officers are comfortable with 100% social rent scheme based on current local need, therefore the scheme can potentially follow the Fast Track Route at 100% social rent on this basis (subject to confirmation of the above subsidy point).
35. The Council should ensure that the quantum and tenure of the affordable units are appropriately secured as part of any planning permission. As this is a Council led scheme, the mechanism of how these affordable homes are to be secured (e.g. a unilateral undertaking with a S.106 entered into by the new owner if the intention is to sell the land, or a service level letter/agreement) should be discussed with and provided to GLA officers prior to Stage 2 referral.

Residential mix

36. London Plan Policy H10 encourages a full range of housing choice. It states that boroughs should provide guidance on the size of units required to ensure affordable housing meets identified needs. Local Plan Policy DM11 states that an overprovision of 1 and 2 beds should be avoided unless they are part of a larger development. The scheme would provide a good mix of unit sizes including 34% family sized dwellings (3+ beds) overall, all of which are for social rent. This does not raise any issues from a strategic perspective.

Playspace

37. London Plan Policy S4 seeks to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 sq.m. per child that is not segregated by tenure. The playspace requirement for the development should be calculated using the GLA's population yield calculator <https://data.london.gov.uk/dataset/population-yield-calculator>.

38. The proposals include the provision of 984 sq.m. of playspace across the development catering for 0-5 year olds, all provided within the courtyard spaces at ground floor level relative to the child yield of each of the three blocks. The remaining playspace would be accommodated within Down Lane Park, adjacent to the south and Hartington Park to the north west. The Council should consider securing a contribution in lieu of on-site playspace to fund improvements to these parks. The applicant has confirmed that the playspace would not be segregated by tenure.
39. Full details should be secured via condition.

Urban design

40. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.

Design scrutiny

41. London Plan Policy D4 requires that all proposals that meet the local definition of a tall building or exceed 350 units per hectare, and that are referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made or demonstrate that they have undergone a local borough process of design scrutiny.
42. As suggested at pre-application stage, the proposals have been presented to the Council's Quality Review Panel twice as confirmed in the case history. The feedback has generally been positive and the applicant has worked proactively to address comments made. Therefore, the proposals comply with Policy D4 of the London Plan.

Development layout

43. The masterplan principles respond to the site's character and significantly improves its relationship with the park which is supported. There is a good number of entrances facing onto the park.
44. The new north-south routes through the site are welcomed which creates new physical and visual linkages through to the park. The on-street parking remains as proposed at pre-application stage. Specific comments on vehicle parking and layout are provide within the transport section of this report.
45. The affordable housing blocks are well distributed across the site. It is noted that all homes are designed to be tenure blind with the same building materials and detailing to both social rent and open market sales which is welcomed in line with Policy D6 of the London Plan.

Scale and massing

46. The overall height and massing strategy is supported. The height of buildings B2 and C2 and in particular their bulk when viewed from the west was a concern at pre-application stage. These have been brought down in height and the townscape views do not give rise to any concerns in this regard. The elevations are now sufficiently detailed to further break up the massing. The frontages to buildings A3 and A4 have been broken up through additional detailing as advised.
47. The proposals involve the development of a 13 storey block. Tall buildings are defined in the Local Plan as being 10 storeys and over. The site is not within an area identified as a potential tall building location. Therefore, the development would not comply with Part B of London Plan Policy D9. Notwithstanding this issue of non-compliance, the visual, functional, environmental and cumulative impacts of the scheme must be addressed in line with Policy D9 Part C. GLA officers will have regard to the level of compliance with Policy D9 and the London Plan as a whole, in conjunction with all other material considerations, when considering tall building acceptability in the planning balance at the Mayor's decision making stage.

Public realm

48. The landscape quality of the overall scheme is welcomed. The communal amenity space is of high quality and the proposals retain a good number of existing trees.

Internal quality

49. In terms of residential quality, 86% of units are either dual or triple aspect. It is clear that the applicant has worked hard to maximise the provision of dual aspect homes through the use of a range of housing typologies. There is an average of 6 units per core. None of the single aspect homes are north facing, which is welcomed. The residential units meet the minimum internal and external space standards as prescribed by Policy D6 of the London Plan. The proposals do not give rise to concerns in respect of daylight/ sunlight, overshadowing to amenity space or privacy but further information is required before it can be confirmed that overheating is not an issue as set out in the energy section of this report.

Architectural quality

50. It is clear that the applicant has sought to address previous concerns raised regarding the use of varying materials and providing more differentiation between blocks in respect of detailing, which is welcomed.

Fire safety

51. In line with Policy D12 of the London Plan, development proposals must achieve the highest standards of fire safety.

52. The application is supported by a Fire Safety Statement (FSS) prepared by the Joule Group, by a suitably accredited fire engineer. The document generally addresses the various requirements of Policy D12. However, the statement should be updated with the following further information: further detail and justification is required in respect of the evacuation strategy; as a qualifying development the applicant should fill out the Gateway 1 form and form 3 for completeness as provided within the draft Fire Safety LPG; location of the pumping appliances, and details of access for fire services and equipment during construction should be provided; sufficient water supply should be confirmed; how the fire strategy and the protective measures would be retained and not be compromised throughout the lifetime of the development.
53. Full detailed comments have been provided to the Council and applicant.
54. The Council must secure all the proposed measures as detailed in the statement through appropriate planning conditions.

Inclusive access

55. Policy D5 of the London Plan seeks to ensure that new development achieves the highest standards of accessible and inclusive design (not just the minimum). The future application should ensure that the development: can be entered and used safely, easily and with dignity by all; is convenient and welcoming (with no disabling barriers); and provides independent access without additional undue effort, separation or special treatment.
56. In this regard, the proposals generally propose a good standard of accessibility, ensuring all parts of the development are safely accessible to all and limiting barriers to access.
57. In accordance with Policy D7 of the London Plan 28 units (over 10% of new build dwellings would meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all remaining dwellings would meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. The location of the wheelchair user homes is indicated on the plans and provide a choice of unit sizes and tenure. The Council should secure M4(2) and M4(3) requirements by condition.
58. The provision of evacuation lifts should also be secured by condition in accordance with Policy D5.

Heritage

59. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should 'should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'.

60. Policy HC1 of the London Plan states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets. In line with case law, any harm identified must be given considerable importance and weight.
61. Paragraph 194 of the NPPF further specifies that in determining applications, local planning authorities should require an applicant to describe the significance of any affected heritage assets, including any contribution made by their setting. Furthermore, paragraph 203 states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
62. The site is not within a conservation area and does not contain any listed or locally listed buildings. However, it is located to the east of Bruce Grove CA and to the north east of Scotland Green CA, both of which form part of the Tottenham High Road Historic corridor. There are several Grade II listed buildings on the High Road to the west. A heritage, townscape and visual impact assessment has been undertaken. The proposals can only be glimpsed at along roads heading east off the High Road and are of a significant distance away such as it would not impact and therefore harm the setting or significance of any of the heritage assets in the vicinity as identified above.

Sustainable development

Energy strategy

63. London Plan Policy SI 2 requires development proposals to reduce carbon dioxide emissions in accordance with the energy hierarchy. Technical energy comments have been provided to the applicant and Council in full under a separate cover. The applicant should respond to this detailed note to address outstanding issues to ensure compliance with the London Plan in advance of the borough planning committee to ensure that any conditions can be appropriately secured.
64. In summary, this is an exemplar scheme which achieves Passivehaus targets, key performance indicators for LETI Net Zero, which is fully supported. The development would achieve a 67% reduction in overall regulated CO2 emissions for the domestic element and 40% for the non-domestic. However, further information is required in respect of overheating; evidence of correspondence for Edmonton Energy from Waste potential and the applicant should continue to engage with the council; the provision of on site network and future connection drawings; further information on ASHP (plan B); and details of PHPP would be welcomed. Furthermore, 'Be Seen' monitoring provisions and an appropriate carbon offset payment would need to be captured in any legal agreement.
65. Full technical comments have been issued to the applicant and Council.

Whole Life Carbon

66. In accordance with London Plan Policy SI12 the applicant is expected to calculate and reduce whole life-cycle carbon emissions to fully capture the development's carbon footprint. The applicant has not submitted a whole life-cycle carbon assessment, which is a requirement of any application submission. This should be submitted for review as soon as possible. This should follow the Whole Life-Cycle Carbon Assessment Guidance and use the GLA's reporting template. The applicant would also be conditioned to submit a post-construction assessment to report on the development's actual WLC emissions. The assessment guidance and template are available on the GLA [website](#).

Circular Economy

67. In line with London Plan Policy SI7, referable applications should promote circular economy outcomes and aim to be net zero-waste. The applicant has submitted a Circular Economy Statement (CES) however, it lacks sufficient detail. In summary, the applicant should provide additional details including: providing a description of the development; additional detail to the strategic approach; key commitments should go beyond standard practice; bill of materials should be expanded upon; commit to achieving 95% of excavation waste to beneficial use; estimates of waste arising should be provided; undertake a pre-demolition audit; commit to waste hierarchy for operational waste and provide further information on operational waste in the statement; provide plans for implementation and end of life strategy as per GLA guidance; provide as an appendix or cross-reference the required supporting information; and commit to a post completion condition and set out indicative deadlines for this.
68. A revised CES should be submitted which fully addresses the items raised in the technical response, the details of which have been sent to the Council and applicant. The requirement to submit a post construction monitoring report should be secured by condition.
69. Full technical comments have been issued to the applicant and Council separately.

Digital connectivity

70. In accordance with Policy SI6 of the London Plan sufficient ducting space for full fibre connectivity infrastructure should be provided to all end users within the development, unless an affordable alternative 1GB/s-capable connection is made available to all end users. The development should also meet demand for mobile connectivity; and not interfere with existing connectivity in the surrounding area or mitigation measures put in place to minimise interference. Full details as to how the proposals would meet the objectives of this policy should be provided.

Environmental issues

Urban greening and SINC

71. Policy G5 of the London Plan requires major development to contribute to the greening of London by including urban greening as a fundamental element of the site and building design. In the absence of a locally set urban greening factor (UGF) the development should achieve a target score of 0.4 for developments that are predominantly residential. In this regard, the development is set to achieve a UGF of 0.45, which exceeds this target and is therefore welcomed. However, the applicant should provide a drawing showing the surface cover types as a standalone document to accompany the Urban Greening Factor Score calculation.
72. An Ecological Impact Assessment has been prepared for the proposed development which considers potential for impacts upon the adjacent SINC. The report states that without mitigation measures to be set out in the CEMP, construction activities could have a negative impact at a local level. As such, the CEMP should be secured by condition with reference to the Ecological Impact Assessment mitigation measures and approved prior to construction.

Biodiversity

73. The development proposes a biodiversity net gain of 104% which is welcomed, in line with London Plan Policy G6.

Sustainable drainage and flood risk

74. The Flood Risk Assessment provided for the proposed development does not currently comply with London Plan Policy SI12, as further information / clarification is required regarding the risk of fluvial and pluvial flooding.
75. The surface water drainage strategy for the proposed development does not currently comply with London Plan Policy SI13 as further clarification on the SuDS proposed is required and every effort should be made to include rainwater harvesting, or appropriate justification if it is not proposed. An updated drainage strategy plan should also be provided.
76. The proposed development generally meets the requirements of London Plan Policy SI5. However, the applicant should also consider water harvesting and reuse to reduce consumption of water across the site. This can be integrated with the surface water drainage system to provide a dual benefit.
77. Additional technical comments have been provided to the applicant and Council.

Air quality

78. Further information is required to determine compliance with London Plan Policy SI1 including providing further evidence to justify the conclusions of

construction dust risk assessment, and to inform the appropriate level of mitigation. Furthermore, an Air Quality Neutral assessment should be carried out in accordance with Policy SI1 and the Air Quality Neutral draft LPG.

79. A condition is recommended to ensure that on-site plant and machinery complies with the London Non-Road Mobile Machinery (NRMM) Low Emission Zone standards for Opportunity Areas. Also, a condition is required to secure measures to control emissions during the construction phase relevant to the risk site. The measures should be approved by the Council, implemented and monitoring protocols implemented throughout the construction phase.
80. Full technical comments have been provided to the applicant and Council.

Transport

Healthy Streets and Active Travel Zone (ATZ) assessment

81. The Mayor's Healthy Streets (HS) Approach is central to delivering good growth in London and enabling people to travel by walking, cycling and public transport.
82. It is expected that all streets and public realm within and around the site to be designed in line with the HS Approach to help achieve the outcomes of the Mayor's Transport Strategy (MTS) relating to healthy streets and healthy people, a good public transport experience, and delivery of good growth.
83. The proposals are supported by an ATZ. To be in line with London Plan policies T2 (Healthy Streets) and T4 (Assessing and mitigating transport impacts), the design of the public realm should reduce vehicle dominance and improve safety for pedestrians and cyclists.
84. Vehicle reduction along Ashley Road is encouraged to maintain safety for pedestrians and cyclists along the School Street Zone. The relationship between the development and the adjacent park should be improved with greater permeability, in line with supporting active travel and healthy streets. For example, the access control bollards proposed along the Park Edge and Residential Street must not restrict wider types of cycles. Tonal contrasts with the surrounding environment must be considered to aid visually impaired pedestrians and cycles. The park edge should be continued along the Park Edge cycling/walking route east of Ashley Road to help connect the site by cycle

Trip generation

85. The applicant has undertaken a trip assessment which is satisfactory. The proposals will increase demand at Tottenham Hale station, though given the recent upgrade, no site-specific mitigation is necessary. In addition, the assessment concludes that there is enough capacity on the surrounding bus network, to cause no significant impact. The methodology used is to divide all bus trips by the number of routes in the area. However, the proximity of route

318 indicates that demand for this route will be higher. Upon further clarification about this matter, mitigation maybe required.

Cycle parking

86. The provision of 512 long stay cycle parking spaces provided for residential purposes is compliant with London Plan Policy T5 (cycling).
87. 14 short stay cycle parking spaces are also provided for residential use and 16 spaces are provided for non-residential use on site, located throughout the public realm which is in line with policy T5 and therefore supported.
88. All cycle parking, should be in line with London Cycle Design Standards (LCDS), and must be located in easily accessible and safe spaces. Five percent of the spaces should be Sheffield stand type spaces and be at ground level with sufficient access space to accommodate adapted bikes for inclusive cycles, cargo cycles, and tricycles.

Car parking

89. 42 car parking spaces are proposed which is 0.15 spaces per dwelling. This is strongly supported given the location in an Outer London Opportunity Area and to minimise the cumulative impact of development in the area on the road network. A minimum of 3% of parking spaces must be blue badge parking and allocation for residential parking spaces should be prioritised for disabled residents.
90. 20% of the proposed car parking will have active electric vehicle charging point (EVCP) provision, remaining spaces will have passive EVCP provision. This should be secured via condition.
91. A Car Management Plan should be secured by the Council as a condition for any future planning permissions.

Management Plans

92. An outline Construction Logistics Plan (CLP) has been provided. A full CLP should be secured by condition in line with London Plan policy T7 (Deliveries, servicing and construction) and discharged in consultation with Transport for London prior to commencement. The full CLP should detail all logistics and construction proposals to ensure that pedestrian and cyclist movement and safety and bus operations are maintained throughout construction. This will support sustainable travel in line with London Plan policies and the Mayor's Vision Zero goal to eliminate deaths and serious injuries from London's transport networks by 2041 and ensure compliance with London Plan policy T4 part F, which says development proposals should not increase road danger. A Delivery and Servicing Plan (DSP) in line with Policy T7 of the London Plan must be provided. This should include a delivery and servicing strategy for this site to ensure that the proposed development does not impact on the surrounding transport network.

93. The provision of cargo bike parking bays to support last-mile deliveries by foot or cycle is welcomed in line with the Mayor's Freight and Servicing Action Plan.
94. An outline residential Travel Plan has been submitted. Funding for the implementation and monitoring of a full Travel Plan should be secured in the S106 in line with London Plan policy T1 (Strategic approach to transport) and T4 part B which states that transport assessments should be submitted with development proposals to ensure that impacts on capacity of the transport network and fully assessed.

Road Safety and vision zero

95. With regards to access from the existing Ashley Road to the new extension, a Stage 1 Road Safety Audit (RSA) should be carried out. There are concerns with vehicle dominance along the extension of Ashley Road due to the location of the servicing bays and the position of the proposed car parking bays, both blue badge and additional car parking.

Local planning authority's position

96. In due course the Council will formally consider the application at a planning committee meeting.

Legal considerations

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

Financial considerations

98. There are no financial considerations at this stage.

Conclusion

99. London Plan policies on safeguarded waste sites; commercial use; housing; affordable housing; urban design; heritage; environmental issues; sustainability;

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

- Land use principles: Any loss of this waste site without compensatory re-provision equal to the maximum throughput of the site is contrary to Policy SI9. As proposed the waste that had been processed by the Park View facility on site would be absorbed by the existing Western Road Recycling Centre without interventions to increase its relative throughput capacity. Clarifications are sought to determine whether Western Road could meet its emerging waste plan waste capacity apportionment, in conjunction with that of Park View, over the plan period. Following this, compliance with Policy SI9 will be assessed at the Mayor's decision making stage.
- Affordable housing: The affordable housing offer is 63% by habitable room, which exceeds the 50% Fast Track Route threshold for industrial/ publicly owned sites. The affordable housing offer comprises entirely social rent homes. The Council planning officers have confirmed that this is acceptable in this instance due to housing need.
- Urban design: The design and layout of the scheme is supported. The site is identified as suitable for the development of tall building, therefore the scheme complies with Policy D9. The applicant has responded well to comments made at pre-application stage and takes full advantage of its park side location. Overheating would need to be addressed, and the Fire Strategy Statement must be revised to provide further information and justification. The provision of wheelchair accessible and adaptable homes should be secured via condition in addition to the provision of evacuation lifts.
- Sustainable development: The energy strategy is exemplary, however, further information is required in respect of overheating; evidence of correspondence for Edmonton Energy from Waste potential and the applicant should continue to engage with the council; the provision of on site network and future connection drawings; further information on ASHP (plan B); and details of PHPP would be welcomed. Furthermore, 'Be Seen' monitoring provisions and an appropriate carbon offset payment would need to be captured in any legal agreement. A Whole Life Cycle Carbon Statement has not been prepared, one must be provided in accordance with Policy SI12 in accordance with GLA guidance. The Circular Economy Statement lacks sufficient detail and a revised statement should be provided including the required information. The production of post construction statements would need to be secured by condition. Digital connectivity has not been addressed within the submission.
- Environmental issues: A UGF score of 0.45 is welcomed. However, a landscape drawing setting out how the UGF score has been reached should be provided. The mitigation measures required to ensure no adverse impacts on the adjacent SINC should be secured via condition. A biodiversity net gain of 104% is sought, which is welcomed. Further

clarification on the SuDS proposed is required and every effort should be made to include rainwater harvesting, or appropriate justification if it is not proposed. An updated drainage strategy plan should also be provided. Further information is required including providing further evidence to justify the conclusions of construction dust risk assessment, and to inform the appropriate level of mitigation. Furthermore, an Air Quality Neutral assessment should be carried out and conditions secured regarding the use of machinery.

- **Transport:** All streets and public realm within and around the site should be designed in line with the healthy streets approach. The design of the public realm should reduce vehicle dominance and improve safety for pedestrians and cyclists. The relationship between the development and the adjacent park should be improved with greater permeability. There are concerns with vehicle dominance along the extension of Ashley Road due to the location of the servicing bays and the position of the proposed car parking bays, both blue badge and additional car parking. Further information on trip generation is required. All cycle parking should accord with LCDS requirements. Management Plans should also be secured.

For further information, contact GLA Planning Unit (Development Management Team):

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We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

Appendix 5 – Summary of Representations from Residents

LOCAL REPRESENTATIONS:	Summary of objection	Response
<p>18 INDIVIDUAL RESPONSES (PLUS TWO REPEAT SUBMISSIONS)</p> <p>14 IN OBJECTION</p> <p>4 IN SUPPORT</p>	<p>Material planning considerations</p> <ul style="list-style-type: none"> • Out of keeping with character of area • Negative impact on character and appearance of area • Excessive development density • Excessive height 	<p>The proposal is a transitional development between the residential neighbourhood to the north and the emerging and built developments to the south on Ashley Road and in Tottenham Hale. The materiality is of a high quality and reflects other materials in the surrounding area.</p> <p>As per the above the development is not out of keeping with the local built environment context. The detailed design has been subject to multiple pre-application and quality review panel meetings and is thus of a high-quality that would accord with and improve local character.</p> <p>New development is required to optimise the capacity of available sites in London which this development would achieve. The site has the characteristics to successfully provide higher density development including good access to public transport and proximity to a range of local amenities including parks and shops.</p> <p>The height on this site can be justified as the site is suitable for denser development given its amenity and public transport access mentioned</p>

	<ul style="list-style-type: none"> • Increased overlooking • Increased overshadowing • Loss of privacy • Loss of day/sunlight • Increased vehicular traffic 	<p>above and the close proximity to much taller buildings within Tottenham Hale District Centre. The tall buildings proposed provide a gateway to an extended Ashley Road and improve local wayfinding. The taller buildings help to frame the park, in a similar manner to those buildings on the southern side of the park. The building heights generally form a transition between Tottenham Hale and the residential neighbourhood to the north.</p> <p>Overlooking towards existing residential properties would not be significant due to the good separation distance between the proposal and all neighbouring properties. New homes have been oriented to minimise overlooking.</p> <p>There would be minimal overshadowing of existing properties. The park would not be significantly overshadowed as it is located to the south of the site.</p> <p>See increased overlooking above. Privacy of existing residents would not be significantly affected by this proposal.</p> <p>Loss of day/sunlight to existing residential properties would not be significant due to the good separation distance between the proposal and all neighbouring properties.</p>
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	<ul style="list-style-type: none"> • Increased on-street parking • Increased air, noise and litter pollution • Insufficient public realm improvements • Insufficient cycling/walking improvements • Inappropriate highway works 	<p>Vehicle traffic from the development would be reduced in comparison to that from the former depot use of the site.</p> <p>Local parking stress surveys have shown there is ample space on nearby streets to accommodate the predicted overspill parking from the development. Parking permits would not be issued to occupiers of the new units.</p> <p>No significant increase in pollution is expected from a new car-capped housing development on this site. Less vehicle movements are expected than from the previous depot use, which would improve air quality. Any disturbance from construction would be mitigated as far as possible through a construction management/logistics plan.</p> <p>There will be a wide range of high quality public realm improvements including new paths around the site, widened public realm areas, a new border to the park, publicly accessible routes through the site and financial contributions towards improvements to access to the Lee Valley Regional park. The park and local roads would also be improved.</p> <p>New pedestrian and cycle priority routes would be provided around the site. The development would provide financial contributions towards walking and cycling measures in the local area.</p>
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	<ul style="list-style-type: none"> • Lack of local community facilities • Lack of local retail/café facilities • Increased pressure on local services • Increased anti-social behaviour • Trees must be protected • Increased pressure on local green space 	<p>Highway works have been developed in collaboration with the Council's Highways team and would improve highway safety and conditions in the local area.</p> <p>The non-residential units in the development may include community facilities. This has yet to be decided. The development would contribute towards improvements to the park which includes the provision of new community facilities and play space.</p> <p>The non-residential units in the development may include retail and/or café facilities. This has yet to be decided.</p> <p>Contributions towards local services will be provided through the community infrastructure levy provided by this development.</p> <p>A contribution will be provided to increase local policing in the area, as the result of an increased population.</p> <p>All of the mature tree specimens around the site would be retained. Although 15 low quality trees would be lost 74 new trees would be planted which significantly improves tree planting in the local area.</p> <p>There would be increased usage of the adjacent park which is large enough to cater for new</p>
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		<p>residents. Other green spaces would share this increased demand. The development will make substantial contributions to improvements to the adjacent park thereby improving its quality and facilities. Connectivity to other local green areas, including the Lee Valley Regional Park, would also improve significantly.</p>
	<p>Non-planning considerations</p> <ul style="list-style-type: none"> • Loss of a private view • Loss of rights to light • Insufficient environmental assessment • Submission of application is premature 	<p>This is a private matter and therefore not a material planning consideration.</p> <p>This is a private matter and therefore not a material planning consideration.</p> <p>Relevant environmental matters have been considered in detail as part of this application.</p> <p>The application has been assessed on the basis of the context at the time of submission.</p>

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Appendix 6 – Quality Review Panel Reports

Panel Review 1

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Haringey Quality Review Panel

Report of Formal Review Meeting: Ashley Road Depot

Wednesday 29 September 2021
Zoom video conference

Panel

Hari Phillips (chair)
Mitch Cook
Irène Djao-Rakotine
Louise Goodison
Dieter Kleiner

Attendees

Rob Krzyszowski	London Borough of Haringey
Robbie McNaugher	London Borough of Haringey
John McRory	London Borough of Haringey
Richard Truscott	London Borough of Haringey
Chris Smith	London Borough of Haringey
Sarah Carmona	Frame Projects
Reema Kaur	Frame Projects

Apologies / report copied to

Deborah Denner	Frame Projects
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Confidentiality

This is a pre-application review, and therefore confidential. As a public organisation Haringey Council is subject to the Freedom of Information Act (FOI), and in the case of an FOI request may be obliged to release project information submitted for review.

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1. Project name and site address

Ashley Road Depot, London, N17 9AZ

2. Presenting team

Mark Stallard	London Borough of Haringey
Bruno Bridge	London Borough of Haringey
Martin Cowie	London Borough of Haringey
Geertje Kreuziger	London Borough of Haringey
Jo McCafferty	Levitt Bernstein
Vinita Dhume	Levitt Bernstein
Li Duanjuan	Levitt Bernstein
Andrew McKay	Levitt Bernstein
Chris Lomas	Levitt Bernstein
Jamie Sullivan	Iceni Projects
Sophie Heritage	Iceni Projects
Thomas Lefevre	Etude

3. Aims of the Quality Review Panel meeting

The Quality Review Panel provides impartial and objective advice from a diverse range of experienced practitioners. This report draws together the panel's advice and is not intended to be a minute of the proceedings. It is intended that the panel's advice may assist the development management team in negotiating design improvements where appropriate and in addition may support decision-making by the Planning Committee, in order to secure the highest possible quality of development.

4. Planning authority briefing

Ashley Road Depot is a broadly rectangular site of approximately two hectares located at the northern end of Ashley Road, to the north of Tottenham Hale. It is currently a council waste collections depot. The site is bounded by the Park View Road to the north and west, Down Lane Park to the south and a secondary school to the east. The site is currently surrounded by a brick wall. The Depot forms part of Ashley Road North Site Allocation (TH7) in the Tottenham Area Action Plan, which identifies the site for new residential development that complements Down Lane Park. The site allocation also requires the extension of Ashley Road to connect to Park View Road (without providing a through route for vehicles). The site is located within the Lee Valley Opportunity Area, the Tottenham Hale Housing Zone and a designated Growth Area. A small corner of the site is currently a safeguarded waste use. The adjacent park is a Site of Importance for Nature Conservation. The maximum public transport accessibility level rating of the site is 5. The area surrounding the site is characterised predominantly by two storey residential properties, a park and two nearby schools (one in a former low-rise office building). There are no conservation areas or listed buildings close to the site – the nearest locally listed building is located 350 metres to the south.

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The proposed development would provide approximately 275 dwellings within three main blocks, with heights ranging from four to thirteen storeys in height. Two new north-south routes would be provided between the blocks – the route to the east would extend Ashley Road and enable vehicle access to the development from the north and south (but no through road), and the other route in the centre of the site would be for pedestrians and cycles only. A commercial unit would be provided on the south-west corner of the development. 50 percent of the homes would be social rented accommodation, with two thirds of those units including at least three-bedrooms. 41 car parking spaces are proposed, enabling wheelchair accessible parking to be provided along with additional parking to support the family-sized social housing. Officers seek the panel's views on scale, massing and building heights, residential layout, the relationship with the park, the re-provision of the existing waste capacity, car parking, sustainability and landscape design.

5. Quality Review Panel's views*Summary*

The Quality Review Panel welcomes the opportunity to consider the proposals for the Ashley Road Depot as they continue to evolve. It congratulates the Haringey team on their aspirations for the site in terms of tenure mix, housing size, typology mix and sustainability. If these aspirations can be achieved, it will be an exemplar development. The panel also congratulates the project team on their comprehensive presentation, analysis and work done to date, and thinks that the proposals have the potential to set a benchmark for Haringey developments in the future.

The site – while challenging – presents a fantastic opportunity to improve local access to Down Lane Park, and to create a stronger link to the wider Lea Valley to the east. In the context of the challenges that the development must address, the panel supports many of the strategic decisions that have been made to date, including the broad layout, the network of routes and connections beyond the site, the hierarchy of streets and spaces and the configuration of the housing. While some promising work has been undertaken on the design of the edges of the park, some further thought is needed.

The panel broadly supports the increase of building heights on site beyond the existing six storey limit; however, taller buildings will need to be of a very high quality and will need to be justified through comprehensive massing and overshadowing analysis. The landscape design is promising, but the panel would encourage further consideration of issues such as surface water attenuation, biodiversity, and wayfinding. Options to retain heritage links within the site should be explored, and there is scope for further refinement of the scheme's architectural expression. The panel would also welcome a further opportunity to consider the elevational treatments across the whole site at a greater level of detail at the next review.

The panel welcomes the adoption of Passivhaus and LETI targets and would like to know more about the strategic and detailed approach to sustainable design. Further details on the panel's views are set out below.

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Panel's post-review note on massing

The panel considers that the height and scale of the proposals is potentially acceptable, subject to further evaluation and discussion of the anticipated overshadowing and daylight impacts, in addition to a detailed exploration of the distribution of mass within the site and the relationship between taller elements. While it understands that there is an established limit of six storeys for development within the site, it considers that it would be acceptable in principle for development of greater than six storeys on site, subject to the quality of the proposals.

Building heights

- At a detailed level, it would like to see further scrutiny of the height, massing and roofline of the courtyard blocks to minimise overshadowing and allow good sunlight penetration into the courtyard spaces.
- The panel considers that the seven storey blocks at the south of the site provide a strong frontage to Down Lane Park.
- It is not yet convinced by the massing of the southeast section of the site and would like to see further exploration of the visual relationship between the taller buildings, the micro-climate and overshadowing implications.

Place-making, public realm and landscape design

- The landscape proposals are ambitious and have the potential to be of a high quality. There is a lot of detail in the design of the streets and spaces, but the panel notes that there needs to be a focused approach to the landscape strategy, with an emphasis on robustness, in terms of both planting and hardscape.
- The panel highlights that the management strategy, maintenance arrangements and ongoing budget should be established to ensure the long term success of the public realm proposals.
- Understanding who will live in or visit the development could help to inform a more 'people-focused' landscape strategy. This should include wayfinding and should identify opportunities to support active lifestyles and positive health outcomes.
- The proposals will create much-improved access to Down Lane Park for local residents to the north and northwest of the site.
- The panel welcomes the proposal for a low traffic neighbourhood and would encourage the project team to ensure that this is reinforced within the design

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of the streets and spaces at a detailed level, in collaboration with highways officers.

- The design of the edges of the site and their relationship to the wider context is generally successful. However, the eastern edge would benefit from further greening / planting, at ground or roof level, to improve the relationship with the Harris Academy.
- The improvements to Park View Road are welcomed, including the creation of a park way, retaining the existing mature plane trees. The panel notes that adequate allowance needs to be made for the substantial root balls within the building layout along the northern boundary of the site.
- The panel would like more information on the biodiversity strategy for the site, and it encourages the project team to use native species within the planting proposals.
- The site is located within the flood plain of the Lea Valley, so serious flood risks should not be overlooked. The panel suggests that small swales will not be adequate to attenuate surface water run-off within the site, and the inner courtyards may need to be used as attenuation ponds to compensate for the built surface area of the development. The scheme should be able to attenuate all of the site's surface water run off within the boundary of the site itself.
- The narrative of the topography and landscape could be used to reinforce the development's location within the Lea Valley, along with improving access to the valley and the marshes.
- The depot wall forms part of the local heritage of the site and options for retaining parts of the wall could be explored, provided this does not become a visual or physical barrier at the edge of the site. For example, the route of the wall could be reflected in the design of the hard landscaping and its bricks could be reused within the landscape.

Scheme layout and access

- The creation of the north-south route and the extension of Ashley Road are very positive aspects of the scheme's layout.
- As the design work progresses, particular attention should be given to the interface between the site and the park and to the thresholds between spaces within the scheme.
- The configuration of the housing is generally successful, and the panel is pleased that the scheme does not rely on podium gardens for open space. It

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would like to see the scheme become an exemplar within the borough, building on the good progress that has been made already.

- The residential lane is potentially very attractive, but this may be compromised by the bin storage, cycle storage and plant that occupies much of the frontage. Relocating the plant – for example on the roof or in a free-standing pavilion within the courtyard – would allow for greater generosity in the plan at ground floor level.
- Options should be explored to retain the Victorian lodge at the southwest corner of the site. If this could be achieved without the loss of a significant number of homes, it might give depth and character to the scheme and mark the north-western entrance to the park.

Architectural expression

- The panel is encouraged by the initial architectural response of the proposals. As design work continues, it would like to see further refinements to the architectural expression, especially in terms of the visual language of the blocks fronting onto Down Lane Park. This would benefit from greater coherence and calmness, and an approach that is less referential to adjacent residential languages.
- Large areas of full-height glazing within the building facades will make the accommodation vulnerable to overheating, and the panel would encourage further work to mitigate this.
- The panel questions the distribution of tenures within the scheme, with market housing in the 'marker' buildings and social rent in the deck access buildings and questions whether this aligns with aspirations for a 'tenure blind' development.
- The panel highlights that the quality of materials and construction details of the balconies will be very important, not least in achieving a good balance between openness and screening / privacy in their enclosures.

Community consultation

- The panel would like to see further thought given to ways in which regeneration can drive other positive impacts for the local community, through involving local residents and helping to grow new community networks, even before the new buildings are occupied.
- The panel feels that the proposals can offer much-improved direct access into the park, which can go some way towards mitigating other impacts of development.

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Inclusive and sustainable design

- The panel would like to know more about the strategic and detailed approach to low carbon design and environmental sustainability within the scheme. Following its Climate Emergency Declaration in 2019, Haringey Council adopted the Climate Change Action Plan in March 2021, which identifies a route map to enable the borough to become Net Zero Carbon by 2041. All new development coming forward should have regard for these requirements to avoid the need for retrofitting later; proposals should demonstrate how they comply with these targets.
- Consideration of embodied energy within the existing structures and elements will be a good starting point; exploration of possible reuse of existing building materials would be welcomed.
- Consideration of the operational energy requirements should start with a 'fabric first' approach – optimising the performance and design of the building envelope, components, and materials to achieve sustainable and energy-efficient design. Utilising renewable energy sources, natural light, cross ventilation, and nature will also form part of this work. Careful consideration of how to integrate blue and green roofs and grey water reuse would also be welcomed.
- The panel understands that the development anticipates connection in the future into a district heat network; it notes that the interim solution may need to be in operation for some time, and it would encourage the project team to explore an all-electric system in the meanwhile.

Next steps

- The panel would welcome a further opportunity to review the proposals. They highlight some action points for consideration by the design team, in consultation with Haringey officers.
- It also offers a focused chair's review specifically on the approach to low carbon design and environmental sustainability if required.

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Appendix: Haringey Development Management DPD**Policy DM1: Delivering high quality design****Haringey Development Charter**

- A All new development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. The Council will support design-led development proposals which meet the following criteria:
- a Relate positively to neighbouring structures, new or old, to create a harmonious whole;
 - b Make a positive contribution to a place, improving the character and quality of an area;
 - c Confidently address feedback from local consultation;
 - d Demonstrate how the quality of the development will be secured when it is built; and
 - e Are inclusive and incorporate sustainable design and construction principles.

Design Standards

Character of development

- B Development proposals should relate positively to their locality, having regard to:
- a Building heights;
 - b Form, scale & massing prevailing around the site;
 - c Urban grain, and the framework of routes and spaces connecting locally and more widely;
 - d Maintaining a sense of enclosure and, where appropriate, following existing building lines;
 - e Rhythm of any neighbouring or local regular plot and building widths;
 - f Active, lively frontages to the public realm; and
 - g Distinctive local architectural styles, detailing and materials.

Panel Review 2

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Haringey Quality Review Panel

Report of Formal Review Meeting: Ashley Road Depot

Wednesday 19 January 2022
Zoom video conference

Panel

Peter Studdert (chair)
Louise Goodison
Dieter Kleiner
Craig Robertson
Lindsey Whitelaw

Attendees

Robbie McNaugher	London Borough of Haringey
John McRory	London Borough of Haringey
Richard Truscott	London Borough of Haringey
Chris Smith	London Borough of Haringey
Sarah Carmona	Frame Projects
Joe Brennan	Frame Projects

Apologies / report copied to

Rob Krzyszowski	London Borough of Haringey
Elisabetta Tonazzi	London Borough of Haringey
Deborah Denner	Frame Projects
Adela Paparisto	Frame Projects

Confidentiality

This is a pre-application review, and therefore confidential. As a public organisation Haringey Council is subject to the Freedom of Information Act (FOI), and in the case of an FOI request may be obliged to release project information submitted for review.

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1. Project name and site address

Ashley Road Depot, London, N17 9AZ

2. Presenting team

Mark Stallard	London Borough of Haringey
Bruno Bridge	London Borough of Haringey
Martin Cowie	London Borough of Haringey
Geertje Kreuziger	London Borough of Haringey
Jo McCafferty	Levitt Bernstein
Li Duanjuan	Levitt Bernstein
Chris Lomas	Levitt Bernstein
Matt Flannery	Levitt Bernstein
Jamie Sullivan	Iceni Projects
Sophie Heritage	Iceni Projects
Thomas Lefevre	Etude

3. Aims of the Quality Review Panel meeting

The Quality Review Panel provides impartial and objective advice from a diverse range of experienced practitioners. This report draws together the panel's advice and is not intended to be a minute of the proceedings. It is intended that the panel's advice may assist the development management team in negotiating design improvements where appropriate and in addition may support decision-making by the Planning Committee, in order to secure the highest possible quality of development.

4. Planning authority briefing

Ashley Road Depot is a broadly rectangular site of approximately two hectares. Currently a council waste collections depot, it is located at the northern end of Ashley Road, to the north of Tottenham Hale. The site is bounded by Park View Road to the north and west, Down Lane Park to the south and a secondary school to the east. The site forms part of Ashley Road North Site Allocation (TH7) in the Tottenham Area Action Plan, which identifies the site for new residential development that complements Down Lane Park; it is located within the Lee Valley Opportunity Area, the Tottenham Hale Housing Zone and a designated Growth Area. A small corner of the site is currently a safeguarded waste use.

The area surrounding the site is characterised predominantly by two storey residential properties, two nearby schools (one in a former low-rise office building). The adjacent park is a Site of Importance for Nature Conservation. There are no conservation areas or listed buildings close to the site – the nearest locally listed building is located 350 metres to the south. The maximum public transport accessibility level rating of the site is 5.

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The proposed development would provide approximately 275 dwellings within three main blocks, with heights ranging from four to thirteen storeys in height, and two new north-south routes. New commercial units would be provided on the south-west corner of the development and at the southern end of the extended Ashley Road. 51 per cent of the dwellings would be social rented homes (64 per cent by habitable room).

Officers seek the panel's views on scale, massing and building heights, residential layout, the relationship with the park, the re-provision of the existing waste capacity, car parking, sustainability and landscape design.

5. Quality Review Panel's views

Summary

The Quality Review Panel welcomes the opportunity to consider the proposals for the Ashley Road Depot as they continue to evolve. The panel thanks the project team for their comprehensive presentation and the work done to date. It supports the aspirations for the site, in terms of tenure mix, housing size, typology mix and sustainability, and thinks that the proposals have the potential to become an exemplar for future development within the borough. It welcomes the response to the comments made at the previous review and thinks the improvements to the plan have been very successful. The panel is broadly supportive of the current proposals but would encourage further refinements to give greater distinctiveness to key buildings. It feels that the ambitions for sustainability are laudable and would like to see mechanisms in place to ensure that these ambitions are delivered in practice. Further details of the panel's views are provided below.

Building heights and massing

- The panel supports the approach to massing and building heights as revised from the previous presentation.
- It welcomes the reduction of Building B1 from five storeys to four storeys fronting onto Park View Road (north), and notes that the shift to a pitched / mansard roofline will also improve the relationship with the street.
- It supports the massing of the taller buildings, Building B2 (13 storeys) and Building C2 (10 storeys), and welcomes the elegant proportions of both. However, comprehensive testing of the microclimate effects of these buildings will be required, along with appropriate mitigation measures, such as tree planting.

Place-making, public realm and landscape design

- The panel feels that the work undertaken on the public realm and landscape design has been successful and has the potential to create an important asset

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for residents and neighbouring communities. It feels that facilities like table tennis tables would further enhance the landscaped spaces.

- The landscape proposals rely heavily on herbaceous planting; consideration of what the landscape will look like in winter may suggest inclusion of some more robust species. In this regard, indigenous evergreen 'marker' plants could also be used to articulate character areas.
- Shadow diagrams should also be used to inform the landscape strategy at a detailed level.
- The panel welcomes the inclusion of rain gardens and is pleased to hear that management strategies are being carefully considered, as these can become unkempt and littered.
- The panel would support greater clarity on the hierarchy of entrances and accesses to the buildings and courtyard spaces, to ensure that natural desire lines are defined and reinforced.
- Opportunities for horticulture and community growing should be explored; establishing management systems so that the community is in control of the growing spaces would be welcomed.
- At a detailed level, there may be potential to strengthen parts of the landscape by grouping some of the smaller planting areas together, for example in the front garden areas of adjacent dwellings.
- The panel welcomes the decision to avoid having waste and recycling bins in front gardens.
- As there are pedestrian-only streets within the development, a management strategy will be needed to allow access for essential vehicles, such as removal vans, to all parts of the new neighbourhood.
- The panel also notes that the western blocks of accommodation are at a distance from the parking provision, and it would encourage the design team to ensure that there is equitable access to parking and car club provision from all parts of the development.
- The panel feels that the design of the pedestrian and cycle-only route at the southern boundary of the site, adjacent to Down Lane Park, should mitigate potential problems with security and surveillance. It highlights that generous pathways, effective lighting strategies, good levels of surveillance and overlooking from adjacent flats, and avoiding the creation of hiding places are key ingredients of safe places.

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Architectural expression

- The panel welcomes the approach to the architectural expression throughout the scheme. At a detailed level, it highlights some opportunities for further refinement.
- It feels that there is scope to introduce greater differentiation in the architectural character of key buildings within the scheme, such as buildings A4 and A1. A more distinctive design for Block A4 would celebrate the corner and bookend the view from the park, while Block A1 plays an important role in closing the view down Havelock Road.
- The panel accepts that it is not possible to retain the Victorian park keepers' cottage at this important corner location and would encourage the design team to explore how Building A4 can be further refined to elegantly turn the corner as a 'marker' building while also reflecting and referencing the nearby Victorian streetscape.
- Building A5 might benefit from some further consideration of the upper floors, which currently look weak and apologetic when set against the strong colonnade below.
- The panel would also encourage greater differentiation between the balconies and access decks that sit next to each other at the junction of Buildings A1 and A5, to avoid an awkward juxtaposition.

Inclusive and sustainable design

- The panel welcomes the clarity of the analysis and strategic decisions that have been taken so far to integrate sustainable design principles into the design. In particular, it feels that the ambition to achieve an exemplar Passivhaus scheme is laudable.
- It also supports the biodiversity targets proposed, as well as the approach adopted towards sustainable urban drainage.
- The commitment to achieving LETI targets within the scheme is also welcomed, but the panel would encourage the design team to push even harder and aim for the 2030 LETI target of 300 kgCO₂/m².
- While these commitments are all extremely positive, the panel would like to see mechanisms in place to ensure that the identified standards for each individual building are 'locked in' during the onward detailed design and construction phases.

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Next steps

- The panel is generally supportive of the scheme and feels that it does not need to see the scheme again unless the proposals change significantly; in which case, it would be happy to offer a further chair's review.

Appendix: Haringey Development Management DPD**Policy DM1: Delivering high quality design****Haringey Development Charter**

- A All new development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. The Council will support design-led development proposals which meet the following criteria:
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Appendix 7 – Development Management Forum minutes

Summary of Discussion Topics

- Management of deliveries
- Residential unit aspect
- Management of site area
- Housing typologies
- Loss of cottage dwelling
- Provision of social rent properties
- Highway improvement works
- Tree provision
- Biodiversity net gain
- Urban greening factor
- Community engagement

Appendix 8 – Pre-Application Committee minutes

Summary of Discussion Topics

- Land contamination remediation
- Public realm improvements
- Provision of affordable housing
- Play space
- Reliance on adjacent park
- Waste management arrangements
- Access deck housing layout
- Waste designation
- Shared pedestrian and vehicle areas
- Community facilities
- Allocation of housing units

Pre-Application Briefing to Planning Sub-Committee – Monday, 11 July 2022

1. DETAILS OF THE DEVELOPMENT

Reference No: PPA/2022/0006

Ward: Hornsey

Address: Hornsey Police Station 98 Tottenham Lane N8 7EJ

Proposal: Retention of existing Police Station building (Block A) with internal refurbishment, rear extensions and loft conversions to create 6 terrace houses and 4 flats. Erection of two buildings comprising of Block C along Glebe Road and Harold Road to create 8 flats and erection of Block B along Tottenham Lane and towards the rear of Tottenham Lane to create 7 flats and 4 mews houses including landscaping and other associated works

Applicant: Kuan Wai Leng Koukan Developments Ltd

Agent: Kuan Wai Leng Koukan Developments Ltd

Ownership: Private

Case Officer Contact: Valerie Okeiyi

2. BACKGROUND

- 2.1 The proposed development is being reported to the Planning Sub-Committee to enable members to view it ahead of the submission of the planning application. Any comments made now are of provisional nature only and will not prejudice the final outcome of any formally submitted planning application
- 2.2 It is anticipated that the planning application, once received, would be presented to the Planning Sub-Committee in November / December 2022. The applicant is currently engaged in pre-application discussions with Haringey Officers.

3. SITE AND SURROUNDS

- 3.1 The site is located on the corner of Harold Road and Tottenham Lane in Hornsey and to the north side of Harold Road/West side of Tottenham Lane. The building occupying the site is 'L' shaped in form and comprises a part two storey, part three storey building known as Hornsey Police Station. There are a number of ad-hoc single-storey structures contained within the service yard/car park which is accessed off Harold Road.
- 3.2 Immediately south of the car park/service yard is a row of two storey terrace houses on Church Lane and to the south west is the two storey building known as Fireman's Cottages and two storey terrace houses on Glebe Road.

Tottenham Lane Local Centre is located immediately east of the site and comprises of a shopping parade with commercial units on the ground floor and residential flats on the upper floors

- 3.3 The site has a public transport accessibility level (PTAL) of 4, considered 'good' access to public transport services. Five different bus services are accessible within 3 to 5 minutes' walk of the site, and Hornsey Railway Station is a 5 to 6 minute walk away.
- 3.4 The site is located within the Hillfield Conservation Area. The prominently sited Police Station building together with its tall red brick boundary walls, makes a positive contribution to the character and appearance of this part of the conservation area.

4. PROPOSED DEVELOPMENT

4.1 The proposed works would involve:

- The conversion of the existing Police Station (Block A) to residential units and the redevelopment of land around it (Blocks B and C) to create 29 flats/houses in total;
- Block A, along Tottenham Lane and Harold Road will include internal refurbishment, rear extensions and loft conversions and would comprise of 6 terrace houses and 4 flats;
- Block B (new build), along Tottenham Lane and towards the rear of Tottenham Lane would be 3 to 4 storeys in height and comprise of 7 flats and 4 mews houses;
- Block C (new build), along Glebe Road and Harold Road will be 3 storeys in height and comprise of 8 flats;
- Houses 1 and 2 in Block A and flat B3 on the first floor of Block B would be wheelchair accessible;
- Associated rationalised landscaping including, public realm improvements including amenity space and playspace;
- Cycle stores;
- Bin stores;
- Car free development with 3 wheelchair accessible onstreet parking bays on Harold Road.

5. PLANNING HISTORY

5.1 The site has planning history dating back to 1993 but nothing relevant to the scheme at pre-application stage.

6. CONSULTATION

6.1 **Public Consultation**

6.2 This scheme is currently at pre-application stage and therefore no formal consultation has been undertaken as yet. However, the applicant has recently undertaken their own pre-application engagement with the local community which consisted of a wide scale leaflet drop to properties in the local area informing residents of the pre-application scheme together with an arranged exhibition hosted by the developers which included a presentation of the scheme to local residents who attended

6.3 Quality Review Panel

6.4 The proposal was presented to the Quality Review Panel (QRP) on 27 April 2022. The report from the QRP Formal Review is attached as **Appendix 1**.

6.5 The Panel broadly supports the proposals for Hornsey Police Station, stating that the scheme is showing potential for achieving a high-quality scheme. The conceptual approach is supported in the context of the conservation area and the existing historic building (former police station). However, the panel did express suggestions of how the scheme could be improved and what aspects of the scheme required further thought and work. The panel was satisfied for officers to pursue further discussions with the developer and that it did not need to be presented to the QRP again.

6.6 Following the QRP meeting, the scheme has been amended in order to address officer and QRP comments and suggestions.

6.7 Development Management Forum

6.8 The pre-application proposal is to be presented at a Development Management Forum on 5th July 2022. Comments received will be fed back verbally to members on the 11th July.

7. MATERIAL PLANNING CONSIDERATIONS

7.1 The Council's initial views on the development proposals are outlined below:

Principle of the development

The Police Station currently occupying the site has been closed and redundant for some time – the closure of Hornsey Police Station formed part of the Metropolitan Police Service's rationalisation and investment programme to close old outdated buildings to reduce costs and provide modern, new facilities to support future policing across London. The money raised from the sale of the site is re-invested into modern ways of working, and supporting the Mayor's Office for Policing and Crime (MOPAC)'s Police and Crime Plan 2017 - 2021.

Although the Police Station has been closed and un-operational for some time now, in land use planning terms the pre-application proposal would result in the loss of the site as a community facility – Appendix F of the Council's Development Management DPD defines police buildings as a community facility. The Council essentially seeks to protect the loss of community facilities whilst maintaining and improving community safety in the Borough. Further, Policy D11 of the London Plan seeks to maintain a safe and secure environment.

The developer will be required as part of any formal submission of a planning application to evidence relevant planning policy justification for the loss of the Police Station site from community use to residential use. Policy DM49 Managing the Provision and Quality of Community Infrastructure states that A) the Council will seek to protect existing social and community facilities unless a replacement facility is provided which meets the needs of the community. It goes on to state that B) where a development proposal may result in the loss of a facility, evidence will be required to show that: a) the facility is no longer required in its current use; b) the loss would not result in a shortfall in provision of that use; and c) the existing facility is not viable in its current use and there is no demand for any other suitable community use on site. Policy DM49 C) also requires evidence and marketing information demonstrating that the premises has been marketed for use as a community facility for a reasonable length of time (minimum 12 months) and that no suitable user has been/or is likely to be found.

Given that the proposed closure and disposal of Hornsey Police Station forms part of the Metropolitan Police Service's rationalisation and investment programme, Officers consider that policy DM49 A), B)) b) and part of c) are met subject to reassurances that the loss of the police station will not result in the overall reduction in public safety/policing services in the locality and the Borough more generally. Further evidence is required to demonstrate that parts c) and C) of the policy are also met i.e. there is no demand for any other suitable community use on site, supported by marketing information.

Design, Appearance and Heritage Impact

Hornsey Police Station is a three-storey building, constructed in 1915, designed in a Baroque style by John Dixon Butler, architect to the Metropolitan Police. It is built in bright-red brick with terracotta banding and window surrounds, six-over-six pane sash windows and a bold pedimented entrance inscribed 'POLICE'. It replaced an earlier police station of c1868 and originally formed part of a fine group of civic buildings including a public library, demolished in the 1960s after

the library was relocated to Crouch End, and a fire station, also demolished. Hornsey Police Station is located within the Hillfield Conservation Area. The most recent appraisal identified the building, together with its tall red brick boundary walls, as making a positive contribution to the character and appearance of this part of the conservation area. The retention of the historic police station building (known as block A) is therefore supported.

Officers consider that taking into consideration the historic development of the site and the existing townscape, the site can accommodate additional development. Officers consider that the height, massing and scale of the proposed 'new build' part of the development to be acceptable within the site's context and existing built form of surrounding buildings.

The contemporary reinterpretation of the Police Station (Block C – which is the 'new build' part of the scheme) is promising subject to further refinements such as adding more interest to the corner gable and upper floor balconies. From a design point of view, the architectural concept of the 'weaved chequered board pattern' works well within its context.

In terms of Block B (also part of the 'new build' part of the scheme), the retention of the gap between the proposed development and the police station building maintains a clear separation between the historic building and the proposed contemporary development. The proposed brickwork for this block matches the brickwork of the Police Station, retaining some connection with the historic building while the contemporary design of the proposed block creates a contrast and distinct separation between old and new. The rhythm of the windows reflects the pattern of fenestration of the former Police Station and adds interest to the proposed block. From a Conservation point of view, although block B is considered a fine piece of architecture, the conservation officer has a concern that the building may appear alien in its surroundings. The design of the mews houses of block B towards the rear of Tottenham Lane would appear subservient in terms of height and scale.

The central communal landscaped garden has progressed. A good quality landscaped plan is fundamental to the success of the scheme. Public realm improvements are also proposed.

Residential Unit Mix and Affordable Housing

The proposal would provide 6 x 1 bed flats, 11 x 2 bed flats, 2 x 3 bed flats, 6 x 3 bed houses and 4 x 4 bed houses of which include 3 wheelchair accessible units. This range of unit sizes is considered appropriate in this location and optimises the use of the site to meet housing need particularly the need for family sized accommodation.

The scheme proposes 7 Affordable Housing Units of which 5 can be rented (London Affordable Rent) and 2 intermediate (Shared Ownership) this equates to 24% affordable units. The affordable units would be located in block C

The developer's viability report will be submitted as part of any formal planning application and thereafter independently assessed to ensure that the proposal provides the maximum amount of affordable housing that can viably be delivered as part of the proposed scheme.

Transportation and Parking

This site has a public transport accessibility level (PTAL) of 4, which is considered 'good' access to public transport services. Several bus services are accessible within 3 to 5 minutes' walk of the site, and Hornsey Railway Station is a 5 minutes walk from the site.

The site is also located within the Hornsey South CPZ, which has operating hours of 11.00 to 13.00 Monday to Friday.

The proposed scheme would be a car free development. With a public transport accessibility level of 4 the pre-application scheme does meet the criteria of Policy DM32 of the Development Management DPD for formal designation as a car free/permit free development. Cycle parking stores will be located in each block. The cycle parking to be provided will need to meet London Plan standards for residential in terms of absolute numbers. Any future planning application will require full details of cycle parking which will be scrutinised by officers to confirm it will be achievable within the development footprint. Three blue badge spaces for the accessible units would be provided which is policy compliant (10% of the overall number of residential units).

Discussions are ongoing with the Council's Transport Planning team who require a parking stress survey to be carried out for the existing arrangements to provide details on the existing parking conditions and provision. In addition to this the developer will likely be required to provide mitigation measures to reduce potential parking impacts and promote the use of sustainable and active modes of travel.

Impact on residential amenity

The windows of the proposed mews houses (Block B) towards the rear of Tottenham Lane would need to be designed to ensure they mitigate potential overlooking and loss of privacy issues to the rear garden and windows of the surrounding properties, in particular the neighbours on Glebe Road and Tottenham Lane.

Further assessment will be required in relation to existing and newly published BRE guidelines in relation to daylight / sunlight requirements so as to ensure that the amenity of neighbouring residents is not materially affected.

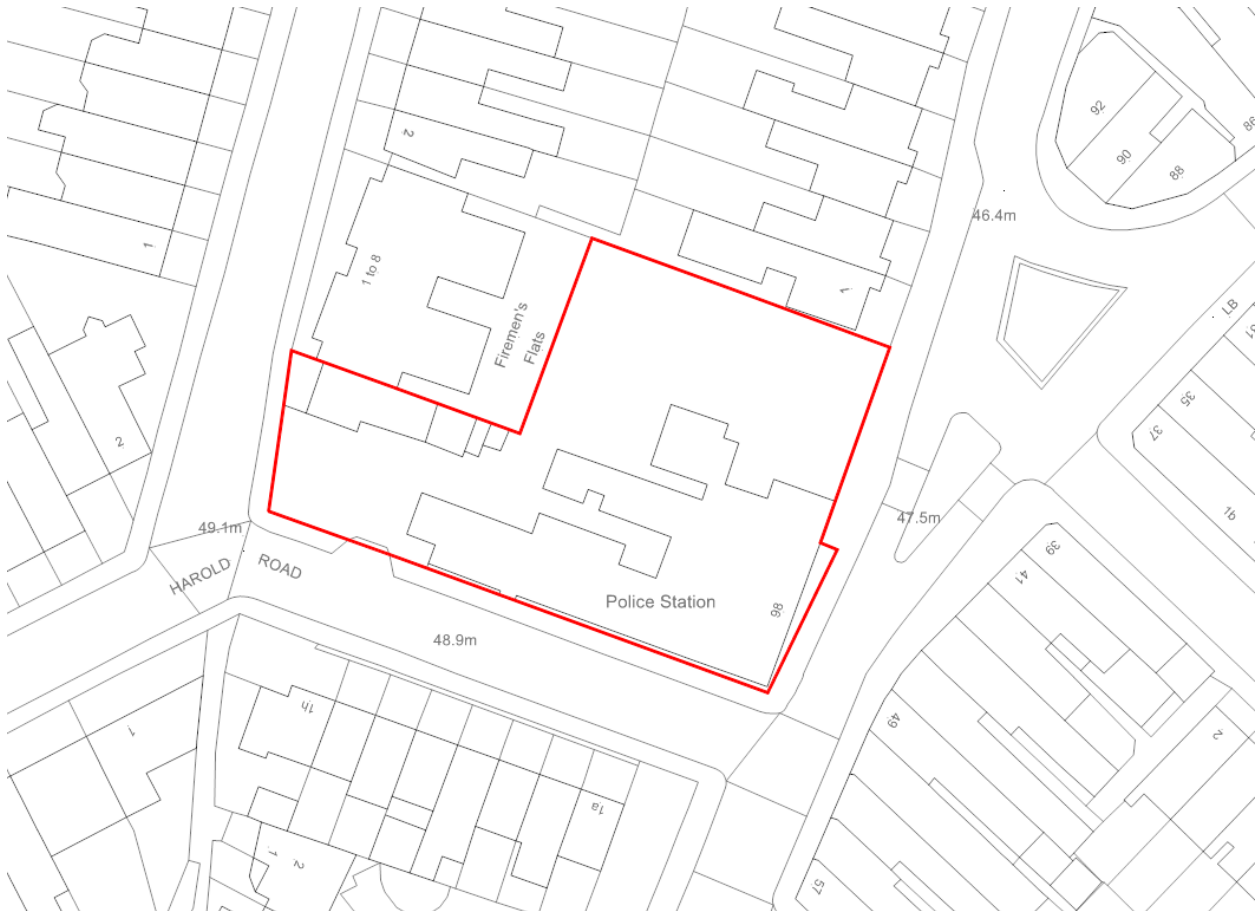
Other matters

Consideration on the following matters is also required – but has not yet been discussed in detail:

- Flooding and drainage (the site is in a critical drainage area);
- Energy strategy;

PLANS AND IMAGES

SITE LOCATION PLAN



PLANS AND IMAGES



View along Harold Road



View east along Harold Road showing vehicle access



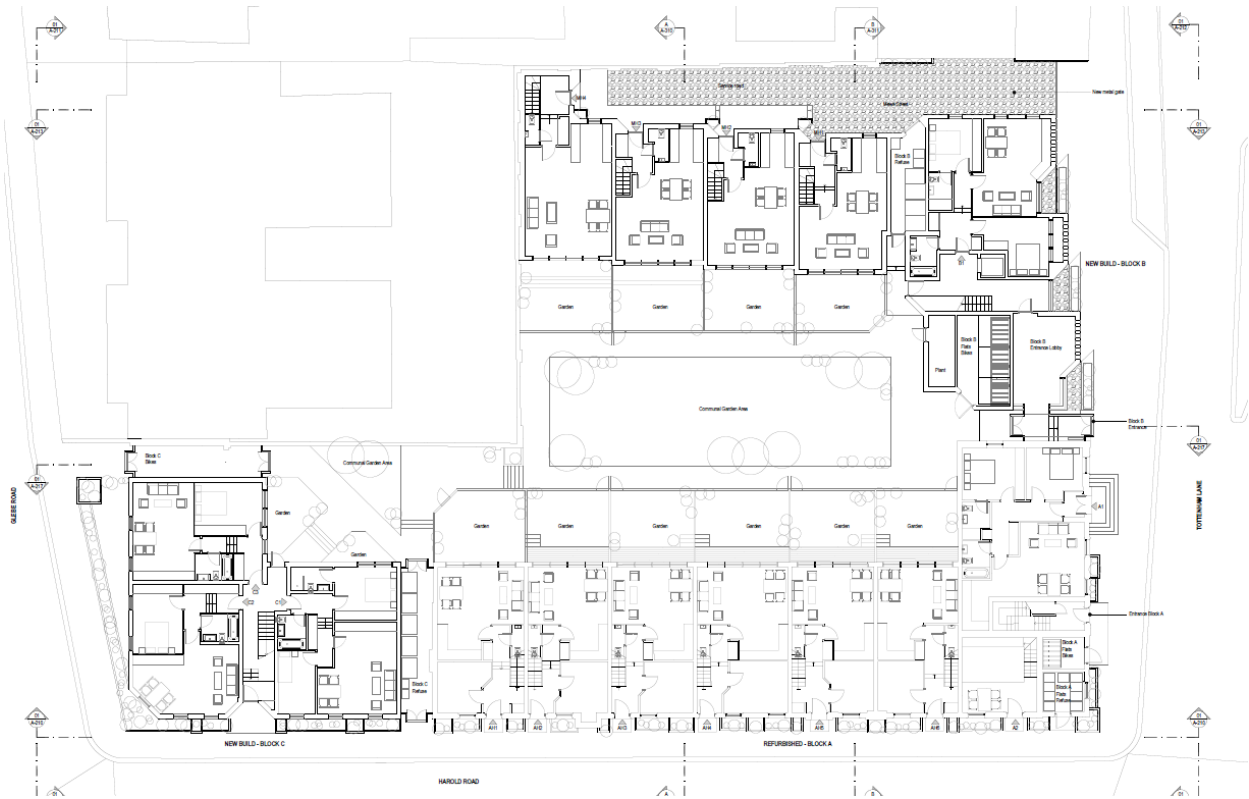
Corner of Tottenham Lane and Harold Road



View into the car park



View from Tottenham Lane and Church Lane



Proposed ground floor plan



Proposed elevation of new houses towards the rear of Tottenham Lane



Indicative landscaping CGI

APPENDIX 1 – QUALITY REVIEW PANEL REPORT

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1. Project name and site address

Hornsey Police Station, 98 Tottenham Lane, N8 7EJ

2. Presenting team

Chris Boyle	Archanaeum
Kuan Leng	Dixon 8
Rie Nijo	Rie Nijo Architects

3. Planning authority briefing

The site is located on the corner of Harold Road and Tottenham Lane in Hornsey, in the Hillfield Conservation Area. Immediately south of the carpark / service yard, partially comprising the site, is a row of two-storey houses on Church Lane, and to the southwest is the two-storey Firemans Cottages and two-storey terraced houses on Glebe Road. Tottenham Lane local centre is immediately east of the site, comprising a shopping parade with commercial units at ground floor and residential flats above.

The principal building currently occupying the site is the 'L'-shaped, part two-storey, part three-storey Hornsey Police Station, built in 1915. Built of red brick with terracotta banding and window surrounds, the police station replaced an earlier one, c1868, and originally formed part of a group of civic buildings including a public library and fire station. Access to the police station's carpark/service yard is off Harold Lane.

The proposal comprises the refurbishment and extension of Hornsey Police Station and the construction of two new residential buildings to provide 30 units and associated landscaping.

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4. Quality Review Panel's views

Summary

The panel broadly supports the proposals for Hornsey Police Station, feeling that it has the potential for a high-quality scheme. The conceptual approach of 'weaving the past with the present' is promising in the context of the conservation area and existing historic building. However, it recommends that this idea is developed further. For example, it suggests that Block C could be more exuberant, using cues from the conservation area, to give this important corner block greater presence. The scale of Blocks A and B at Tottenham Lane seems appropriate given the surrounding area. However, the panel questions the scale of the mews housing element of Block B, which it suggests is likely to be more viable at two storeys than three. The panel is also concerned about how the level changes across the site are addressed currently and recommends further detailed sectional analysis of this aspect of the scheme. Similarly, the panel is not yet convinced by the proposed layouts of individual residential spaces and suggests further detailed consideration of this in order to improve the quality of the interior spaces. The panel has some concerns about the scheme's environmental and energy strategy, commenting that these appear to be being considered late in the scheme's development. It also has some concerns about the complexity of the landscaping of the internal courtyard.

Architecture

- The panel admires the conceptual approach to 'weaving the past with the present' and its potential to underpin the architectural approach. However, it feels that this concept would be further strengthened if more rigorously applied across the whole scheme.
- The panel would encourage retention of the existing police station staircases in Block A.
- The panel supports the use red brick throughout the scheme, seeing it as appropriate to the immediate context and adjacent conservation area, and in keeping with the materiality of the existing police station.
- it feels that the concept of 'weaving' could be taken much further to add variation, depth and interest to the facades and to the overall scheme.
- The panel questions the type and placement of the windows at various locations in the scheme. Further consideration of these may lead to improvements in the quality of daylight brought into the interiors across the development, as well as its external appearance.
- The panel is not yet convinced by the roof detailing of the new-build section of Block A and recommends careful consideration of the choice of materials for this roof, including the gutter detailing.



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- In relation to the above point, improving the quality of light brought into the top floor apartments in Block A will be a key determinant of the design of the roof.
- The panel admires the way that the Block B entrance offers a direct view into the courtyard, suggesting that decisions about the cladding of the entrance will be key to the success of its design.

Interior layouts

- The panel recommends further detailed consideration of the internal layouts of the houses and flats, to maximise the quality of the interior spaces for the users.
- For example, one of the new-build flats on Tottenham Lane proposes a dining area with no window. The panel appreciates that this is to prevent overlooking of the refuse store but suggests further thought about the quality of this unit.

Block C

- The panel suggests that Block C could be more exuberant, using cues from the conservation area, to give this important corner block greater presence.
- The panel asks for further thought about the relationship between Block C and the adjacent Firemans Cottages, where currently its first and second floor balconies are tight against the gable end walls.

Block B mews

- The panel is concerned about the mews component of Block B and the proposed scale of the houses at three storeys, where it feels that two storeys would be more appropriate.
- The associated problems caused by large, three- and four-bedroom houses in relation to provision for private vehicles / parking are also a concern, as is the restricted size of their living / dining spaces.
- The panel also suggests that two storeys will be more compatible with the narrow entrance to the mews from Tottenham Lane, and that the materiality of this entrance will be important to the success of that significant corner of the scheme.

Scheme layout

- The panel suggests relocating the refuse stores currently along Tottenham Lane. Whilst this location is ideal for refuse collection, there is a risk they will have a negative impact on that street frontage.



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- The panel recommends further sectional analysis of the two-metre level change across the site. Currently, this appears to be creating some uncomfortable relationships between elements of the development.
- For example, if the mews level was brought to the level of the courtyard space, this might increase the sense of this as a single generous garden space.

Landscape

- The panel feels that the courtyard is a generous offer, but that its design is overcomplicated by the introduction of multiple levels and recommends further consideration of this aspect of the landscape design.
- For the courtyard to be successful as a shared space, it will be important to resolve its relationship with the surrounding private gardens. For example, boundary treatments will need careful thought to ensure the courtyard is welcoming and attractive.
- The panel recommends further thought about how the landscape design responds to the site's sunpath.

Parking strategy

- The panel recognises the work done on the parking strategy so far, particularly given the complexities of changes to the local parking provision. It recommends that the details—particularly of the disabled parking—are pinned down swiftly.
- The panel recommends that further clarity is sought from the council regarding the extent to which parking previously allotted to the police station will contribute to the scheme's provision.
- Providing additional electric vehicle charging points on surrounding streets could contribute well to the parking strategy, which is not intended to increase the parking provision in the area.

Sustainability

- Further thought is needed to refine the development's environmental and energy approach. For example, it highlights that PVs located on flat roofs of the three-bedroom houses may be overshadowed by the second floor accommodation to their south.
- Generally, the panel recommends the positioning of PVs on roofs should be thought of as an integral part of the overall design approach.
- The panel suggests that the development's heating strategy could be improved with heat pumps rather than electric boilers.
- If heat pumps are provided, their location will need careful thought in terms of noise and visual impact.

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27 April 2022
HQR125_ Hornsey Police Station



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- The environmental and heritage aspects of retaining the existing single-glazed windows need to be developed further.
- The panel suggests the introduction of secondary glazing or new double glazed sash windows to match the existing appearance.
- The panel questions the scheme's form factor; the large surface area of the scheme poses a challenge in terms of thermal efficiency.

Next steps

The panel would be pleased to consider the proposals again at a chair's review, if required.

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