

NOTICE OF MEETING

PLANNING SUB COMMITTEE

Monday, 18th December, 2017, 7.00 pm - Civic Centre, High Road, Wood Green, N22 8LE

Members: Councillors Natan Doron (Chair), Toni Mallett (Vice-Chair), Dhiren Basu, Barbara Blake, David Beacham, John Bevan, Clive Carter, Jennifer Mann, Peter Mitchell, James Patterson and Ann Waters

Co-optees/Non Voting Members:

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 2016. 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

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. 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.

7. WESTBURY COURT, 435 LORDSHIP LANE, N22 5DH (PAGES 1 - 6)

Proposal: Demolition of the existing building and erection of a new part 7 part 5 storey building with 50 residential units and commercial units at ground floor.

8. 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.

9. SW PLOT HALE VILLAGE FERRY LANE LONDON N17 LONDON (PAGES 7 - 216)

Proposal: Mixed use development ranging from 11 to 33 storeys comprising 1,588sqm commercial space (flexible A1/A3/A4/B1/D1 uses), 279 residential units including affordable housing, together with roof garden and associated landscaping, the provision of basement car parking, bicycle spaces, associated plant including building maintenance unit and internal refuse storage at Plot SW, Hale Village.

RECOMMENDATION: That the Committee resolve to GRANT the application, taking account of the information set out in the Environmental Statement, and that the Head of Development Management is given delegated authority to issue the planning permission subject to the conditions and informatives set out in the Appendices of this report, subject to the prior completion of a Legal

Agreement to secure the obligations set out in the Heads of Terms below and subject to referral to the Mayor for London.

10. NEW ITEMS OF URGENT BUSINESS

To consider any items admitted at item 4 above.

11. DATE OF NEXT MEETING

15 January 2018

Felicity Foley, Principal Committee Co-ordinator

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Bernie Ryan

Assistant Director – Corporate Governance and Monitoring Officer

River Park House, 225 High Road, Wood Green, N22 8HQ

Friday, 08 December 2017

Pre-application briefing to Committee**1. DETAILS OF THE DEVELOPMENT****Reference No: PRE/2017/2005****Ward: West Green****Address:** Westbury Court, 435 Lordship Lane, N22 5DH**Proposal:** Demolition of the existing building and erection of a new part 7 part 5 storey building with 50 residential units and commercial units at ground floor.**Applicant:** c/o Agent**Agent:** Collective Planning**Ownership:** Private**Case Officer Contact:** Christopher Smith**2. BACKGROUND**

- 2.1 The proposed development is being reported to Planning Sub Committee to enable members to view it at an early stage. Any comments made are of a provisional nature only and will not prejudice the final outcome of any planning application submitted for formal determination.
- 2.2 It is anticipated that the planning application, once received, will be presented to the Planning Sub-Committee in early 2018. The applicant is engaged in pre-application discussions with Haringey Officers.

3. SITE AND SURROUNDS

- 3.1. The application site is an existing three storey terrace of commercial units with flats above, known as Westbury Court. The block faces onto Lordship Lane to the north and is bordered by Downhills Way to the east, Westbury Avenue to the west and Penniston Close to the south. The Downhills Way/Lordship Lane intersection is a busy and significant road junction.
- 3.2. The area to the north on Lordship Lane has a commercial character with the majority of properties being no greater than 3 storeys in height, brick built with a traditional articulation and commercial premises occupying the ground floor space. Properties on Downhills Way and Westbury Avenue are of a more residential character.

4. PROPOSED DEVELOPMENT

4.1. The scheme proposed comprises demolition of existing terrace, erection of part 5 part 7 storey building fronting onto Lordship Lane, consisting of 50 flats for rent only. Some affordable rent units will be provided with the quantum dependent on a financial viability assessment. Commercial units would front onto Lordship Lane.

4.2. The scheme would be generally car free, although five parking spaces for disabled occupiers would be provided at rear. Cycle parking and refuse collection facilities are also provided.

5. PLANNING HISTORY

5.1 The site has a limited planning history, although an application was approved recently for a double-height mansard roof extension for use as flats.

6 CONSULTATION

Internal/External Consultation

6.1 This scheme is currently at pre-application stage and therefore no formal consultation has been undertaken.

6.2 The applicant has undertaken the private delivery of leaflets in the local area to publicise the scheme

Development Management Forum

6.3 The proposal was presented at a DM Forum on 30th November 2017.

Quality Review Panel

6.4 A previous version of the proposal was assessed by the Quality Review Panel (QRP) on 18th October 2017. The QRP's report is attached as **Appendix 1**.

6.5 Following this QRP review the applicant amended the scheme. The bulk and massing of the scheme, particularly at roof level, has been slightly reduced and the design of the courtyard improved. Core arrangements have also improved with the inclusion of an additional lift. The number of flats has been reduced from 58 to 50.

6.6 The submission of a full application is anticipated at either the end of December 2017 or at the start of the new year.

7 MATERIAL PLANNING CONSIDERATIONS

7.1 The main planning issues raised by the proposed development are considered below:

Principle of the development

7.2 The principle of the development is acceptable as it would replace a mixed use block of commercial units with residential above with a new building with a similar use arrangement.

Design and Appearance

7.3 Officers consider the design of the scheme is of a high quality contemporary development with robust finishing materials that would improve the character of this locality. The design would not be excessively prominent from nearby conservation areas and would form a quality entrance point to this part of Lordship Lane from the east.

7.4 The height and bulk generally reflects that of other buildings in the area and therefore is not considered to be excessive.

Residential Unit Mix and Affordable Housing

7.5 The proposed residential mix has not been confirmed but the majority of units would be one and two bedroom flats for rent. A proportion would be affordable rent but specific details have not yet been provided as a financial viability appraisal is being undertaken.

Density

7.6 The density of the development would be similar to that of other developments in the locality.

Transportation and Parking

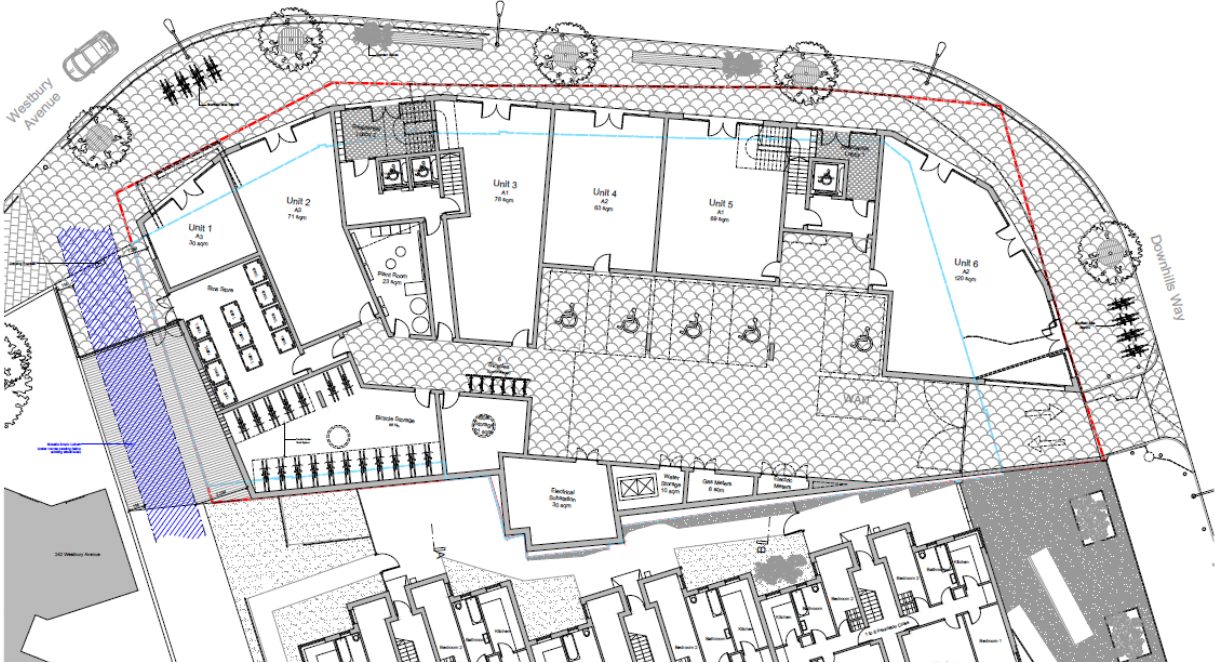
7.7 The site has a PTAL rating of 3-4 and this development would be designated as car free with car parking provided for disabled occupiers only. Transport connections to Wood Green and other parts of London by bus are good and no applications for car parking permits would be permitted (controlled by legal agreement).

Impacts to Amenity

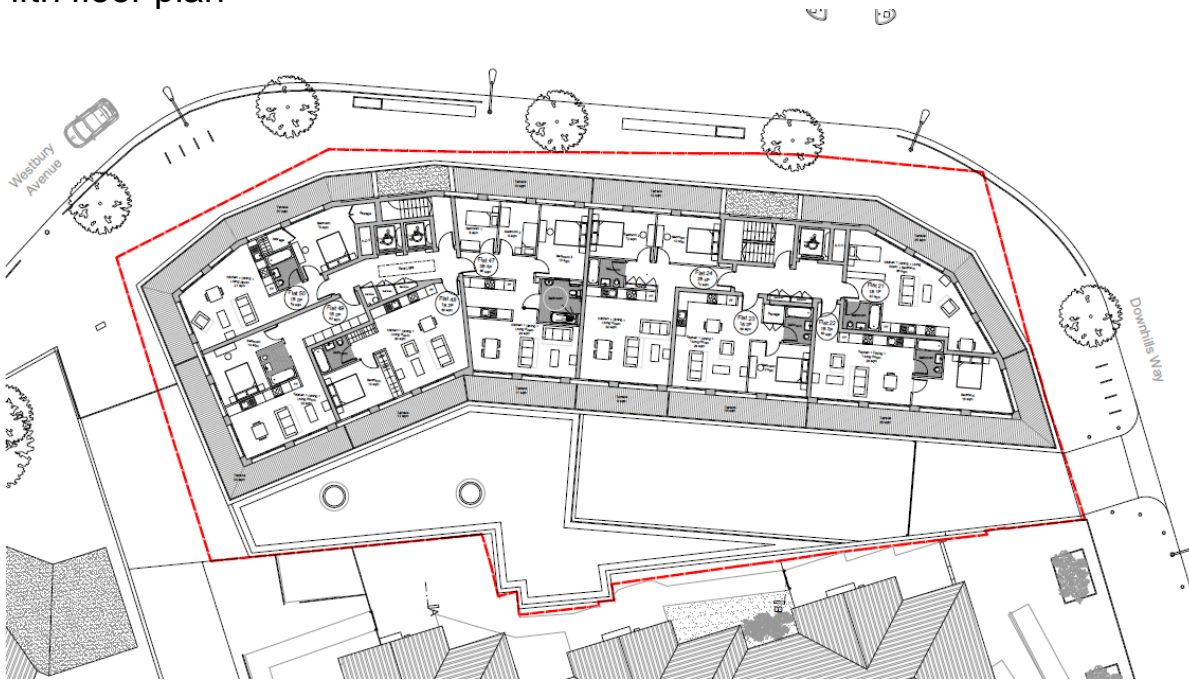
7.8 Flats are separated from residential properties to the rear by more than 10 metres in most cases and existing units in those flats have their main amenity spaces positioned on other elevations of that neighbouring building. No excessive reduction in sunlight or daylight is expected but an appropriate assessment will be provided with the planning application.

PLANS AND IMAGES

Ground floor plan



Fifth floor plan



View from east on Lordship Lane



View from north on Lordship Lane



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Planning Sub Committee 18th December 2017

Item No.

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference No: HGY/2017/2005

Ward: Tottenham Hale

Address: SW Plot Hale Village Ferry Lane London N17 London

Proposal: Mixed use development ranging from 11 to 33 storeys comprising 1,588sqm commercial space (flexible A1/A3/A4/B1/D1 uses), 279 residential units including affordable housing, together with roof garden and associated landscaping, the provision of basement car parking, bicycle spaces, associated plant including building maintenance unit and internal refuse storage at Plot SW, Hale Village.

Applicant: Mr Scott Bailey, Anthology Hale Works Ltd

Ownership: Private

Case Officer Contact: Christopher Smith

Site Visit Date: 14/07/2017

Date received: 30/06/2017 **Last amended date:** 15/11/2017

Drawing number of plans:

GWT-HBA-00-XX-DR-A-PL-0000, 0001, 0002, 0005, 0101; GWT-HBA-00-ZZ-DR-A-PL-0003, 0004, 0102, 0104, 0105, 0107, 0200, 0201, 0202, 0203, 0204, 0205, 0300, 0301; GWT-HBA-00-B1-DR-A-PL-0100, GWT-HBA-00-11-DR-A-PL-0103, GWT-HBA-00-33-DR-A-PL-0106 (all drawings Rev. P1); 000(90)L0001, 000(90)L0021, 000(91)L0001, 000(94)0001, HB16013 'affordable units' plan dated 10.11.17, L16007/DS/201 Rev. P2, 612756/315 Rev. P8 (drainage layout only), 612756/300 Rev. E (drainage layout only), roof plant plan 'RIDGE 28.6.17'.

Supporting documents also approved:

Design and Access Statement June 2017, Design and Access Statement Addendum August 2017, Energy Strategy Version 6.0 September 2017, Overheating Study Version 3.0 August 2017, Car Parking Management Plan September 2017, Delivery and Servicing Management Plan June 2017, Framework Construction Logistics Plan June 2017, Framework Travel Plan June 2017, Piling Method Statement Revision 2 June 2017, Environmental Statement Volume 1 June 2017, Environmental Statement Non-Technical Summary June 2017, Archaeology and Heritage Desk Base Assessment June 2017, Planning

Statement June 2017, Noise and Vibration Report 1.0 June 2017, Statement of Community Involvement June 2017, Transport Assessment June 2017, Ground Condition Desktop Study June 2017, Waste Management Plan June 2017, Affordable Housing Viability Assessment June 2017, Engineering Services Stage 2 Design report Revision 03 July 2017, Fire Safety Strategy June 2017, Façade Construction Statement- Fire Safety dated October 2017, Written Scheme of Investigation for Archaeological Mitigation dated September 2017, SUDS flows and volumes pro forma, BMU cross-section drawings and example photos, Air Quality Report dated September 2017, addendum letter to Heritage, Townscape and Visual Impact Assessment dated 2nd August 2017, Below Ground Drainage Maintenance and Management Regime dated September 2017, letter from Hale Village Management Ltd ref 'Local Authority Drainage inquiries', Illustrative Wind Mitigation Strategy – Rev 1.

1.1 This application is being reported to the planning committee as it is a major application recommended for approval.

1.2 **SUMMARY OF KEY REASONS FOR RECOMMENDATION**

- The development is acceptable in principle, as it meets the land use requirements of the Site Allocation TH8, improves the local public realm and provides a marker building adjacent to an important transport hub.
- The development would provide 15.8% on-site affordable housing units (44 shared ownership units) which is 53% of the 83 additional units proposed over and above the approved outline planning permission with an off-site contribution of £150,000 which is considered to be the maximum reasonable amount the scheme can viably provide;
- The development would be a high quality tall building that respects the visual quality of the area, including key local views, and does not impact negatively on local heritage assets;
- The development would not have a detrimental impact on the amenity of adjoining occupiers in terms of a loss of sunlight or daylight, outlook, and privacy;
- The development would provide high quality living accommodation for residents, including 10% wheelchair accessible or adaptable units, private and communal amenity space and appropriate play space;
- The development would provide an adequate number of appropriately located car and cycle parking spaces;
- The development would not impact negatively on local ecological areas or wildlife habitats;
- The development would be acceptable in terms of its impact on carbon reduction and sustainability;
- The development would be constructed to meet Building Regulations requirements on fire safety, including the provision of sprinkler systems, and external cladding would be of the highest fire safety standard feasible.

2. RECOMMENDATION

- 2.1 That the Committee resolve to GRANT the application, taking account of the information set out in the Environmental Statement, and that the Head of Development Management is given delegated authority to issue the planning permission subject to the conditions and informatives set out in the Appendices of this report, subject to the prior completion of a Legal Agreement to secure the obligations set out in the Heads of Terms below and subject to referral to the Mayor for London.
- 2.2 That the section 106 legal agreement referred to in resolution (2.1) above is to be completed no later than 31st December 2017 or within such extended time as the Head of Development Management or the Assistant Director Planning shall in her/his sole discretion allow; and
- 2.3 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.2) above, planning permission shall be granted in accordance with the Planning Application subject to the attachment of the conditions; and
- 2.4 That delegated authority be granted to the Assistant Director of Planning / Head of Development Management 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 Chairman (or in their absence the Vice-Chairman) of the Sub-Committee.

Conditions

- 1) Development to commence within three years
- 2) In accordance with the approved plans
- 3) Use class restrictions
- 4) Use hours
- 5) Materials to be submitted for approval
- 6) Accessible units
- 7) Ventilation of commercial units
- 8) Antennas and satellite dishes
- 9) Hard/soft landscaping
- 10) Wind mitigation strategy
- 11) Lighting scheme
- 12) Ecological requirements
- 13) Winter garden strategy
- 14) Waste and recycling strategy
- 15) Internal noise levels
- 16) Sound insulation
- 17) Plant noise restriction

- 18) Ground noise mitigation
- 19) Piling method statement
- 20) Sustainable drainage scheme
- 21) Secured by design accreditation
- 22) Archaeology surveys
- 23) Piling impact and Crossrail
- 24) Network Rail operations protection
- 25) Electric vehicle parking
- 26) Cycle parking management
- 27) Construction logistics plan
- 28) Car club space
- 29) Mechanical ventilation details
- 30) Gas and contamination remediation
- 31) Air quality and dust management plan
- 32) Plant and machinery details
- 33) Overheating management
- 34) Electric vehicle charging 2

Informatives

- 1) Community co-operation
- 2) CIL liability
- 3) S106 agreement
- 4) Street numbering
- 5) WSIs
- 6) Security
- 7) Groundwater risk management permit
- 8) Water mains
- 9) Asbestos
- 10) Crossrail
- 11) Signage
- 12) Advert consent
- 13) Highway licenses
- 14) Commercial waste collections
- 15) Definitions

Section 106 Heads of Terms:

- 1) Affordable Housing
 - No less than 44 affordable housing units (all shared ownership tenure). All affordable units in the development are to be lower-cost shared ownership aimed at those households earning less than £60,000 a year;
 - Off-site affordable housing contribution of £150,000.
 - Early and late stage viability reviews to be undertaken. Uplift funds where available are to be provided towards off-site affordable housing provision;

- Marketing of the lower-cost shared ownership homes, to persons who live or are employed in Haringey.
- 2) Car Club Contributions
- Car club membership for three years for up to two residents per dwelling;
 - Provide £50 credit for each membership registration, or £150 voucher to contribute to the cost of a bicycle;
- 3) Considerate Contractors Scheme
- 4) Local Labour and Training
- Employment skills plan to ensure local labour provisions and not less than 20% of those employed are residents of LB Haringey;
 - 25% of the LB Haringey residents employed shall be full-time apprenticeships;
 - End User Skills Training financial contribution of £38,112 towards LB Haringey's Employment and Recruitment Partnership's activities;
- 5) Travel Plans; Residential and Commercial
- Submission of Travel Plans, including:
 - i. Residential travel plan, or amend the previously submitted Hale Village Masterplan residential travel plan and submit for assessment;
 - ii. Commercial travel plan for each separate use, or amend the previously submitted Hale Village Masterplan and submit for assessment;
 - iii. Provide a monitoring contribution of £3,000 per each new or revised travel plan, payable on commencement;
 - Conduct annual reviews of the Travel Plan and amend the Plan as may be reasonably required by the Council;
 - To comply with the Travel Plan during the lifetime of the development.
- 6) Parking Control Measures
- Occupiers of the development are not eligible for on-street car parking permits relating to existing or proposed future Controlled Parking Zones in the Borough.
- 7) Car Parking Management Plan
- Submission of a document that demonstrates the following:
 - i. 24 wheelchair accessible parking spaces shall be provided;
 - ii. No more than 20 of the 24 spaces shall be sold and they must be allocated to a wheelchair dwellings (part M(3));
 - iii. The remaining 4 shall be available for rent for the wheelchair accessible units if required;
 - iv. Parking spaces for non-wheelchair user dwellings shall also be allocated to individual units at a maximum rate of one per unit;

- v. Additional accessible parking spaces for the residential (4 spaces) and commercial units (1 space) shall be made available within the Hale Village Masterplan car parking area.

8) Public Realm Improvements

- Works to the pedestrian realm in the locality in accordance with the aims and objectives of the Hale Village Masterplan, including:
 - i. Allow public access free and without restriction to the footpaths and squares provided as part of this development;
 - ii. Maintain the development of public realm areas in accordance with standards to be agreed with the Council;

9) District Heating Network Connection

- The applicant shall connect to the existing Hale Village District Heating Network;
- The development shall be connected to the Network and shall be in a position to provide heat to all units prior to first occupation of the approved development;
- All space heating and hot water requirements of the development shall be supplied via the link to the Network;
- The connection system will be signed up to and comply with the Heat Trust Standard to ensure customer protection.

10) Carbon Offsetting

- To carry out the Development in accordance with the approved Energy Strategy;
- Within six months of the Completion Date to submit to the Council an Energy Strategy Review for its written approval. Should the identified targets in the Energy Strategy not be met a further offsetting contribution may be required;
- Offset contribution at the cost of £1,800 per tonne of carbon (£93,292), payable on commencement.

11) Retention of Architects

- The existing architect will be retained in an Architectural Quality Control Role to supervise the work of an executive architect whose role is to ensure a high quality overall design;
- This role shall be undertaken in a collaborative spirit to ensure the design develops in a manner consistent with the original design intent of the Planning Application.

12) Monitoring Fee

- Pay the monitoring fee contribution – 5% of the total contributions (£9,425.15).

- 2.4 In the event that members choose to make a decision contrary to officers' recommendation members will need to state their reasons.
- 2.5 That, in the absence of the agreement referred to in resolution (2.1) above being completed within the time period provided for in resolution (2.2) above, the planning permission be refused for the following reasons:
1. The proposed development in the absence of a legal agreement securing the provision of affordable housing would have a detrimental impact on the provision of much required affordable housing stock within the Borough and would set an undesirable precedent for future similar planning applications. As such, the proposal is contrary to Policy SP2 'Housing' of the Council's Local Plan March 2017 and Policy 3.12 (Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes) of the London Plan.
 2. The proposed development in the absence of a legal agreement to work with the Haringey Employment Delivery Partnership would fail to support local employment, regeneration and address local unemployment by facilitating training opportunities for the local population. As such, the proposal is contrary to Local Plan 2017 Policies SP8 and SP9.
 3. The proposed development, in the absence of a legal agreement to secure planning obligations for mitigation measures to promote sustainable transport and a parking management plan by reason of its lack of car parking provision would significantly exacerbate pressure for on-street parking spaces in surrounding streets, prejudicing the free flow of traffic and conditions of general safety along the neighbouring highway and would be detrimental to the amenity of local residents. As such the proposal is considered contrary to the requirements of Policy 6.13 of the London Plan 2016.
 4. The proposed development, in the absence of a legal agreement securing sufficient energy efficiency measures, connection to a future district energy network and a financial contribution towards carbon offsetting, would result in an unacceptable level of carbon dioxide emissions. As such, the proposal would be contrary to London Plan 2016 Policy 5.2 and Local Plan 2017 Policy SP4.
 5. The proposed development, in the absence of a legal agreement securing public realm enhancements the proposal would give rise to an illegible public realm of poor townscape character, whilst the lack of involvement of the original architects in the detailed construction design of the development would have a negative impact on the design quality of the completed building, adversely affecting the character and appearance of the area. As such, the proposal would be contrary to London Plan policies 7.1, 7.2, 7.4 and 7.5, Local Plan 2017 Policy SP11, Policies DM1, DM3 and DM19 of the Development Management Development Plan Document and TH8 of the Tottenham Area Action Plan.

6. The proposed development, in the absence of a legal agreement securing confirmation of the service delivery standards contract to the proposed residents and also confirmation that the requirements of the Section 106 legal agreement and planning conditions of planning application ref. HGY/2006/1177 have or will be met would have a detrimental impact on neighbouring amenity, character and appearance of the development and the local area, and local ecology and biodiversity. As such, the proposal would be contrary to London Plan policies 7.4, 7.5 and 7.19, Local Plan Policies SP11 and SP13 and Policies DM1, DM3 and DM19 of the Development Management Development Plan Document.
- 2.6 In the event that the Planning Application is refused for the reasons set out in resolution (2.5) above, the Head of Development Management (in consultation with the Chair of Planning sub-committee) is hereby authorised to approve any further application for planning permission which duplicates the Planning Application provided that:
- (i) There has not been any material change in circumstances in the relevant planning considerations, and
 - (ii) The further application for planning permission is submitted to and approved by the Assistant Director within a period of not more than 12 months from the date of the said refusal, and
 - (iii) The relevant parties shall have previously entered into the agreement contemplated in resolution (1) above to secure the obligations specified therein.

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- 4.0 CONSULTATION RESPONSE
- 5.0 LOCAL REPRESENTATIONS
- 6.0 MATERIAL PLANNING CONSIDERATIONS
- 7.0 RECOMMENDATION

APPENDICES:

- Appendix 1: Consultation Responses
- Appendix 2: Plans and images
- Appendix 3: Quality Review Panel Notes
- Appendix 4: DM Forum Notes

3.0 PROPOSED DEVELOPMENT AND LOCATION DETAILS

3.1 Proposed development

This application is for full planning permission for the erection of a building ranging from 11 to 33 storeys in height comprising 1,588sqm of commercial space (flexible Use Class A1/A3/A4/B1/D1 uses) in the form of three units within a ground floor podium, with 279 residential units on the floors above.

The development would include 15.8% affordable housing (53% on the uplift provided by the new development in comparison to the previously approved outline permission for the site).

The residential unit mix would be as follows:

- 120 x 1 bedroom flats (including 10 studios);
- 149 x 2 bedroom flats;
- 10 x 3 bedroom flats.

The development would also provide a roof garden at the 11th floor, associated landscaping and public realm works, basement car and cycle parking, associated plant including building maintenance unit and internal refuse storage.

Vehicle access to the development would be from Jarrow Road via the undercroft access under Ferry Lane.

The development would be finished in cream aluminium metal panels, dark grey window frames and glass balconies with wood-coloured cement board soffits. The panels would be vertically narrow in some areas and wide in others. Glass balconies to flats at the first to 11th floors will incorporate a patterned interlayer inspired by Harris Lebus furniture pieces. Recessed external balconies on the south and west elevations and projecting internal balconies on the north and east sides provide further articulation to the building.

The application site is angular in nature due to a number of site constraints such as neighbouring large buildings to the north and east, public walkway to the north, and Ferry Lane to the south, as well as subterranean considerations such as tube lines.

3.2 Site and Surroundings

The site is located on the north side of Ferry Lane adjacent to Tottenham Hale Station. It is the south-west corner of the wider Hale Village Masterplan area that is currently vacant. The Masterplan area is bound by Lockwood Industrial Park to the north, Millmead Road to the east and Ferry Lane to the south. The west of the site is bound by the West Anglia Main Line. The majority of the Masterplan site has now been fully developed into a mix of flats, student accommodation, education, health, office, retail and other uses. Only the application site remains vacant.

The site measures 0.271 hectares in size and there is a gradient across the site that results in a difference in land levels of 2.3m from the east to west of the site.

Pedestrian access routes from the Masterplan area converge on the nearby Tottenham Hale Rail and Underground Station adjacent to the application site. Ferry Lane (A503) to the south of the site provides a direct connection towards the Lee Valley Park and across the river corridor to Walthamstow to the east.

The application site contains no listed, locally listed buildings or conservation areas within close proximity of the site.

The site forms part of Tottenham Hale which is subject to significant levels of investment in the form of new development at the present time and is within a Housing Zone. Tottenham Hale is a significant transport node with a large proportion of commercial uses in the vicinity.

The wider urban area of Tottenham extends from the river to the west as a mix of residential, commercial and industrial areas.

3.3 Policy Designations

The site is part of land identified as site allocation TH8 within the Council's Tottenham Area Action Plan Development Plan Document (AAP). This site allocation, which also includes the remainder of the Hale Village site to the north and east, is identified as land being suitable for a residential-led mixed-use development, with commercial/town centre uses on the ground floor. The following additional designations also apply.

- Tottenham Hale Growth Area;
- Flood Zone 2;
- Area of Archaeological Importance;
- Borough Grade II Site of Importance for Nature Conservation;
- Ecological Corridor;

The site is identified as being suitable for a tall building by the District Centre Framework (2015). Furthermore, the site also falls within the Upper Lea Valley Opportunity Area and the Tottenham Housing Zone as identified by the Mayor of London.

3.4 Relevant Planning History

The site has a long and complex planning history originating with the approval of the original Masterplan for Hale Village in 2007, and including a large number of later amendments, conditions and other applications.

The originally approved Masterplan is referenced below (planning ref. HGY/2006/1177). This outline planning permission was implemented and has almost been completed, other than for this site and a landscaping area to the north of the masterplan which

contains temporary parking, a ball court and temporary GP surgery. All subsequent permissions that are directly relevant to the site only (Plot SW) are described below:

HGY/2006/1177 - Demolition of all structures and remediation for the development of a mixed use scheme comprising up to 1210 residential units (Use Class C3), student accommodation (C2), office (B1), hotel (C1), retail (A1, A2, A3, A4, A5 and B1) uses, a health centre (D1), a health club (D2), crèche (D1) and a primary school, with provision for underground and on-street car parking, to be comprised within separate building blocks ranging in height from 1 to 18 storeys, incorporating public open space, an unculverted watercourse and Combined Heat and Power (CHP) with associated renewable energy systems (outline application). Granted October 2007.

Key elements relevant to Plot SW:

- 18 storey development block featuring retail and hotel uses at ground floor level, and hotel and residential units on the floors above;
- The hotel included up to 100 bed spaces;
- The retail space was to include a relative proportion of the overall 5500sqm of A1-A5 uses;
- The residential space was to include a relative proportion of the overall 1210 residential units;
- 30% affordable housing for the overall development was proposed to be provided across the whole site with a tenure split of 50% social rented and 50% intermediate housing (43% of the social rented would be 3/4 bed units).

HGY/2008/0729 - Approval Of Reserved Matters pursuant to Outline Permission HGY/2006/1177 and Condition 5 (Works, Road, Walkways) Condition 11 (Design), Condition 12 (Storage / collection, refuse) and Condition 42 (Environmental Sustainability Plan) of said permission for the construction of a level basement (beneath plot SW) comprising car parking, bicycle parking, associated access ramps, building cores, plant and storage areas and other associated works. Granted June 2008.

HGY/2010/1897 - Extension of time limit for implementation of outline planning permission reference HGY/2006/1177 (see above). Granted March 2012.

HGY/2015/0795 - Approval of reserved matters application (including appearance, layout, access, scale and landscaping) in relation to outline permission no HGY/2010/1897 for Plot SW forming part of the Hale Village Masterplan and discharge of conditions 1,4,5,6,7,8,11,12,15,41 and 42 attached to the outline permission. The development that is the subject of this reserved matters application comprises a nineteen storey building including 194 residential units, 1600 sqm of retail floorspace and associated works, the completion and laying out of basement beneath plot. The original outline planning application was subject to an environmental impact assessment application and an environmental statement was submitted to the planning authority at that time. Not yet determined.

HGY/2015/0798 - Application under Section 73 of the Town and Country Planning Act 1990 for a minor material amendment to Planning Permission Reference HGY/2010/1897 granted on 29 March 2012 for: Extension of time limit for

implementation of outline planning permission HGY/2006/1177 granted 9th October 2007 for a mixed use redevelopment of the site comprising of demolition of all structures and remediation for the development of a mixed use scheme comprising up to 1210 residential units (Use Class C3), student accommodation (C2), office (B1), hotel (C1), retail (A1, A2, A3, A4, A5 and B1) uses, a health centre (D1), a health club (D2), a crèche (D1) and a primary school, with provision for underground and on-street car parking, to be comprising within separate building blocks ranging in height from 1 to 18 storeys, incorporating public open space, an un-culverted watercourse and Combined Heat and Power (CHP) with associated renewable energy systems. The minor material amendment being sought is a variation to Condition 66 (Approved Drawing Numbers) added by non-material amendment (Ref: HGY/2015/0667) to omit the hotel use from Plot SW entirely. The amended parameter plans therefore propose retail uses (Use Class A1, A2, A3, A4, A5) at ground floor only, with residential use (Use Class C3) on the upper floors. Not yet determined.

HGY/2017/0150. Request for Scoping Opinion in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as Amended). Opinion provided March 2017.

Other Relevant Applications:

HGY/2013/2610 - Works to extend the operational railway station at Tottenham Hale. Creation of a new station entrance, enlarged station concourse, improved access and a new access for all bridge. Extension of the existing footbridge to form a new station entrance from Hale Village, relocation of the station vent shaft and provision of a new station control facility, provision of retail units and associated works. Development involves the closure of the existing Ferry Lane subway. Granted March 2014

This development includes the erection of a footbridge to Hale Village from the station to the west of the site.

4. CONSULTATION RESPONSE

4.1 Planning Committee Pre-Application Briefing

4.2 The proposal was presented to the Planning Committee at a Pre-Application Briefing on 2nd February 2017. The relevant minutes of the meeting are described below:

- Concerns were raised over the increase in height and density sought compared to the extant permission for an 18 storey tower and the potential for the scheme to be out of context with the area in this regard. The applicant outlined that the site had been identified as an appropriate location for a tall building under the wider Hale Village masterplan and would serve as a landmark building identifying the location of the station. The revised scheme was considered to be an improvement on the extant plans including a slimmer profile design for the tower. It was also considered to be more economically viable;

- In response to a question, the applicant advised that discussions were underway with London Underground regarding the design of the foundations and proximity to the Victoria line tunnels.
- In response to a question, plans were confirmed to provide commercial units at ground floor level to all elevations;
- Concerns were raised over the number of single aspect units. The applicant advised that these would be minimised and mitigated in line with the constraints of the site such as use of a bay window design;
- The limited parking arrangements proposed for the site of only 50 spaces were identified as a significant concern. The importance was stressed of the applicant giving careful consideration as to how these spaces were allocated and arrangements for deliveries etc to service the flats as parking provision in the vicinity was very limited.

4.3 Quality Review Panel (QRP)

4.4 The Haringey QRP considered three different iterations of the development proposals on 22nd February, 17th May and 5th July 2017. The minutes of the last meeting are set out in Appendix 3

4.5 Development Management Forum (DMF)

4.6 The DMF was held on 19th June 2017. The notes of the meeting are set out in Appendix 4 and summarised below:

- Requests were made for confirmation of fire safety plans – development will be fully sprinklered and cladding higher fire-rated;
- Confirmation over number of lifts was requested – 3 to be provided, including one fire-fighting lift;
- Concerns were raised over continual increases in height over original approval – no further increases in height are proposed;
- Questioned when development will start – likely start of 2018 if planning permission given;
- Further information on progress of connecting bridge was requested – likely mid-2018 start and bridge will be completed before the proposed building is finished;
- How much social housing will be provided? – negotiations are continuing.

4.7 The following were consulted regarding this planning application:

4.8 INTERNAL

4.9 Design Officer

4.10 The design is considered to be acceptable subject to a condition securing details of the materials.

4.11 Conservation Officer

4.12 Whilst the proposed development would be visible within the setting of several heritage assets and in long distance views, it would not lead to negative impact and as such is considered to cause no harm to setting of heritage assets. As such, the scheme would be acceptable from a conservation point of view.

4.13 Transportation

4.14 Raise no objections subject to conditions and s106 requirements.

4.15 Housing

4.16 Noting the recommendations of the Viability Consultant's report, the affordable housing offer of 43 intermediate shared ownership units is acceptable.

4.17 Drainage Engineer

4.18 The adjacent site appears to have drainage infrastructure in place that has been sized to take additional unattenuated flows from the proposed new development. Engineer is satisfied with the maintenance regime for this site. Evidence should be provided to demonstrate that the existing drainage system is sized to receive the runoff from the site.

4.19 Carbon Management

4.20 To achieve policy compliance, the scheme will need to deliver the energy efficiency and generation measures set out within its energy strategy and offset the remaining carbon emissions to achieve the zero carbon target. Further information is required to address overheating risk in the future.

4.21 Pollution – Air Quality and Land Contamination

4.22 An air quality assessment (WYG, June 2017, ref: A101186) has been submitted along with the planning application to assess the air pollution impact of the proposed developments. This assessment confirms exceedances of the Government's objective for NO₂. However, this would be managed by filtration equipment and as such conditions are recommended to mitigate for the site's proximity to a main road. Dust and other air pollution during construction shall also be managed by condition.

- 4.23 There are no concerns raised in respect of land contamination.
- 4.24 Waste Management
- 4.25 No objections raised.
- 4.26 Building Control
- 4.27 No objections to the fire information provided. Further details of the proposed cladding should be sought prior to construction.
- 4.28 Tottenham Team
- 4.29 No objections raised.
- 4.30 Arboricultural Officer
- 4.31 The species selection and size of the proposed trees are acceptable and would provide immediate impact. The podium roof will create a new flora rich habitat for invertebrates and birds that will increase local biodiversity.
- 4.32 Education
- 4.33 The site is within Planning Area 4. Currently, projections state that there will be a primary school place deficit in this area of around one form of entry by 2023/4 and a borough-wide deficit of secondary places of around one form of entry by 2019/20 (at which time the development would be expected to be completed).
- 4.34 However, primary places are expected to be at a surplus borough-wide and thus space is available for these pupils elsewhere within the Borough as required. Furthermore, across London increases in secondary school capacity are ongoing and the Council specifically is engaging with local community, academy and foundation schools in order to meet expected demand.
- 4.35 Licensing
- 4.36 No comments to make.
- 4.37 Noise
- 4.38 No objections to the principle of the application, although conditions shall apply to internal noise conditions, insulation between commercial and residential properties and plant noise.
- 4.39 EXTERNAL

4.40 Greater London Authority (GLA)

4.41 Stage 1 comments are described in detail in Appendix 5. To summarise the GLA commented as follows:

4.42 Whilst the principle of the proposal is supported in strategic planning terms, further information is required regarding the following issues before it can be confirmed that the proposal complies with the London Plan:

- **Affordable housing:** 15% (by habitable room) of the total units, or 48% of the uplift, made up of 100% intermediate shared ownership. GLA officers will work with the Council and the applicant to maximise affordable housing provision, and in the context of the Mayor's SPG, will robustly scrutinise the viability assessment, including the affordability of shared ownership units and potential grant funding. Early and late viability reviews must be secured in accordance with the SPG.
- **Urban design and tall buildings:** The applicant should replace a proportion of those units that have additional internalised space, with winter gardens.
- **Transport:** The applicant should consider an increased level of Blue Badge parking; increase the cycle parking to London Plan standard; and reconsider the layout of basement cycle storage. The section 106 obligations relating to the delivery of the public realm should ensure that the applicant is required to work with TfL to enable the pedestrian footbridge to be linked to the site. Crossrail 2 safeguarding, a full delivery servicing plan, and a construction logistics plan should be secured by condition.
- **Climate change:** Further information has been requested from the applicant, including the potential for on-site renewables, which is required before it can be confirmed that the application meets London Plan requirements.

4.43 Planning Casework Unit

4.44 No objections to the contents of the submitted Environmental Statement.

4.45 Thames Water

4.46 No objections, subject to conditions.

4.47 London Fire Service

4.48 Satisfied with the proposals for firefighting access.

4.49 Metropolitan Police

4.50 No significant objections, subject to conditions.

- 4.51 Environment Agency
- 4.52 No comments to make, other than the application is recommended to follow Flood Risk Standing Advice, NPPF and NPPG.
- 4.53 Natural England
- 4.54 No objection raised in terms of the development's impact on any statutory nature conservation sites, such as the Lee Valley SPA and RAMSAR, or the Walthamstow Reservoir SSSI.
- 4.55 Greater London Archaeological Advisory Service (GLAAS)
- 4.56 Field evaluation is required to determine appropriate archaeological mitigation, if required. This can be dealt with by condition.
- 4.57 Transport for London
- 4.58 No significant objections to the proposal are raised, subject to conditions and s106 requirements.
- 4.59 Network Rail
- 4.60 The development should respect Network Rail's requirements during construction of the scheme proposed.
- 4.61 London Underground Infrastructure Provision
- 4.62 No comments to make.
- 4.63 London Overground Infrastructure Management
- 4.64 No comments to make.
- 4.65 Crossrail 2 Safeguarding
- 4.66 The site is outside of the Crossrail 2 safeguarding area, but is in close proximity to a proposed work site. No objections but a condition is recommended.
- 4.67 Arriva London
- 4.68 No comments received.
- 4.69 National Grid

4.70 No comments received.

4.71 LB Hackney

4.72 The development would be visually obtrusive when viewed from various sites within Hackney including Springfield Park. It is suggested that the height be reduced. Objection raised.

4.73 LB Waltham Forest

4.74 No objections raised. There would not be a negative impact on nearby heritage assets. However, a contribution is expected towards improvements to the wetlands due to the likely increase in pedestrian activity arising from this proposed development.

4.75 Lee Valley Regional Park Authority

4.76 The scheme is likely to result in additional users of the Regional Park and therefore the Council should consider contributing some of its CIL receipts from this development towards a series of improvements throughout the Parklands.

4.77 London Wildlife Trust

4.78 No comments received.

4.79 Inland Waterways Association

4.80 No comments received.

4.81 Canal & River Trust

4.82 No specific comments to make on the proposal.

LOCAL REPRESENTATIONS

5.1 The following were consulted:

- 1,868 neighbouring properties;
- Public notices were erected in the vicinity of the site;
- Residents groups were contacted, including:
 - Ferry Lane Action Group;
 - Friends of Tottenham Marshes;
 - Friends of Paddock Green.

5.2 The number of representations received from neighbours, local groups etc in response to notification and publicity of the application were as follows:

5.3 Individual responses – 80 (33 letters of objection and 47 in support).

5.4 The following local groups/societies made representations:

- None.

5.5 The following Councillors made representations:

- None.

5.6 The issues raised in representations that are material to the determination of the application are summarised as follows:

Design

- Out of keeping with local character;
- Poor design;
- Poor streetscape;
- Excessive height;
- Excessive scale, bulk and massing;
- Dominating appearance;
- Neighbouring amenity;
- Loss of day/sunlight;
- Loss of outlook;
- Loss of privacy;
- Increased wind tunnelling;
- Increased pollution;
- Increased noise disturbance;

Layout and Density

- Overdevelopment and overcrowding;
- Lack of affordable housing;
- Poor internal layout;
- Insufficient local services and community facilities;

Parking and Highways

- Increased congestion;
- Insufficient parking;
- Disturbance from building works traffic;

Open/Green Space

- Impact on nearby marshes;
- Loss of green space;

Other Matters

- Insufficient local consultation;

- Increased anti-social behaviour;
- Lack of safety;

Non-Material Considerations

- Loss of a view;
- Loss of property value;
- Previous approval is not valid.

6 MATERIAL PLANNING CONSIDERATIONS

6.1 The main planning issues raised by the proposed development are:

1. Principle of the Development
 - Policy Framework
 - Masterplan Background
 - Proposed Land Uses
 - Tall Building Suitability
2. Tall Buildings
 - Townscape and View Management
 - Microclimate
3. Density and Appearance
 - Density
 - Detailed Design
4. Heritage Impact
 - Built Heritage
 - Archaeology
5. Affordable Housing, Housing Mix and Residential Quality
 - Affordable Housing
 - Housing Mix
 - Layout
 - Accessibility
6. Impact on the Amenity of Adjoining Occupiers
 - Daylight Impact
 - Sunlight Impact
 - Overshadowing
 - Outlook and Privacy
 - Impact from Noise, Light and Dust
7. Transport and Parking
8. Ecology and Landscaping
9. Sustainability
10. Waste Management
11. Air Quality and Land Contamination
12. Flood Risk, Drainage and Water Management
13. Fire Safety and Security
14. Environmental Impact Assessment

15. Equalities

16. S106 Heads of Terms

6.2 Principle of the development

6.2.1 Policy Framework

6.2.2 *National Policy*

6.2.3 The National Planning Policy Framework (NPPF) establishes overarching principles of the planning system, including the requirement of the system to 'drive and support development' through the local development plan process and to support 'approving development proposals that accord with the development plan without delay'. The NPPF also expresses a 'presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking.'

6.2.4 *The Development Plan*

6.2.5 For the purposes of S38(6) of the Planning and Compulsory Purchase Act 2004 the Development Plan consists of the London Plan (consolidated 2016), Haringey's Local Plan (consolidated 2017), the Tottenham Area Action Plan and Development Management Policies DPD (both 2017). The decision must be made in accordance with the plan unless material considerations indicate otherwise.

6.2.6 *The London Plan*

6.2.7 The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. The consolidated London Plan (2016) sets a number of objectives for development through various policies. The policies in the London Plan are accompanied by a suite of Supplementary Planning Guidance (SPGs) that provide further guidance.

6.2.8 Tottenham Hale is within an Opportunity Area (Upper Lea Valley) and a Regeneration Area as set out by the London Plan and is also identified for siting on the proposed Crossrail 2 rail link.

6.2.9 The Plan sets out a housing target of 20,100 units and also a target of 15,000 jobs for this Opportunity Area by 2031.

6.2.10 *Upper Lea Valley Opportunity Area Planning Framework*

6.2.11 The Upper Lea Valley Opportunity Area Planning Framework (OAPF, 2013) is supplementary guidance to the London Plan. The OAPF sets out the overarching framework for the area, which includes the application site, and the objectives for the Upper Lee Valley. The OAPF identifies the wider Hale Village

site, of which this site forms a part, as suitable for a residential-led mixed use scheme with new homes, student housing and shops, cafes and restaurants.

6.2.12 The OAPF specifically identifies Tottenham Hale as an area suitable for tall buildings.

6.2.13 *Housing Zone*

6.2.14 Key to the delivery of regeneration in the Tottenham Hale area is the Council's participation in the Mayor of London's Housing Zone program. Tottenham Hale's designation as a Housing Zone provides funding for new infrastructure and allows policy interventions such as tax incentives, rationalised planning regulations and the use of compulsory purchase powers to facilitate the construction of new housing developments.

6.2.15 The programme seeks to deliver a total of 5,500 new homes – an estimated 1,700 more than would otherwise be viable – through the unlocking of 'brownfield' sites for development. The Housing Zone approach also promotes an area-wide 'portfolio' approach to housing delivery to better align public sector resources. This approach allows the balancing of housing tenures and dwelling mixtures across Housing Zone areas.

6.2.16 *Haringey Local Plan Strategic Policies (consolidated, 2017)*

6.2.17 Haringey's Local Plan Strategic Policies document highlights the importance of growth areas within the Borough and notes that Tottenham Hale will be a key location for Haringey's future growth. The Local Plan has recently been updated to reflect a more challenging position in respect of overall housing targets and affordable housing delivery.

6.2.18 SP11 of the Local Plan identifies Tottenham Hale as a site suitable for some tall buildings by virtue of its excellent transport links and designation as an Opportunity Area by the Mayor.

6.2.19 *Tottenham Area Action Plan (AAP, 2017)*

6.2.20 The Tottenham AAP provides site specific and area based policy to underpin the delivery of the spatial vision set out in the adopted Local Plan and the attendant suite of Development Plan Documents (DPDs). The AAP aims to articulate the spatial vision for growth in the Borough.

6.2.21 *AAP Site Allocation*

6.2.22 The site allocation TH8, as identified within the AAP, envisages the completion of Hale Village, reflecting the extant planning permission and existing

masterplan, with a new mixed use tower consisting of town centre uses at ground floor with residential and potentially a hotel above.

6.2.23 The site specific requirements for the site allocation are as follows:

- Indicative development capacity of 253 residential units and 1800sqm of town centre space;
- The outline planning permission permits a tall building (18 storeys);
- Ground floor uses should contribute to the vitality of the existing urban streets within the site, and provide amenities for local residents;
- Development proposals will be required to be accompanied by a site-wide masterplan showing how the land included meets this policy and does not compromise coordinated development on the other land parcels within the allocation;
- Development will engage with the Ferry Lane frontage, including creating an appropriate frontage for part of the Green Grid network connecting Tottenham Hale to the Lee Valley Regional Park;
- The connection to Tottenham Hale station will be optimised, and a high quality public realm will be created through this site;
- Development will need to provide for limited car parking to serve accessible residential units, taking account of the usage of existing spaces in Hale Village;
- Proposals for development that provide additional units beyond outline planning permission extent will need to provide details of infrastructure impacts arising from additional units/occupants.

6.2.24 The development guidelines are:

- Proposals for a tall building over 18 stories will require justification and will need to satisfy Policy DM6 on tall buildings;
- Design should respect and respond to the wider site and should engage with the approved Tottenham Hale Station scheme (HGY/2013/2610) which includes a bridge landing in the urban realm outside this site, and any design on this site should respond positively to this;
- Any development should demonstrate how it has an acceptable relationship with neighbouring land uses by virtue of microclimate and daylight/sunlight;
- Development will need to engage with the existing design code for Hale Village;
- Development should connect to the decentralised energy hub, as a customer and consider how the network can be extended;
- This site is in an area of flood risk, and a Flood Risk Assessment should accompany any planning application.

6.2.25 *Tottenham Hale District Centre Framework (2015)*

6.2.26 The Tottenham Hale District Centre Framework (DCF) sets out that Tottenham Hale has been identified as having the capacity for a significant number of new homes, with numerous sites that are suitable for new residential or residential-led mixed-use development. In the next 10-15 years, it is expected that 5,000 homes will come forward on these sites. A mix of housing tenures will be delivered, with emphasis on the affordable end of the market, to provide choice.

6.2.27 The DCF is not a Development Plan Document (DPD) but acted as a key part of the evidence base informing the Tottenham AAP. The Tottenham AAP will allow for the implementation of proposals for the Tottenham Hale District Centre. The DCF has also been informed through engagement with the community, stakeholders and key landowners/developers in the Tottenham Hale area. The DCF provides design guidance and parameters for the wider allocated site.

6.2.28 The DCF does not provide specific development guidelines for the Hale Village site, other than indicating that the Plot SW site is suitable for a tall building and has permission for an 18 storey tower, and that Hale Village has been an important instigator for regeneration in the locality. This document describes why Tottenham Hale is suitable for appropriate large-scale and dense development, including detailing future transport, open space and public realm improvements.

6.2.29 *Tottenham Hale Streets and Spaces Strategy (2015)*

6.2.30 The Streets and Spaces Strategy sets out how to improve streets and public spaces around the area to make them safer, more user-friendly and inviting. The Strategy seeks to provide improved pedestrian and cycle connections along Ferry Lane, including a reduction in the width of the Ferry Lane bridge and separation of cycle lanes from the road. This document sits below the DCF and is not a development plan document.

6.2.31 *Tottenham Hale Green and Open Spaces Strategy (2015)*

6.2.32 The Green and Open Spaces Strategy suggests ways to improve and protect existing green spaces. The strategy suggests making it easier to get to the Lea Valley with new and improved connections.

6.2.33 The Strategy references Down Lane Park stating that it is a well-used facility for local children with recently improved play facilities including enhanced facilities for very young children, a new BMX track for older children, external gym and improved tennis courts. The document sits below the DCF and is not a development plan document.

6.2.34 *Tottenham Strategic Regeneration Framework (2014)*

6.2.35 The Tottenham Strategic Regeneration Framework outlines the key strategies that will be used to revitalise Tottenham. It sets seven strategic and overarching priorities for achieving the vision and the aspirations for Tottenham. While inter-related, most of the priorities are less directly related to the built form of Tottenham and instead address issues such as educational and service provision. The Framework sets out what the community thinks Tottenham will be and feel like when these strategies have been delivered and what it may mean for Tottenham's different character areas.

6.2.36 *Tottenham Physical Development Framework (2012)*

6.2.37 The Tottenham Physical Development Framework highlights the scale of the opportunities within the Borough. The document was not consulted upon or adopted by the Council as planning policy and as such has no weight in planning terms. It notes that the area is becoming known for a high-quality, well-connected public realm providing a welcoming place to do business and socialise throughout the day and evening.

6.2.38 Masterplan Background

6.2.39 The site sits within the Hale Village Masterplan site area which was approved in 2007 under planning reference HGY/2006/1177 for 'Demolition of all structures and remediation for the development of a mixed use scheme comprising up to 1210 residential units (Use Class C3), student accommodation (C2), office (B1), hotel (C1), retail (A1, A2, A3, A4, A5 and B1) uses, a health centre (D1), a health club (D2), crèche (D1) and a primary school, with provision for underground and on-street car parking, to be comprised within separate building blocks ranging in height from 1 to 18 storeys, incorporating public open space, an un-culverted watercourse and Combined Heat and Power (CHP) with associated renewable energy systems (outline application).' The masterplan area is defined by Ferry Lane in the south, Mill Mead Road and Pymme's Brook to the east, Tottenham Hale Station and the West Anglia Main Line to the west and the Lockwood Industrial Park to the north.

6.2.40 The application site is known as Plot SW of the Masterplan and is the only plot which has not yet been developed. The Masterplan parameters approved a triangular-shaped building of 18 storeys with hotel and residential uses on upper floors and commercial units plus the hotel lobby at ground floor level. The Masterplan shows a generous public realm area to surround the building with commercial uses promoting an emerging town centre to the west. An 18 storey tower on the application site was to act as a landmark for the site, defining the character of Tottenham Hale through the identification of the rail and underground station as a gateway to the local area. This established a building envelope capable of delivering 196 units.

- 6.2.41 The timeframe for the implementation of all parts of the Masterplan was extended in 2012 (reference HGY/2010/1897) and an application for the approval of reserved matters was submitted in 2015 (HGY/2015/0795) that provided the development details for the aspects of the Masterplan scheme relating to Plot SW that had not previously been approved, but this application has not been determined. A Section 73 application for minor material amendments was also submitted in 2015 (HGY/2015/0798) to amend the Masterplan parameters for Plot SW and replace the approved hotel use with residential units, and this application has also not been determined.
- 6.2.42 The application site was subject to an application for approval of reserved matters in 2008 (HGY/2008/0729) for the construction of a basement beneath the application site comprising car parking, bicycle parking, associated access ramps, building cores, plant and storage areas. This application was approved in June 2008 but has not been implemented.
- 6.2.43 Although this application is submitted in the context of the approved Masterplan it is not a reserved matters application but instead seeks a new planning permission and must be assessed as such. Given there is an extant outline planning permission for the application site that the applicant could implement (subject to an acceptable reserved matters application being approved) the Masterplan proposals must be given significant weight in informing the assessment of this application.
- 6.2.44 Proposed Land Uses
- 6.2.45 The NPPF states that one of its core principles is to encourage the effective use of land by reusing land that has been previously developed. Policy SP1 of the Local Plan 2017 states that the Council will promote growth in the Tottenham Hale Growth Area. London Plan Policy 3.3 provides explicit strategic support for the provision of housing within London, and sets a target for the Council to deliver a minimum of 15,019 homes in the Plan period 2015-2025.
- 6.2.46 London Plan Policy 2.13 (and supporting Table A1.1) recognises the significant potential of the Upper Lee Valley Opportunity Area to accommodate new homes, and identifies a minimum of 20,100 new homes to be provided within the area.
- 6.2.47 Haringey's Local Plan Policy SP1 seeks to focus the majority of housing growth in the designated Growth Areas, including Tottenham Hale. Any development within identified growth areas will be expected to maximise housing delivery on the site, and high densities will be expected.
- 6.2.48 Given the site's context within the Upper Lee Valley Opportunity Area and the Tottenham Housing Zone, and in light of the Council's local policy designations,

the principle of the redevelopment for 279 new homes is supported and in line with the principles of both London Plan and local planning policy.

6.2.49 The extant outline permission permits the use of the site for a mixed-use development including retail at ground floor level and residential above, and as such the principle of a mixed-use development at the site is also acceptable.

6.2.50 This application seeks permission for specific ground floor uses and an increase in the number of residential units above the outline permission. The principle of these matters is considered below.

6.2.51 *Commercial Uses*

6.2.52 Policy SP8 of the Local Plan states that the Council will support employment and regeneration aims and contribute towards a diverse London and north London economy.

6.2.53 Policy DM41B of the Development Management DPD states that proposals for retail, leisure and cultural uses at edge-of-centre locations will be permitted where there are no appropriate town centre sites available, where the site is the most preferable alternative location, and where the proposals are consistent with the town centre and supports its ongoing vitality and viability.

6.2.54 The AAP allocates the site for town centre uses at ground floor, with 'residential, and potentially a hotel above'. Although presented as a potentially acceptable option a hotel is not a site requirement of the allocation and has not been included in the proposals.

6.2.55 The site requirements state that 'ground floor uses should contribute to the vitality of the existing urban streets within the site, and provide amenities for local residents'. The proposed development capacity of the site allocation indicates the potential for 1800sqm of town centre uses within the Plot SW site.

6.2.56 The proposed ground floor includes 1588sqm of commercial floor space that would be split into three separate units; one large unit facing west, a smaller unit facing north and another facing south. These units have been designed as open-plan spaces that may be easily subdivided into smaller units to adapt to market trends. This arrangement would encourage active frontages on all sides of the building at ground floor level, facilitated by the full-height glazed frontages of the units.

6.2.57 The exact uses for each specific individual commercial unit have not yet been confirmed. To achieve the objectives of the site allocation by activating the public realm and providing for residents needs the units to the west and north would be appropriate for Use Classes A1 (retail), A3 (restaurant) or A4 (drinking establishments), whilst the unit to the south-east is proposed to have a more

flexible use within Use Classes A1, A3, B1a (office) or D1 (non-residential institutions). The north-facing unit may also be acceptable for office uses should the frontage and internal layout of the unit be designed to include a street-facing reception and/or café. The uses of these units will be restricted by condition.

6.2.58 The commercial units proposed would complement those larger units to the west and south-west of Tottenham Hale.

6.2.59 It is considered that the scale and mix of town centre uses would contribute to the vitality of the existing urban streets within the site and provide amenities for local residents, thus meeting the aims and objectives of the site allocation.

6.2.60 *Residential Uses*

6.2.61 The principle of residential use on the site has already been established by the extant outline planning permission.

6.2.62 The extant outline permission, with the hotel element removed and replaced by residential properties, would allow for an estimated 196 units at this site. The site allocation indicates that the site has capacity for 253 residential units. The proposal is for 279 units. An increase in number of residential units above the extant permission and the indicative development capacity of the site is acceptable in principle subject to the detailed elements of the overall proposal, such as design, impact on amenity and impact on the public highway, etc, also being acceptable as discussed in the sections below.

6.2.63 Tall Building Suitability

6.2.64 London Plan Policy 7.7 is the key London-wide policy for determining tall building applications. The policy requires that tall buildings 'should generally be limited to sites in opportunity areas, areas of intensification or town centres that have good access to public transport'. This site meets these requirements.

6.2.65 Local Plan Policy SP11 requires all new development to 'enhance and enrich Haringey's built environment and create places and buildings of high quality'. Policy DM6 Building Heights identifies the local area (as per Figure 2.2 'Potential Locations Appropriate for Tall Buildings) as being suitable for a tall building and indicates set criteria that tall buildings should achieve.

6.2.66 Historic England Advice Note 4 supersedes the document 'Guidance on Tall Buildings' produced by English Heritage and CABI in 2007 (as referenced in Policy DM6). While not part of the Development Plan, this note provides a list of design criteria that should be satisfied when considering the merit of tall buildings. These criteria include:

- Architectural quality;

- Sustainable design and construction;
- Credibility of the design;
- Contribution to public space and facilities;
- Consideration of the impact on the local environment;
- Provision of a well-designed inclusive environment.

6.2.67 At the local level, Policy DM5 of the Development Management DPD identifies Locally Important Views and Vistas as set out in Figure 2.1 of the DPD. These designated views have been evaluated according to their interest as panoramas, vistas, landmarks and townscapes. The site falls within the Linear View No. 26 from Queenmore Road and Stapleton Hall Road junction towards Seven Sisters and Hale Village.

6.2.68 Furthermore, Policy DM6 of the Development Management DPD demonstrates that the application site is located within an area that is suitable for tall buildings as identified by Figure 2.2.

6.2.69 *Assessment of siting*

6.2.70 The Tottenham Area Action Plan Policy AAP6 (Urban Design and Character including Tall Buildings) outlines the opportunity to 'establish a new urban character' for Growth Areas such as Tottenham Hale. One overall objective under TH1 is to create 'a new urban form – consistent with the area's status and accessibility'. The status of Tottenham Hale is rapidly increasing due to its emergence as a town centre and its excellent and improving public transport connections.

6.2.71 Site allocation TH8 states that any building over the permitted 18 storeys will require justification and will also need to satisfy Policy DM6 of the Development Management DPD, which states that taller buildings that project above the prevailing height of the locale must be justified in urban design terms, including being of a high architectural quality (including high quality public realm), protecting locally important and strategic views and conserving heritage assets.

6.2.72 DM6 also states that tall buildings will only be acceptable in identified areas which includes Tottenham Hale. Buildings should represent a landmark that is a way-finder or marker drawing attention to key locations such as public transport interchanges, and should be elegant, well-proportioned and visually interesting from any distance or direction, as well as positively engaging with the street environment.

6.2.73 Policy AAP6 of the Tottenham AAP indicates that the Tottenham Hale Growth Area is potentially suitable for the delivery of tall buildings. Part D of that policy states that the highest density development is expected to be located close to public transport nodes, whilst also noting that taller buildings are appropriate

along Ferry Lane. It also outlines the opportunity to 'establish a new urban character' for this Growth Area.

6.2.74 The outline planning permission for the Hale Village masterplan sets out within its parameters that the tallest building within the Village development would be located on the south-western plot in order to provide a gateway to the site from the west and indicate the location of both the adjacent 'village' development and Tottenham Hale station.

6.2.75 The scheme proposes a new building of 33 storeys with a podium at ground floor level, a larger footprint over the lower levels up to the 11th storey and a 'shoulder' element to create a slimmer form on the upper floors. This would be a significant step up from the height of the surrounding buildings which currently extend up to a maximum 11 storeys (Coppermill Heights to east and Unite Student Housing to north) and is also an increase of 15 storeys on the building parameters approved as part of the earlier outline planning permission.

6.2.76 Since the outline planning permission designated this site as the potential location for a 'wayfinding' tall building the principle of its suitability for a tall building has been reinforced through a consistent identification and designation of the site as such in local and regional policy, as described in the sections above. In addition, since the outline permission was granted further investment in local transport connectivity has been identified, whilst the character of this growth area has also developed into one even more suitable for taller structures, given the recent granting of permissions for buildings of more than twenty storeys in the locale.

6.2.77 Overall, it is considered that there is strong and consistent policy support for a tall building in this location at the local and regional level. The Development Management DPD and DCF have identified this site as suitable for a tall building and note, in particular, the building's potential to act as a wayfinding structure to Hale Village, Tottenham Hale station and the emerging town centre. As such, it is considered that a tall building on this site would represent an appropriate and positive addition to Tottenham Hale and is therefore supported in this location.

6.2.78 The proposed design and other impacts on matters such as local character, key views, neighbouring amenity, carbon reduction, ecology and all other relevant considerations will be assessed in the relevant sections below.

6.2.79 Tall Buildings

6.2.80 Townscape and View Management

6.2.81 The DCF states that the most appropriate location of new tall buildings in Tottenham Hale is within the central area of the proposed district centre,

immediately adjacent to Tottenham Hale station. A 'strip' arrangement is proposed that aligns tall buildings along the northern side of Ferry Lane. This arrangement is intended to minimise the impact of the cluster to local views given existing building orientations.

- 6.2.82 The location of the proposed building is consistent with a strip formation in terms of location, and the emerging Station Square proposal and Argent Related proposals are considered to compliment this arrangement. The development sits to the north (and outside) the designated local view from Burgoyne Road.
- 6.2.83 A Heritage, Townscape and Visual Impact Assessment' (HTVI) assessment, submitted with the application as part of the Environmental Statement, has been carried out of the effect of the development on existing townscape character and on views towards the site. A total of key 16 representative views within the local area were selected and agreed with Council officers. The assessments comprise two separate but interrelated assessments: an assessment of the likely significant effects on the character and quality of the townscape together with an assessment of the effect of development on views (including protected views), viewers and their visual amenity. The cumulative impact of the wider proposals for Tottenham Hale was also assessed.
- 6.2.84 The development is assessed on its own merits but also in the context of the emerging character of Tottenham Hale and recent planning consents for tall building development in the local area.
- 6.2.85 *Townscape*
- 6.2.86 The development of this site would deliver a considerable change in urban scale around this part of Tottenham Hale. This would be commensurate with the objectives set out in the District Centre Framework. The HTVI states that the creation of a landmark tall building development in this site would contribute towards improving local legibility.
- 6.2.87 *Key Views*
- 6.2.88 Key views have been assessed in the context of the approved outline planning permission's parameters for an 18 storey tower, as well as the emerging context of Tottenham Hale which is of a new district centre featuring a number of tall buildings, some of which have already received planning approval.
- 6.2.89 The building's impact was noted to be no greater than minor in terms of its potential magnitude of adverse impact on the identified important local views, as indicated within the submitted HTVI, and therefore the proposed building is considered not to dominate local views, designated heritage assets or distant skylines to a significant or negative extent. The HTVI indicates that the slender

proportions and visual effect of the façade treatments on the proposed building are likely to contribute positively to townscape and visual effects in short and longer views in many cases, including in key views such as from Alexandra Palace (View 15).

6.2.90 The GLA's Stage 1 comments raise no adverse comments to the impact of the proposed building on townscape views. The Council's Design and Conservation Officers also raise no objections to the height of the building, in terms of impact on local and distant views, including its impact on nearby conservation areas, due to the lack of negative impact that would arise from the design and height of the structure as it would appear in key views as indicated.

6.2.91 Therefore, it is considered that the proposed development would have a beneficial impact on the townscape and visual amenity of Tottenham Hale. The scale, form and character of the proposed building would complete the previously consented masterplan for Hale Village with an elegant tall building that is a direct response to the emerging policy requirement for a high quality mixed-use 'wayfinding' tall building development in this location and would not harm local or distant views.

6.2.92 Microclimate

6.2.93 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.

6.2.94 The proposed development has been modelled in a wind tunnel to test for impacts on local microclimate. The surrounding area was also represented up to a radius of approximately 220m. Measurements were taken at 192 locations around the existing site and 234 locations for the proposed development scenario, focussing on sensitive receptor locations including footpaths, potential amenity areas, roof terraces and entrances. The modelling has taken into account potential cumulative impacts from the proposed and other recently approved developments. The prevailing wind direction is from the south-west.

6.2.95 Measurements were assessed against the Lawson comfort criteria which allows wind conditions to be considered unacceptable, tolerable or acceptable, for activities of high, medium or low sensitivity. Higher sensitivity locations such as long-term sitting areas or development entrances have a lower unacceptable threshold than lower sensitivity areas such as those used for 'business walking' (i.e. fast and direct walking between two specific locations such as a transport hub and residential property or place of work). To ensure a vibrant and comfortable public realm around the site the wind conditions must be suitable for pedestrian strolling and sitting.

- 6.2.96 The Wind Microclimate Assessment (WMA), undertaken by the BRE has been assessed by an independent consultant engineer from RWDI.
- 6.2.97 RWDI advised that there are changes to the existing wind conditions as the result of the development, with some places becoming windier and others calmer. There were no exceedances of 'thresholds for distress' anticipated for the proposed development scenario. However, RWDI advise that entrances and seating areas for both the existing and proposed developments in the locale would be rated 'unacceptable' for their intended use, and thus would require mitigation.
- 6.2.98 It is noted that in the worst predicted weather conditions (i.e. during winter) 74% of the locations measured had wind conditions suitable for all pedestrian activity. In the summer this level is much higher (94%). Of all of the unsuitable locations, only four had wind conditions that met the lowest acceptability threshold – suitable for 'business walking only'. These are locations: on Lebus Street to the south-eastern corner of the student block; by the south-eastern entrance of the proposed development; by the service entrance on the northern elevation of the proposed development; at the north-western corner of the proposed development block. At these locations, the unsuitable conditions are caused by the presence of wind vortices acting on the proposed development and by accelerated winds around the ground-level corners.
- 6.2.99 In response to these comments the applicant has submitted an indicative wind mitigation strategy to reduce the wind impact to acceptable levels. To mitigate against impact on pedestrians from unsuitable conditions at three of the four key locations identified above a large potted planter would be installed that would divert pedestrians away from these windier locations. RWDI have accepted this arrangement as appropriate mitigation.
- 6.2.100 The other location that has been identified as requiring mitigation is the south-east of Emily Bowes Court. It is noted that wind conditions around the site would significantly improve when other consented developments have been erected and as such the mitigation of wind in this area would only be necessary in the short term. This location is currently used as a fire exit and not a main entrance to a building. However, there is also an entrance to a retail unit (dry cleaners at present). Therefore, it is considered that direct mitigation would also be required in this location and this would be secured by condition.
- 6.2.101 Other locations around the site have been indicated as suitable for 'pedestrian strolling' only and not for sitting or lingering. The wind movements in these locations have been deemed acceptable other than where they impact on entrances to buildings or main seating areas.
- 6.2.102 To mitigate against unacceptable wind conditions at the entrances to the retail units in the southern elevation of Emily Bowes Court the applicant

proposes permeable metal wind screens. These would be located to the west side and 300mm in front of the entrances of those commercial units in order to protect pedestrians entering and leaving those premises.

6.2.103 The location of the residential entrance in the north elevation of the proposed building would not be excessively windy and in any case would be significantly recessed to protect residents during access and egress.

6.2.104 Some other entrances to the proposed building are also indicated to have 'business walking' level adverse wind conditions. These are the service entrance on the north elevation and the entrance to the commercial unit on the south-eastern corner. The service entrance would not be used regularly by residents and therefore is considered not to require permanent mitigation.

6.2.105 The entrance on the south-western corner would be used regularly and thus does require further mitigation, which is proposed to be through the installation of a recessed entrance doorway. Final details of the design and location of these mitigation arrangements will be secured by condition as part of a wind mitigation strategy.

6.2.106 The large seating area to the west of the site would only be suitable for pedestrian strolling during winter, and thus would not be ideal for long-term sitting. However, it is considered that this seating area, and indeed others around the site, are much less likely to be used during winter months in any case, and thus the impact from wind in these areas would not result in a significant reduction in activity in this area during winter. Additional screening to seating areas would be provided by tree and other planting in any case, which has not been included in the wind modelling scenario, and further mitigation in the form of screens would be considered by condition as part of the proposed wind mitigation strategy.

6.2.107 The sky terrace has been identified as being partially unsuitable for sitting during spring but given that the vast majority of the terrace would be appropriate for all activities all year round, including during winter, this is not considered to have a significant impact on the overall usability of this amenity space. The affected southern part of the terrace would in any case be partially screened by a glass balustrade that did not form part of the wind tunnel modelling.

6.2.108 As such, it is considered that the wind environment around the site would be acceptable, subject to a condition securing additional wind mitigation. Therefore, the proposal would be acceptable in terms of its impact on the local microclimate.

6.3 Density and Appearance

6.3.1 Density

6.3.2 London Plan Policy 3.4 indicates that a rigorous application of housing density ranges is crucial to realising the optimum potential of sites, but also that density is only the start of planning housing development considerations. It is not appropriate to apply the London Plan Density Matrix mechanistically - its density ranges for particular types of locations are broad, enabling account to be taken of other factors relevant to optimising potential – local context, design and transport capacity are particularly important, as well as social infrastructure. The Mayor’s SPG Housing encourages higher density mixed use development in Opportunity Areas. This approach to density is reflected in the Tottenham AAP and other adopted and emerging local policy documents.

6.3.3 Appropriate density ranges are related to setting in terms of location, existing townscape and built form, and the index of public transport accessibility (PTAL). The site is considered to be within an ‘central’ setting (very dense development, mix of uses, four to six storeys, large building footprints) where the density matrix sets a guideline of 214- 405 units or 650-1110 habitable rooms per hectare with a PTAL of 4-6.

6.3.4 The density of the development equates to a maximum of 1029 units per hectare. This is significantly higher than the recommended density ranges contained within Table 3.2 of the London Plan. Considering its location within the Upper Lee Valley Opportunity Area and the Tottenham Housing Zone and the accessibility of site with maximum possible rating for public transport accessibility (PTAL of 6A), future improvements through Crossrail 2 and the four-tracking of the nearby railway lines, and proximity to nearby open spaces, it is considered that the proposed density of the development is acceptable, subject to a high quality design.

6.3.5 Design

6.3.6 *Quality Review Panel (QRP)*

6.3.7 The proposal has been assessed by the QRP three times during both the pre-application and application stage. The final review took place on 5th July 2017 and the Panel’s summarising comments are provided below:

6.3.8 *“Given the existing permission that has been granted on this site for a tall building, the Quality Review Panel accepts the broad principles of the scheme, and the decisions that have been taken as the design has developed. Whilst understanding the rationale that has driven the reduction in podium height, they feel that further consideration is required for the design of the podium element in order to avoid it looking visually insubstantial compared to the tower above.*

6.3.9 *They welcome the refinements to the articulation of the north façade, in addition to the castellation detail at the roofscape. Prior to planning permission being granted, they would like to see further refinement of some of the detailed design elements of the exterior of the podium and tower, in addition to aspects of the public realm and landscape design, to help ensure that the development frames and supports this important gateway into Hale Village.”*

6.3.10 Provided below is a summary of the relevant comments from the most recent review, with officer comments following:

Panel Comments	Officer Response
Massing, scale and architectural expression	
Given the previous permission on this site, the panel accepts the broad principles of the scheme, including the scale and massing of the tower and podium.	Comments noted.
Architectural expression	
The panel recommends refinement of the podium design, to ensure that this appears visually strong enough to support the tower rising above.	The podium design has been refined to increase the depth of the fascia which improves its visual presence relative to the tower above.
This could include exploring whether the roof garden on top of the podium could be made deeper and more substantial, so that its planting is more visible from street level.	The detailed design of the podium roof planting shall be secured by condition at a later date, to ensure a high quality layout.
In addition, a deeper fascia to the roof line of the podium could act as a balustrade to the roof garden whilst also giving increased visual ‘weight’ to the podium itself.	As set out above the fascia of the podium has been increased to address this comment.
The inclusion of a castellated roofline is welcomed by the panel.	Comments noted.
The articulation of the north façade is also improved since the previous review.	Comments noted.
The panel supports the inclusion of the fritted glass detail to the balconies.	Comments noted.
The full-width balconies on the south west façade of the tower are a very attractive feature that will celebrate the wonderful views across the city.	Comments noted.

<p>The panel remains to be convinced about the single soffit colour specified for the full height of the tower; they question whether a graded approach to the specification of colours would be more appropriate.</p>	<p>The soffit appearance has been graded to address this comment.</p>
<p>The quality of materials and construction, for example the metal cladding to the tower, will be essential to the success of the completed scheme. The panel would support planning officers in securing this through planning conditions.</p>	<p>High quality materials have been demonstrated on a materials board and will be secured by condition.</p>
<p>Public realm and landscape design</p>	
<p>Potential exists to create a unique and vibrant public realm around the podium. Playful elements could be included within the main public space to the west of the site, and within the pedestrian routes around the podium.</p>	<p>Timber seating and other planting has been installed to provide a high quality public realm around the site.</p>
<p>There are also opportunities within the design of the public realm and landscape to express the history of the site and its links to cabinet-making. This could echo the fritted glass detail at high level in the tower referencing fine wood-working, making this theme more apparent at ground level.</p>	<p>Final design of the street furniture will be secured by condition so these comments can be addressed in the final public realm.</p>
<p>Awnings (pegged or fixed) adjacent to the café area at the west of the site could provide colour and visual interest, in addition to shade.</p>	<p>The final occupiers will determine whether awnings are installed, the limited use classes for the western commercial unit mean a shop or café is likely so an awning is likely to be installed.</p>
<p>Trees in pots could also help to create a comfortable microclimate for users of the space and the café area, whilst softening and enlivening the public realm.</p>	<p>Additional tree pots are proposed to mitigate any adverse wind movements.</p>
<p>The panel notes that the bridge link to Tottenham Hale Station will need to ramp up in order to accommodate</p>	<p>The applicant has committed to work with Transport for London on the provision of a high quality</p>

<p>the two new rail lines that will be at a lower level. The landing of the bridge link will need to be well-integrated into the design of the public realm at the western end of the site.</p>	<p>bridge link and a requirement to work with TfL in providing the bridge link will be secured within the legal agreement.</p>
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6.3.11 As set out above, the applicant has sought to engage with the QRP at various stages in the pre-application and application stages, and the final development has evolved to respond to earlier panel advice.

6.3.12 The Council’s Design Officer has also commented on the proposal, noting that the profile and form of the tower is slender and highly elegant, with the podium element giving the development a human scale at close quarters. The Officer makes reference to key elements of the design including the ‘castellated’ top level which adds a distinctive interest to the roof of the building, and the unifying repetitiveness of the façade system, broken slightly by horizontal panelling, with coloured balcony soffits adding further visual interest when the development is viewed from street level.

6.3.13 Conditions will be included to ensure the material quality of the development.

6.3.14 As such, it is considered that the proposed development would be a landmark building of a high quality design that would have a positive impact on the character and appearance of the surrounding area.

6.3.15 *Public Realm*

6.3.16 Site allocation TH8 identifies a number of public realm improvements including optimising the connection to Tottenham Hale station, by engaging with the pedestrian bridge proposals identified as part of the approved Station redevelopment (planning ref. HGY/2013/2610), and offering a high quality public realm connecting into the existing Hale Village public realm provision.

6.3.17 The Council’s Streets & Spaces Strategy indicates a public realm strategy for the wider Tottenham Hale area and recommends that green infrastructure should be located along busy highways such as Ferry Lane. The existing area of hard landscaping to the north and west of the site is presently only 50% complete and as such would be widened as the result of the proposed development.

6.3.18 The applicant proposes to integrate the public realm for this development into the existing Hale Village public space and landscaping scheme. As such, the existing public areas would be vastly expanded creating a public square adjacent to the station and wider pedestrian routes. The square would be directly accessed from the station from the approved bridge across the West Anglia Main Line to the application site, once it is erected. The applicant has

committed to working with Transport for London in providing the proposed bridge to Tottenham Hale station and this will be secured through the S106.

6.3.19 Other public realm improvements include soft landscaped buffers between the site and Ferry Lane as well as Coppermill Heights, public seating and cycle parking. Land levels would flow gently across the site to avoid any need for rails or ramps.

6.3.20 In combination with the proposed new commercial units these public realm proposals would provide significant improvements to the quality of the local pedestrian environment and thus also the character and appearance of the area. As such, it is considered that the public realm proposals are acceptable.

6.3.21 *Security*

6.3.22 Local Plan Policy SP11 requires proposals to incorporate solutions to reduce crime and fear of crime. Policy DM2 of the DM DPD makes clear that development should comply with the principles of 'Secured by Design'.

6.3.23 The proposal has been designed in accordance with the appropriate secured by design principles. The proposed public realm areas are overlooked by many dwellings and active commercial units. Secure access only is available to the sky garden. The podium is not accessible by residents and is high enough (4.8m) above ground floor level so as not be reachable from the ground.

6.3.24 Main accesses to the development are controlled, with key fob access only to all lifts. CCTV is provided to the main residential entrance and basement areas.

6.3.25 The Metropolitan Police have stated that the development is likely to achieve Secured by Design accreditation as currently proposed. This will be secured by condition.

6.4 **Heritage Impact**

6.4.1 *Relevant Heritage Assets*

6.4.2 The Tottenham High Road Historic Corridor (comprising North Tottenham, Scotland Green, Tottenham Green, Seven Sisters and South Tottenham Conservation Areas) is located approximately 1km to the west. Bruce Castle and Clyde Circus Conservation Areas are approximately 1.5km away from the site. Leucha Road Conservation Area is located a similar distance away within the London Borough of Waltham Forest. The building would also be visible from key points within other Conservation Areas such as Alexandra Palace Park.

6.4.3 The nearest Listed Building to the site is The Ferry Boat Inn (Grade II) located approximately 300m to the east of the site along Ferry Lane, and is also within

LB Waltham Forest. The nearest Listed Buildings within the borough are the Pumping Station Building and Engine (Grade II) at Markfield Road, and 62 High Cross Road (Grade II) which are both within 1km of the application site.

- 6.4.4 Locally Listed Buildings within 1km of the site are Berol House and former Eagle Pencil Works at 25 Ashley Road and The Green School on Somerset Road. Within LB Waltham Forest the nearest Locally Listed Buildings are the bridge over the River Lee adjacent to The Ferry Boat and the Marine House Pumping Station at Ferry Lane/Forest Road.
- 6.4.5 The site is within the Lee Valley Archaeological Priority Area.
- 6.4.6 *Legislation, National Guidance and Policies*
- 6.4.7 The legal position with respect to heritage assets is pursuant to Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and as per relevant planning case law, which is set out below.
- 6.4.8 The Barnwell Manor Wind Farm Energy Limited v East Northamptonshire District Council case indicates that "Parliament in enacting section 66(1) did intend that the desirability of preserving the settings of 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." The Forge Field Society v Sevenoaks District Council case indicates 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 the settings of 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.
- 6.4.9 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, it must give that harm considerable importance and weight. This does not mean that an authority's assessment of likely harm to the setting of a listed building or to a conservation area is other than a matter for its own planning judgment. It does not mean that the weight the authority should give to harm which it considers would be limited or less than substantial must be the same as the weight it might give to harm which would be substantial. But it is to recognise, as the Court of Appeal emphasized in Barnwell, that 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.
- 6.4.10 The presumption is a statutory one, but it is not irrefutable. 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 statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering.

6.4.11 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 to each element 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.

6.4.12 Policies 7.8 and 7.9 of the London Plan requires that development affecting heritage assets and their settings are required to conserve their significance by being sympathetic to their form, scale and architectural detail. Policy SP12 requires the conservation of the historic significance of Haringey's heritage assets. Policy DM9 of the Development Management DPD reflects this approach.

6.4.13 Built Heritage

6.4.14 The application site is not within a designated heritage location and there are no listed or locally listed buildings adjacent to the application site. However, the 33 storey height of the structure means it would be visually prominent within the local area including from the setting of nearby heritage assets.

6.4.15 The applicant has submitted an Environmental Statement which contains a detailed Heritage and Townscape Visual Impact (HTVI) Statement. The HTVI identifies a minor adverse effect from the development upon the locally listed Berol House with others being none or neutral effect. There will be neutral effects on the Grade II listed buildings described above that are located within 1km of the Site.

6.4.16 This opinion is supported by the Council's Principal Conservation Officer. Who notes that whilst the proposed development would be visible within the setting of several heritage assets and in long distance views, it would not lead to negative impact and as such is considered to cause no harm to setting of heritage assets."

6.4.17 No negative impacts are anticipated to locally listed buildings in the area given the context of the area which is one of an expanding commercial and residential location including a new district centre and additional tall buildings.

6.4.18 As such, it is considered that the proposal would comply with current statutory and policy requirements and would be acceptable in terms of its impact on local heritage assets.

6.4.19 Archaeology

6.4.20 Policy DM9 of the DM Policies DPD requires proposals in Archaeological Priority Areas to consider the significance of the archaeological asset and its setting, the impact of the proposal on archaeological assets, and give priority to its preservation and management. The site is located with an Area of Archaeological Importance.

6.4.21 In terms of archaeological impact, the submitted Archaeology and Heritage Desk-Based Assessment states that, on the basis of other archaeological assets recorded within the 1km study area as well as geo-archaeological modelling, the site holds a medium to high potential for previously unrecorded archaeological remains from the prehistoric to medieval periods.

6.4.22 The Greater London Archaeological Advisory Service (GLAAS) has been consulted on this application. They note that the site lies close to the Saxon settlement of Tottenham Hale, a traditional river crossing of the River Lea and may also include parts of air raid shelters. It also has potential for prehistoric and Roman remains. However, no significant objections were raised. As such, conditions are recommended requiring a written scheme of investigation and other documentation as necessary prior to the commencement of development, should the proposal be considered acceptable for all other reasons.

6.4.23 Therefore, it is considered that the proposal would be acceptable in terms of its impact on local archaeology.

6.5 Affordable Housing, Housing Mix and Residential Quality

6.5.1 Affordable Housing

6.5.2 The NPPF states that where it is identified that affordable housing is needed, planning policies should be set for meeting this need on site. London Plan Policy 3.11 sets targets for affordable housing, whilst Policy 3.12 states that boroughs should seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes.

6.5.3 Local Plan Policy SP2 requires developments of more than 10 units to provide a proportion of affordable housing to meet an overall borough target of 40%. This approach is reflected in Policy DM13, which also sets out the preferred affordable housing mix as set out in the Council's Housing Strategy.

- 6.5.4 Policy AAP3 and DM13A(c) provide that this split should be reversed in Tottenham to rebalance the historically high levels of social rented accommodation. Policy therefore requires 60% intermediate accommodation and 40% affordable rented accommodation in this area.
- 6.5.5 Policy DM13 also states the Council may seek to alter the tenure of affordable provision to be secured on a case-by-case basis, to avoid affordable housing of a certain tenure being over or under represented in an area. This approach is in line with London Plan Policy 3.9 which states that a more balanced mix of tenures should be sought in neighbourhoods where social renting predominates and there are concentrations of deprivation.
- 6.5.6 The Mayor has recently published an Affordable Housing and Viability (AHV) SPG. This document provides detailed guidance to ensure that existing affordable housing policy is as effective as possible. The SPG includes guidance that requires all developments not meeting a 35% affordable housing threshold must be assessed for financial viability via an appropriate financial appraisal.
- 6.5.7 *Affordable Provision*
- 6.5.8 The Hale Village development has so far (apart from the application site 'Plot SW') provided 542 affordable homes which is 56.5% of the 959 units currently completed. The outline planning permission for the Hale Village Masterplan was for 1210 homes including 30% affordable housing by habitable room. The required affordable housing provision for the masterplan has thus been comfortably exceeded and therefore any residential development on this site submitted within the parameters of the approved outline permission would not be obliged to include affordable housing.
- 6.5.9 As 959 of the permitted 1210 residential units have been provided an additional 251 units would be permitted by the remaining parameters of the outline permission. A fully residential scheme within the envelope of the 18 storey building approved by the parameter plans of the outline is anticipated to be able to provide approximately 196 units.
- 6.5.10 This proposal is for 279 units which is an uplift of 83 units from the approximately 196-unit outline permission. The proposal includes 44 affordable (intermediate shared ownership) units which is 53% of the 83-unit uplift and 15.8% of the total residential accommodation proposed by this development. Should the proposal be approved the total affordable housing provision across Hale Village, including this application and all previously implemented elements of the outline planning consent, would equate to 47.33% of the approved units, which means that the original affordable housing objectives (30% as originally approved in 2007) for the Hale Village masterplan would have been exceeded. In addition, an off-site affordable housing contribution of £150,000 has also

been agreed. The applicant's viability appraisal has been independently reviewed and the on-site provision together with the off-site affordable housing contribution has been confirmed to be the maximum reasonable amount available for this development.

Early-stage (if the scheme is not implemented within two years) and late-stage (when 75% of units are sold) reviews of the scheme viability will be included in the section 106 agreement in accordance with the Council's policies and the requirements of the Mayor's Affordable Housing and Viability SPG

6.5.11 Table Showing Built-Out Housing Provision for the Hale Village Masterplan

Development Block	No. of Units	Affordable Housing	Percentage Affordable	Status
Plot W	687 (Student accom.)	0	0%	Occupied
Plot NW2	557 (Student accom.)	0	0%	Occupied
Plot SE	154	154	100%	Occupied
Plot NW1	102	102	100%	Occupied
Plot N	176	176	100%	Occupied
Pavilion 1	70	0	0%	Occupied
Pavilion 2	70	0	0%	Occupied
Pavilion 3	71	0	0%	Occupied
Pavilion 4	71	0	0%	Occupied
Pavilion 5	71	0	0%	Occupied
Pavilion 6	64	0	0%	Occupied
Plot C	110	110	100%	Occupied
Plot SW	279	44	15.8%	Under consideration
Total	1238	586	47.33%	

6.5.12 As such, the Council accepts the proposed 44 intermediate shared ownership units as an acceptable level of affordable housing for this proposal, subject to the provision of an additional financial contribution and further reviews of the levels of affordable housing being completed at both early and late stages of its construction.

6.5.13 Portfolio Approach and Affordable Tenure

- 6.5.14 The Haringey Housing Strategy (2017-2022) seeks to encourage mixed tenures to improve access to home ownership for those able to consider alternatives to social housing, or who do not qualify for it. The Strategy also provides that homes for lower cost shared ownership offer the most realistic chance for people unable to purchase on the open market to get on the housing ladder.
- 6.5.15 This site is located within the boundaries of a Housing Zone, as designated by the Mayor of London. 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.
- 6.5.16 The Housing Zone seeks a portfolio approach to housing delivery across the Zone area to better align public sector resources. This approach sets out to balance housing tenures and dwelling mixtures across overall Housing Zone areas.
- 6.5.17 The Tottenham Area Action Plan paragraph 4.14 sets out the following: ‘a portfolio approach where a group of sites can be seen to work together to meet the overall objectives of the Plan will be encouraged. This could for example mean that two or more sites working in parallel deliver different mixes or tenures of units which together make a policy compliant outcome in the area.’ Paragraph 2.34 of the London Plan Affordable Housing and Viability SPG 2017 also raises the potential for a portfolio approach to affordable housing across sites.
- 6.5.18 This means that each site will be considered in terms of its specific characteristics and suitability for different housing types and tenures and other non-residential uses, and balanced against proposals for other sites in Tottenham Hale, with the council playing a key role in managing the distribution across the area.
- 6.5.19 For example, some sites may be more appropriate for family or smaller units, whereas as others may lend themselves to particular tenure types. The same principle is true for non-residential uses where some areas are suited to different balances of social/community uses, retail and leisure and commercial.
- 6.5.20 In addition, the council has been coordinating the delivery of the wider package of infrastructure required to deliver the District Centre, bringing together developer, council and critically Housing Zone resources to support the significant infrastructure requirements set out in the Tottenham Hale District Centre Framework and its companion Delivery Strategies.
- 6.5.21 The council has also secured the land receipts from the Tottenham Hale Strategic Development Partnership (SDP) for investment in affordable housing in the Tottenham Housing Zone and the delivery of infrastructure within the

Tottenham Hale District Centre Framework area. These receipts are subject to both overage and profit-share arrangements. It was agreed at Cabinet that these land receipts would be used to fund the provision of additional affordable housing through this innovative mechanism.

6.5.22 As part of this managed approach, the council reports on its delivery progress to demonstrate the performance of the approach. The table below sets out performance of the portfolio approach against key site allocations in Tottenham Hale (those with active planning activity).

6.5.23 ***Table Showing the Housing Secured and Anticipated Through the Portfolio Approach for Tottenham Hale***

Tottenham Hale Portfolio Approach											Overall
				Tenure mix							
SITES				Market			Affordable				
Site Allocations DPD Reference	Site allocation	Site Title	Total Units		For Sale	For Rent	Shared Ownership	Pocket	DMR / LLR	Affordable Rent	
A. Sites with Recommendation to Grant Planning Permission											
Ashley Road South	TH6	NHHG	265	no.	118	0	112	0	0	35	
				%	45%	0%	42%	0%	0%	13%	
Station Square West	TH4	One Station Square (BSD)	128	no.	11	0	117	0	0	0	
				%	9%	0%	91%	0%	0%	0%	
Hale Wharf	TH9	Hale Wharf (Muse)	505	no.	328	0	143	0	0	34	
				%	65%	0%	28%	0%	0%	7%	
Monument Way	TH10	Monument Way (Newlon)	54	no.	0	0	0	0	0	54	
				%	65%	0%	0%	0%	0%	100%	
Sub-total (A.)			952	no.	457	0	372	0	0	123	
				%	48%	0%	39%	0%	0%	13%	
B. Sites before Planning Committee in November 2017											
Ashley Road South	TH6	BSD	561	no.	261	158	101	0	8	33	
				%	47%	28%	18%	0%	1%	6%	
Sub-total (B.)			561	no.	261	158	101	0	8	33	
				%	27%	17%	11%	0%	1%	3%	
Running Total (A+B)			1513	no.	718	158	473	0	8	156	
				%	47%	10%	31%	0%	1%	10%	
C. Sites in Pre-application Discussions with the Planning Authority											
Hale Village Tower	TH8	HVT (Anthology)	279	no.	236	0	43	0	0	0	
				%	85%	0%	15%	0%	0%	0%	
Station Square West	TH4	Station Square West (AR)	541	no.	406	0	135	0	0	0	
				%	75%	0%	25%	0%	0%	0%	
Station Square North	TH5	Ashley Road East (AR) Ashley Road West (AR)	247	no.	235	0	12	0	0	0	
				%	95%	0%	5%	0%	0%	0%	
Monument Way & Welbourne Centre	TH10	Welbourne Centre (AR)	166	no.	66	0	0	100	0	0	
				%	40%	0%	0%	60%	0%	0%	
Sub-total (C.)			1233	no.	943	0	190	100	0	0	
				%	76%	0%	15%	8%	0%	0%	
Running Total (A+B+C)			2746	no.	1661	158	663	100	8	156	
				%	60%	6%	24%	4%	0%	6%	
D. Top-up affordable from Argent Related Strategic Development Partnership Development Agreement (Cabinet Authorities in Place)											
Running Total (A+B+C+D)			2746	no.	1543	158	781	100	8	156	
118 Additional Grant Funded Units on Ashley Road South (NHHG); Contract Under Negotiation				%	56%	6%	28%	4%	0%	6%	
E. Top-up affordable from Argent Related Strategic Development Partnership											
Running Total (A+B+C+D+E)			2879	no.	1543	158	914	100	8	156	
133 Additional Grant Funded Units on site TBD based on modelled returns from the SDP				%	54%	5%	32%	3%	0%	5%	

6.5.24 Current performance suggests that for the Tottenham Hale area, the level of affordable likely to be achieved is approximately 38%. If proposed levels are achieved within the SDP area, the overall total will increase to approximately 41%. This latter figure is subject to SDP planning applications which are yet to be submitted or determined.

6.5.25 The affordable housing tenure split proposed by the applicant is consistent with the Housing Zone approach in which various sites may each contribute a higher or lower proportion of a particular affordable housing type or tenure, in line with an overall Zone-wide target. Individual contributions depend on specific site characteristics and viability.

6.5.26 Table Showing Unit Mix for the Proposed Development

No. of Beds	Overall	Overall Proportion of Total	Affordable	Affordable Proportion of Total
Studio	10	3.6%	0	0%
One-bed	110	39.4%	24	8.6%
Two-bed	149	53.4%	20	7.17%
Three-bed	10	3.6%	0	0%
Total	279	100%	44	15.8%

6.5.27 As such, it is considered that the affordable housing mix and tenure split, by virtue of its location within a Housing Zone, reflects local strategic priorities.

6.5.28 Unit Affordability

6.5.29 London Plan Policy 3.12 states that criteria for intermediate housing may be set locally to recognise the individual characteristics of local housing markets, whilst Policy 3.10 notes that affordable housing should include provisions to remain at an affordable price for future eligible households.

6.5.30 The Mayor's Affordable Housing and Viability SPG notes the income cap for all intermediate products is £90,000 per household per annum. The units therefore can only be marketed to households with incomes below this threshold. The 44 proposed shared ownership units would first be advertised to households of between £30,000 and £60,000 per annum who live or are employed in Haringey. Providing new housing for this income group is a Council priority and as such this provision is acceptable.

6.5.31 The affordability and eligibility for the shared ownership units, are considered to respond to the characteristics of the local housing market and will provide a

significant number of affordable homes, including towards the lower end of the income scale. In the specific circumstances of this site the affordable housing contribution is acceptable in the context of the wider portfolio approach.

6.5.32 Housing Mix

6.5.33 London Plan Policy 3.8 requires new residential developments to offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors. Amended Strategic Policy SP2 and Policy DM11 of the Council's Development Management DPD continue this approach.

6.5.34 DM11 also states that Council will not support proposals which result in an over-concentration of one or two bedroom units overall unless they are part of larger developments or located within neighbourhoods where such provision would deliver a better overall mix of unit sizes.

6.5.35 The overall mix of the residential units proposed is as described in the table above. The development proposes a high level of one and two-bedroom flats, which is acceptable given the excellent public transport accessibility of the site, the tall nature of the building and the limited area of the building's floor plate. The Council's Housing team supports the proposed mix of residential units.

6.5.36 Layout

6.5.37 *Proposed Residential Accommodation – Internal Layout and Amenity*

6.5.38 The Mayor of London's Housing SPG sets out detailed design requirements for new dwellings. Policy 3.6 of the London Plan states that development proposals should make provision for play and informal recreation.

6.5.39 All properties within the development have been designed to meet the internal space requirements of the Mayor's Housing SPG.

6.5.40 The units facing north and east are provided with internal amenity space in place of balconies, to avoid overshadowing from external balconies and maximise the sunlight reaching these units. The potential for high wind speeds at high levels and noise disturbance at lower levels also make balconies unsuitable for these units. The area of external balcony space required by the Housing SPG is provided internally to provide a larger living area in excess of the SPG requirements for living space. The Mayor's Housing SPG permits such layouts in exceptional circumstances. The GLA Stage 1 comments have raised concern that the layout of this block is not exceptional for a tall building, and the large proportion of units with this layout significantly limits the choice of potential future residents. They suggest that a proportion of these internalised balconies could be replaced with winter gardens which would provide varied options whilst

also providing adequate residential amenity. A condition is recommended which requires an investigation into the provision of winter gardens at the site to ascertain the feasibility of winter gardens and require some provision where possible.

6.5.41 All units facing south and west are provided with appropriately-sized private outdoor amenity space. An area of communal amenity space (198sqm) is available at the 11th floor and accessible to all residents.

6.5.42 The proposal has been designed to maximise dual aspect units, there are however a number of single aspect units in each elevation of the building. These units have projecting bays to the living spaces to provide a degree of cross ventilation and improved aspect. The height of the building means that most properties would benefit from a good outlook, with properties on the southern and western elevations being provided with pleasant views. This is considered to be acceptable.

6.5.43 The Mayor's Housing SPG states that each core should accommodate no more than 8 units on each floor; however, levels 1-10 have 11 units per floor with 8 units per floor above level 11. Alternative layouts were explored at pre-application stage but none found to be feasible for this site. The layout is considered to be acceptable in this case as flats are accessed off a large central lobby area rather than a long corridor which the SPG seeks to avoid.

6.5.44 *Sun and Daylight*

6.5.45 The Daylight, Sunlight and Overshadowing Assessment submitted with the application has assessed each of the proposed first floor residential rooms, as these will have the lowest light levels to identify the typical average daylight factor (ADF) within them. The Report notes that ADF for each of these flats during an overcast day would meet the ADF criteria for each habitable room as set by the Building Research Establishment (BRE) and thus no additional electric lighting is recommended. Therefore, all other rooms are expected to have good access to daylight.

6.5.46 In terms of access to sunlight the majority of units to the south and west would have good quality unobscured access to sunlight. Properties to the north would benefit from sunlight from the west during evening periods due to the angled nature of their balconies and additional side-facing windows. Properties to the lower part of the eastern elevation may not receive large amounts of direct sunlight due to the existing siting of Coppermill Heights. However, it is noted that this set of circumstances has already been considered acceptable for the development approved under the outline permission. The hotel was to be located on the western side of this approved block and thus properties to the eastern side were always intended to be residential properties with reduced access to day and sunlight compared to other flats in the proposed block. It is

also noted that the Mayor's Housing SPG states that BRE guidelines should be applied sensitively to new buildings in locations suitable for higher density development, with particular reference to opportunity areas, town centres, large sites and accessible locations. Above the 8th storey the proposed units would be unaffected by the height of the adjacent Coppermill Heights block. The eastern flats would also have angled projecting windows to capture day/sunlight from the south. As such, it is considered that in comparison with the parameters of the outline permission the proposed development is acceptable.

6.5.47 Noise

6.5.48 The NPPF states that new development should not be put at unacceptable risk from noise pollution. Standard 29 of the Mayor's Housing SPG states that new developments should not be exposed to excessive noise levels.

6.5.49 The proposed development would be located in an environment close to a number of noise emitting areas, such as railway and tube lines and a main road. The scheme would also include new plant and areas for public congregation and movement. The applicant has submitted a Noise Vibration Report with the application which includes an environmental noise survey undertaken to establish the noise climate at the site.

6.5.50 The cladding, windows and ventilation openings for the proposed building would achieve internal ambient noise levels in line with the relevant British Standard guidance (BS 8233:2014). This would control noise emanating from surface-level transport from the nearby roads and railway lines, as well as from pedestrian movements and sitting out in front of the western commercial unit.

6.5.51 The Council's Specialist Noise Officer states that internal noise levels are not expected to reach uncomfortable levels and also recommends a condition to ensure the final construction achieves good internal ambient noise levels.

6.5.52 Network Rail have indicated that levels of usage of the nearby railway network may increase at any time, and indeed an increased frequency of trains is proposed for these lines. The development has taken the adjacent railway noise into account and in any case internal mechanical ventilation is available should windows be closed in order to minimise external noise impact.

6.5.53 Mechanical ventilation is provided for cooling the residential units and these would achieve appropriately low internal noise levels. Plant noise levels would be controlled by condition so as not to exceed existing background values. Residential units at 1st and 2nd floors may notice some noise from underground trains at times. However, this would affect only a very small proportion (12 units - 4%) of the proposed properties.

6.5.54 The Council's Noise Specialist has stated that additional noise mitigation must be provided to these units and the Noise and Vibration Report, sets out options that can be provided during the internal fit-out of the proposed development. A condition has been imposed to provide further details to achieve the required 5-10dB mitigation. The Council's Noise Specialist also recommends that sound insulation would need to be provided between the floors of commercial units and first floor flats and this would also be secured by condition.

6.5.55 The site is adjacent to a potential Crossrail 2 work site. Works for Crossrail 2 would be significant, but would ultimately be temporary in nature. Windows could be closed to mitigate noise disturbances during these works with ventilation and cooling still provided through the mechanical ventilation equipment.

6.5.56 *Play Space*

6.5.57 Policy 3.6 of the London Plan seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG, which sets a benchmark of 10sqm of useable child play space to be provided per child, with under-fives play space provided on-site as a minimum.

6.5.58 The child yield for this development is anticipated to be 20, including 12 under-fives. A total of 198sqm of play space is required and 231sqm of combined formal and informal play space would be provided at the 11th floor communal 'sky garden', which will be accessible to all residents, and is adjacent to an internal residents' lounge which overlooks that space.

6.5.59 Furthermore, the existing Hale Village development already includes a minimum of 2,000sqm of amenity space with further amenity areas to be provided once the Masterplan is completed. The open spaces of Down Lane Park, the Paddock Community Nature Park, Tottenham Marshes and Walthamstow Wetlands are also within a short walk of the site.

6.5.60 Accessibility

6.5.61 Policy 3.8 of the London Plan states that 90% of units should be 'accessible and adaptable', with 10% 'wheelchair user dwellings' according to the building regulations (Parts M4 (2) and (3)). Policy DM12 states that family housing should have access to private gardens.

6.5.62 All flats have been designed to be adaptable for people with disabilities and a total of 10% (28 units) would be wheelchair accessible or adaptable, within both the private and affordable tenures and spread across all floors of the building.

6.5.63 The development aims to promote inclusive access by eliminating physical, attitudinal and procedural barriers to access for disabled people. The surrounding public realm would be widened and public areas would be level, substantially improving the existing pedestrian experience. The level residential entrance to the north of the building would be deep and wide to provide adequate resident shelter. Lift access would be available between car parking areas and residential/public areas.

6.5.64 The sky terrace at 11th floor would be reached by a level access threshold from the communal area. All external balconies would also have a level threshold from living spaces.

6.5.65 As such, it is considered that the application is acceptable in terms of its layout and provision of adequate living conditions for the proposed occupiers.

6.6 Impact on the amenity of adjoining occupiers

6.6.1 The London Plan Policy 7.6 states that development must not cause unacceptable harm to the amenity of surrounding land and buildings. Policy DM1 continues this approach and requires developments to ensure a high standard of privacy and amenity for its users and neighbours.

6.6.2 The impact on the proposal of neighbouring properties should be assessed against the baseline set by Hale Village Masterplan which include parameters for an 18 storey building on the site. It is noted that adjacent properties within the Masterplan site, including Coppermill Heights, Emily Bowes Court and 'Block C' have been built out as per the parameters set by the approved outline permission.

6.6.3 There are no recently approved developments in the Tottenham Hale which are in sufficient close proximity to the site that they must also be considered in terms of their potential cumulative impact on neighbouring properties.

6.6.4 The closest residential units to the proposed site are located within the blocks at Coppermill Heights to the east, Emily Bowes Court to the north and 'Block C' (a building located to the north of Coppermill Heights) to the north-east. 1-12 Jarrow Road are sited approximately 50 metres to the south of the site and are separated from the proposed building by Ferry Lane and an area of open space.

6.6.5 The Mayor's SPG Housing indicates that BRE guidelines on assessing daylight and sunlight should be applied sensitively to higher density development particularly in central and urban settings, recognising the London Plan's strategic approach to optimise housing output (Policy 3.4) and the need to accommodate additional housing supply in locations with good accessibility suitable for higher density development (Policy 3.3). Quantitative standards on

daylight and sunlight should not be applied rigidly within built up urban areas, without carefully considering the location and context and standards experienced in broadly comparable housing typologies in London.

6.6.6 Daylight Impact

6.6.7 The Daylight, Sunlight and Overshadowing Assessment submitted with the application considered 783 windows at the nearest residential properties. Lighting is considered not to be adversely affected if the decrease in vertical sky component (VSC) measured is not below 80% of its former value. The assessment clarifies that the daylight and sunlight impacts at neighbouring properties must be considered in the context of the consented 18 storey development at this site, given that a building of that size and bulk could be built out (subject to reserved matters).

6.6.8 The windows assessed include 24 windows at 1-12 Jarrow Road, 394 windows at Emily Bowes Court, 247 windows at Coppermill Heights and 118 windows at Block C. A minor decrease in daylight levels would occur to the windows, as described below:

- 1-12 Jarrow Road – 24 windows affected (out of 24);
- Emily Bowes Court – 179 windows affected (out of 394);
- Coppermill Heights – 67 windows affected (out of 247);
- Block C – 96 windows affected (out of 118).

6.6.9 The vast majority of impact to affected properties would be less than a 10% VSC reduction.

6.6.10 Given this context, the assessment notes that all of the assessed windows pass the required VSC criteria for this proposed development. When compared to the parameters approved in outline, a substantial number of windows at neighbouring properties would receive increased levels of daylight (215 windows at Emily Bowes Court, 180 at Coppermill Heights and 22 at Block C) as a result of the more slender nature of the current proposal.

6.6.11 As such, all windows assessed on Block C, Emily Bowes Court and Coppermill Heights within the submitted Daylight, Sunlight and Overshadowing Assessment meet the BRE daylight criteria when compared with the 18 storey consented development. The magnitude of impact in terms of a loss of daylight is therefore considered to be negligible.

6.6.12 Sunlight Impact

6.6.13 In terms of sunlight impact, the qualitative assessment requires that all facades within 90 degrees of due south that could be impacted by the proposal should be identified and where windows within these facades are intersected by the

proposed building then potential for impact occurs. Windows that already face north, or within 90 degrees of north are not considered to be impacted by new structures. As such, windows at Emily Bowes Court, Coppermill Heights and Block C have been assessed.

6.6.14 It is noted that the approved 18 storey development would impact on some windows at these blocks, which are lower in height than that approved building at a maximum of 11 storeys. This 7 floor difference in height between the approved and neighbouring existing blocks means that the windows to those neighbouring developments which would be most affected by the approved outline scheme are not going to be affected to a significantly greater degree by the proposed 33 storey block, due to the substantial distance in height between the additional floors proposed and the windows on adjacent buildings that have already been built-out. In practice this means that, in a similar manner to the consideration of daylight impacts, no window would receive less than 80% of the sunlight it was expected to receive as a result of the outline development, due to design and siting of the result of the taller proposed development.

6.6.15 As such, all windows assessed on Block C, Emily Bowes Court and Coppermill Heights within the submitted Daylight, Sunlight and Overshadowing Assessment meet the BRE sunlight criteria when compared with the 18 storey consented development. The magnitude of impact in terms of a loss of sunlight is therefore considered negligible.

6.6.16 Overshadowing

6.6.17 In respect of overshadowing of amenity spaces and balconies. The effects of the development on the 21st March between the hours of 07:00 and 18:00 have been considered within the assessment. The results of the overshadowing analysis identified that as a result of the proposed development, existing gardens/amenity areas would receive the same or more hours of sunlight on the 21st March when compared to the approved 18 storey parameters. This is again due to the increased slenderness of the proposed development in comparison to the parameters of the approved outline permission. As such, the BRE standards are considered to have been satisfied, as amenity spaces and balconies would be adequately sunlit throughout the year.

6.6.18 It is noted that, out of 24 balconies assessed for overshadowing at Coppermill Heights, 21 actually show an increase in sunlight hours with the development in place when compared with the consented 18 storey building.

6.6.19 Outlook and Privacy

6.6.20 In terms of outlook and privacy, this is assessed in a similar manner to daylight, sunlight and overshadowing. The approved 18 storey development would be significant greater in height than the neighbouring blocks at Coppermill Heights,

Emily Bowes Court and Block C, whilst above the 11th floor of the proposed building the bulk of the structure would be relatively slender compared to the approved scheme's parameters. In addition, the lower ground elements below that 11th floor 'shoulder' are also narrower than the approved outline scheme's dimensions.

6.6.21 The outlook from within those neighbouring three buildings would not change significantly whilst proposed overlooking would also not increase significantly, compared with the approved outline development. Any outlook for the new units above 18th floor would be over the top floor of the existing neighbouring buildings. Any incidence of overlooking that would occur would not constitute a significant increase from that which would be expected from flats within the parameters of the previous outline approval.

6.6.22 Direct overlooking to the neighbouring blocks from the 11th floor sky garden would be prevented by a 1.6 metre high screen surrounding that communal amenity space, as well as through careful arrangement of planters (to the edge of the garden area) and seating (facing west towards the main building or located away from the garden edges).

6.6.23 Impact from Noise, Light and Dust

6.6.24 There is already a significant amount of human activity in Hale Village, Ferry Lane and Tottenham Hale. As such, it is considered that the increase in noise or light from occupants of the proposed development would not cause additional impacts to local residents from significantly increased noise, light or dust. Plant noise from commercial activities would be limited by condition.

6.6.25 Disturbances from dust and noise relating to demolition and construction on site are temporary impacts that are largely controlled by other legislation. To minimise the impact from construction a demolition and construction management plan would be required by condition.

6.6.26 As such, the development is considered to be acceptable in terms of its impact on the amenity of neighbouring properties.

6.7 Transport and Parking

6.7.1 Local Plan Policy SP7 states that the Council aims to tackle climate change, and 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 approach is continued in Development Management Policies DM31 and DM32.

- 6.7.2 London Plan Policy 6.13 states that new development should demonstrate a balance between providing parking and preventing excessive amounts that would undermine cycling, walking and public transport use. It also states that electric vehicle charging points, disabled parking spaces, cycle parking should be provided at appropriate levels. In addition, Policy 3.8 of the London Plan recommends are that 10% of new housing should be, either designed to be wheelchair accessible from the start, or easily adaptable for residents who are wheelchair users.
- 6.7.3 *Parking and the Highway Network*
- 6.7.4 36 car parking spaces are proposed within the proposed basement. 12 are proposed to be standard parking spaces with 24 designated wheelchair accessible spaces. 50 per cent of all spaces would be set up for use by electric vehicles (though electric vehicle charging points – EVCPs) with an additional 50 per cent passive provision installed to enable use by electric vehicles in the future.
- 6.7.5 The proposed residential car park would be privately managed by the site management company. 24-hour access to the basement would be available. Access for vehicles would be from Jarrow Road. Another vehicle entrance is available on Waterside Way to the north of the site, with vehicle access to the parking area through the Hale Village car park. The parking area would be separated from the public highway by a security gate, which would include a separate security door for pedestrians.
- 6.7.6 Pedestrian access to the car park is provided off Ferry Lane and Daneland Walk through the main foyer of the development. Residents that have a parking space are able to gain access to the basement area via a fob key. All parking provision is for the residential element of the scheme.
- 6.7.7 Parking for service vehicles is facilitated by a designated 3.5m by 10m loading/deliveries bay within the car parking area. Access to and from this bay is possible by a large delivery vehicle in forward gear. A dedicated bay is also provided for 'moving days' and other residential drop-off requirements. This space can also be used for secondary delivery/service parking.
- 6.7.8 No changes to the existing public highway are proposed as part of this proposal.
- 6.7.9 *Accessible Car Parking Spaces*
- 6.7.10 The London Plan recommends that ten per cent of all new housing should be designed to be wheelchair accessible from the start, or should be easily adaptable for residents who are wheelchair users. This equates to a requirement to provide a total of 28 residential wheelchair user dwellings. The

Mayor's Housing SPG reflects these standards, indicating that each designated wheelchair accessible unit should have a car parking space.

- 6.7.11 The applicant proposes 24 accessible parking spaces. These would be linked to 24 of the 28 wheelchair user dwellings and sold with those units. This provision is below the requirement of the London Plan. However, it is considered that not all of the adaptable wheelchair user dwellings would be purchased and occupied by people with wheelchairs and given the close proximity of accessible public transport at this site it is anticipated that not all wheelchair users would own a car.
- 6.7.12 In the circumstance that all owners of the wheelchair units require an accessible parking spaces the applicant has indicated that additional accessible parking is available within the adjacent underground car park. The additional spaces would be directly accessible from the proposed basement car park, and the furthest space approximately 92 metres from the lift core. Their layout would not impact on the layout of the adjacent car parking area which is provided for the remainder of Hale Village.
- 6.7.13 The Transportation Officer has considered this arrangement acceptable, given that full take up of all 28 wheelchair accessible parking spaces at any one time is unlikely. Subject to the 24 accessible spaces being allocated to specific wheelchair user flats and confirmation of the layout of the potential additional car parking spaces within a revised Car Parking Management Plan to be secured by legal agreement, the provision of accessible parking spaces is considered acceptable.
- 6.7.14 The remaining 12 car parking spaces would also be allocated to specific individual flats and confirmation of this allocation can be secured through a legal agreement. Parking provision would be capped at 36 spaces, which is acceptable given the excellent public transport links in the area.
- 6.7.15 In order to support the restrained level of car parking provision a suite of sustainable transport initiatives would also be required. Full travel plans for both the residential and commercial aspects of the scheme should be submitted, secured by legal agreement, in addition to appropriate financial contributions towards monitoring.
- 6.7.16 As part of previously approved developments a car club space has been secured within the Hale Village site but has not yet been installed. This would need to be provided in the form of a dedicated car club parking space on local streets before the occupation of the development hereby approved and this is secured by condition.

6.7.17 *Commercial Parking*

6.7.18 In terms of car parking for the commercial units none is proposed. The London Plan notes that for locations with PTAL 6 and 'central' area characteristics no parking other than for operational purposes, or for disabled people, should be provided (see Parking Addendum to Chapter 6).

6.7.19 This is a highly accessible location for public transport (PTAL 6a) with characteristics of a central London area due to the high density of the local built form and the proposed commercial units would largely serve local residents and users of the adjacent station. As such, it is considered that no commercial parking is required.

6.7.20 To provide an accessible space for any staff of the commercial facilities with disabilities an additional space is considered necessary and this would be provided within the adjacent car park, in a similar location to the overspill residential parking, and secured by legal agreement.

6.7.21 28 short stay and 10 long stay cycle parking spaces are proposed for the commercial units, including 18 'Sheffield' stands, which is also in accordance with London Plan policy.

6.7.22 *Cycle Parking*

6.7.23 Long stay cycle parking (438 spaces) would be provided in the basement for both the residential and commercial uses. Additional short stay cycle parking (36 spaces) would be provided at ground level. 5% of all spaces would be for larger cycles.

6.7.24 The Transportation Officer has stated that cycle parking provision is considered acceptable. However, both the Council's and Transport for London's Officers indicate that the layout of cycle parking within the basement would benefit from some minor layout changes to improve ease of movement and maximise the uptake of cycling. As such, revisions to cycle parking layout would be secured by condition in the event of an approval.

6.7.25 No objections are raised to the layout of the proposed pedestrian environment.

6.7.26 A draft construction logistics plan (CLP) has been submitted with this application and no objections to this document have been raised. Managing of the deliveries is proposed via booking system with pre-arranged slots. A full CLP will be submitted and agreed to by the Council prior to the commencement of works, and this would be secured by condition. Construction traffic to/from the site must avoid highway network peak times. The construction traffic must be co-ordinated with other approved proposals in the area.

6.7.27 *Rail Transport Impacts*

- 6.7.28 The application site lies in close proximity to London Underground and national rail lines, whilst the site is also in close proximity to a likely Crossrail 2 construction work site.
- 6.7.29 Both Transport for London and Network Rail have commented in respect of their respective infrastructure referencing build methodology and potential disturbance from construction works. The location of the proposed building is more than 10m from the nearby railway line. Due to this significant separation no part of the completed building is anticipated to overhang or otherwise impact upon that adjacent railway infrastructure. Furthermore, the various requirements and limitations required by Network Rail, as raised in their consultation response, would need to be dealt with by the applicant as a private matter between the two parties. For the Council to ensure that Network Rail's concerns are dealt with to their satisfaction details of agreements between them shall be submitted to the Council and secured by condition.
- 6.7.30 Transport for London have also requested that specific documentation is submitted to them that demonstrates how the proposed build methodology of the development would impact on potential Crossrail 2-related structures, including temporary works sites. This matter would be secured by condition.
- 6.7.31 Transport for London also recommend that the applicant works with them in delivering a bridge connection to Tottenham Hale Station and this matter would be secured through an informative. London Underground have raised no objections to the proposal.
- 6.7.32 As such, the application is considered to be acceptable in terms of its parking and highway impact, and its impact on nearby rail networks.

6.8 Ecology and Landscaping

6.8.1 Ecology

- 6.8.2 Local Plan Policy SP13 states that all development must protect and improve sites of biodiversity and nature conservation, including SINC's (Sites of Importance for Nature Conservation). Policy DM19 requires that where possible, development should make a positive contribution to the protection, enhancement, creation and management of biodiversity and should protect and enhance SINC's.
- 6.8.3 London Plan Policy 7.19 makes clear that wherever possible, development should make a positive contribution to the protection, enhancement, creation and management of biodiversity. It gives the highest priority to protecting sites of international (including SPAs and Ramsar sites) and national importance (including SSSIs – Sites of Special Scientific Interest).

- 6.8.4 The application site lies partially (on the western side) within an ecological corridor associated with the adjacent railway line, which is designated as a Borough Grade II SINC. To the east lies the Lee Valley Regional Park and a SINC of Metropolitan Importance. There are two nationally designated sites for wildlife (Walthamstow Marshes Site of Specific Scientific Interest and Springfield Park Local Nature Reserve) and one internationally designated site (Lee Valley (Walthamstow Reservoirs) Ramsar site, Site of Special Scientific Interest and Special Protection Area) within 2km of the application site. Epping Forest is also located within a 5km radius of the application site.
- 6.8.5 A Preliminary Ecological Assessment (PEA) has been submitted with the application, in addition to an Interim Wintering and Migratory Bird Survey Results document. Desk and field surveys were undertaken in December 2016 and March 2017. A full bird survey is due towards the end of 2017.
- 6.8.6 The PEA states that the site consists mainly of grassland and other herbs of negligible ecological value, and that the immediate surrounding habitats are manmade and isolated from the surrounding sites of high wildlife importance.
- 6.8.7 The site was assessed for great crested newts, reptiles, breeding birds, wintering birds and bats. None of the species were found on site and existing habitats were not deemed suitable for them, other than for wintering birds. The PEA notes that the erection of a 33 storey building at this site has the potential to impact migratory or over-wintering birds and thus reduce the integrity of the nearby Lee Valley SPA/SSSI/Ramsar wetland.
- 6.8.8 Natural England commented to state that: *"The proposal, if undertaken in strict accordance with the details submitted, is not likely to have a significant effect on the interest features for which Lee Valley SPA and RAMSAR has been classified."*
- 6.8.9 Furthermore, Natural England also confirm that: *"The application, as submitted, will not damage or destroy the interest features for which the Walthamstow Reservoir SSSI has been notified. We therefore advise your authority that this SSSI does not represent a constraint in determining this application."* As such, Natural England recommend that biodiversity enhancements including bird boxes and bat boxes roosting opportunities are integrated into the plans. This can be secured by condition. Other than this requirement Natural England are satisfied with the proposals.
- 6.8.10 However, in order to ensure no species are affected the submitted Preliminary Ecological Assessment recommends that further surveys are also undertaken including a wintering and migratory bird survey and a nesting bird check. These should be completed during the appropriate season and will be secured by condition.

6.8.11 A Habitats Regulations Assessment Screening report should also be completed, with the bird surveys feeding into this assessment. Mitigation, in addition to the bird/bat requirements referenced above, is anticipated to include the installation of invertebrate habitats into the proposed building or landscape design, for example within green roof locations.

6.8.12 The Council's Arboriculturalist has also commented to state that the proposed podium roof would create a new flora rich habitat for invertebrates and birds that would increase local biodiversity.

6.8.13 As such, the proposal is considered to be acceptable in terms of impact on local ecology.

6.8.14 *Landscaping*

6.8.15 Local Plan Policy SP13 seeks the protection, management and maintenance of existing trees and the planting of additional trees where appropriate. London Plan Policy 7.21 requires existing trees of value to be retained and also the planting of additional trees where appropriate. Policy DM1 states that tree planting and landscaping should be integrated into development proposals where appropriate.

6.8.16 The proposed landscaping scheme demonstrates a simple and coherent plan that reflects the existing high quality materials of the surrounding public realm as well as the contemporary design of the proposed tower. It would improve legibility and access through the Hale Village site to the station by widening the pavement along Daneland Walk as well as providing spaces for seating in amongst the planters and street trees.

6.8.17 The communal sky garden would provide additional space for lingering in the form of planters edged with timber seating, and sculptural elements for informal play. Further green space is also included above the proposed ground floor podium which provides visual amenity benefits, whilst additional large planters are also to be installed as part of a comprehensive wind mitigation strategy. No trees would be removed as the result of the proposal.

6.8.18 The Council's Arboriculturalist supports the proposed species selection for new tree planting, including the installation of large-scale trees, as they would provide an immediate and high quality impact.

6.8.19 As such, the proposal is considered to be acceptable in terms of its landscape provision.

6.9 Sustainability

6.9.1 The NPPF and London Plan Policies 5.1, 5.2, 5.3, 5.7, 5.8, 5.9, 5.10 and 5.11, and Local Plan Policy SP4 sets out the approach to climate change and

requires developments to meet the highest standards of sustainable design, including the conservation of energy and water, and ensuring designs make the most of natural systems and the conserving and enhancing the natural environment. The London Plan requires all new residential units to achieve a zero carbon target beyond Part L 2013 of the Building Regulations. A lesser 35% reduction is required for commercial properties.

6.9.2 Policies DM1, DM21 and DM22 of the Development Management DPD expect proposals to incorporate sustainable design and construction principles and implement appropriate techniques, whilst also contributing to and making use of decentralised energy infrastructure where possible.

6.9.3 The London Plan Policy 5.5 sets a target of 25% of the heat and power used in London to be generated through the use of localised decentralised energy systems by 2025. Where an identified future decentralised energy network exists in close proximity to a site it will be expected that the site is designed so that it can easily be connected to the future network when it is delivered.

6.9.4 The applicant has submitted a revised Energy Strategy with the application. The revised documentation indicates that the proposed development will exceed the carbon reduction requirements of the 2013 Building Regulations by 48% for the residential element of the scheme and 30% for the non-residential element.

6.9.5 *Energy – Be Lean*

6.9.6 Energy efficiency measures have been provided. These include highly efficient lighting, heat-retaining building materials and use of smart meters, whilst high G-value glazing would be provided to prevent overheating risk and reduce demand for mechanical cooling.

6.9.7 This has resulted in a 48% improvement against Part L of 2013 Building Regulations for the residential element of the proposal and an approximate 30% reduction in regulated emissions for the commercial element.

6.9.8 *Energy – Be Clean*

6.9.9 The development would connect to an existing low-carbon site-wide District Energy Network (DEN) in Hale Village. An approximate 45% carbon emission reduction for the residential element of the proposal can be achieved by connecting dwellings to this DEN. The improvements achieved by the commercial element are limited although a small saving is made.

6.9.10 Heat delivery through the DEN is proposed to change shortly and will be provided through 10% biomass, 75% gas-fired CHP and 15% gas-fired boilers. The development would connect to the existing Hale Village DEN for all space heating and hot water requirements.

6.9.11 This is considered acceptable and would be secured through a legal agreement, with the following appropriate clauses:

- connect and be able to provide heat for first occupation via a link to the existing DEN;
- all space heating and hot water needs of this development will be supplied through this DEN link; and
- compliance with the Heat Trust Standard to ensure customer protection.

6.9.12 *Energy – Be Green*

6.9.13 The applicant's revised Energy Strategy states that the feasibility of renewable technologies at this site, other than connection to the DEN, is limited. Site constraints including the relatively narrow plot mean that very limited space is available to install a PV array on the roof of the development due to requirements of service equipment for lifts, plant and window cleaning.

6.9.14 Opportunities for installations on other open spaces within the site area, such as the sky garden, podium roof or public realm, would all have significant negative impacts on visual amenity or pedestrian movements.

6.9.15 *Overheating*

6.9.16 Policy 5.9 of the London Plan 2016 states that development shall minimise overheating risk and active cooling demand.

6.9.17 The applicant has reduced the window size and installed high G-rated glazing to reduce thermal gains from the sun. Passive shading is provided to south-facing flats from projecting balconies. Glazing covers no more than 35% of the façade proportions of flats.

6.9.18 However, the submitted Overheating Study demonstrates that several of the modelled units do overheat in current summer weather scenarios. To address this the applicant proposes to install manually-operated internal blinds.

6.9.19 The dynamic thermal modelling in the Overheating Study has demonstrated that the vast majority of units pass the relevant CIBSE Technical Memorandum 52 standards. The limited exceedances of the criteria that do occur are not considered to be significant. The standards are set by three technical criteria including an assessment of the building's thermal characteristics, the length and degree of potential future temperature spikes and likely future temperature limits.

6.9.20 Eight flats have been modelled – three on the top floor and five mid-level flats at the 8th floor. These are considered to be the most likely to overheat with most of them having an element of south-facing façade that would be exposed to sunlight for most of the day. The results have also been provided in accordance with a model where windows are closed at all times to demonstrate circumstances where impacts on residents from air pollution and/or noise disturbance would also be minimal.

6.9.21 Although some exceedances occur it is considered that residents are able to mitigate these as necessary through the use of internal blinds and mechanical ventilation.

6.9.22 *Summary*

6.9.23 The Council's Carbon Reduction Officer has commented on the submitted documentation and raised no objections subject to conditions for the development to meet the objectives of the Energy Statement, provide further consideration of overheating mitigation to ensure this is maximised, and the provision of electric vehicle charging points.

6.9.24 A carbon offsetting contribution is required as the residential element of the development does not meet zero carbon requirements and the commercial element does not provide a 35% reduction in carbon emissions against current Building Regulations.

6.9.25 168.91 tonnes would need to be offset from the residential development, whilst 5.31 tonnes would need to be offset from the non-domestic element. As such, 174.22 tonnes would need to be offset if the development was to be considered on its own merits as a standalone application.

6.9.26 However, this application must be assessed in the context of the previous outline planning permission. The applicant has provided a separate 'Background Briefing' statement to the Energy Strategy that demonstrates how the proposed scheme relates to the approved outline scheme in terms of carbon reduction. The Council is in agreement with the applicant that approximately 196 residential units could reasonably be delivered within the outline development, with the hotel element removed and replaced with housing. The difference between the approved and proposed schemes is therefore 83 residential units only, and only these new units shall be assessed against the current policy requirements.

6.9.27 The applicant has provided calculations to demonstrate the carbon offsetting contribution by calculating the overall contribution required by an entirely policy compliant scheme and estimating a figure pro-rata for the 'new' 83 units (29.75% of the overall unit provision) as well as a similar proportionate uplift in commercial space. This methodology is accepted by the Council and has

resulted in a final offsetting contribution of £93,292 (an overall reduction of 51.83 tonnes of carbon).

6.9.28 This would be secured by legal agreement and would also be payable upon commencement of the development.

6.10 Waste Management

6.10.1 London Plan Policy 5.16 indicates the Mayor is committed to reducing waste and facilitating a step change in the way in which waste is managed. Local Plan Policy SP6 requires development proposals to make adequate provision for waste and recycling storage and collection. The approach is reflected in Policy DM4 of the Development Management DPD.

6.10.2 Submitted with the application is a Waste Management Plan. Commercial and residential waste stores are shown to be separated on the submitted plans. Household waste storage locations have been identified within the basement, from where they would be collected by Council waste vehicles. Segregated areas for refuse and recycling must be defined but this can be adequately dealt with by condition in the event of an approval.

6.10.3 The Council's Waste Management team raise no objections to the proposed but state that 47 large 'Euro' bins would be required for refuse and another 28 for recycling. 20 food waste bins and 279 food waste kitchen caddies would also be required. This can be secured by condition.

6.10.4 As such, it is considered that the application is acceptable in terms of its waste storage provision and collection methodologies.

6.11 Air Quality and Land Contamination

6.11.1 Air Quality

6.11.2 London Plan, Policy 7.14 states that new development should 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), promote sustainable design and construction to reduce emissions, be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality and ensure that provision to reduce emissions is made on site where possible. Policy DM23 of the DM DPD states that all development proposals should consider air quality and be designed to improve or mitigate impact upon local air quality in the Borough and also impact on residents of the proposed development.

6.11.3 The whole of the borough of Haringey is a designated Air Quality Management Area (AQMQ). The Council is committed to being a 'Cleaner Air Borough',

working towards improving air quality and minimising the risk of poor air quality to human health and quality of life for residents. The proposed development would introduce new exposures located adjacent the major arterial route of Ferry Lane. The development would include 36 car parking spaces, the vehicles for which would be the main polluting operations. The connection to a district energy network reduces the potential emissions from boilers.

6.11.4 An Air Quality Assessment has been submitted with the application. The AQA demonstrates two future scenarios for the development which indicate that NO₂ and PM₁₀ increases from the proposal would range from negligible to insignificant in terms of their impact on existing properties. Within one scenario, the prediction indicates that the dwellings at the first to ninth floors of the proposal would exceed the Government's nitrogen dioxide exposure limits. However, those dwellings on the first to ninth floors would be provided with an air filtration unit which, combined with the proposed mechanical ventilation system, would improve the internal air quality of those units by reducing pollutants to acceptable levels. Details of this filtration arrangement would be secured by condition, including the requirement that filtration is installed for all relevant flats up to 11th floor.

6.11.5 Although the development would not be air quality neutral it has made all reasonable attempts to minimise impacts on air quality including minimising vehicle parking and movements and connection to a district energy network, in addition to mitigating impact on residents by providing air filters. Impact on the occupiers of upper floor flats in terms in terms of air quality is expected to be mitigated by wind movements at higher levels.

6.11.6 As such, the Council's Pollution Officer raised no objections to the proposed and has recommended that the proposal is acceptable in terms of air quality, subject to conditions in respect of dust control and management and details of on-site plant and machinery.

6.11.7 *Land Contamination*

6.11.8 Policy DM32 of the Development Management DPD requires development proposals on potentially contaminated land to follow a risk management based protocol to ensure contamination is properly addressed and carry out investigations to remove or mitigate any risks to local receptors.

6.11.9 The applicant has submitted a Ground Condition Desktop Study with the application. The Study notes that due to the absence of significant or widespread contamination source on site or nearby, that few significant risks exist. The Council's Pollution Officer recommends that these matters can be effectively mitigated by conditions in respect of further ground gas monitoring and on-site remediation.

6.11.10 As such, the Council's Pollution Officer has recommended that the proposal is acceptable in terms of its impact on air quality and land contamination.

6.12 Flood Risk, Drainage and Water Management

6.12.1 Flood Risk and Drainage

6.12.2 Local Plan Policy SP5 states that development shall reduce forms of flooding and implement Sustainable Urban Drainage Systems (SUDS) to improve water attenuation, quality and amenity. Policies DM24 and DM25 of the DM DPD call for measures to reduce and manage flood risk, and incorporate SUDS. London Plan Policies 5.12 and 5.13 also call for measures to reduce and manage flood risk.

6.12.3 The application site is located within an area designated as being a 'Flood Zone 2', which is considered to have a low risk of flooding. The site is also not located within a Critical Drainage Area. Data from the Environment Agency provided in the applicant's Flood Risk Assessment indicates that the site would be adequately defended from fluvial flooding with the chance of flooding being at between 1% and 0.1% in any year. No residential properties are proposed at ground floor level and therefore impact on occupier safety from flooding is minimised.

6.12.4 The development is proposed to be constructed in accordance with the ground floor levels around the site, which raises the land level of the existing application site and significantly reduces the potential for surface water flow into the site from surrounding areas.

6.12.5 Surface water run-off is to be collected and attenuated through a connection to the sustainable drainage system that is already installed within the Hale Village Masterplan site, before discharging off site to the east. The adjacent drainage system was designed for the entire Hale Village masterplan including any development on the application site and therefore the Council's Drainage Officer has confirmed that this arrangement is acceptable, subject to the provision of a condition to check that the drainage framework has been provided as previously approved via a CCTV survey. The Environment Agency has also raised no objections to the proposal on flood risk grounds.

6.12.6 Water Management

6.12.7 Thames Water has raised no objections to the proposal in terms of either sewerage infrastructure capacity or water infrastructure capacity. However, any piling of foundations would need to be agreed with Thames Water and the Council prior to the commencement of such works. This matter can be secured by condition.

6.12.8 As such, it is considered that the proposal is acceptable as it would not lead to an increase in local flood risk, drainage concerns or any other water management issues.

6.13 Fire Safety and Security

6.13.1 Fire safety is not a planning matter and it is usually dealt with at Building Regulations stage. However, bearing in mind the nature of the development officers asked the applicant to provide detailed information at planning stage. High rise residential blocks are constructed in many different ways and the varying possible combinations of design and materials mean that all proposals have to be considered on their own merits.

6.13.2 Building Regulations are minimum standards for design and construction for the erection of new buildings and the alterations of existing buildings. The regulations cover many areas including requirements surrounding structure, fire, sound resistance, ventilation, drainage, conservation of fuel, electrical installations, security and access for disabled people.

6.13.3 The development would be required to meet the Building Regulations in force at the time of its construction. The Building Control Body (the Local Authority or an Approved Inspector) would carry out an examination of drawings for the proposed works and carry out site inspections during the course of the work to ensure the works are carried out correctly as far as can be ascertained. As part of the plan checking process a consultation with the Fire Service would also be carried out. On completion of work the Building Control Body will issue a Completion Certificate to confirm that the works comply with the requirement of the Building Regulations.

6.13.4 Fire Safety Strategy

6.13.5 The applicant has submitted a Fire Safety Strategy with this application. The Strategy states that all flats have access to a common 'protected corridor' that is provided with a mechanical smoke ventilation system. This then leads to a residential stair case that provides a direct exit of the building, and would be designed as part of a protected fire-fighting shaft through the building. The fire-fighting shaft accesses all levels of the building. The whole building would be either horizontally or vertically compartmentalised to prevent fire spread from floor to floor or flat to flat.

6.13.6 All residential areas would be provided with an automatic sprinkler system, including corridors, residential flats and communal spaces. The basement car park would be protected from the main building by two hours of fire resisting construction so that it forms its own fire compartment.

6.13.7 External walls and roofs are required to have sufficient resistance against the spread of fire between buildings. The building would have a great enough separation from adjacent buildings so as not to pose a fire risk to them and to prevent fire spread externally.

6.13.8 *Fire detection and alarms*

6.13.9 One or more mains-powered alarms with an integral standby power supply would be required for all habitable rooms within flats including circulation spaces that form part of escape routes from flats. Alarms must be audible on balconies. Interlinked heat detectors and alarms would be required in kitchens.

6.13.10 Fire detection systems would also be provided in common areas such as corridors to activate corridor smoke ventilation systems. Commercial units would be provided with manual alarm systems.

6.13.11 *Provision of sprinklers*

6.13.12 The provision of a sprinkler system throughout the building is a requirement and all residential properties plus the communal lounge would have a sprinkler system.

6.13.13 The basement car park would not be covered by sprinklers but a jet fan system would be available to vent smoke and reduce temperature build up.

6.13.14 Ground floor units would not be sprinkler-protected due to the ease of access out of these units. Fire access to these units would similarly be very good. The upper floors would be protected by two-hour fire-resistant construction methodologies. The residential stair core is similarly protected from commercial units and as such there would be no immediate risk of fire blocking the means of escape from the residential floors above.

6.13.15 *Materials*

6.13.16 When the materials are submitted for the discharge of the materials condition the materials will need to meet the Building Regulations in force at the time and also take account of the current Government Guidance. The highest possible quality of fire resistance will be required.

6.13.17 It has not yet been decided which exact materials would be used on the elevations of the building. However, the applicant has confirmed in a 'Façade Construction Statement – Fire Safety' that the façade system would comprise powder-coated aluminium framed windows and aluminium cladding with stone wool insulation. Both the insulation and aluminium cladding are proposed to be 'A1-rated' non-combustible materials.

6.13.18 Potential routes for fire spread within buildings with this type of façade system can be the ventilation cavity behind the cladding system, which can act as a chimney in the event of a fire. Building Regulations requires cavity barriers to be provided and for this proposal both horizontal and vertical cavity fire barriers would be installed between each flat's construction with additional barriers also provided around openings in the façade, such as around windows. This arrangement would prevent fire spread into the façade cavity and, even if fire entered into the cavity, would then also prevent spread beyond a single flat's built 'compartment'.

6.13.19 As such, it is considered that the suite of measures proposed for the tower development, including a sprinkler system, non-combustible materials, and the prevention of cavity fire spread, is sufficient for the application to be acceptable in terms of its fire safety measures.

6.14 Environmental Impact Assessment

6.14.1 As the proposed development is of a size and scale with the potential to have significant effects on the environment, it is required to be subject to an Environmental Impact Assessment (EIA). The proposed development is considered to be 'EIA development' as it falls within the category of developments specified at Section 10(b), Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, due to including the erection of more than 150 dwellings.

6.14.2 Regulation 3 of the EIA Regulations 2017 prohibits the grant of planning permission for EIA development unless prior to doing so an EIA has been carried out in respect of that development.

6.14.3 The environmental information submitted comprises the Environmental Statement and representations made by consultation bodies and others about the environmental effects of the proposed development. The Planning Casework Unit responded on behalf of the Department for Communities and Local Government to state they had received a copy of the Environmental Statement and have no comments to make in respect of its contents.

6.14.4 The applicant has confirmed that it believes that the assessment of likely significant environmental effects set out in the Environmental Statement are not affected by the additional wind mitigation provisions that have been added to the proposal during the course of its assessment.

6.14.5 It is considered that the environmental information submitted demonstrates that subject to mitigations and controls, the development does not give rise to environmental impacts that cannot be satisfactorily addressed so that the principle of the development is not acceptable. The findings of the ES are referred to throughout this report, where appropriate.

6.15 Equalities

- 6.15.1 In determining this planning application the Council is required to have regard to its obligations under equalities legislation including the obligations under the Equality Act 2010.
- 6.15.2 In carrying out the Council's functions due regard must be had, firstly to the need to eliminate unlawful discrimination, and secondly to the need to promote equality of opportunity and to foster good relations between persons who share a protected characteristic and people who do not share it. Members must have regard to these duties in taking a decision on this application.
- 6.15.3 The proposed development would engage primarily with people with protected characteristics in respect of physical access and has been designed to be in accordance with existing Building Regulations. The proposed development would offer step free access throughout including all entrances to private and affordable housing, as well as access to the commercial spaces and the basement parking area. All floors of the residential accommodation would be served by two lifts.
- 6.15.4 All residential units would be built to Part M4 (2) 'accessible and adaptable dwellings' and 10% will be built to Part M4 (3) 'wheelchair user dwellings' of Building Regulations.
- 6.15.5 The proposed development would be likely to provide a range of socio-economic and regeneration outcomes for the Tottenham Hale area including the provision of new housing (including affordable housing) to increase affordability and reduce overcrowding of existing housing. It would also result in local employment impacts including an increased and varied employment offer plus the generation of construction employment and other new employment opportunities.
- 6.15.6 The Council seeks to involve local priority groups that experience difficulties in accessing employment through its local labour and training initiatives.
- 6.15.7 As such, it is considered that the Council has had appropriate regard to its equalities obligations in respect of the Act as indicated above.

6.16 S106 Agreement Heads of terms

- 6.16.1 Policy DM48 permits the Council to seek relevant financial and other contributions in the form of planning obligations to meet the infrastructure requirements of developments, where this is necessary to make the development acceptable in planning terms.

6.16.2 Planning obligations as described in Section 2 above are to be secured from the development should planning permission be granted, by way of a legal agreement.

6.17 Conclusion

6.17.1 This application is a major development. Having assessed all relevant material planning considerations, officers consider that:

- The development is acceptable in principle, as it meets the land use requirements of the Site Allocation TH8, improves the local public realm and provides a marker building adjacent to an important transport hub;
- The development would provide 15.8% on-site affordable housing units (44 shared ownership units) which is 53% of the 83 additional units proposed over and above the approved outline planning permission with an off-site contribution of £150,000 which is considered to be the maximum reasonable amount the scheme can viably provide;
- The development would be a high quality tall building that respects the visual quality of the area, including key local views, and does not impact negatively on local heritage assets;
- The development would not have a detrimental impact on the amenity of adjoining occupiers in terms of a loss of sunlight or daylight, outlook, and privacy;
- The development would provide high quality living accommodation for residents, including 10% wheelchair accessible or adaptable units, private and communal amenity space and appropriate play space;
- The development would provide an adequate number of appropriately located car and cycle parking spaces;
- The development would not impact negatively on local ecological areas or wildlife habitats;
- The development would be acceptable in terms of its impact on carbon reduction and sustainability;
- The development would be constructed to meet Building Regulations requirements on fire safety, including the provision of sprinkler systems, and external cladding would be of the highest fire safety standard feasible.

6.17.2 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.

6.18 Community Infrastructure Levy

6.18.1 Based on the information given on the plans, the Mayoral CIL charge will be £1,260,231.21 (28,374sqm x £35 x 1.269) and the Haringey CIL charge will be £435,433.92 (26,681sqm x £15 x 1.088).

6.18.2 This will be collected by Haringey after the scheme is implemented 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 construction costs index. An appropriate informative will be attached to any decision notice advising the applicant of this charge.

7 RECOMMENDATIONS

7.1.1 GRANT PERMISSION subject to conditions and subject to a s.106 Legal Agreement.

7.1.2 Applicant's drawing No.(s):

GWT-HBA-00-XX-DR-A-PL-0000, 0001, 0002, 0005, 0101; GWT-HBA-00-ZZ-DR-A-PL-0003, 0004, 0102, 0104, 0105, 0107, 0200, 0201, 0202, 0203, 0204, 0205, 0300, 0301; GWT-HBA-00-B1-DR-A-PL-0100, GWT-HBA-00-11-DR-A-PL-0103, GWT-HBA-00-33-DR-A-PL-0106 (all drawings Rev. P1); 000(90)L0001, 000(90)L0021, 000(91)L0001, 000(94)0001, HB16013 'affordable units' plan dated 10.11.17, L16007/DS/201 Rev. P2, 612756/315 Rev. P8 (drainage layout only), 612756/300 Rev. E (drainage layout only), roof plant plan 'RIDGE 28.6.17'.

Supporting documents also approved:

Design and Access Statement June 2017, Design and Access Statement Addendum August 2017, Energy Strategy Version 6.0 September 2017, Overheating Study Version 3.0 August 2017, Car Parking Management Plan September 2017, Delivery and Servicing Management Plan June 2017, Framework Construction Logistics Plan June 2017, Framework Travel Plan June 2017, Piling Method Statement Revision 2 June 2017, Environmental Statement Volume 1 June 2017, Environmental Statement Non-Technical Summary June 2017, Archaeology and Heritage Desk Base Assessment June 2017, Planning Statement June 2017, Noise and Vibration Report 1.0 June 2017, Statement of Community Involvement June 2017, Transport Assessment June 2017, Ground Condition Desktop Study June 2017, Waste Management Plan June 2017, Affordable Housing Viability Assessment June 2017, Engineering Services Stage 2 Design report Revision 03 July 2017, Fire Safety Strategy June 2017, Façade Construction Statement- Fire Safety dated October 2017, Written Scheme of Investigation for Archaeological Mitigation dated September 2017, SUDS flows and volumes pro forma, BMU cross-section drawings and example photos, Air Quality Report dated September 2017, addendum letter to Heritage, Townscape and Visual Impact Assessment dated 2nd August 2017, Below Ground Drainage Maintenance and Management Regime dated September 2017, letter from Hale Village Management Ltd ref 'Local Authority Drainage inquiries', Illustrative Wind Mitigation Strategy – Rev 1.

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:

GWT-HBA-00-XX-DR-A-PL-0000, 0001, 0002, 0005, 0101; GWT-HBA-00-ZZ-DR-A-PL-0003, 0004, 0102, 0104, 0105, 0107, 0200, 0201, 0202, 0203, 0204, 0205, 0300, 0301; GWT-HBA-00-B1-DR-A-PL-0100, GWT-HBA-00-11-DR-A-PL-0103, GWT-HBA-00-33-DR-A-PL-0106 (all drawings Rev. P1); 000(90)L0001, 000(90)L0021, 000(91)L0001, 000(94)0001.

Supporting documents also approved:

Design and Access Statement June 2017, Design and Access Statement Addendum August 2017, Energy Strategy Version 6.0 September 2017, Overheating Study Version 3.0 August 2017, Car Parking Management Plan September 2017, Delivery and Servicing Management Plan June 2017, Framework Construction Logistics Plan June 2017, Framework Travel Plan June 2017, Piling Method Statement Revision 2 June 2017, Environmental Statement Volume 1 June 2017, Environmental Statement Non-Technical Summary June 2017, Archaeology and Heritage Desk Base Assessment June 2017, Planning Statement June 2017, Noise and Vibration Report 1.0 June 2017, Statement of Community Involvement June 2017, Transport Assessment June 2017, Ground Condition Desktop Study June 2017, Waste Management Plan June 2017, Affordable Housing Viability Assessment June 2017, Engineering Services Stage 2 Design report Revision 03 July 2017, Fire Safety Strategy June 2017.

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

3. The commercial units within the ground floor of the proposed development shall be used only for the following purposes falling within the use classes of the Town and Country Planning (Use Classes) Order 1987 (as amended), unless otherwise agreed in writing in advance by the Local Planning Authority. Changes to the proposed uses shall only be permissible if supported by appropriate marketing evidence to demonstrate the uses indicated below are not viable.

- Western unit – activities within Use Classes A1, A3 or A4 only;
- North eastern unit – activities within Use Classes A1, A3, A4 or B1(a) only;

- South eastern unit – activities within Use Classes A1, A3, A4, B1(a) or D1 only.

Any B1(a) use within the north eastern unit must provide an active frontage by way of a street-fronting reception and/or café element.

Reason: In order to protect the character and appearance of the area and to protect the amenity of local residents in accordance with Policy DM1 of the Development Management Development Plan Document 2017.

4. The commercial units at ground floor level of the development hereby approved shall be open only between 0800h and 2400h on any day of the week, other than for uses within Use Class B1(a) of the Town and Country Planning (Use Classes) Order 1987 (as amended) which may operate over 24 hours.

Reason: In order to safeguard residential amenity in accordance with Policy DM1 of the Development Management Development Plan Document 2017.

5. Prior to the commencement of works to the superstructure of the development hereby approved details of appropriately high quality and durable finishing materials to be used for the external surfaces of the development, including samples as appropriate and a full-scale example bay construction, shall be submitted to and approved in writing by the Local Planning Authority. Samples shall include example external panelling at a minimum, combined with a schedule of the exact product references for other materials. The proposed cladding shall have a minimum Euroclass rating of Class A2 (non-combustible). Fire resistance/safety documentation shall be submitted with the cladding material sample.

Reason: In order to protect the character and appearance of the area and to protect the amenity of local residents in accordance with Policy DM1 of the Development Management Development Plan Document 2017.

6. All the residential units will be built to Part M(2) 'accessible and adaptable dwellings' of the Building Regulations 2010 (as amended) and at least 10% (28 units) 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 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 3.8.

7. No activities within Use Classes A3 or A4 of the Town and Country Planning (Use Classes) Order 1987 (as amended) shall commence until details of ventilation measures associated with the specific use concerned have been

submitted to and approved in writing by the Local Planning Authority. The approved ventilation measures shall be installed and made operational before any A3 or A4 use commences and shall be so maintained in accordance with the approved details and to the satisfaction of the Council.

Reason: To safeguard residential amenity in accordance with Policy DM1 of the Development Management Development Plan Document 2017.

8. The placement of any satellite dish or television antenna on any external surface of the development is precluded, excepting the approved central dish/receiving system indicated on approved drawing ref. 'RIDGE 28.6.17'.

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

9. Save for the implementation of the approved public realm landscaping scheme (HGY/2009/1105), prior to the commencement of works to the relevant part of the development, full details of both hard and soft landscape works for the public realm areas and sky garden shall be submitted to and approved in writing by the Local Planning Authority and these works shall thereafter be carried out as approved. These details shall include:

- a) proposed finished levels or contours;
- b) means of enclosure;
- c) car parking layouts;
- d) other vehicle and pedestrian access and circulation areas;
- e) hard surfacing materials;
- f) minor artefacts and structures (eg. furniture, play equipment, refuse or other storage units, signs, lighting etc.);
- g) proposed and existing functional services above and below ground (eg. drainage power, communications cables, pipelines etc. indicating lines, manholes, supports etc.); and
- h) measures to mitigate the impacts of wind within the development.

Soft landscape works shall include:

- i) planting plans;
- j) written specifications (including written specifications (including cultivation and other operations associated with plant and grass establishment);
- k) schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate; and
- l) implementation and management programmes.

The soft landscaping scheme shall include detailed drawings of:

- m) those existing trees to be retained;
- n) those existing trees which will require thinning, pruning, pollarding or lopping as a result of this consent; and

- o) those new trees and shrubs to be planted together with a schedule of species;
- p) green/podium roof details including details on substrate depth;
- q) communal 'sky garden' planting.

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 in relation to the site itself, thereby ensuring a satisfactory setting for the proposed development in the interests of the visual amenity of the area consistent with Policy 7.21 of the London Plan 2016 and Policy SP11 of the Local Plan 2017.

10. Prior to the first occupation of the development hereby approved the applicant shall submit to the Local Planning Authority for its written approval a detailed Wind Mitigation Strategy that demonstrates long-term or permanent installations, as appropriate, within the site and surroundings to minimise wind disturbance to areas of public realm. In particular, the strategy shall ensure that all proposed entrances and public seating areas will not be affected by 'unacceptable' wind speeds (in accordance with the Lawson Comfort Criteria), unless otherwise agreed by the Local Planning Authority. The Strategy shall be implemented in accordance with the approved plans and retained as such thereafter.

Reason: To ensure that all new development can be used safely, easily and with dignity by all in accordance with Policy DM2 of the Development Management Development Plan Document 2017.

11. Prior to first occupation of the development hereby approved details of all permanent external lighting to building facades, street furniture and public realm features, including the relevant elements of the wind mitigation strategy, shall be submitted to and approved in writing by the Local Planning Authority. The agreed lighting scheme shall be retained as such thereafter.

Reason: To ensure the design quality of the development and also to safeguard residential amenity in accordance with Policy DM1 of the Development Management Development Plan Document 2017.

12.A - Prior to commencement of development a Wintering and Migratory Bird Survey shall be carried out in accordance with the approved Preliminary Ecological Appraisal and details shall be submitted to and approved by the Local Planning Authority;

B - If works commence in the nesting bird season (March-September inclusive) a check for nesting birds shall be carried out by a nominated person no more than 24 hours before commencement, and the works shall proceed in line with the recommendations of the approved Preliminary Ecological Appraisal;

C - Prior to the commencement of works to the superstructure of the development hereby approved, enhancements for biodiversity shall be submitted to and agreed in writing by the Local Planning Authority, and any such enhancements are to be retained thereafter (enhancements shall include, at a minimum, integration of bird and bat boxes into the overall development structure, and a flora rich habitat for invertebrates and birds at podium roof level).

Reason: In accordance with Paragraph 118 of the National Planning Policy Framework, London Plan Policy 7.19 and Policy DM19 of the Development Management Development Plan Document.

13. Prior to the commencement of works to the superstructure of the development hereby approved, a feasibility study into the provision of winter gardens within the proposed tower shall be submitted to and approved in writing by the Local Planning Authority. The agreed strategy shall be implemented and permanently retained thereafter.

Reason: To provide sufficient private amenity for occupiers of the proposed flats in accordance with the Mayor's Housing SPG.

14. Prior to the commencement of works to the superstructure of the development hereby approved, a detailed scheme for the provision of refuse and waste storage and recycling facilities has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include the following details:

- The identification within the site of separated general waste and recycling areas;
- The provision of 47 x 1100L Euro bins for refuse, 28 x 1100L Euro bins for recycling, 20 x 140L Food waste bins and 279 x Food waste kitchen caddies to units as appropriate.

Once approved the facilities shall be implemented and permanently retained thereafter.

Reason: In order to protect the amenities of the locality and to comply with Policy 5.17 of the London Plan 2016.

15. Internal Noise Levels within Residential Units shall not exceed the following maximum noise levels (in accordance with BS8233:2014):

Time	Area	Maximum Noise Level
Daytime Noise (7am – 11pm)	Living rooms and Bedrooms	35dB(A)
	Dining Room/ Area	40dB(A)
Night Time Noise (11pm - 7am)	Bedrooms	30dB(A)

No individual noise events shall exceed 45dB LAmax (measured with F time weighting) in bedrooms with windows closed between 2300hrs and 0700hrs.

Reason: In order to protect the amenity of neighbouring properties in accordance with Policy DM1 of the Development Management Development Plan Document 2017.

16. Sound insulation between the commercial premises on the ground floor and residential units first floor shall be provided and installed in the premises in accordance with a scheme submitted to and approved by the Local Planning Authority prior to commencement of the building works for the fit-out of the commercial units.

Reason: In order to protect the amenity of neighbouring properties in accordance with Policy DM1 of the Development Management Development Plan Document 2017.

17. Noise arising from the use of any plant and associated equipment shall not exceed the existing background noise level (LA90 15mins) when appropriate measurements are taken 1 metre external (LAeq 15mins) from the nearest residential or noise sensitive premises.

Reason: In order to protect the amenity of neighbouring properties in accordance with Policy DM1 of the Development Management Development Plan Document 2017.

18. Prior to the commencement of works to the superstructure of the development hereby approved, a strategy of further noise and vibration mitigation measures that demonstrate none of the residential units will exceed the 'low' ground-borne noise criterion (35-39 LAmax(s)), as identified by the Noise and Vibration Assessment, shall be submitted to and approved in writing by the Local Planning Authority. The development shall be completed in accordance with the approved report and the mitigation retained as such thereafter.

Reason: In order to protect the amenity of neighbouring properties in accordance with Policy DM1 of the Development Management Development Plan Document 2017.

19. No piling shall take place until an amended 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 proximity to underground sewerage utility infrastructure.

20. Prior to any works commencing to the superstructure of the development hereby approved, the results of a CCTV survey of the existing drainage system within the Hale Village site shall be submitted to the Local Planning Authority for its written approval. The survey shall demonstrate that the drainage system has been erected in accordance with drawing no. 612756/30217 Rev. P1 and the Below Ground Drainage Maintenance & Management Regime ref. L16007 Rev. 0 dated September 2017, and if any variations are noted then works shall take place to complete the system in accordance with those previously approved plans, and to the satisfaction of the Local Planning Authority, within three months of details being approved.

Reason: In order to ensure that suitable site drainage is available in order to comply with Policy DM29 of the Development Management DPD 2017.

21. Prior to the commencement of works to the superstructure of the development hereby approved details shall be submitted to and approved in writing by the Local Planning Authority to demonstrate that the building hereby approved shall achieve full 'Secured by Design' Accreditation. Once approved the development shall only be carried out in accordance with the approved details.

Reason: To ensure that the proposed development meets the Police standards for the physical protection of buildings and their occupants, and to comply with London Plan 2016 Policy 7.3 and Local Plan 2017 Policy SP11.

22. 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.

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) 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: In accordance with Section 12 of the National Planning Policy Framework and the London Plan 2016 Policy 7.8 emphasise that the conservation of archaeological interest is a material consideration in the planning process.

23. The development hereby permitted shall not be commenced until detailed design and construction method statements for all of the ground floor structures, foundations and basements and for any other structures below ground level, including piling and any other temporary or permanent installations and for ground investigations, have been submitted to and approved in writing by the Local Planning Authority which accommodate the proposed location of the Crossrail 2 structures including temporary works.

Reason: To enable the safe operation of future railway infrastructure and in accordance with Policy 6.2 of the London Plan 2016.

24. Prior to the commencement of works to the superstructure of the development hereby approved written confirmation from Network Rail that Asset Protection Agreements for each relevant stage of the construction process are in place shall be submitted to and agreed in writing by the Local Planning Authority. Where Network Rail deem that railway operations and/or their or adjoining land would be adversely affected appropriate mitigation arrangements must be made with Network Rail and agreed in writing with the Local Planning Authority's approval prior to their installation, and retained as approved thereafter.

Reason: To enable the safe operation of the railway and the protection of Network Rail's land and interests.

25. Prior to occupation of the development hereby approved, 50% of car parking shall be provided with electric vehicle charging infrastructure, with a further 50% allocated for passive provision.

Reason: To encourage the uptake of electric vehicles consistent with Policy 6.13 of the London Plan 2016, Policies SP0 and SP4 of the Haringey Local Plan 2017, and the recommendations of the Mayor's Sustainable Design and Construction SPG.

26. Prior to the first occupation of the development hereby approved a Revised Cycle Parking Layout shall be submitted to and approved in writing by the Local Planning Authority, supported by a detailed Cycle Parking Strategy to include the following information:

- How the design of the cycle parking has been improved in line with TfL's comments dated 4th August 2017;
- How minimum standards for non-residential cycle parking are being met in accordance with London Plan Policy 6.9; and
- Clarify cycle routes through the site in accordance with London Plan Policy 6.9.

The recommendations and requirements of the London Cycle Design Standards document should be followed. The approved plans shall be retained as agreed thereafter.

Reason: In accordance with Policy 6.3 and 6.9 of the London Plan.

27. Prior to the commencement of the development hereby approved a detailed Construction Logistics Plan (CLP) shall be submitted for the Local Planning Authority's written approval. The CLP should provide details on how construction work (including demolition) would be undertaken in a manner so that disruption to traffic and pedestrians on Ferry Lane and other surrounding roads around the site is minimised. Construction vehicle movements shall be planned and coordinated to avoid the AM and PM peak periods.

Reason: To reduce congestion and mitigate any obstruction to the flow of traffic on the transportation network.

28. The development hereby approved shall not be occupied until plans have been submitted to the Local Planning Authority for its written approval demonstrating the location of at least one car club parking space within the Hale Village site. The car club parking space(s) shall be installed as agreed and retained as such thereafter, in perpetuity.

Reason: To provide appropriate sustainable transport initiatives in accordance with Policy DM32 of the Development Management Development Plan Document 2017.

29. Details of the NOx filter units to be installed to all flats between first and 11th floor inclusive, together with details of the mechanical ventilation and the annual

maintenance programme for both, shall be submitted to the Local Planning Authority for its written approval prior to installation.

Reason: To protect the amenity of future occupiers of the development in accordance with Policy DM23 of the Development Management Development Plan Document 2017.

30. Before development commences other than for investigative work further ground gas monitoring shall be undertaken. Using the results of the additional ground gas monitoring and the information provided within the contaminated land report summary (WYG, June 2017), the site conceptual model and risk assessment shall be updated, if required, and submitted to the Local Planning Authority together with a remediation Method Statement detailing the remediation requirements. Using the information obtained from the site investigation and also detailing any post-remedial monitoring the remediation method statement shall be approved in writing by the Local Planning Authority prior to that remediation being carried out on site.

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.

31. No works shall be carried out on the site until a detailed Air Quality and Dust Management Plan (AQDMP), detailing the management of demolition and construction dust, has been submitted and approved by the Local Planning Authority. The plan shall be in accordance with the GLA SPG Dust and Emissions Control and shall also include a Dust Risk Assessment.

Reason: To comply with Policy 7.14 of the London Plan 2016.

32. 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 IIIA of EU Directive 97/68/ EC for both NO_x 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.

33. A Suite of Measures to Address Overheating Risk in the future shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of works to the superstructure of the approved development. The following measures shall be considered in detail and referred to the Suite of Measures:

- reduction in the size of windows;
- installation of design integrated solutions (such as Brise soleil, cross ventilation, or sunken windows);
- provision of documentation to residents that describes effective cooling techniques for individual residential units.

Measures agreed shall be implemented in accordance with the approved details and retained as such thereafter.

Reason: To comply with Policy 5.9 of the London Plan 2016.

34. Details and location of the parking spaces equipped with Active Electric Vehicle Charging Points (EVCP's) shall be submitted within a Strategy for the written approval of the Local Planning Authority prior to first occupation of the development hereby approved. The details shall include:

- Location of active charge points covering all new parking spaces and provision;
- Detailed specification of charging equipment;
- Operation/management strategy.

Once these details are approved the Council shall be notified if the applicant alters any of the measures and standards set out in the approved Strategy. Any alterations should be presented with justification and new standards for approval by the Council.

Reason: To comply with London Plan Policy 6.13.

35. Prior to occupation of the development hereby approved a public realm management plan describing how the public areas approved as part of this application will be maintained and controlled shall be submitted to the Local

Planning Authority for its written approval. The approved management plan shall thereafter be followed in perpetuity.

Reason: In accordance with Policy DM3(B) of the Development Management Policies Development Plan Document 2017/

INFORMATIVES

1. Informative: 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 2016, 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. Informative: Based on the information given on the plans, the Mayoral CIL charge will be £1,260,231.21 (28,374sqm x £35 x 1.269) and the Haringey CIL charge will be £435,433.92 (26,681sqm x £15 x 1.088).
3. Informative: The development hereby approved shall be completed in accordance with the associated Section 106 agreement.
4. Informative: 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 5573) to arrange for the allocation of a suitable address.
5. Informative: Written schemes of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.
6. Informative: In aiming to satisfy the condition the applicant should seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs). The services of MPS DOCOs are available free of charge and can be contacted via *docomailbox.ne@met.police.uk* or 0208 217 3813.
7. Informative: A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater

discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality.

8. Informative: There are large water mains adjacent to the proposed development. Thames Water will not allow any building within 5 metres of them and will require 24 hours access for maintenance purposes. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.
9. Informative: 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.
10. Informative: The applicants are encouraged to engage with Crossrail 2 in respect of the foundation design for the proposals in the course of preparing detailed design and method statements and can be contacted at crossrail2@tfl.gov.uk
11. Informative: The applicants must engage and work with Transport for London in respect of providing an adequate connection to Tottenham Hale station through the erection of a pedestrian foot bridge from the proposed public square.
12. Informative: A separate application will be required for either the installation of a new shopfront or the display of any illuminated signs.
13. Informative: Planning permission has been granted without prejudice to the need to obtain advertisement consent under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.
14. Informative: The following highways licences may be required: crane licence, hoarding licence, on-street parking suspensions. The applicant must check and follow the processes and apply to the Highway Authority.
15. Informative: Commercial Business must ensure all waste produced on site are disposed of responsibly under their duty of care within Environmental Protection Act 1990. It is for the business to arrange a properly documented process for waste collection from a licensed contractor of their choice. Documentation must be kept by the business and be produced on request of an authorised Council Official under section 34 of the Act. Failure to do so may result in a fixed penalty fine or prosecution through the criminal Court system.

16. Informative: For the avoidance of doubt any reference to 'superstructure' in the above planning conditions refers to 'the part of a building or structure above its foundations'.

Appendix 1: Consultation Responses from internal and external agencies

Stakeholder	Question/Comment	Response
INTERNAL		
Design Officer	<p>Height</p> <ul style="list-style-type: none"> · The principle of a tall building at this location is long established by a number and variety of different documents that have been consulted on and approved by the council previously, from the Tottenham Hale Urban Centre Masterplan, October 2006, now superseded by the Tottenham AAP, adopted July 2017, carrying forward the same vision, and in the original Hale Village Outline Planning Permission, and · The outline permission was for a tower on this site of 18 storeys height, along with and in deliberate contrast to blocks of 6-8 storeys (10 along the railway edge) on the remainder of Hale Village. All the other sites within Hale Village have been granted reserved matters consent and been or are being built out, but generally with one or two extra floors to the masterplan. · Since the adoption and granting of planning permission of the two masterplans, economic growth across London, increasing housing need, transport improvements, lifestyle changes and greater expectations of density have led to increased building height expectations at key highly connected growth points like Tottenham Hale, reflected in more recent revisions to the London Plan and Haringey's Local Plan. · Of greater significance, the vision for height across the Tottenham Hale Urban Centre, envisaged in the District Centre Framework (DCF), adopted December 2015, and now in the Tottenham Area Action Plan (AAP), adopted July 2017, to be a spaced out cluster of high-rise buildings rising to the highest points around the public transport interchange that is Tottenham Hale national 	<p>Comments noted. Materials to be controlled by condition 5.</p>

Stakeholder	Question/Comment	Response
	<p>rail, underground and bus station. This site is the closest high-rise development site to the transport interchange. The intended profile is best illustrated on pages 82-3 of the DCF.</p> <ul style="list-style-type: none"> · With high-rise buildings of 21 storeys at 1 Station Square and 22 storeys at Hale Wharf approved in the last year, it is expected that this site should go higher to maintain the intention for heights to build up towards the interchange. <p>Scale, Bulk and Massing</p> <ul style="list-style-type: none"> · I consider the profile and form of the tower to be commendably elegant, with a high degree of slenderness that is considered to give a high-rise building the most satisfying appearance from middle and long distant observation points. As a slender profile tower, it is unlikely to “block out” a significant part of the sky from most viewing points. · The plan form of the tower, as a faceted triangle, will present a comparatively slender form from all viewing points, unlike a more “slab-like” plan form. · The faceted ends of the tower at its western and south-eastern points, will present a particularly slender and elegant face to the two most significant views of the tower, from approaches along Ferry Lane and from the Tottenham hale Station Square. This is illustrated particularly well on pages 13 and 15 of the applicants Design and Access Statement. · The height of the tower is substantially mitigated at close-to, where that could appear oppressive and alien to human scale, with the addition of a substantial podium floor extending beyond the tower plan form on all sides and 	

Stakeholder	Question/Comment	Response
	<p>taking the building plot up to more appropriate building edges to enclose surrounding streets and the square propose for its western edge.</p> <ul style="list-style-type: none"> · This proposed square will form an “entrance square” to Hale Village, a space to mark the new eastern entrance to Tottenham Hale Station and a sitting-out space for the planned restaurant in the western half of the ground floor, animating and enlivening the street scene. · The form of the southern side of the podium tapers away from the line of Ferry Lane westwards, but by less than the taper in the line of the tower itself. These together will allow unfolding of views of the station and allow a green screen of trees and planters between the busy road, pedestrians and the residential building. · The form of the northern side of the podium curves to follow the line of the street, again contrasting with and emphasising its difference to the tower, whilst the east side forms a simple straight street. · The key visual refinement to the form of the tower is the indenting of the façades to the longer southern, eastern and northern faces in a series of bays. These create bay windows and balconies for the flats, but from the point of view of form, sculpt the facades and accentuate the tower’s verticality. · The tower form is further modified by the inclusion of a “sky garden” level at Level 11. This breaks up the tower form on its three main facades with a substantial break about a third of way up, in my view improving its sense of being well proportioned. Buildings of this scale appear more satisfying in longer views when their scale is mitigated at greater than the floor-by-floor scale, where expression and differences can appear relentless and repetitive. Instead, the tower has a substantial break, which “cuts into” the façade of either side, disrupting the otherwise repetitive fenestration pattern 	

Stakeholder	Question/Comment	Response
	<p>and the vertical banding of the bays, as well as creating a shelf to the east side.</p> <ul style="list-style-type: none"> · The difference between the broader thickness of the tower up to the sky garden level and its skinnier profile above also reflects its changing context, from where it sits within and amongst the medium rised existing blocks of Hale Village, forming enclosed urban blocks, to where it rises above the rooftops, to where it sits in thin air, only (eventually) surrounded by a few other, much more distant, high-rise towers. · The final significant formal element of the design is the way the “top” is celebrated, made special and distinctive. This is done by extending the bays to create a “castellated” parapet. This is achieved by extending the cladding a floor extra on outer bay elevations than on the inner facades. Further detailed refinements in materials to the top two residential floors pick out the distinctiveness of the top some more, as described below. <p>Detailed Design</p> <ul style="list-style-type: none"> · There will be a distinct and different elevational treatment, palette of materials and detailing to the podium and main body of the tower. The podium will be a predominantly glazed façade, with curtain walling and glazed doors into commercial premises, creating maximum transparency to the activities within and a sense of a lively but dignified arcade façade where it is most directly engaged with a busy, pedestrian oriented public realm. · The top of the podium has been the subject of further discussions between us and the applicants, after submission of the application, to ensure the podium and in particular its parapet had sufficient height and a sufficiently bold profile to give it a presence and emphasis from close-to, street level 	

Stakeholder	Question/Comment	Response
	<p>views, so that the podium dominates at street level and so that its proportioning is satisfying, and avoids looking “spindly”, in itself. I am happy that the modified form now achieves this and will ensure that in its human scale and physical presence, the podium will form an excellent transition between the street scale and tower.</p> <ul style="list-style-type: none"> · The podium roof is also landscaped, with a “green roof” of decent depth, to grow not just sedum but a wildflower meadow, with occasional taller bushier plants. It will therefore be a pleasant outlook for the lower flats and for the public at street level. · The main body of the tower is detailed in a repetitive, glassy, striated façade system of floor to ceiling glazing between bright white metal cladding. Although I have always been concerned this could be over-repetitive, I have to admit this is likely to be elegantly and slickly detailed and to provide a great unifying effect. Cladding panelling is arranged to pick out floors as continuous pieces of horizontal emphasis, with solid panels between windows of a more vertical emphasis. · Although detailing and materials should be subject to conditions, to be resolved by detailed design by specialist manufacturer as part of the construction works, I am confident they could be designed and installed to be finely and elegantly detailed to be robust, resistant to staining, discolouration and fire spread. · The bays as the key distinctions of the longer façade enliven and distinguish each façade, with on the southern façade having open balconies between the bays, the northern and eastern façade having their amenity internalised in wider bay windows, with the recesses between forming continuous vertical slots, and with the narrow facet ends of the tower, the 	

Stakeholder	Question/Comment	Response
	<p>western and south-eastern corners, being full width balconies.</p> <ul style="list-style-type: none"> · Balcony soffits are exploited as an opportunity for further contrasting detailed embellishment, with darker, coloured fibre-cement boards in changing colours, with a darker, richer red to the lower floors (up to sky garden level), a greyer-brown to the upper-middle levels and a lighter, yellower-brown to the top two floors. I am confident this will enrich the elevational appearance. · As mentioned above the sky garden forms a break in the overall tower sculptural form at about one third of its height. It will also be able to be lushly planted with bushes and small trees, further breaking up the length of the façade, sufficient to be visible from ground level. · Balustrades are patterned with a twisted weave pattern inspired by furniture historically manufactured on site by the Harris Lebus company <p>Key Views</p> <ul style="list-style-type: none"> · The proposal would clearly be visible from a wide range of locations across a wide area. However, there are not many heritage asserts nearby or likely to be such that the proposal would disturb important views from within their settings. Public open space and important streets are more likely to be effected. · In particular, the wide open spaces of the Lee Valley, containing a continuous range of open land, some used as public parks and recreation grounds (and therefore accessible), many with wildlife and biodiversity significance, designations and protections, much also currently used for water industries, but also planned to become a large continuous accessible public 	

Stakeholder	Question/Comment	Response
	<p>open space, the Walthamstow Wetlands.</p> <ul style="list-style-type: none"> · we asked the applicants to test their proposal from a large number of more sensitive locations; these are found in Appendix 7 of the applicants' Environmental Statement. · I do not consider the view of the proposals in any of the verified views would be unacceptable. 	
<p>Principal Conservation Officer</p>	<p>BACKGROUND: 1. This site is part of wider Tottenham Hale area. The site is currently a vacant sunken plot that forms the final phase of the wider Hale Village Masterplan. As a part of the existing planning application for Hale Village, the site was granted outline planning permission for an 18-storey residential led tower. 2. It does not fall within a conservation area or contain any listed or locally listed structures. However, due to the proposed scale of the building it is likely to have an impact on the wider setting of various heritage assets nearby. The applicant, in support of the application, has submitted a Heritage and Townscape Visual Impact (HTVI) Statement along with a detailed Design and Access Statement. I have reviewed these documents from a conservation point of view along with other planning documents and have considered the impact of the development in accordance with the Council's statutory duty as per Planning (Listed Buildings and Conservation Areas) Act, 1990.</p> <p>COMMENTS: 3. The new scheme proposes a new mixed use development ranging from 11 to 33 storeys comprising commercial space (flexible A1/A3/A4/B1/D1 uses), 279 residential units including affordable housing, together with roof garden and associated landscaping, the provision of basement car parking, bicycle spaces, associated plant including building</p>	<p>Comments noted.</p>

Stakeholder	Question/Comment	Response
	<p>maintenance unit and internal refuse storage at Plot SW, Hale Village. In their Design and Access Statement the applicant states that ‘The development proposal is for an attractive and architecturally interesting tall building which marks the gateway to a number of key items: The Hale Village development and emerging development areas in close proximity; and, The key Tottenham Hale Station transport interchange.’ The Tottenham Area Action Plan (AAP) states that the site is a suitable site for a tall building and that the site should be ‘a marker for the entrance to the station from Ferry Lane’. 4. From a conservation point of view, the height of the building is such that it would have an impact on the wider setting of various assets within the Tottenham area. The structure would be most visible in context of the grade II listed Ferry Boat Inn. This building is within the borough of Walthamstow Forest and appropriate comments should be sought for the same. In my view, the building’s location on the island between River Lee and Coppermill Stream and the nearby Nature Park gives it a rural setting away from the urban nature of the Hale Village. This setting adds to the significance of the building. The introduction of a 33 storey tower within the wider setting of the building would have some impact on this setting. However, given that Hale Village has been envisioned to become a District Centre in the future with a different scale of the buildings altogether, this impact would be inevitable. Additionally, I agree with the applicant’s assessment in this matter that the site itself does not contribute to the significance of the setting of the Inn. The setting of the building can be appreciated in other views and within its immediate vicinity. As such I would agree with the applicant’s assessment that the proposed development would have a neutral impact. 5. In addition, the structure would be visible from long distance views from other locations such as Markfield Beam Engine, 62 Monument Way, Tottenham High Cross, High Road, Bruce Castle and the Park as well as Alexandra Palace Park. Whilst the scale and height of the building would be visible in the long distance views and within the setting of these heritage assets, the impact is not considered to be negative and as such no harm would be incurred to the setting of these heritage assets.</p>	

Stakeholder	Question/Comment	Response
	<p>CONCLUSION: 6. Whilst the proposed development would be visible within the setting of several heritage assets and in long distance views, it would not lead to negative impact and as such is considered to cause no harm to setting of heritage assets. As such, the scheme would comply with current statutory and policy requirements and would be acceptable from a conservation point of view.</p>	
<p>Transportation</p>	<p>This proposal is a mixed use development comprising of 1,588 sqm commercial space (flexible A1/A3/A4/B1/D1 uses) and 279 residential units. The development site is part of the Masterplan and is the last one to be build out. The site forms a boundary in parts to the West and North with Daneland Walk and Unite student block, to the East with Coppermill Heights and Tottenham Hale Station and railway tracks to the West, and Ferry Lane to the South.</p> <p>The development site is highly accessible with a score of Public Transport Accessibility Level (PTAL) 6a. PTAL ranges from 1 (described as 'very poor') to 6B (described as 'excellent').</p> <p><u>Access</u> The main vehicular access is proposed via Jarrow Road, next to the railway tracks and immediate to the south and below the Ferry Lane. The other access/ egress points is through a ramp located within the Hale Village development, and is located on Waterside Way to the north of proposed site. This first connects to Mill Mead Road and then to Ferry Lane. Residents that have parking space are able to gain access to the basement area via a fob key. Pedestrian access is provided off Ferry Lane and Daneland Walk through the main foyer at Gateway tower.</p>	<p>Observations have been taken into account. The recommended legal agreement clauses, conditions 25-28 and informatives will be included with any grant of planning permission as appropriate.</p>

Stakeholder	Question/Comment	Response
	<p>This proposal does not include changes to the public highway to accommodate the proposed vehicular or pedestrian access.</p> <p><u>Trip Generation</u> Multimodal trip generation for residential units was derived from TRICS having considered similar sites to the proposed development. Also, 2011 Census database of travel to work for Middle Super Output Area (MSOA) Haringey 15, in order to identify current work patterns and predict the trips for commercial parts of this proposal.</p> <p>The trip rates are considered acceptable.</p> <p>This proposal is predicted to generate a total of 24 two-way car trips during AM peak, and 15 PM peak. The majority of two-way trips will be made by underground, bus and train, at: 78, 51 and 24 respectively, whereas during AM peak the predictions are 77, 50 and 23 during the PM peak. The trip rates are considered acceptable.</p>	

Stakeholder	Question/Comment	Response																																																																																																																		
	<p data-bbox="546 272 1120 296">Table 5.10 Total Expected Trips per Travel Mode - All Uses</p> <table border="1" data-bbox="557 320 1451 703"> <thead> <tr> <th rowspan="2">Travel Mode</th> <th rowspan="2">AM Mode Split (%)</th> <th colspan="3">AM Peak Hour</th> <th rowspan="2">PM Mode Split (%)</th> <th colspan="3">PM Peak Hour</th> </tr> <tr> <th>Arr</th> <th>Dep</th> <th>Total</th> <th>Arr</th> <th>Dep</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Underground</td> <td>37.9%</td> <td>19</td> <td>59</td> <td>78</td> <td>29.3%</td> <td>41</td> <td>36</td> <td>77</td> </tr> <tr> <td>Train</td> <td>11.4%</td> <td>6</td> <td>18</td> <td>24</td> <td>8.8%</td> <td>12</td> <td>11</td> <td>23</td> </tr> <tr> <td>Bus</td> <td>24.9%</td> <td>13</td> <td>39</td> <td>51</td> <td>19.2%</td> <td>27</td> <td>24</td> <td>50</td> </tr> <tr> <td>Taxi</td> <td>0.8%</td> <td>1</td> <td>1</td> <td>2</td> <td>1.5%</td> <td>2</td> <td>2</td> <td>4</td> </tr> <tr> <td>Motorcycle</td> <td>0.6%</td> <td>0</td> <td>1</td> <td>1</td> <td>0.3%</td> <td>1</td> <td>0</td> <td>1</td> </tr> <tr> <td>Car</td> <td>11.4%</td> <td>4</td> <td>20</td> <td>24</td> <td>5.6%</td> <td>10</td> <td>5</td> <td>15</td> </tr> <tr> <td>Passenger</td> <td>1.2%</td> <td>0</td> <td>2</td> <td>2</td> <td>0.6%</td> <td>1</td> <td>1</td> <td>2</td> </tr> <tr> <td>Bicycle</td> <td>2.4%</td> <td>1</td> <td>4</td> <td>5</td> <td>1.4%</td> <td>2</td> <td>2</td> <td>4</td> </tr> <tr> <td>On Foot</td> <td>8.7%</td> <td>6</td> <td>12</td> <td>18</td> <td>33.0%</td> <td>44</td> <td>43</td> <td>87</td> </tr> <tr> <td>Other</td> <td>0.6%</td> <td>0</td> <td>1</td> <td>1</td> <td>0.3%</td> <td>1</td> <td>0</td> <td>1</td> </tr> <tr> <td>Total</td> <td>100.0%</td> <td>51</td> <td>155</td> <td>206</td> <td>100.0%</td> <td>140</td> <td>123</td> <td>263</td> </tr> </tbody> </table> <p data-bbox="568 703 1417 740"><i>Notes: Based on 279 residential units and 1,600sqm of non-residential space (equally apportioned over A3, A4 and B1 uses). Potential arithmetical errors due to rounding.</i></p> <p data-bbox="533 794 741 818">1.0 Car parking</p> <p data-bbox="533 826 1648 930">A total of 36 car parking spaces are included in this proposal. The proposed spaces are of standard type (12 parking spaces) and for disabled users (24 parking spaces).</p> <p data-bbox="533 975 1648 1337">Policy 6.13, of the London Plan sets out the car parking standards and strategic direction to facilitate new developments with appropriate levels of parking. It indicates that, maximum car parking standards for residential developments in the outer London with a high PTAL, is up to 1 space per unit. LBH is identified in map 2.2, of the London Plan, as part of the outer London. Parking addendum to Chapter 6, has recommendations for blue badge holders, indicating that: for non-residential developments, requirement is a provision for at least one accessible on or off-street parking space. It is also stated that when off-street parking is provided then at least two parking spaces should be for blue badge holders.</p>	Travel Mode	AM Mode Split (%)	AM Peak Hour			PM Mode Split (%)	PM Peak Hour			Arr	Dep	Total	Arr	Dep	Total	Underground	37.9%	19	59	78	29.3%	41	36	77	Train	11.4%	6	18	24	8.8%	12	11	23	Bus	24.9%	13	39	51	19.2%	27	24	50	Taxi	0.8%	1	1	2	1.5%	2	2	4	Motorcycle	0.6%	0	1	1	0.3%	1	0	1	Car	11.4%	4	20	24	5.6%	10	5	15	Passenger	1.2%	0	2	2	0.6%	1	1	2	Bicycle	2.4%	1	4	5	1.4%	2	2	4	On Foot	8.7%	6	12	18	33.0%	44	43	87	Other	0.6%	0	1	1	0.3%	1	0	1	Total	100.0%	51	155	206	100.0%	140	123	263	
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Stakeholder	Question/Comment	Response
	<p>In addition, Policy 6A.1, of the addendum includes parking standards for blue badge holders for non- residential uses, indicating that, at least one on or off street car parking should be provided, and designated for blue badge holders, even if no other parking is provided.</p> <p>With regards to employment land uses the addendum necessitates parking provision for each disabled employee, including provision for disabled visitors.</p> <p>Policy 2.8 of the outer London Transport outlines strategic direction and recognises car parking requirements for outer London areas to be higher in comparison with central areas, although a flexible approach is encouraged in applying standards of the Policy 6.13 and Table 6.2.</p> <p>Policy 3.8 of the London Plan recommends are that 10% of new housing should be, either designed to be wheelchair accessible from the start, or easily adaptable for residents who are wheelchair users.</p> <p>Policy DM32 on parking standards, part of the LBH Development Management DPD- January 2016, indicates that London Plan policies are valid when planning proposals are assessed.</p> <p>When applying policy 3.8, this development should include a total of 28 residential units which are Wheelchair User Dwellings (WUD) at the point of construction, or easily adaptable afters.</p> <p>This proposal includes 28 WUD units.</p> <p>Thus,</p> <p>a). It has been accepted that not all of the 10% included, will be wheelchair accessible residential units at the start of occupation, or at all times. Therefore, the % of WUD is subject to demand and would be varied over time.</p>	

Stakeholder	Question/Comment	Response
	<p>The Housing Supplementary Planning Guidance (March 2016)-London Plan 2016 Implementation Framework, set up standards indicating that each designated wheelchair accessible unit, should have a car parking space. If all of the assigned WUD are in use as wheelchair accessible units, and each have access to a car parking space at the same time, then parking provision for this proposal should be 28 spaces.</p> <p>b). Considering that not all disabled users who are residing at WUD will have cars, there is no need for each unit to have a car parking space, at all times.</p> <p>Nevertheless, the London Plan recognises that car parking can take up considerable land and encourages the use of sustainable modes of transport, nonetheless car parking for disabled users is considered an essential provision and must be fully satisfied at all times.</p> <p>c). there is potential to utilise the unused spaces for commercial uses, which have no parking assigned, which may not be otherwise acceptable in policy terms.</p> <p>This is a car free development where all residents, (except disabled users of the WUD), do not have access to off or on-street car parking spaces</p> <p>S106: 'car free development'- constraints secured through s106.</p> <p>Having considered all of the above policies, it was concluded that, residential car parking provision is acceptable, if the following is attained and secured through S106,</p> <ul style="list-style-type: none"> • each WUD has access to a car parking space (off-street), at a point of request. 	

Stakeholder	Question/Comment	Response
	<p>S106: Disabled users of the WAU must be able to obtain one parking permit, at the point of request, issued by developer's management company. No charging for these permits, in perpetuity.</p> <p><u>Or, the other version</u></p> <p><u>(if the developer proposes to sell car parking spaces the other acceptable version.</u></p> <p><u>One parking space per WUD unit, so this is a 1:1 provision and is considered policy compliant.</u></p> <p>S106: <u>Each WUD unit must have one corresponding car parking space, clearly marked on a drawing, secured through a S106.)</u></p> <p>The London Plan includes non-operational maximum parking standards for B1 employment on the Outer London, and is based on the proposed floorspace, with maximum provision of one car parking space per (100-600) sqm of gross floorspace(GIA)</p> <p>For the 1,588 sqm of commercial included in this proposal the range of the car parking provision is (max 16 spaces- min 3).</p> <p>Furthermore, parking standards for retail parking, (if any included) is based on the PTAL score and for sites with PTAL 6and 5 those are:</p> <p>food (up to 500sqm) is one parking space per 75 sqm of gross floorspace, food (up to 2500sqm) is one parking space per (45-30) sqm of gross floorspace,</p>	

Stakeholder	Question/Comment	Response
	<p>food (over 2500sqm) is one parking space per (38-25) sqm of gross floorspace,</p> <p>non-food is one parking space per (65-45) sqm of gross florspace,</p> <p>Since commercial land uses are not fixed, car parking for disabled users must be made available. Allocations must be reviewed when land uses are fully known.</p> <ul style="list-style-type: none"> • Allocation of disabled car parking for commercial uses is recommended to be a part of condition. <p>Managing the off-street car parking spaces is done through Car Parking Management Plan (CPMP), and secured through:</p> <p>Condition: CPMP-further details to be submitted to cover matters (1-9), below:</p> <ol style="list-style-type: none"> 1. prior to occupation, all parking spaces must be in place, and marked on site as disabled spaces, and retained thereafter. 2. include which residential units are WAU, thus eligible for parking permits 3. submit a drawing and highlight parking spaces for each uses include in this proposal 4. review the allocation of car parking for commercial uses 5. all parking spaces to be used in connection with this development, only 6. review the demand for parking spaces and occupancy levels for residential part of this proposal - include details on how this is proposed to be managed. 7. Include details of duties and responsibilities for issuing, reviewing of the off-street permit allocation, and reassigning of parking permits. 	

Stakeholder	Question/Comment	Response
	<p>8. details to be submitted: 48</p> <p>Current London Plan policies require a minimum provision of 20% active and 20% passive Electric Vehicle Charging Points (EVCP). Because of low number of parking spaces included in this proposal, recommendations are to aim for all spaces to have EVCP, either active or passive.</p> <p>9. include locations of Electric Vehicle Charging Points (EVCP), and indicate criteria for reviewing the usage and converting passive points (if any proposed) to active.</p> <p>2.0 Cycle Parking</p> <p>The proposal includes a total of 483 cycle parking spaces, 364 long stay and 164 short stay.</p> <p>Spaces provided are assigned to: a total of 445 for residential use, (438 long stay) located in the basement and (5 short stay) located at the basement level. 5% of the total are proposed to accommodate larger cycles.</p> <p>In addition, there are a total of 38 cycle parking spaces, (28 short stay and (10 long stay) for the commercial uses that are part of the proposal.</p> <p>The cycle parking provision is considered acceptable.</p> <p>Locations of the proposed cycle parking spaces are shown on the basement level. There are some potential issues with aisles being too narrow and easy accessibility to get to some of the cycle parking spaces. Recommendations are to revise the design so that all spaces are accessible.</p> <p>Condition: revise the design-create easy access to the cycle parking, cycle parking for each proposed land use to be shown on a drawing, parking spaces</p>	

Stakeholder	Question/Comment	Response
	<p>must be of suitable quality, details of how residents/staff gain access to the cycle parking areas, and maintenance arrangements of the area. Cycle parking should be available from the occupation, and all spaces must be retained, thereafter.</p> <p>3.0 <u>Car Club</u></p> <p>The applicant conducted discussions with one of the car club operators. One car club space is likely to be provided, in a location to be determined.</p> <p>Grampian condition: provision of a car club.</p> <p>4.0 <u>Pedestrian Environment Review System (PERS)</u></p> <p>It was accepted that as the highway network in the vicinity was undergone considerable change thus full PERS report is not necessary.</p> <p>Nevertheless, PERS brief audit was carried out which included the assessment of 4 pedestrian links, 4 crossing points, 2 public transport waiting areas, and the interchange to the Tottenham Hale Station. Most were rated positive in terms of permeability, road safety and environment quality.</p> <p>Overall all scored green, apart from the pedestrian link 2-Ferry Lane footpath on the northern side.</p> <p>5.0 <u>Parking restrictions on the public highways</u></p> <p>In order to monitor potential parking displacement following the occupation of proposed development, S106 contributions are sought. Contributions will be used to assess and analyse parking stress in the vicinity to establish base</p>	

Stakeholder	Question/Comment	Response
	<p>data prior to occupation, and thereafter when the level of occupation is at 50% and 75% or over.</p> <p>In case the findings suggest that there has been an increase in parking stress, affecting areas which are not within the CPZ, or the timing of parking restrictions are not appropriate, then CPZ modifications would be proposed by the local HA, with the aim to implement the changes. Nevertheless, changes are subject to public consultations.</p> <p>S106 contributions_ parking stress review, including all costs incurred as a result of revision of the existing(s) CPZ.</p> <p>6.0 <u>Travel Plan</u></p> <p>The Framework Travel Plan (TP) was included, as part of the submission. The developer is responsible for creating a sustainable development and achieving the TP targets. Their strategy was to appoint a Sustainable Travel Manager by site's management company to ensure that targets of the travel plan are met.</p> <p>In addition, Travel Plan co-ordinators are proposed for each land uses included in this proposal.</p> <p>Nevertheless, obligation remains with the developer to implement travel plan measures. Each travel plans will be signed off only after targets, as agreed with the LPA, have been met.</p> <p>Each detailed travel plan must have SMART targets, which must be monitored at regular intervals for at least five years, following occupation. Although several actions were listed to be part of the TP, however further TP actions are required.</p>	

Stakeholder	Question/Comment	Response
	<p>One of the actions recommended, is contributions to car club membership for new residents.</p> <p>S106 include TP monitoring contribution and TP initiatives for the residential part of this proposal.</p> <p>S106 for commercial uses which meet the TP thresholds, request for workplace travel plan. Include smart initiatives and TP monitoring</p> <p>7.0 <u>Delivery/Servicing plan</u></p> <p>Delivery servicing plan framework was included in the submission.</p> <p>Due to the privately managed Hale Village, deliveries will be monitored and managed at all times. Access for deliveries is proposed from Mill Mead Road and Lebus Street and leave parcels with the concierge. The way out is via Waterside Way and Daneland Walk.</p> <p>This is considered acceptable.</p> <p>Servicing is proposed at the basement level, where a loading/servicing bay is located. Request for</p> <p>Condition: Swept path analysis- related to all vehicles using the loading bay</p> <p>8.0 <u>Refuse/ recycling</u></p> <p>The refuse strategy is the same and part of the wider Hale village.</p> <p>Some details where included such as, refuse vehicle reversing 70m into the site.</p>	

Stakeholder	Question/Comment	Response
	<p>Include the agreement with the Environmental Services, including is responsible to place the bins to the agreed collection point.</p> <p>The commercial refuse/ recycling is assumed to be done through private service providers. If other, please provide details.</p> <p>Condition: Further details to be submitted - for refuse collections: providing evidence on agreeing the collection There were no details on the recycling strategy/ areas area/ and collection arrangements. Therefore,</p> <p>Condition: Recycling recycling/ storage area and details on collections</p> <p>9.0 <u>Construction Logistic Plan</u></p> <p>The proposal included the submission of Construction Logistic Plan (CLP). In order to manage the construction of this proposal the Construction Logistic Plan (CLP) should be submitted. This could be covered by a condition.</p> <p>Condition: Further details to be submitted and agreed, prior to start of the construction phase. Highways Authority(HA) must be notified before the construction phase has started. The construction traffic must be co-ordinated with other approved proposals in the area. Temporary access points may be required during the construction phase.</p> <p>Managing of the deliveries is proposed via booking system with pre-arranged slots, and allowing sufficient time to carry loading/unloading.</p> <p>Construction traffic to/from the site must avoid highway network peak times.</p>	

Stakeholder	Question/Comment	Response
	<p>All routes and n timings should be agreed in advance with the local HA.</p> <p><u>Reason:</u> to co-ordinate the construction traffic routes, generated to/from the site.</p> <p>Also,</p> <ol style="list-style-type: none"> 1. vehicles involved in construction should be part of Fleet Operator Recognition Scheme (FORS) 2. include swept paths of the largest vehicle that will enter/exit the site, and turnings 4. No temporary car parking for staff and personnel involved in the construction of this development. <p>The developer and/or their appointed contractor, must:</p> <ul style="list-style-type: none"> -display contact details of the project manager at all times. - have a communication plan to contain: first point of contact, how the developer will inform residents and others affected, for example: informing about road closures, alternative route/s, duration of works etc. <p>The developer is responsible in promoting the use of public transport to, all staff and personnel involved in the construction of this development. Staff/personnel should be aware of public transport provisions in the area, and aim to use sustainable modes of transport.</p> <p>A travel plan for personnel involved in the construction, showing routes to and from site, is considered a part of the CLP. Other travel plan measures should be included and reported to the LBH , as part of monitoring process. The applicant to agree the method of working with local HA prior to the start of construction.</p> <p>In addition:</p>	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • Please include Informative(s) about Highways licences. The applicant must check and follow the processes and apply direct to the HA <p><u>Recommendation</u></p> <p>On behalf of Highway Authority, I recommend this proposal for approval, subject to including Conditions and S106.</p>	
<p>Financial Viability Consultant</p>	<p>Executive Summary:</p> <ul style="list-style-type: none"> . We have been asked by LB Haringey to review the Financial Viability Report submitted by the Applicant, Anthology Hale Works Ltd. . We have reviewed the submitted information and table below our revised appraisal inputs/outputs for the proposed scheme for 236 private units and 43 intermediate units (see response document for Table of fogures) . The applicant’s Residual Land Value for the proposed scheme is £15,079,057 against their proposed Site Value Benchmark of £17m, which they state cannot afford any additional affordable housing. . Our amended appraisal produces a Residual Land Value of £13,081,259 against our revised Site Value Benchmark of £12,556,143 which produces a surplus of £525,116. A copy of our appraisal can be found at Appendix 2. . We conclude therefore that the proposed scheme can viably provide a Payment in Lieu of Affordable Housing of £525,115 and would recommend reviews in line with the GLA document (Affordable Housing 	<p>Comments noted.</p>

Stakeholder	Question/Comment	Response
	<p>and Viability SPG (August 2017), which recommends an early and a late stage review.</p>	
Housing	<p>On the basis that the affordable housing offer on this scheme, is judged on the basis that the extant permission on the site is the benchmark land value, then the affordable housing offer of 43 Intermediate units is acceptable, on the following conditions</p> <ol style="list-style-type: none"> 1. The surplus above the benchmark land value of £521,116 is paid to the council on commencement of the permission, for the use of affordable housing within the borough 2. That the intermediate units proposed are transferred to a Registered Provider at the complete package price of no more than £13,653,548 (This being the agreed value of the Intermediate Units £12,880,705 plus 6% profit) . This price shall include all common parts and egress. 	<p>Comments noted and will feed into ongoing negotiations.</p>
Drainage Engineer	<p>It is suggested by the applicant that the adjacent, now developed, site has the drainage infrastructure in place that has been sized to take additional unattenuated flows from the proposed new development. The drainage layout drawings for the adjacent site show the system to drain in to Pymmes Brook at a controlled rate of 24l/s. The confirmation of capacity is based on the applicant running unattenuated flows from the proposed site through the originally created Micro-drainage model to show no surcharging for a 1 in 2 year event and no flooding for a 1 in 100 year plus climate change event.</p> <p>The main concern is whether there is sufficient evidence that the original designed drainage system was actually installed as per the design, bearing in mind the timescale involved (2006), and as a result whether the original Micro-</p>	<p>Comments noted, condition 20 attached.</p>

Stakeholder	Question/Comment	Response
	<p>drainage model is representative of the installed drainage network. As it stands we are not in a position to accept the proposal without further evidence being made available and now seek advice from yourselves (LPA) on how we can progress this.</p> <p>The applicant would normally be issued with Haringey's guidance along with a pro-forma to assist in the preparation of a drainage strategy. The minimum we would expect to see is an initial concept drawing of the proposed site to form the basis of early engagement and then look to agree the overall drainage strategy prior to progressing to full application. There appears to be no evidence of this having been provided by the applicant which is a concern, however, it could be a failure in our established procedure which has resulted in the applicant not receiving the Haringey documents for the initial development.</p> <p>Rainwater falling on the site should be controlled prior to leaving the site unless sufficient evidence is provided to confirm that there is capacity built into the previously constructed local drainage network. We do require that SuDS solutions (e.g. Green Roofs, Bio-Retention Planters, Permeable Paving, Rainwater Harvesting etc) have been suitably considered and maximised on this proposed development to ensure it manages surface water as close to source as well as contributing to other local environmental/sustainability policies.</p> <p>We also require a maintenance plan for the SuDS and this should be for the lifetime of the development detailing the frequency and the responsible party for the maintenance.</p> <p>Additional Comments:</p> <p>I am now satisfied with the maintenance regime for this site, I'm not completely</p>	

Stakeholder	Question/Comment	Response
	<p>satisfied the evidence has been provided to prove the previously developed site has a drainage system sized to receive the runoff from the proposed Anthology site. This could be proved by having a CCTV survey carried out on the system so a condition could be included if you agree this is appropriate.</p>	
<p>Carbon Management</p>	<p>Energy Strategy and Offsetting</p> <p>The energy strategy submitted addresses the needs for the full application for 279 dwellings and 1,588m² commercial space. The Energy Strategy is set out as per the London Plan guidance under Lean, Clean and Green Energy. It demonstrates that the design of the building will achieve a 33.6% reduction in carbon on site, and that the sites remaining carbon will be offset.</p> <ul style="list-style-type: none"> - Under Lean Measures: Under Lean Measures: 9.93% carbon reduction has been achieved by energy efficiency measures. This is a good standard to achieve on a scheme of this nature. - Under Clean Measures: Under Clean Measures: The scheme will connect to the Hale Village Community Heating Network. No onsite provision of space heating or hot water is proposed. Therefore, the Heating Network connection will provide the scheme with all the sites hot water and space heating requirements. There is no recommendation on the management of this network, but the GLA and Council have recommended that the scheme is signed up to the Heat Trust Scheme, to ensure customer protection. - Under Green Measures: Under Green Measures: No renewable technologies are included in this scheme. This is disappointing, but the offsetting contribution will enable schemes to be implemented in the local area to deliver the same outcome. Therefore if the offsetting is secured this impact can be mitigated. <p>The Energy Strategy is therefore accepted and this should be conditioned:</p> <p>Suggested Condition</p>	<p>Comments noted, condition 25, 33 and 34, and legal agreement clauses attached.</p>

Stakeholder	Question/Comment	Response
	<p>You must deliver the energy standards as set out in “Hale Works - Energy Strategy”, Version 6.0, 29.09.17 by Ridge. The development shall then be constructed and the deliver the carbon savings set out in this document. Achieving the agreed carbon reduction of 33.6% reduction beyond BR 2013 across the site. Confirmation that these energy efficiency measures and carbon reduction targets have been achieved must be submitted to the local authority at least 6 months of completion on site for approval.</p> <p>This report will demonstrate that the following have been delivered:</p> <ul style="list-style-type: none"> - show emissions figures at design stage to demonstrate building regulations compliance, and then report against the constructed building; - that the link to the Hale Village has been delivered and that this provides the Hale Works Site with all its space heating and hot water needs; and - that the community heating network is covered by the Heat Trust customer protection scheme (or better) and that all users will be members. <p>The Council should be notified if the applicant alters any of the measures and standards set out in the submitted strategy (as referenced above). Any alterations should be presented with justification and any new proposals for approval by the Council. Should the agreed target not be able to be achieved on site through energy measures as set out in the afore mentioned strategy, then any shortfall should be offset at the cost of £2,700 per tonne of carbon plus a 10% management fee. Reason: To comply with London Plan Policy 5.2. and local plan policy SP:04</p> <p>Offsetting</p> <p>After all measures have been implemented (Lean, Clean and Green Measures) the scheme will still emit 245.36 tonnes of carbon. This is significant and as referenced in the Energy Strategy it will need to be offset.</p>	

Stakeholder	Question/Comment	Response
	<p>They have not created any convincing argument to avoid this payment in the submitted strategy. If any other view point is considered this may require further work on the EIA and whether all appropriate mitigation strategies have been investigated and delivered (such as all low carbon energy sources). The applicant would not be able to build their permitted outline scheme as both Building Regulations and planning policy has moved on since that permission was granted.</p> <p>Of this total figure 168.91 tonnes come for the residential development which will need to fully offset to be policy compliant, and 5.31 tonnes will need to be offset from the non-domestic to achieve the policy requirement of a 35% improvement over BR 2013. This means 174.22 tonnes need to be offset at a total cost of £470,394.00. This needs to be secured by legal agreement which should be payable upon commencement.</p> <p>Suggested s106:</p> <p>The applicants Energy Strategy entitled “Hale Works - Energy Strategy”, Version 6.0, 29.09.17 by Ridge. Shows that the development will emit 245.36 tonnes of carbon per year in regulated energy consumption. Of this value 174.22 tonnes needs to be offset to achieve policy compliance as set out in the London Plan Policy 5.2 and Local Plan Policy SP:04.</p> <p>To do this a payment of £470,394.00 will be paid to the planning authority upon commencement. This offsetting contribution will be used to deliver carbon reduction projects in the borough of Haringey, as set out in the planning obligations document.</p> <p>Overheating</p> <p>The submitted overheating strategy demonstrates that several of the modelled</p>	

Stakeholder	Question/Comment	Response
	<p>units do overheat in current summer weather scenarios. To address this the applicant has installed blinds which will be required to close and prevent over heating into these units. Blinds are not a fixture and therefore are not a planning consideration.</p> <p>The modelling has also been undertaken for 2050 summer weather scenarios. This increases the number of units that overheat and even with blinds, 5 of the modelled units (out of 8) will be unfit for occupation in the summer weather of 2050. The applicant has stated that they have reduced the window size and 3 installed high g-rated glazing (which reduces thermal gains from the sun). But further reduction in the size of windows and the installation of design integrated solutions (such as Brise soleil, cross ventilation, or sunken windows) could and should have been considered. There is no information as to how the building will be adapted to address overheating risk in the future.</p> <p>Car Parking</p> <p>All car parking spaces will include electric recharging infrastructure.</p> <p>Suggested Condition:</p> <p>Details and location of the parking spaces equipped with Active Electric Vehicle Charging Points (EVCP's) must be submitted 3 months prior to works commencing on site. The details shall include:</p> <ul style="list-style-type: none"> • Location of active charge points covering all new parking spaces and provision • Specification of charging equipment • Operation/management strategy <p>Once these details are approved the Council should be notified if the applicant alters any of the measures and standards set out in the submitted strategy (as referenced above). Any alterations should be presented with justification and new standards for</p>	

Stakeholder	Question/Comment	Response
	approval by the Council. Reason: To comply with London Plan Policy 6.13.	
Pollution – Air Quality and Land Contamination	<p><u>Air Quality:</u></p> <p>The application is adjacent a main road, Ferry Lane; a major route for which modelling indicates likely exceedences of the Government’s air quality objectives for nitrogen dioxide (NO₂) and PM2.5. The proposed development is also adjacent an air quality NO₂ hotspot location. The whole of the borough of Haringey is a designated Air Quality Management Area (AQMQ) and is committed to being a ‘Cleaner Air Borough’ and working towards improving air quality and to minimise the risk of poor air quality to human health and quality of life for all residents. The proposed development will introduce new exposure adjacent this major arterial route; the proposed residential units being located adjacent Ferry Lane.</p> <p>The main air polluting operations associated with the proposed development include 36 car parking spaces and associated traffic movements. There are 448 cycle spaces also located within the basement. With regard to Energy use, the <i>‘development will be connected to the existing Hale Village district heating system run by Veolia as an ESCo. (Energy Service Company).’</i></p> <p>An air quality assessment (WYG , June 2017, ref: A101186) has been submitted along with the planning application to assess the air pollution impact of the proposed developments. This assessment confirms exceedences of the Government’s objective for NO₂ and states that the <i>‘.first floor to the 9th floor are predicted to exceed the AQO. The residential dwellings will be provided with filtration via an “AAC Eurovent Nitrosorb” (or similar) unit which is combined with the MVHR mechanical ventilation.’</i></p> <p>The London Plan, Policy 7.14 states that new development should:</p>	Comments noted and conditions 29-32 attached

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • 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) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans • promote sustainable design and construction to reduce emissions from the demolition and construction of buildings; • be at least ‘air quality neutral’ and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)). • Ensure that where provision needs to be made to reduce emissions from a development, this is usually made on-site. <p>I recommend the following conditions:</p> <p><u>Air Quality:</u></p> <ul style="list-style-type: none"> • Details of the “AAC Eurovent Nitrosorb” units to be installed to the PR1 (1st to 10th Floor), PR2 (1st to 11th Floor), PR3, PR4 and PR5 (1st to 10th Floor), PR6 (1st to 11th Floor), PR7 (1st to 10th Floor), and PR9 (11th Floor), together with details of the MVHR mechanical ventilation and the annual maintenance programme shall be submitted for approval by the LPA prior to installation and occupation. 	

Stakeholder	Question/Comment	Response
	<p><u>Combustion and Energy Plant:</u></p> <ul style="list-style-type: none"> • Prior to installation, details of the Ultra Low NOx boilers 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 20 mg/kWh. <p><i><u>Reason:</u> To protect local air quality.</i></p> <ul style="list-style-type: none"> • Prior to installation details of all the chimney heights calculations, diameters and locations will be required to be submitted for approval by the LPA prior to construction. <p><i><u>Reason:</u> To protect local air quality and ensure effective dispersal of emissions.</i></p> <ul style="list-style-type: none"> • Prior to commencement of the development, details of the CHP must be submitted to evidence that the unit to be installed complies with the emissions standards as set out in the GLA SPG Sustainable Design and Construction for Band B. A CHP Information form must be submitted to and approved by the LPA. <p><i><u>Reason:</u> To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction.</i></p> <p><u>Contaminated land: (CON1 & CON2)</u></p>	

Stakeholder	Question/Comment	Response
	<p><u>CON1:</u></p> <ul style="list-style-type: none"> • Before development commences other than for investigative work: <p>Further ground gas monitoring shall be undertaken. Using the results of the additional ground gas monitoring and the information provided within the contaminated land report summary (WYG, June2017), the site conceptual model and risk assessment shall be updated, if required and submitted to the Local Planning Authority together with a remediation Method Statement detailing the remediation requirements. Using the information obtained from the site investigation and also detailing any post remedial monitoring the remediation method statement shall be approved in writing by the Local Planning Authority prior to that remediation being carried out on site.</p> <p><u>And CON2 :</u></p> <ul style="list-style-type: none"> • 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. <p><i><u>Reason:</u> To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</i></p> <p><u>Management and Control of Dust:</u></p>	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • No works shall be carried out on the site until a detailed Air Quality and Dust Management Plan (AQDMP), detailing the management of demolition and construction dust, has been submitted and approved by the LPA. The plan shall be in accordance with the GLA SPG Dust and Emissions Control and shall also include a Dust Risk Assessment. <p><i><u>Reason:</u> To Comply with Policy 7.14 of the London Plan</i></p> <ul style="list-style-type: none"> • Prior to the commencement of any works the site or Contractor Company is to register with the Considerate Constructors Scheme. Proof of registration must be sent to the LPA. <p><i><u>Reason:</u> To Comply with Policy 7.14 of the London Plan</i></p> <ul style="list-style-type: none"> • 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 IIIA 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. <p><i><u>Reason:</u> To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ.</i></p> <ul style="list-style-type: none"> • An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All 	

Stakeholder	Question/Comment	Response
	<p>machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.</p> <p><i>Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ.</i></p> <p><u>As an informative:</u></p> <p>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.</p> <p>Additional comments:</p> <p>It was reported verbally to the case officer that the revised document air quality documentation submitted by the applicant in response to the GLA's comments do not change the initial comments provided.</p>	
<p>Waste Management Officer</p>	<ul style="list-style-type: none"> • Wheelie bins or bulk waste containers must be provided for household collections. • Bulk waste containers must be located no further than 10 metres from the point of collection. • Route from waste storage points to collection point must be as straight as possible with no kerbs or steps. Gradients should be no greater than 1:20 and surfaces should be smooth and sound, concrete rather than flexible. Dropped kerbs should be installed as 	<p>The comments are noted. The case officer has studied the submitted waste management plan in light of these comments and considered the provisions acceptable.</p>

Stakeholder	Question/Comment	Response
	<p>necessary.</p> <ul style="list-style-type: none"> • If waste containers are housed, housings must be big enough to fit as many containers as are necessary to facilitate once per week collection and be high enough for lids to be open and closed where lidded containers are installed. Internal housing layouts must allow all containers to be accessed by users. Applicants can seek further advice about housings from Waste Management if required. • Waste container housings may need to be lit so as to be safe for residents and collectors to use and service during darkness hours. • All doors and pathways need to be 200mm wider than any bins that are required to pass through or over them. • If access through security gates/doors is required for household waste collection, codes, keys, transponders or any other type of access equipment must be provided to the council. No charges will be accepted by the council for equipment required to gain access. • Waste collection vehicles require height clearance of at least 4.75 metres. Roads required for access by waste collection vehicles must be constructed to withstand load bearing of up to 26 tonnes. • Adequate waste storage arrangements must be made so that waste does not need to be placed on the public highway other than immediately before it is due to be collected. Further detailed advice can be given on this where required. • Other comments: <p>Proposal: 279 x Residential units and in addition varied commercial waste units. This proposed application will require adequate provision for refuse and recycling off street at the front of the property. I would like to confirm that space must be provided for the following and the management of the placement of bins on collection day must be as stated in the application provided. Bins must be placed no further than 10 meters from the waste collection vehicle and vehicles must be able to enter and exit the site using</p>	<p>Condition 15 attached.</p>

Stakeholder	Question/Comment	Response
	<p>forward motions only. Guidance for this application has been highlighted above and below. 47 x 1100L Euro bins for refuse 28 x 1100L Euro bins for recycling 20 x 140L Food waste bins 279 x Food waste kitchen caddy's Arrangements will need to be made to ensure waste is contained at all times. Provision will need to be made for storage of receptacles within the property boundary not on the public highway. The waste collection point will need to be at the front of the property from Hale Works N17 on the estate itself. Commercial waste will need to be stored separately from residential waste The business owner will need to ensure that they have a cleansing schedule in place and that all waste is contained at all times. Commercial Business must ensure all waste produced on site are disposed of responsibly under their duty of care within Environmental Protection Act 1990. It is for the business to arrange a properly documented process for waste collection from a licensed contractor of their choice. Documentation must be kept by the business and be produced on request of an authorised Council Official under section 34 of the Act. Failure to do so may result in a fixed penalty fine or prosecution through the criminal Court system.</p> <p>The above planning application has been given a RAG traffic light status of GREEN for waste storage and collection if the guidance above is followed and the management of the waste is carried out as stated within the application waste management plan.</p>	
Building Control	<p>I have read the fire strategy extract and agree with Andrews comment below, although what they have suggested does need to be discussed with us, but will comply. Of more interest however is the lack of information they provide with regard to external fire spread – they indicate compliance with unprotected areas, but give no indication of cladding material used, fire stopping etc.</p> <p>Further comments:</p>	<p>Comments noted. Further information on cladding will be sought and secured as part of condition 5.</p>

Stakeholder	Question/Comment	Response
	<p>I think that in light of the current circumstances, it would be prudent to ask what the cladding will be. They will (should) just come back and advise that the cladding will have been tested and have a BR135 report to show full compliance as a total system.</p>	
<p>Wind Assessment Consultant</p>	<p>Report Conclusions:</p> <p>In summary, this review highlights the following:</p> <p>Overall, the methodology, as described within the Environmental Statement and accompanying Technical Appendix 9.1, is suitable in assessing the expected wind microclimate in and around the proposed development.</p> <p>The results for all configurations are what would typically be expected for the site in question, the geometry of the proposed development and cumulative schemes. In regards to the cumulative schemes, a list of the cumulatives included within the wind tunnel tests should be provided.</p> <p>Mitigation measures have been suggested (in general terms within the Environmental Statement and more specifically for typical aerodynamic effects in appendix G and I of Technical Appendix 9.1) for unacceptable entrances and long term seating areas. However, the locations and specific dimensions of the mitigation has not been stated – only what would typically be used for these winder than desired locations. Furthermore, it is not stated whether these mitigation measures have been committed to by the developer and if they will be wind tunnel tested in order to assess their effectiveness</p> <p>It is noted that the LBH’s requirement to include climate change into the cumulative scenario wind assessment is unique, the approach used by the BRE is deemed sensible; however, it is the reviewer’s professional opinion that this may not be an accurate representation of the cumulative wind</p>	<p>Comments noted. Applicant has provided a detailed wind mitigation strategy in response to these comments. Furthermore, condition 10 is included.</p>

Stakeholder	Question/Comment	Response
	<p>microclimate.</p> <p>Technical Appendix 9.1 provides more detail on the methodology and results obtained from the study, alongside a graphical presentation of the results. It would be beneficial to include the graphically presented plots within the Environmental Statement for ease of reference.</p> <p>The comments in his report are based upon this reviewer's understanding/interpretation of the Applicant's presentation.</p> <p>Additional Comments:</p> <p>The consultant is stating that the proposed development has unacceptable winds when tested in the context of the existing surrounding buildings, however that once the future consented buildings are constructed these locations become comfortable. I agree that this is the case. This means that the proposal not to mitigate these uncomfortable winds is only acceptable if we are certain that the future consented buildings will be completed ahead of the proposed development.</p> <p>Further Additional Comments:</p> <p>If this is only a fire exit then we would consider this reasonable.</p> <p>With regards to outdoor seating, typically it is assumed that people won't expect to sit outside during the winter months due to the poor weather. The only exception to this would be locations where it is intended to locate a Christmas market.</p>	
Tottenham Team	No comments received.	Noted.

Stakeholder	Question/Comment	Response
Arboricultural Officer	<p>I would support their proposed species selection for new tree planting, as it is line with the Councils Tree Strategy, and also the proposed size of tree at time of planting, which would provide immediate impact.</p> <p>Additional comments: The proposed new podium roof is a welcome addition that provides a new amenity planting space. It will create a new flora rich habitat for invertebrates and birds that will increase local biodiversity.</p>	<p>Comments noted. Condition 9 included for tree planting and landscaping.</p>

Stakeholder	Question/Comment	Response
Education	<p>Hale Village is in our Planning Area 4, close to the Waltham Forest border.</p> <p>According to the latest 2017 School Place Planning report (attached), we are projecting a deficit of primary school places by 2023/24 of around 1 form of entry (-20) growing to 3-4 forms of entry (-103) by 2026/27– see pages 37-40 for more detail.</p> <p>Secondary projections are done borough wide rather than at planning area level and here we are projecting a deficit of Year 7 places (secondary transfer) by 2019/20 equivalent to 1 form of entry (-19) building to a peak of 5-6 forms of entry (-161).</p> <p>Additional comments:</p> <p>Primary The Primary places issue is currently less pressing since across the borough as a whole we are forecast to have a surplus of places – we are looking to reduce rather than increase capacity. Obviously this isn't in the case in Planning Area 4 but as pupil place projections are fluid and subject to change we aren't specifically looking to boost reception places yet.</p> <p>Secondary With regard to secondary place planning, I've adapted a recent response to a Members Enquiry sent in September as it covers much the same ground:</p> <p>School place planners in Haringey have been aware of the projected need for additional capacity in its secondary year 7 cohort for a number of years as a result of the school roll projections for our borough that are reported in our annual <u>School Place Planning report</u>.</p>	<p>Comments noted.</p>

Stakeholder	Question/Comment	Response
	<p>Through judicious planning of places, together with the addition of a new secondary school in the borough in the last five years, we have increased the total number of places in Year 7 (secondary transfer) from 2,357 (2013/14) to 2,628 (2017,18) – equivalent to an additional nine forms of entry (271 places). However, even allowing for these increases we still project a shortfall of -19 places by 2019/20 rising to a peak of -161 places by 2023/24.</p> <p>To address this further deficit of places we have had initial conversations with the secondary Head teachers of our community schools (Highgate Wood, Park View School, Hornsey School for Girls and Gladesmore Community School) about how additional capacity <i>might</i> be achieved, and these conversations are reflected in a <u>Cabinet report</u> dating from July 2017. We continue to maintain a dialogue with all of our secondary schools to establish how we can provide further additional capacity through the provision of one-off or ‘bulge’ classes.</p> <p>While the Local Authority can only provide additional capacity in the following community schools: Gladesmore School, Hornsey School for Girls, Highgate Wood School, Park View School, we do also have an open and regular dialogue with our academy and foundation schools to effect sufficiency of places.</p> <p>On a wider scale, councils across London are working to boosting capacity in their secondary schools and we liaise quarterly with other local authorities in north London and beyond to take account of their plans to increase capacity and ensure that our approaches are joined up. Further information on how additional capacity is being planned in London can be found in the London Councils report, <u>Do the Maths 2017</u>.</p>	
Licensing	I have no comments from a licensing perspective at this time.	Comments noted.

Stakeholder	Question/Comment	Response											
Noise Specialist	<p>I have examined the Noise and Vibration Impact Assessment (Ref 176001-AC-R001) dated 27th June 2017 authorised by Romill Bettany of Optimise in response to the proposed development.</p> <p>This mixed development will fall within the Hale Village Master Plan and lies in close proximity to the busy (A503) Ferry Lane Road and Tottenham Hale Railway Station. The development will be constructed directly above the northbound London Underground Victoria Line tunnel.</p> <p>There is no objection made in principle to this application, however the following conditions shall apply;</p> <p>Internal Noise Levels within Residential Units (in accordance with BS8233:2014)</p> <table border="1" data-bbox="533 826 1644 1054"> <thead> <tr> <th data-bbox="533 826 902 863">Time</th> <th data-bbox="902 826 1252 863">Area</th> <th data-bbox="1252 826 1644 863">Maximum Noise level</th> </tr> </thead> <tbody> <tr> <td data-bbox="533 863 902 978" rowspan="2">Daytime Noise 7am – 11pm</td> <td data-bbox="902 863 1252 938">Living rooms and Bedrooms</td> <td data-bbox="1252 863 1644 938">35dB(A)</td> </tr> <tr> <td data-bbox="902 938 1252 978">Dining Room/Area</td> <td data-bbox="1252 938 1644 978">40dB(A)</td> </tr> <tr> <td data-bbox="533 978 902 1054">Night Time Noise 11pm -7am</td> <td data-bbox="902 978 1252 1054">Bedrooms</td> <td data-bbox="1252 978 1644 1054">30dB(A)</td> </tr> </tbody> </table> <p>With no individual noise events to exceed 45dB L_{Amax} (measured with F time weighting) in bedrooms with windows closed between 23.00hrs - 07.00hrs.</p> <p>Sound Insulation between Residential and Commercial Properties. Sound insulation between the commercial premises on the ground floor and residential units on level 1 shall be provided and installed in the premises in accordance with a scheme submitted to and approved by the Local Planning Authority before the commencement of any building works.</p>	Time	Area	Maximum Noise level	Daytime Noise 7am – 11pm	Living rooms and Bedrooms	35dB(A)	Dining Room/Area	40dB(A)	Night Time Noise 11pm -7am	Bedrooms	30dB(A)	<p>Comments noted. Conditions 15-19 included.</p>
Time	Area	Maximum Noise level											
Daytime Noise 7am – 11pm	Living rooms and Bedrooms	35dB(A)											
	Dining Room/Area	40dB(A)											
Night Time Noise 11pm -7am	Bedrooms	30dB(A)											

Stakeholder	Question/Comment	Response
	<p>Requirement: The applicant shall submit respective schemes of Sound Insulation (glazing and separating floor) to the Local Planning Authority for approval before the commencement of any building works.</p> <p>Plant Noise Design Criteria Noise arising from the use of any plant and associated equipment <u>shall not exceed</u> the existing background noise level ($L_{A90\ 15mins}$) when measures 1 metre external ($L_{Aeq\ 15mins}$) from the nearest residential or noise sensitive premises.</p> <p>Vibration and Ground-Borne Noise The results from the Vibration Assessment undertaken in accordance with BS6472:2008 indicate that “Adverse Comments are unlikely”. Whilst this was the case for measurement locations B, C and D, results for measurement location A which is positioned closer to and directly above the LU Victoria Line tunnel has not been included in this report.</p> <p>The report confirmed that 4% of the total residential units will exceed the ground-borne noise criterion and further mitigation measures will be required.</p> <p>Requirement: The applicant shall submit evidence that the ground-borne noise criterion will not be exceeded within any of the residential units. This submission shall be approved by the Local Authority before the occupancy of the residential units.</p>	
EXTERNAL		
Greater London Authority	London Plan policies on Opportunity Areas; affordable housing; housing; urban design and tall buildings; inclusive design; transport; and climate change are relevant to this application. Whilst the principle of the proposal is	Comments noted.

Stakeholder	Question/Comment	Response
	<p>supported in strategic planning terms, further information is required regarding the following issues before it can be confirmed that the proposal complies with the London Plan:</p> <ul style="list-style-type: none"> • Affordable housing: 15% (by habitable room) of the total units, or 48% of the uplift, made up of 100% intermediate shared ownership. GLA officers will work with the Council and the applicant to maximise affordable housing provision, and in the context of the Mayor’s SPG, will robustly scrutinise the viability assessment, including the affordability of shared ownership units and potential grant funding. Early and late viability reviews must be secured in accordance with the SPG. • Urban design and tall buildings: The applicant should replace a proportion of those units that have additional internalised space, with winter gardens. • Transport: The applicant should consider an increased level of Blue Badge parking; increase the cycle parking to London Plan standard; and reconsider the layout of basement cycle storage. The section 106 obligations relating to the delivery of the public realm should ensure that the applicant is required to work with TfL to enable the pedestrian footbridge to be linked to the site. Crossrail 2 safeguarding, a full delivery servicing plan, and a construction logistics plan should be secured by condition. • Climate change: Further information has been requested from the applicant, including the potential for on-site renewables, which is required before it can be confirmed that the application meets London Plan requirements. <p>Additional comments – Air Quality:</p> <p>Summary: The development proposes to link to the nearby energy centre, which would require the activation of a currently unused biomass system and</p>	

Stakeholder	Question/Comment	Response
	<p>the possible addition of a new 1 MW gas fired CHP plant, which would have significant impacts on both the proposed development and surrounding residential properties. The applicant's assessment also suggests that the development will not meet Air Quality Neutral requirements for building emissions. The separate transport emissions benchmark will be met. London Plan Policy: The development does not meet the requirements London Plan Policy 7.14</p> <p>Recommendations: 1. The proposed mitigation of the significant air quality impacts from the upgraded energy centre only affects the proposed development itself, impacts on surrounding developments are not addressed. This is not sufficient. Furthermore, the modelled emission rates for the existing and proposed new/newly activated elements of the energy centre do not meet the limits set out in the GLA SPG "Sustainable Design and Construction" The applicant should investigate the steps necessary for, at least the new or reactivated elements of the energy centre to be brought up to the required standards (ideally the gas boilers should also be brought up to current standards as well). This could be done either by retro fitting abatement equipment or by a different choice of installed unit (for the new parts of the energy centre). The modelling exercise should then be re-done with the new specification of equipment to demonstrate whether the significant impacts have been removed. We would expect that by using equipment that meets our emissions limits the majority of the impacts will be removed, and that the Air Quality Neutral requirement should be met. Emissions characteristics and, if necessary retro-fitted abatement equipment, should be secured by condition or s106 agreement. 2. In order to comply with London Plan policy 7.14(b) and the associated SPG "Control of Dust and Emissions during Construction and Demolition" compliance with the Non-Road Mobile Machinery Low Emission Zone must be secured by condition. The following example condition, or similar wording, could be used:</p>	

Stakeholder	Question/Comment	Response
	<p>Condition: 1) All Non Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall meet at least Stage IIIA of EU Directive 97/68/EC (as amended) if in use before 1 September 2020 or Stage IIIB of the directive if in use on 1 September 2020 or later. 2) If NRMM meeting the relevant Stage in paragraph 1 above is not available the requirement may be met using the following techniques: Reorganisation of NRMM fleet Replacing equipment (with new or second hand equipment which meets the policy) Retrofit abatement technologies Re-engining This is subject to the local planning authority's prior written consent. 3) If NRMM meeting the policy in paragraph 2 above is not available every effort should be made to use the least polluting equipment available including retrofitting technologies to reduce particulate emissions. This is subject to the local planning authority's prior written consent. Unless it complies with the above standards under paragraphs 1, 2 or 3 above, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at https://nrmm.london/</p> <p>Reason: To protect local amenity and air quality in accordance with [local policy] and London Plan policies 5.3 and 7.14</p> <p>Additional comments – Energy:</p> <p>The applicant has proposed to use the SunGuard SN 70/37 glass, or equivalent, for the apartments on the scheme. It has been confirmed that the glazing has a visible light transmission of 70% and a corresponding G value (solar transmission) of 37%, which marginally exceeds the performance requirements currently assumed in the Overheating Study. Nothing further required.</p>	

Stakeholder	Question/Comment	Response
	The be lean BRUKL has been provided; nothing further outstanding.	
Planning Casework Unit	I confirm that we have no comments to make on the environmental statement.	Noted.
Environment Agency	<p>Thank you for consulting the Environment Agency.</p> <p>We have no comments on this application but wish to offer the following advice in relation to flood risk and contaminated land.</p> <p>Flood Risk The application site lies within Flood Zone 2 defined by Table 1 of the National Planning Practice Guidance, Flood Risk and Costal Change (section 25) as having medium probability of flooding (from rivers or sea).</p> <p>We have produced a series of standard comments for local planning authorities (LPAs) and planning applicants to refer to on 'lower risk' development proposals where flood risk is an issue. These comments replace the requirement for direct case by case consultation with us. This planning application sits within this category. Our standard comments are known as Flood Risk Standing Advice (FRSA). We recommend that you view this standing advice in full to obtain the relevant comment or guidance for this proposal.</p> <p>Contaminated Land We are currently operating with a significantly reduced resource in our Groundwater and Contaminated Land Team in Hertfordshire and North London Area. This has regrettably affected our ability to respond to Local Planning Authorities for some planning consultations. We are not providing specific advice on the risks to controlled waters for this site as we need to concentrate our local resources on the highest risk proposals.</p>	Comments are noted.

Stakeholder	Question/Comment	Response
	<p>We recommend however that the requirements of the National Planning Policy Framework and National Planning Policy Guidance (NPPG) are still followed. This means that all risks to groundwater and surface waters from contamination need to be identified so that appropriate remedial action can be taken. This should be additional to the risk to human health that your Environmental Health Department will be looking at.</p> <p>We expect reports and Risk Assessments to be prepared in line with our 'Groundwater protection: Principles and practice' document (commonly referred to as GP3) and CLR11 (Model Procedures for the Management of Land Contamination).</p> <p>In order to protect groundwater quality from further deterioration:</p> <ul style="list-style-type: none"> - No infiltration based sustainable drainage systems should be constructed on land affected by contamination as contaminants can remobilise and cause groundwater pollution. - Piling or any other foundation designs using penetrative methods should not cause preferential pathways for contaminants to migrate to groundwater and cause pollution. <p>The applicant should refer to the following sources of information and advice in dealing with land affected by contamination, especially with respect to protection of the groundwater beneath the site:</p> <ul style="list-style-type: none"> - From www.gov.uk: <ul style="list-style-type: none"> <input type="checkbox"/> Groundwater Protection: Principles and Practice (August 2013) <input type="checkbox"/> Our Technical Guidance Pages, which includes links to CLR11 (Model Procedures for the Management of Land Contamination) and GPLC (Environment Agency's Guiding Principles for Land Contamination) in the 'overarching documents' section <input type="checkbox"/> Use MCERTS accredited methods for testing contaminated soils at the site - From the National Planning Practice Guidance: 	

Stakeholder	Question/Comment	Response
	<p><input type="checkbox"/> Land affected by contamination</p> <p>- British Standards when investigating potentially contaminated sites and groundwater:</p> <ul style="list-style-type: none"> <input type="checkbox"/> BS 5930: 1999+A2:2010 Code of practice for site investigations <input type="checkbox"/> BS 10175:2011 Code of practice for investigation of potentially contaminated sites <input type="checkbox"/> BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points <input type="checkbox"/> BS ISO 5667-11:2009 Water quality. Sampling. Guidance on sampling of groundwaters <p>All investigations of land potentially affected by contamination should be carried out by or under the direction of a suitably qualified competent person. The competent person would normally be expected to be a chartered member of an appropriate body (such as the Institution of Civil Engineers, Geological Society of London, Royal Institution of Chartered Surveyors, Institution of Environmental Management) and also have relevant experience of investigating contaminated sites.</p> <p>If you have any questions please contact me on 0203 025 5486 or email me at HNL SustainablePlaces@environment-agency.gov.uk, quoting the reference at the beginning of this letter.</p>	
Thames Water	<p>Waste Comments</p> <p>Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the</p>	<p>Observations have been taken into account and condition 19 and informatives included</p>

Stakeholder	Question/Comment	Response
	<p>boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. The contact number is 0800 009 3921. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.</p> <p>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 proximity to underground sewerage utility infrastructure.</p> <p>Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.</p> <p>'We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any</p>	

Stakeholder	Question/Comment	Response
	<p>discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality."</p> <p>Water Comments</p> <p>The existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development. Thames Water therefore recommend the following condition be imposed:</p> <p>Development should not be commenced until: Impact studies of the existing water supply infrastructure have been submitted to, and approved in writing by, the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point. Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand.</p> <p>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 water 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 proximity to underground water utility</p>	

Stakeholder	Question/Comment	Response
	<p>infrastructure.</p> <p>Piling has the potential to impact on local underground water utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.</p> <p>Thames Water recommend the following informative be attached to any planning permission: There are large water mains adjacent to the proposed development. Thames Water will not allow any building within 5 metres of them and will require 24 hours access for maintenance purposes. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.</p> <p>Supplementary Comments</p> <p>Proposed in drainage strategy connection points are not to the public sewer hence it is the responsibility of a developer to make proper provision with sewer owner. Based on drawing L16007/DS/201Rev P1 we believe that foul water will be connected to public sewer via private sewer and discharge at manhole TQ3489661A.</p> <p>We have no objection to foul water sewer proposal based on gravity connection. Regarding surface water we have no comments as entire system, as presented on drawing L16007/DS/201Rev P1, does not belong to Thames Water. Private owner agreement should be arranged.</p> <p>Additional Comments:</p> <p>Further to your enquiry below Thames Water can confirm that we would have no issue with water capacity and rescind the impact study condition, although</p>	

Stakeholder	Question/Comment	Response
	<p>the piling condition and trunk mains proximity conditions should still remain as the development is close to our network.</p> <p>Additional Comments 2:</p> <p>Please submit a single piling layout plan clearly indicating the locations of all piles across the development site that are to be installed and indicate the minimum horizontal separation between the proposed piles and all Thames Water assets in separate detailed drawings. This plan should also show the positions of the piles in relation to Thames Water assets and local topography such as roads, waterways (please include road names), existing buildings and/or any other notable features. Do not include other assets in the area on the plan drawings. Please ensure that all drawings have a scale bar. If any basements are intended to be constructed as part of the development, please clearly indicate the location and footprint and produce separate details with cross sectional views showing depths and location in relation to TW assets. Assume that the cover to the crown of the existing raw water main is 6.74m AOD.</p> <p>Without a drawing showing the clearances between the face of the piles/ other type of foundations and confirmed location of the Thames Water assets the condition cannot be discharged.</p> <p>Please see the guidance document 'Working Near Our Assets' available at the following link for more details on Thames Water policy with regards to piling, demolition, excavation and abnormal loading: (available online at https://developers.thameswater.co.uk/developing-a-large-site/planning-yourdevelopment/working-near-or-diverting-our-pipes).</p> <p>Plans of Thames Water apparatus can be obtained through our website at www.thameswaterpropertysearches.co.uk. Please contact Developer Services</p>	

Stakeholder	Question/Comment	Response
	<p>if you wish to discuss further (by email at DSCLX2039@thameswater.co.uk). Please use the following reference in all future correspondence: DTS54484</p>	
<p>Metropolitan Police</p>	<p>With reference the above application I have now had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on available information, including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.</p> <p>1.0 It is my professional opinion that crime prevention and community safety are material considerations, because of the proposed use, design, layout and location of the development proposed.</p> <p>1.1 To ensure the delivery of a safer development in line with Local Development Framework policies SP11 (See Appendix for details of these policies), I have highlighted some of my main areas of concern in Section 2 and I have recommended the attaching of a suitably worded condition, together with an informative.</p> <p>Recommendations:</p> <p>2.0 I can confirm that I have not met with the project architects or agents to discuss the intention around Secured by Design (SbD) as laid out in L.B. Haringey' SP11 policy, The London Plan and the project planning statement, (s3.3.37).</p> <p>Crime analysis and research with commercial outlets & CCTV control centre on the the Hale village development indicates that, Street crime, such as Theft from the person, Theft Snatch, Fraud (ATM), Alcohol/Drugs misuse & Anti Social Behaviour (ASB) are the main types of crime that affect the residents on a regular basis. Having attended the location & noted the site</p>	<p>Observations have been taken into account and amendments to the plans made where possible. Condition 21 included.</p>

Stakeholder	Question/Comment	Response
	<p>perimeter hoarding position and current CCTV positions I am concerned pre & post construction will hugely effect the current coverage, particularly to the public walkway off Ferry Lane and adjacent to Tesco leading to a rise in crime on this area.</p> <p>I have reviewed the planning application and due to the areas of concern (See 2.1 below) request the completion of the relevant SbD application forms at the earliest opportunity.</p> <p>Following consultation with the MPS Designing Out Crime team, the project has the potential to achieve a Secured by Design Gold Award & Commercial Award.</p> <p>Concerns: 2.1 In summary I have site specific concerns in relation to the following items:</p> <ul style="list-style-type: none"> • Community/Amenity space • Basement Car parking undercroft/s • Perimeter treatments • Access Control • Postal strategy • Refuse Store/s • Bicycle Stores • Compartmentalisation • Physical Security • External Lighting • Vehicle Delivery strategy • CCTV (Public Realm) <p>Community Safety – Secured by Design Conditions:</p>	

Stakeholder	Question/Comment	Response
	<p>3.0 (1) I request that prior to carrying out above grade 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 full Secured by Design' Accreditation.</p> <p>The development shall only be carried out in accordance with the approved details.</p> <p>(2) 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.</p> <p>Community Safety - Informative:</p> <p>3.1 In aiming to satisfy the condition the applicant should seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs). The services of MPS DOCOs are available free of charge and can be contacted via <i>docomailbox.ne@met.police.uk</i> or 0208 217 3813.</p> <p>Crime Figures:</p> <p>4.0 Crime and disorder is a factor for consideration with this application. Crime data affecting this application are highlighted in appendix 2 below.</p> <p>Legislation & SBD Guidance:</p> <p>5.0 The LB Haringey LPD Core strategy requires all developments to demonstrate and apply the principles and practices of the Secured by Design (SBD) scheme. The measures recommended below are not intended to be prescriptive but to provide a suitable direction for the development. As a matter of course, all due consideration should be given to the SBD 'Homes 2016' guide (available online via</p>	

Stakeholder	Question/Comment	Response
	<p data-bbox="533 236 1400 268">http://www.securedbydesign.com/professionals/guides.aspx)</p> <p data-bbox="533 312 1644 528">Crime prevention and community safety are material considerations. If the L.B. Haringey are to consider granting consent, I would ask that the condition(s) and informative detailed above are attached. This is to mitigate the impact and deliver a safer development in line with national, regional and local planning policies. I would also like to draw your attention to Section 17 CDA 1988 and the NPPF, (See appendix) in supporting my recommendations.</p> <p data-bbox="533 568 1630 783">5.1 Whilst I accept that with the introduction of Approved Document Q of the Building Regulations from 1st October it is no longer appropriate for local authorities to attach planning conditions relating to technical door and window standards I would encourage the planning authority to note the experience gained by the UK police service over the past 26 years in this specific subject area.</p> <p data-bbox="533 823 1637 1190">That experience has led to the provision of a physical security requirement considered to be more consistent than that set out within Approved Document Q of the Building Regulations (England); specifically the recognition of products that have been tested to the relevant security standards but crucially are also fully certificated by an independent third party, accredited by UKAS (Notified Body). This provides assurance that products have been produced under a controlled manufacturing environment in accordance with the specifiers aims and minimises misrepresentation of the products by unscrupulous manufacturers/suppliers and leads to the delivery, on site, of a more secure product.</p> <p data-bbox="533 1230 1626 1342">I would therefore request that the benefits of certified products be pointed out to applicants and that the Local Authority encourages assessment for this application.</p>	

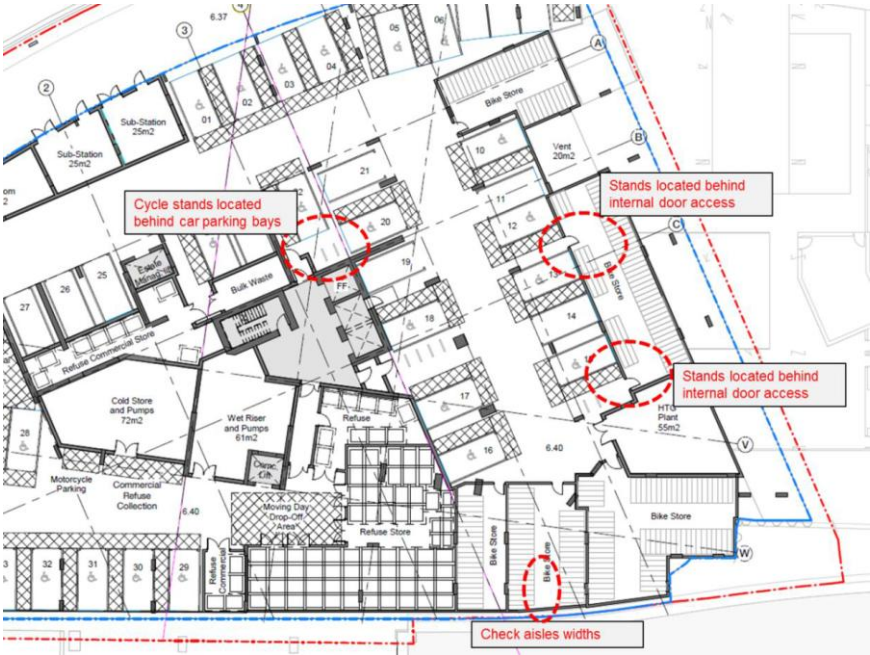
Stakeholder	Question/Comment	Response
	<p>For a complete explanation of certified products please refer to the Secured by Design guidance documents which can be found on the website. www.securedbydesign.com .</p> <p>Conclusion:</p> <p>I would ask that my interest in this planning application is noted and that I am kept apprised of developments. Additionally, I would welcome the opportunity of sitting in on any meeting you might have concerning this proposal.</p> <p>Should the Planning Authority require clarification of any of the above comments please do not hesitate to contact me at the above office.</p>	
London Fire Service	<p><i>The Service originally objected but had not seen the Fire Safety Strategy document submitted. After this was pointed out the following comments were provided:</i></p> <p>The Brigade is satisfied with the proposals for fire fighting access.</p> <p>This Authority strongly recommends that sprinklers are considered for new developments and major alterations to existing premises, particularly where the proposals relate to schools and care homes. Sprinkler systems installed in buildings can significantly reduce the damage caused by fire and the consequential cost to businesses and housing providers, and can reduce the risk to life. The Brigade opinion is that there are opportunities for developers and building owners to install sprinkler systems in order to save money, save property and protect the lives of occupier. Please note that it is our policy to regularly advise our elected Members about how many cases there have been where we have recommended sprinklers and what the outcomes of those recommendations were. These quarterly reports to our Members are public documents which are available on our website.</p>	Comments noted.

Stakeholder	Question/Comment	Response
Transport for London	<p>I write following receipt of the Transport Assessment (TA) dated 28 June 2017 submitted in support of the above planning application to the London Borough of Haringey.</p> <p>The following comments represent the views of Transport for London officers and are made on a “without prejudice” basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. These comments also do not necessarily represent the views of the Greater London Authority.</p> <p>Site description</p> <p>The site is bounded by A503 Ferry Lane to the south, and Daneland Walk to the north and west, with rail lines just beyond to the west. The nearest section of the Transport for London Road Network (TLRN) is the Hale / Broad Lane junction, approximately 200 metres to the west of the site. The nearest section of the Strategic Road Network (SRN) is the A1010 High Road, approximately 1.4km to the north-west of the site. The nearest station is Tottenham Hale, which is approximately 100 metres to the west of the site, providing access to rail services between Liverpool Street, Cambridge and Stansted Airport and underground services on the Victoria Line. With the forthcoming redevelopment of the station, there will be a new pedestrian footbridge linking directly into Hale Village with a new station entrance opposite the SW Plot Hale Village development site. A taxi rank and bus station are also located at Tottenham Hale, with the latter providing access to six bus services. The nearest bus stops to the site are the pair of Mill Mead Road bus stops that are located just south of the site on A503 Ferry Lane: these stops are served by routes 123, 230, N73 and W4. Due to the aforementioned public transport connections, the Public Transport Accessibility Level (PTAL) of the site ranges from 5-6a (on a scale of 1 to 6 where 6 is excellent and 1 is very poor).</p>	<p>Comments noted and will be dealt with by conditions 23, 26 and 27 and legal agreement as appropriate.</p>

Stakeholder	Question/Comment	Response
	<p>Proposed development TfL understands that the proposals are for a new mixed use development comprising:</p> <ul style="list-style-type: none"> □ 1,588sqm commercial space (flexible A1/A3/A4/B1/D1 uses); □ 279 residential units. <p>Trip generation The approach to trip generation forecasting is acceptable and in accordance with our guidance. TRICS has been used to forecast the development site trip generation and local census data has been used to forecast how these trips will be split between different modes of transport, whilst taking account of the low car nature of the development and excellent public transport links. We have reviewed the trip generation forecasts, including modal splits, and we find these forecasts to be reasonable.</p> <p>Car Parking A total of 36 car parking spaces are proposed, which we find an acceptable number. A total of 24 of these 36 car parking spaces are Blue Badge spaces, which equates to one Blue Badge space for 8.6 per cent of the proposed residential units. This represents an under provision against the London Plan Policy 6.13 requirement for each wheelchair accessible unit to have an accessible parking space (based on the assumption that 10 per cent of the residential units will be accessible). We therefore ask that the applicant investigates whether the accessible parking quantum could be revised upwards within the constraints of the site.</p> <p>Highways impact The development is forecast to generate 24 morning peak vehicle trips and 15 evening peak vehicle trips. We do not have a concern regarding the highways impact of these vehicle trip numbers.</p>	

Stakeholder	Question/Comment	Response
	<p>Buses The development is forecast to generate 51 bus trips in the morning peak and 50 bus trips in the evening peak. TfL is satisfied that, when distributed across the local bus network, these trips will not have a material impact on any individual bus route and therefore no bus contribution is sought.</p> <p>Walking The PERS audit does not identify any opportunities to improve the pedestrian environment. We encourage the Council to consider whether the local pedestrian network could be improved as part of the TfL Healthy Streets approach to promoting walking to/from the site.</p> <p>We consider that there is the opportunity for this development to deliver Legible London signage in coordination with other development in the area. We would welcome further discussion with the Council and the applicant on this matter.</p> <p>Cycling Assessment of local cycling conditions. The applicant has identified cycle routes in close vicinity of the site and potential cycle routes to the site. The applicant has not however provided an assessment of the quality of these routes neither severance issues for those cycling to/from the site. Therefore, we recommend that the Council request the applicant provide a Cycling Level of Service (CLoS) analysis of key links and junctions in close vicinity of the site. Such an assessment would help to identify the key safety issues for those cycling to/from the site, as well as possible improvements to the local cycling environment. The scope of the CLoS analysis should also include routes to key local cycle destinations.</p> <p>Access to / from and through the site</p>	

Stakeholder	Question/Comment	Response
	<p>In line with London Plan Policy 6.9, the applicant should clarify which parts of the site can be cycled through. Cyclists should be able to ride up to the entrance of cycle parking storage areas (i.e. not be required to dismount). This is an accessibility requirement for those using cycles as mobility aids as well as a practical recommendation.</p> <p>Cycle parking numbers A total of 438 long stay and 7 short stay cycle parking spaces are proposed for the residential element of the development. We are satisfied that these numbers adhere to the London Plan minimum standards. A total of 10 long stay and 28 short stay cycle parking spaces are also proposed for the flexible commercial element of the development. It is not possible for us to assess whether these numbers adhere to the London Plan minimum standards without further disaggregation of the land use. Further clarification is sought from the applicant.</p> <p>Cycle parking location and access Residential long-stay cycle parking is proposed at the basement level and is distributed across five storage rooms. Access to the basement level is made via a ramp and via a lift. The basement plan submitted raises a series of concerns. The internal layout of some of the storage rooms suggests that aisles may be too narrow for users to manoeuvre and park their bicycles without blocking the access to or through the facility. The location of two-tier stands behind the internal access doors is similarly a concern, as the operation of the upper level of the two-tier rack is likely to restrict access to the facility. The location of Sheffield stands in the basement also raises concerns. Some of the stands are likely to block/restrict access to the cycle storage room due to their alignment with the main doors. Additionally, some spaces are located behind car park bays and therefore may have restricted access.</p>	

Stakeholder	Question/Comment	Response
	<p>We welcome the provision of short-stay cycle parking in the public realm. However, we would recommend a more even distribution across the site.</p>  <p>Type of cycle parking The information submitted suggests that there will be a mix of two-tier racks and Sheffield stands. We welcome that 5% of all spaces are to be capable of accommodating larger cycles. Two-tier racks should have a mechanically or pneumatically assisted system for accessing the upper level, as many people find using these spaces difficult. The product must also allow for double-locking. Minimum aisle widths, as set out in the London Cycling Design Standards and recommended by manufacturers, must be met in order for these stands to be usable.</p>	

Stakeholder	Question/Comment	Response
	<p>London Underground capacity The development proposal in isolation does not give TfL concern regarding Victoria Line capacity at Tottenham Hale.</p> <p>London Underground infrastructure The developer is working with London Underground engineers on this scheme and should continue to do so.</p> <p>London Underground infrastructure You will be aware that the proposed development is adjacent to and above London Underground infrastructure. Accordingly, the applicant is working with London Underground engineers on this scheme and should continue to do so.</p> <p>The interface between the development and the new Hale Village link into the station, referred to above, is important – this link will use the existing station footbridge which will be extended to connect into the Hale Village development. This will provide step-free access into the station from Hale Village, enhancing station access for residents and visitors. In addition, the link will provide a step-free route through the station for non-station users, providing a direct and convenient connection to Tottenham bus station and the emerging district centre.</p> <p>We request that through the S106 agreement the developer is obliged to work with TfL to facilitate the delivery of the Tottenham Hale Station – Hale Village link.</p> <p>Crossrail 2 Tottenham Hale station would become a key interchange station on the Crossrail 2 route, and would require improvement works to accommodate the new Crossrail 2 services. These plans are still in the early stages of</p>	

Stakeholder	Question/Comment	Response
	<p>development, but proposals would include platform and station works together with track realignment. The proposals would be adjacent to the limits of land subject to consultation by the Crossrail 2 Safeguarding Direction. It is therefore essential to ensure that both projects can be delivered without one prejudicing the other.</p> <p>If the Council, in its capacity as Local Planning Authority, is minded to grant planning permission, TfL who have responsibility for administering the Crossrail 2 Safeguarding Directions requests that the following condition is imposed: “None of the development hereby permitted shall be commenced until detailed design and construction method statements for all of the ground floor structures, foundations and basements and for any other structures below ground level, including piling and any other temporary or permanent installations and for ground investigations, have been submitted to and approved in writing by the Local Planning Authority which accommodate the proposed location of the Crossrail 2 structures including temporary works.”</p> <p>The application site would be adjacent to a major Crossrail 2 worksite and therefore TfL advises Haringey Council that: the applicants are encouraged to engage with Crossrail 2 in respect of the foundation design for the proposals in the course of preparing detailed design and method statements and can be contacted at crossrail2@tfl.gov.uk; the applicant and Local Planning Authority should also be aware that the site is adjacent to a proposed major Crossrail 2 worksite and it is recommended that the design of the proposals include noise mitigation measures particularly to windows and openings to the residential units.</p> <p>Deliveries TfL has reviewed the Delivery and Servicing Management Plan and find it to be satisfactory.</p>	

Stakeholder	Question/Comment	Response
	<p>TfL expects that the full delivery servicing plan (DSP) be secured by planning condition, to comply with London Plan policy 6.14 “Freight” to rationalise and manage servicing activities for the proposal.</p> <p>Construction TfL has reviewed the Framework Construction Logistics Plan (CLP) and find it to be satisfactory.</p> <p>The CLP should be secured by pre commencement condition.</p> <p>Travel Plan The Travel Plan mode share targets should flow from the trip generation forecasts as set out in the transport assessment i.e. the trip generation forecasts in the TA should represent what the applicant considers a realistic forecast for year 1, with year 3 and 5 forecasts representing change from year 1 (change from the TA forecast). TfL asks that the Travel Plan targets are adjusted to follow this logical, transparent structure.</p> <p>TfL welcomes the applicant’s commitment to appoint a Travel Plan Co-ordinator to take control of the development and management of the Travel Plan, and to ensure its delivery. The Travel Plan should be secured through the Section 106 agreement.</p> <p>Summary In order to comply with London Plan policies, TfL requests the following:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Where feasible, increase Blue Badge parking provision to meet the London Plan Policy 6.13 requirement; <input type="checkbox"/> Clarify cycle routes through the site in line with London Plan Policy 6.9; <input type="checkbox"/> Demonstrate that the London Plan minimum standards for non-residential cycle parking are being met (London Plan Policy 6.9); <input type="checkbox"/> Revise the design of the basement cycle parking to address TfL’s design 	

Stakeholder	Question/Comment	Response
	<p>concerns in line with London Plan Policy 6.9;</p> <ul style="list-style-type: none"> <input type="checkbox"/> That the developer works with TfL to facilitate the delivery of the Tottenham Hale Station – Hale Village link; <input type="checkbox"/> Ensure that Crossrail 2 is safeguarded by imposing the following condition: <p>“None of the development hereby permitted shall be commenced until detailed design and construction method statements for all of the ground floor structures, foundations and basements and for any other structures below ground level, including piling and any other temporary or permanent installations and for ground investigations, have been submitted to and approved in writing by the Local Planning Authority which accommodate the proposed location of the Crossrail 2 structures including temporary works.”</p> <ul style="list-style-type: none"> <input type="checkbox"/> Secure a full delivery servicing plan (DSP) by planning condition, to rationalise and manage servicing activities in accordance with London Plan policy 6.14 “Freight”; <input type="checkbox"/> Secure the CLP by pre commencement condition; <input type="checkbox"/> Secure and monitor the Travel Plan through the Section 106 agreement. <p>I trust that the above provides you with a better understanding of TfL’s current position on the planning application. Please do not hesitate to contact me if you have any questions or need clarification on any of the points raised.</p>	
Network Rail	<p>Thank you very much for consulting with Network Rail in regards to application HGY/2017/2005 and offering us the opportunity to comment, please also be advised your application has been passed onto the Crossrail2 team to review who will respond directly in due course. The developer/applicant must ensure that their proposal, both during construction and after completion of works on site, does not:</p> <ul style="list-style-type: none"> . encroach onto Network Rail land . affect the safety, operation or integrity of the company's railway and its 	<p>Comments noted. Condition 24 has been included.</p>

Stakeholder	Question/Comment	Response
	<p>infrastructure</p> <ul style="list-style-type: none"> . undermine its support zone . damage the company's infrastructure . place additional load on cuttings . adversely affect any railway land or structure . over-sail or encroach upon the air-space of any Network Rail land . cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future <p>The developer should comply with the following comments and requirements for the safe operation of the railway and the protection of Network Rail's adjoining land.</p> <p>Please see below & attached comments,</p> <p>Future maintenance</p> <p>The development must ensure that any future maintenance can be conducted solely on the applicant's land. The applicant must ensure that any construction and any subsequent maintenance can be carried out to any proposed buildings or structures without adversely affecting the safety of, or encroaching upon Network Rail's adjacent land and air-space, and therefore all/any building should be situated at least 2 metres (3m for overhead lines and third rail) from Network Rail's boundary. The reason for the 2m (3m for overhead lines and third rail) stand off requirement is to allow for construction and future maintenance of a building and without requirement for access to the operational railway environment which may not necessarily be granted or if granted subject to railway site safety requirements and special provisions with all associated railway costs charged to the applicant. Any less than 2m (3m for overhead lines and third rail) and there is a strong possibility that the applicant (and any future resident) will need to utilise Network Rail land and air-space to</p>	

Stakeholder	Question/Comment	Response
	<p>facilitate works. The applicant / resident would need to receive approval for such works from the Network Rail Asset Protection Engineer, the applicant / resident would need to submit the request at least 20 weeks before any works were due to commence on site and they would be liable for all costs (e.g. all possession costs, all site safety costs, all asset protection presence costs). However, Network Rail is not required to grant permission for any third party access to its land. No structure/building should be built hard-against Network Rail's boundary as in this case there is an even higher probability of access to Network Rail land being required to undertake any construction / maintenance works. Equally any structure/building erected hard against the boundary with Network Rail will impact adversely upon our maintenance teams' ability to maintain our boundary fencing and boundary treatments.</p> <p>Drainage No Storm/surface water or effluent should be discharged from the site or operations on the site into Network Rail's property or into Network Rail's culverts or drains except by agreement with Network Rail. 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. Proper provision must be made to accept and continue drainage discharging from Network Rail's property; full details to be submitted for approval to the Network Rail Asset Protection Engineer. Suitable foul drainage must be provided separate from Network Rail's existing drainage. Soakaways, as a means of storm/surface water disposal must not be constructed near/within 10 - 20 metres of Network Rail's boundary or at any point which could adversely affect the stability of Network Rail's property. After the completion and occupation of the development, any new or exacerbated problems attributable to the new development shall be investigated and remedied at the applicants' expense.</p> <p>Plant & Materials</p>	

Stakeholder	Question/Comment	Response
	<p>All operations, including the use of cranes or other mechanical plant working adjacent to Network Rail's property, must at all times be carried out in a "fail safe" manner such that in the event of mishandling, collapse or failure, no plant or materials are capable of falling within 3.0m of the boundary with Network Rail.</p> <p>Scaffolding Any scaffold which is to be constructed within 10 metres of the railway boundary fence must be erected in such a manner that at no time will any poles over-sail the railway and protective netting around such scaffold must be installed. The applicant/applicant's contractor must consider if they can undertake the works and associated scaffold/access for working at height within the footprint of their property boundary.</p> <p>Piling Where vibro-compaction/displacement piling plant is to be used in development, details of the use of such machinery and a method statement should be submitted for the approval of the Network Rail's Asset Protection Engineer prior to the commencement of works and the works shall only be carried out in accordance with the approved method statement.</p> <p>Fencing In view of the nature of the development, it is essential that the developer provide (at their own expense) and thereafter maintain a substantial, trespass proof fence along the development side of the existing boundary fence, to a minimum height of 1.8 metres. The 1.8m fencing should be adjacent to the railway boundary and the developer/applicant should make provision for its future maintenance and renewal without encroachment upon Network Rail land. Network Rail's existing fencing / wall must not be removed or damaged and at no point either during construction or after works are completed on site</p>	

Stakeholder	Question/Comment	Response
	<p>should the foundations of the fencing or wall or any embankment therein, be damaged, undermined or compromised in any way. Any vegetation on Network Rail land and within Network Rail's boundary must also not be disturbed. Any fencing installed by the applicant must not prevent Network Rail from maintaining its own fencing/boundary treatment.</p> <p>Lighting Any lighting associated with the development (including vehicle lights) must not interfere with the sighting of signalling apparatus and/or train drivers vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signalling arrangements on the railway. The developers should obtain Network Rail's Asset Protection Engineer's approval of their detailed proposals regarding lighting.</p> <p>Noise and Vibration The potential for any noise/ vibration impacts caused by the proximity between the proposed development and any existing railway must be assessed in the context of the National Planning Policy Framework which holds relevant national guidance information. The current level of usage may be subject to change at any time without notification including increased frequency of trains, night time train running and heavy freight trains.</p> <p>Landscaping Where trees/shrubs are to be planted adjacent to the railway boundary these shrubs should be positioned at a minimum distance greater than their predicted mature height from the boundary. Certain broad leaf deciduous species should not be planted adjacent to the railway boundary as the species will contribute to leaf fall which will have a detrimental effect on the safety and operation of the railway. We would wish to be involved in the approval of any landscaping scheme adjacent to the railway. Where landscaping is proposed as part of an application adjacent to the railway it will be necessary for details</p>	

Stakeholder	Question/Comment	Response
	<p>of the landscaping to be known and approved to ensure it does not impact upon the railway infrastructure. Any hedge planted adjacent to Network Rail's boundary fencing for screening purposes should be so placed that when fully grown it does not damage the fencing or provide a means of scaling it. No hedge should prevent Network Rail from maintaining its boundary fencing. Lists of trees that are permitted and those that are not permitted are provided below and these should be added to any tree planting conditions:</p> <p>Permitted: Birch (Betula), Crab Apple (Malus Sylvestris), Field Maple (Acer Campestre), Bird Cherry (Prunus Padus), Wild Pear (Pyrus Communis), Fir Trees - Pines (Pinus), Hawthorne (Cretaegus), Mountain Ash - Whitebeams (Sorbus), False Acacia (Robinia), Willow Shrubs (Shrubby Salix), Thuja Plicatat</p> <p>"Zebrina" Not Permitted: Alder (Alnus Glutinosa), Aspen - Poplar (Populus), Beech (Fagus Sylvatica), Wild Cherry (Prunus Avium), Hornbeam (Carpinus Betulus), Small-leaved Lime (Tilia Cordata), Oak (Quercus), Willows (Salix Willow), Sycamore - Norway Maple (Acer), Horse Chestnut (Aesculus Hippocastanum), Sweet Chestnut (Castanea Sativa), London Plane (Platanus Hispanica).</p> <p>Vehicle Incursion</p> <p>Where a proposal calls for hard standing area / parking of vehicles area near the boundary with the operational railway, Network Rail would recommend the installation of a highways approved vehicle incursion barrier or high kerbs to prevent vehicles accidentally driving or rolling onto the railway or damaging lineside fencing.</p> <p>As the site is adjacent to Network Rail's operational railway infrastructure, Network Rail strongly recommends the developer contacts</p>	

Stakeholder	Question/Comment	Response
	<p>AssetProtectionAnglia@networkrail.co.uk prior to any works commencing on site. Network Rail strongly recommends the developer agrees an Asset Protection Agreement with us to enable approval of detailed works. More information can also be obtained from our website at www.networkrail.co.uk/asp/1538.aspx.</p>	
London Overground Infrastructure Management	<p>Rail for London (RfL) has reviewed the application and from an Infrastructure Protection perspective, has no comments to make. We have forwarded this to Network Rail who may have assets in this area.</p>	Comments noted.
London Underground Infrastructure Provision	<p>I can confirm that the planning applicant is in communication with London Underground engineers with regard to the development above. Therefore, we have no comment to make on the application except that the developer should continue to work with LU engineers.</p> <p>These comments relate only to the London Underground infrastructure protection issues raised by the application. They should not be taken to be representative of the position which may be taken by the Mayor and/or another part of TfL. You are advised to consider whether it is also necessary or appropriate to consult other parts of TfL and whether the application should be referred to the Mayor as an application of potential strategic importance pursuant to the provisions of the Town and Country Planning (Mayor of London) Order 2008. All other consultations with TfL should be made by emailing boroughplanning@tfl.gov.uk.</p>	Comments noted.
Crossrail 2 Safeguarding	<p>Transport for London administers the Crossrail 2 (CR2) Safeguarding Direction made by the Secretary of State for Transport on 23 March 2015. Crossrail 2 has been advised via Network Rail's development team of the proposed planning application at Tottenham Hale.</p> <p>Crossrail 2 would like to make comment on this application and advises</p>	Comments noted. Condition 23 and informatives included.

Stakeholder	Question/Comment	Response
	<p>Haringey Planning Authority that whilst the development site boundary is currently outside safeguarding limits it is in close proximity to a proposed and significant Crossrail 2 construction worksite.</p> <p>Tottenham Hale station would also become a key interchange station on the route, and would require improvement works to accommodate the new Crossrail 2 services. These plans are still in the early stages of development, but proposals would include platform and station works together with track realignment. The proposals as set out on the application for planning permission are adjacent to the limits of land subject to consultation by the Crossrail 2 Safeguarding Direction. It is therefore essential to ensure that both projects can be delivered without one prejudicing the other.</p> <p>If the Council, in its capacity as Local Planning Authority, is minded to grant planning permission, TfL who have responsibility for administering the Crossrail 2 Safeguarding Directions have requested the following condition is applied to any Notice of Permission:</p> <p>None of the development hereby permitted shall be commenced until detailed design and construction method statements for all of the ground floor structures, foundations and basements and for any other structures below ground level, including piling and any other temporary or permanent installations and for ground investigations, have been submitted to and approved in writing by the Local Planning Authority which accommodate the proposed location of the Crossrail 2 structures including temporary works.</p> <p>The application site would be adjacent to a major Crossrail 2 worksite and therefore TfL has advised the LPA that:</p> <p>The applicants are encouraged to engage with Crossrail 2 in respect of the foundation design for the proposals in the course of preparing detailed design</p>	

Stakeholder	Question/Comment	Response
	<p>and method statements and can be contacted at crossrail2@tfl.gov.uk</p> <p>The applicant and Local Planning Authority should also be aware that the site is adjacent to a major Crossrail 2 worksite and it is recommended that the design of the proposals include noise mitigation measures particularly to windows and openings to the residential units.</p> <p>In addition, the latest project developments can be found on the Crossrail 2 website www.crossrail2.co.uk , which is updated on a regular basis. I hope this information is helpful, but if you require any further information or assistance then please feel free to contact a member of the Safeguarding Team on 0343 222 1155, or by email to crossrail2@tfl.gov.uk</p>	
<p>Natural England</p>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>The Wildlife and Countryside Act 1981 (as amended) The Conservation of Habitats and Species Regulations 2010 (as amended)</p> <p>Natural England's comments in relation to this application are provided in the following sections.</p> <p>Statutory nature conservation sites – no objection Natural England has assessed this application using the Impact Risk Zones data (IRZs). Natural England advises your authority that the proposal, if undertaken in strict accordance with the details submitted, is not likely to have a significant effect on the interest features for which Lee Valley SPA and RAMSAR has been classified. Natural England therefore advises that your</p>	<p>Comments noted. Condition 12 has been included.</p>

Stakeholder	Question/Comment	Response
	<p>Authority is not required to undertake an Appropriate Assessment to assess the implications of this proposal on the site's conservation objectives.</p> <p>In addition, Natural England is satisfied that the proposed development being carried out in strict accordance with the details of the application, as submitted, will not damage or destroy the interest features for which the Walthamstow Reservoir SSSI has been notified. We therefore advise your authority that this SSSI does not represent a constraint in determining this application.</p> <p>Should the details of this application change, Natural England draws your attention to Section 28(l) of the Wildlife and Countryside Act 1981 (as amended), requiring your authority to re-consult Natural England.</p> <p>Protected species</p> <p>We have not assessed this application and associated documents for impacts on protected species.</p> <p>Natural England has published Standing Advice on protected species. You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.</p> <p>The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected Species (EPS) that the proposed development is unlikely to affect the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence is needed (which is the developer's responsibility) or may be granted.</p> <p>If you have any specific questions on aspects that are not covered by our Standing Advice for European Protected Species or have difficulty in applying</p>	

Stakeholder	Question/Comment	Response
	<p>it to this application please contact us with details at consultations@naturalengland.org.uk.</p> <p>Biodiversity enhancements This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the National Planning Policy Framework. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that <i>‘Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity’</i>. Section 40(3) of the same Act also states that <i>‘conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat’</i>.</p> <p>Sites of Special Scientific Interest Impact Risk Zones The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on “Development in or likely to affect a Site of Special Scientific Interest” (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website.</p> <p>We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</p>	

Stakeholder	Question/Comment	Response
GLAAS	<p>The planning application lies in an area of archaeological interest.</p> <p>The application site lies close to the Saxon settlement of Tottenham Hale, a traditional river crossing of the Lea and may also include part of the GLS air raid shelters. It also has potential for prehistoric and Roman remains.</p> <p>Appraisal of this application using the Greater London Historic Environment Record and information submitted with the application indicates the need for field evaluation 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 condition could provide an acceptable safeguard. A condition is therefore recommended to require a two stage process of archaeological investigation comprising: first, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. The archaeological interest should therefore be conserved by 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</p>	<p>Comments and recommended. Condition 22 and an informative included.</p>

Stakeholder	Question/Comment	Response
	<p>include:</p> <p>A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works</p> <p>B. 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 and Country Planning (Development Management Procedure) (England) Order 2015.</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</p>	

Stakeholder	Question/Comment	Response
	<p>after permission has been granted.</p> <p>Further information on archaeology and planning in Greater London including Archaeological Priority Areas is available on the Historic England website.</p> <p>Please do not hesitate to contact me should you require further information or assistance. I would be grateful to be kept informed of the progress of this application.</p> <p>Please note that this response relates solely to archaeological considerations. If necessary, Historic England's Development Management or Historic Places teams should be consulted separately regarding statutory matters.</p>	
Lee Valley Regional Park Authority	<p>Having looked at the application despite its size it is well outside the Park boundary and it may be that we will be seeking CIL to be directed to the Regional Park. I will present this application to our members in late September when I will send over the formal minute but I can send over a draft recommendation in advance to meet your deadline. Personally I think it could be an attractive addition to the skyline.</p>	<p>Comments noted.</p>
London Borough of Hackney	<p>Particulars of Decision: OBJECTION Reasons: At 33 storeys the proposed development is significantly taller than the approved 18 storey building and the other buildings approved on sites nearby, and as such will be visually obtrusive when viewed from various sites within Hackney including Springfield Park, which is included in the applicant's verified views document. It is suggested that the height be reduced so that it is closer to that of other approved buildings nearby.</p>	<p>Comments noted. Although an objection has been received the submitted documentation notes that the impact on Springfield Park and other key views within LB Hackney would be 'minor' or less. The Council's Principal Conservation Officer and</p>

Stakeholder	Question/Comment	Response
		the GLA have also raised no objection. Therefore, the objection is not considered to be reasonable in this case.
London Borough of Waltham Forest	<p>Thank you for your consultation and I apologise for the late response. I had understood my comments had already been sent to you some weeks ago. My understanding is that the proposal involves construction of a 33 storey tower in Hale Village and there has been some suggestion it might impact on its surroundings (understandably) and perhaps some Listed buildings such as the Ferry Boat Inn some 400 metres away in our borough</p> <p>Given the degree of separation however and the fact the Ferry Boat Inn is a 2 and a half storey pub which can't be expected to have dominance in terms of height, it is not considered that the proposal would have any adverse affect (see photo 4 below)</p> <p>As advised however the proposal would result in a significantly more intensive use of the local area and would put considerable additional pressure on the need for open space. We would expect this to be mitigated by financial contributions towards the wetlands and that this should be secured by any S106 legal agreement so please do advise us prior to instructing your legal team and preparing your committee report.</p>	Comments noted. All open space requirements are provided within this and the surrounding Hale Village site and therefore a contribution towards is not considered to be reasonable.
Canal and River Trust	The Trust has reviewed the application. This is our substantive response under the Town and Country Planning (Development Management Procedure) (England) Order 2015. Based upon the information available we have no specific comments to make on the proposal.	Comments noted.

Stakeholder	Question/Comment	Response
	<p>However, we note that the development is significantly taller than surrounding development, and that the number of units is likely to increase the number of visitors to the Lee Navigation and its towpath, which would put pressure on the Trust's maintenance of this publicly accessible, open space facility. The Trust would therefore welcome a discussion with the LPA to discuss how funds that are secured through CIL from the development are to be allocated to mitigate the impact of the proposal in the Lee Valley and waterway corridor.</p> <p>In order for the Canal & River Trust to monitor our role as a statutory consultee, please send me a copy of the decision notice and the requirements of any planning obligation.</p>	
<p>LOCAL REPRESENTATIONS (80)</p>	<p>Summary of responses:</p> <p><u>Design</u></p> <p>1) Out of keeping with local character;</p> <ul style="list-style-type: none"> • Developments must be in keeping with the surroundings • Wrong location for a building of this size • No balance with existing buildings • Development does not fit in with existing buildings <p>2) Poor design;</p> <ul style="list-style-type: none"> • Design is bland • Poor quality landmark 	<p>The development would be in accordance with the emerging character of Tottenham Hale which is increasingly of tall buildings with a contemporary design. This specific site is identified for a landmark tall building.</p> <p>The design contrasts positively with the</p>

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • Aesthetics differ from other local buildings • Will materials be high quality? • Negative impact on appearance of the skyline • Angular corner design is oppressive <p>3) Poor street scape;</p> <ul style="list-style-type: none"> • Creation of a narrow urban canyon • Development would not integrate into existing built form • Hale Village and Ferry Lane will be separated • Size will create the sense of a ghetto <p>4) Excessive height;</p> <ul style="list-style-type: none"> • Too tall • Height is very excessive • Height is repressive • Much taller than expected and previously approved plans • Height is exaggerated • Four times taller than adjacent buildings • Tower blocks of this size are usually unsuccessful • Too high for marshland/canal environment • Building heights should decrease from town centres • Adjacent buildings are only nine stories 	<p>extremely colourful finish of some buildings within Hale Village, and would have an elegant articulation. Design has been ratified by the QRP and Design Officer. Materials would be of a very high quality.</p> <p>Street layout meets the previously approved Masterplan parameters. Site was always intended for a building significantly taller than the surroundings. Separation of Hale Village from main road was an objective of original masterplan.</p> <p>Building was always intended to be significantly greater in height than remainder of Hale Village masterplan, and emerging character of Tottenham Hale is of tall buildings. Location is suitable for dense and</p>

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • Too many tall buildings in Tottenham <p>5) Excessive scale, bulk and massing;</p> <ul style="list-style-type: none"> • Over-scaled • Out of proportion • Gross mismatch with size of other local buildings • Located too close to Coppermill Heights <p>6) Dominating appearance;</p> <ol style="list-style-type: none"> a. Impact on local views b. Impact on long-distance views c. Overbearing relationship <p><u>Neighbouring Amenity</u></p> <p>1) Loss of day/sunlight;</p> <ul style="list-style-type: none"> • Existing flat already has poor access to light (Coppermill Heights) • Reduction in afternoon sun • Natural sunlight reduced • Loss of sunlight to Coppermill Heights • Loss of sunlight will be very bad in the winter 	<p>tall development. Distance from much smaller buildings and open space is significant. Tottenham Hale is an emerging district 'town' centre.</p> <p>Proportions are consistent with the emerging character of Tottenham Hale, which is of tall buildings. Host plot is suitable for dense development. Boundary parameters set by original masterplan.</p> <p>Impact on local and long views would be no greater than minor, and in some cases positive. Human relationship at street level would be facilitated by podium element.</p> <p>Sun and daylight matters are dealt with in detail in the case officer report. In</p>

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • Loss of light to balconies • Increased overshadowing • Loss of light to communal garden at Coppermill Heights • Loss of light to play areas • Light study is inaccurate <p>2) Loss of outlook;</p> <ul style="list-style-type: none"> • Clear outlook removed and replaced with flats <p>3) Loss of privacy;</p> <ul style="list-style-type: none"> • Complete loss of privacy as new block 10m away from flat <p>4) Increased wind tunnelling;</p> <ul style="list-style-type: none"> • Wind tunnel will be unavoidable • Existing wind tunnelling would excessively increase <p>5) Increased pollution;</p> <ul style="list-style-type: none"> • Dangerous levels of air pollution would increase further • Light pollution would increase 	<p>many cases the impact on existing properties would be reduced compared to the size parameters of the outline planning permission.</p> <p>Parameters of a tall building at this site are already set by outline permission.</p> <p>Parameters of a tall building with residential units on the eastern side have been set by outline permission.</p> <p>Wind movements would remain within acceptable limits, subject to mitigation to be secured by condition.</p> <p>Number of vehicles</p>

Stakeholder	Question/Comment	Response
	<p>6) Increased noise disturbance;</p> <ul style="list-style-type: none"> • Disturbance from building works over a long period; • Area is already very loud; • New residents will create additional noise particularly to Coppermill Heights properties; <p><u>Layout and Density</u></p> <p>1) Overdevelopment/overcrowding;</p> <ul style="list-style-type: none"> • Already a high amount of pedestrian movements • Very large for small plot • Too many flats for a small area • Area is already overcrowded • Tottenham Hale station is already too crowded • Station renovation will not sufficiently increase capacity • Victoria underground line is already too crowded • Lack of infrastructure for the development • Large increase in local population <p>2) Lack of affordable housing;</p> <ul style="list-style-type: none"> • Level of affordable housing provided is low 	<p>would result in insignificant or negligible increases in air pollution. Light pollution would not be significant for an urban area.</p> <p>Construction works are for a limited period only. Additional noise from occupiers would not be significant for an urban area.</p> <p>Site is identified for a tall building and is suitable for very dense development. Investment in local transport and other infrastructure are ongoing.</p> <p>See officer report for more detail. Scheme viability has been tested and maximum possible</p>

Stakeholder	Question/Comment	Response
	<p>3) Poor internal layout;</p> <ul style="list-style-type: none"> • Floor plans are poor <p>4) Insufficient local services and community facilities;</p> <ul style="list-style-type: none"> • Increased negative impact on health and social services • Lack of infrastructure for proposed number of residents • Inadequate schools and doctors' services • Site could be used for community activities for young people • Insufficient shops and cash points <p><u>Parking/Highways</u></p> <p>1) Increased traffic congestion;</p> <ul style="list-style-type: none"> • Detrimental to road traffic • Increased congestion • Roads are already congested • Increase in unnecessary traffic <p>2) Insufficient parking;</p> <ul style="list-style-type: none"> • Parking is a big local problem • Parking provision is inadequate <p>3) Disturbance from building works traffic</p> <ul style="list-style-type: none"> • Vehicle movements can be unsafe <p><u>Open/Green Space</u></p>	<p>provision has been sought.</p> <p>Layout meets Mayor's Housing SPG criteria where appropriate.</p> <p>Medical and other social services are available nearby. Schools in the borough are anticipated to expand as local population grows. Many shops are available nearby.</p> <p>No significant increase in private vehicles would occur from the proposal.</p> <p>On-street parking would be monitored as per the legal agreement.</p> <p>Construction to follow requirements of a</p>

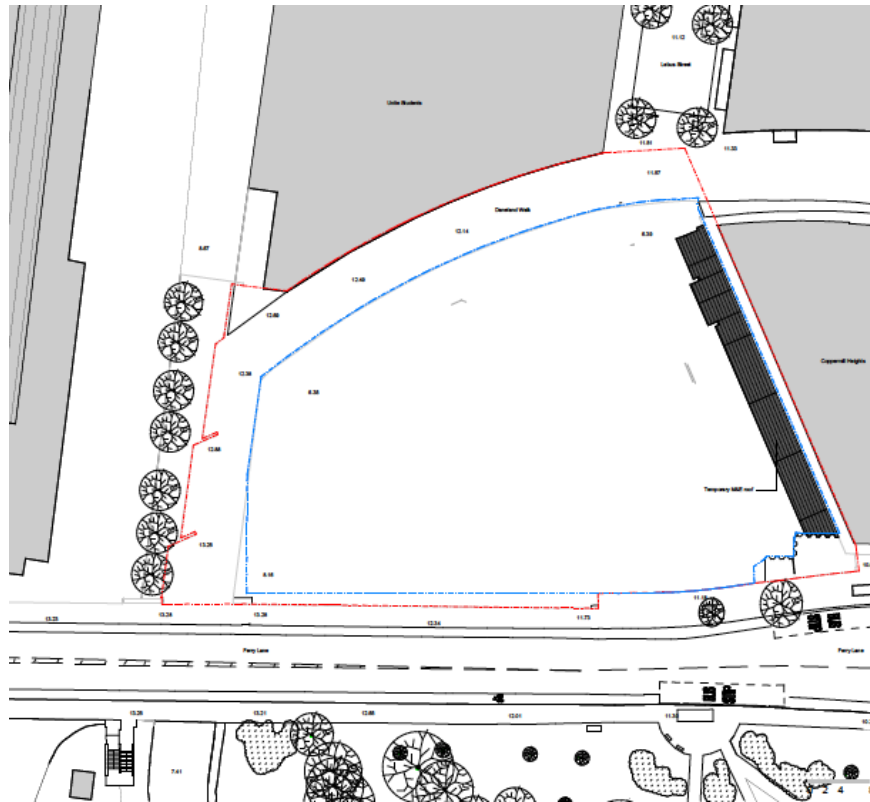
Stakeholder	Question/Comment	Response
	<p>1) Impact on nearby marshes;</p> <p>2) Loss of green space;</p> <ul style="list-style-type: none"> • Building would be located on a green space • Impact on the green belt <p><u>Other Matters</u></p> <p>1) Insufficient local consultation;</p> <ul style="list-style-type: none"> • Consultations were poorly advertised; • Meetings were sales pitches not real consultations • Only one site notice posted • Emailed questions have not been responded to <p>2) Increased anti-social behaviour</p> <ul style="list-style-type: none"> • Anti-social behaviour is already a problem • Building would create dark alleys increasing anti-social opportunity <p>3) Lack of safety</p> <ul style="list-style-type: none"> • Tall buildings are high fire risks 	<p>Construction Management Plan.</p> <p>Proposal is too far away from marshes to have an impact.</p> <p>The site has been laid to lawn whilst awaiting completion of the masterplan, and is not within or adjacent to green belt.</p> <p>See the applicant's SCI for details of consultations. Council has followed statutory requirements including posting several site notices around Hale Village.</p> <p>Proposal would be built to secured by design standards. Condition would be included for street lighting.</p>

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • Tall buildings pose a fire risk to neighbouring buildings • Will a sprinkler system be provided? • Vehicle movements unsafe for pedestrians <p><u>Non-Material Considerations</u></p> <ol style="list-style-type: none"> 1) Loss of a private view; 2) Loss of property value; 3) Previous plans were never approved. 	<p>Fire safety requirements have been considered in detail. Sprinklers provided. Fire safety is a building control matter. No vehicles for this scheme would enter the internal Hale Village street layout.</p> <p>Loss of a private view or property value is not a material planning consideration.</p> <p>Outline parameters were approved as part of the planning permission approved in 2007.</p>

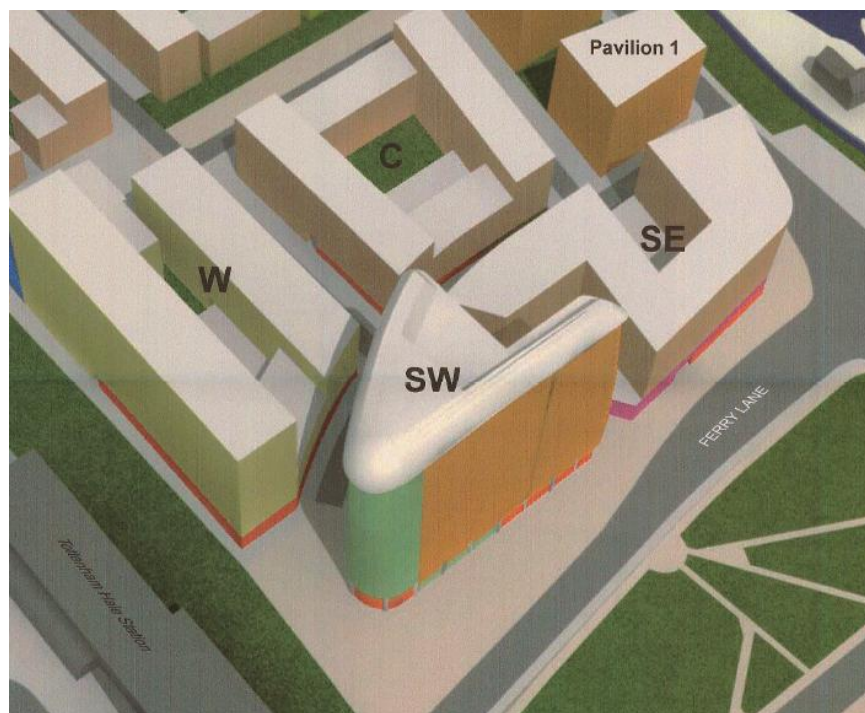
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Appendix 2: Plans and Images

Existing Location Plan



Approved Parameters of Outline Consent for Plot SW



Ground Floor Plan (Commercial and Entrance Levels)



Lower Level Residential Plans (Below Sky Garden Level)



Upper Level Residential Plans (Above Sky Garden Level)



Level 11 Plan (Sky Garden Level)



Indicative Sky Garden Sketch



Public Realm Area with Podium Frontage



View of Building from West on Ferry Lane



View of Building from North on Ashley Road



View of Building from East on Ferry Lane



View of Building from North on Lebus Street



Appendix 3: Quality Review Panel Reports

First Review – 22nd February 2017

Summary

The panel finds much to admire in Hawkins Brown's designs for Hale Village Tower, and thinks this has the potential to be a high quality landmark for Tottenham Hale. Careful thought has been given to the massing of the development, in terms of the quality of residential accommodation, and appearance in a fly through visualisation. The use of bays to add to the spatial quality of flats, and provide articulation and interest in the facades is particularly welcome. However, further testing of scale and massing in townscape views is needed. At street level, a podium promises to mitigate downdraught winds from the tall building, and provide shops and cafes to bring activity to the area. As design work continues, the panel would encourage the team to consider how the architecture of this tall building can be given a domestic quality that signals its use. A creative lettings strategy for commercial units at street level will be important, to create a lively public realm. In terms of environmental sustainability, the risk of flats overheating needs further thought. A robust management and maintenance strategy will also be essential, and the commitment of Anthology Development to long term ownership gives confidence this can be achieved. These comments are expanded below.

Massing and development density

- The panel supports the increase in height of Hale Village Tower, from 18 storeys as set out in the outline planning approval, to 33 currently proposed.
- The site has been identified as being an appropriate location for a landmark tall building, through the outline planning process.
- The panel agrees that a 33 storey tower has the potential to be successful as a landmark with elegant proportions, given the scale of development now envisaged on other sites at Tottenham Hale.
- Further testing of scale and massing in townscape views is needed, as described below.

Place-making, character and quality

- Whilst the panel support the overall scale of the proposals, they would encourage exploration of long distance and nearby views, to help refine the massing of the tall building.
- This will be a highly prominent building on London's skyline – and views analysis should inform aspects of its design, such as the top of tower.
- One of the broader elevations faces south, towards central London, and long distance views from this direction should be tested as the design is refined. Further

thought about the balance between horizontal and vertical elements of the façade will contribute to the success of the scheme in these views.

- At lower levels, the panel think there may be scope to respond to the 'datum' of existing buildings at Hale Village, to enhance the way the development is experienced at street level.
- The panel would also encourage the team to explore how a residential tall building can be designed to respond to the special character of this part of Haringey.

Relationship to surroundings: access and integration

- Hale Village Tower occupies a key location, close to Tottenham Hale Station, and on a street envisaged in the outline planning masterplan as a shopping street.
- This means that there will be significant pedestrian movement to and from the station past the site, and an opportunity for shops, restaurants or cafes to enliven Daneland Walk.
- The panel would encourage creative thinking about the lettings strategy for ground floor units on Daneland Walk – where currently a supermarket and Kidney and Diabetes Centre both have blanked out windows facing the street.
- An approach to lettings that brings Daneland Walk to life has the potential to add value to the development – for example a destination restaurant could attract visitors, as well as residents.
- The way in which the podium design is adapted to the very different contexts of Ferry Lane and Daneland Walk also needs more exploration.
- The scheme will close views along Lebus Street from Perkyn Square – and careful thought is needed to ensure the quality of this important pedestrian route towards the station.
- The involvement of BDP as landscape architects is positive, and the panel looks forward to seeing more detail on their work, and the way this encourages people to dwell in and enjoy external spaces around the site.

Scheme layout

- Changes in the guidance on residential layouts in the London plan, since the outline planning approval, mean that a maximum of 8 units accessed from each vertical circulation core is now recommended.
- The scheme deals with this issue by arranging lifts at the centre of the plan, with lobbies either side giving access to no more than six units.
- Whilst the panel agrees this is a practical solution, they would encourage the design team to explore the scope for a more generous shared lobby.

- The Barbican towers provide a precedent for triangular lift lobbies, that create a sense of generosity in the access from lift to flats.
- At a detailed level, the panel thinks the idea of internalising north west facing balconies needs careful consideration – and notes that north facing balconies could benefit from evening sun.

Architectural expression

- The review took place at an early pre-application stage, and focused primarily on scale, massing, layout, and townscape issues – with limited information on architectural expression.
- However, the panel welcomes the use of bay windows, which adds to the quality of the residential accommodation, and helps articulate the facades.
- At the next stage of design, the panel would encourage the team to explore how such a large building can be given a domestic character, through the choice of materials and construction detailing.
- It will be essential that the degree of skill and care apparent in the current designs continues throughout the construction stage, and the panel trusts Hawkins Brown will be retained to achieve this.

Environmental sustainability

- A key issue for the design of tall buildings, is the challenge of mitigating downdraught winds, to ensure a comfortable environment for pedestrians at street level.
- A podium has been introduced, in response to comments from Haringey officers about this issue, and the panel agree this is potentially a good solution – subject to environmental analysis.
- The panel also welcomes the thought that has been given to daylighting of the residential units – and thinks similar consideration of potential overheating is needed.
- One possible solution would be to incorporate external blinds into the façade design, to allow maximum sunlight in winter, and solar control in summer. The risk of overheating is a significant issue for single aspect flats, which will not benefit from cross ventilation – especially where opening windows may not be practical due to wind at upper levels of a tall building.

Long term management and maintenance

- The long term management and maintenance of residential tall buildings is an important issue, given the substantial cost of lift and façade maintenance.

- The commitment of Anthology Development to long term ownership of Hale Village Tower gives confidence that a robust management and maintenance strategy can be put in place.
- The panel would support planning officers in requesting details of the long term strategy for financing building maintenance, as part of the planning process.

Next Steps

- The panel would welcome a further opportunity to comment on Hale Village Tower, before a planning application is submitted.

Second Review – 17th May 2017

Summary

It was clear from the design team's presentation that this scheme has progressed in a positive way through pre-application discussions with Haringey officers. The emerging scheme represents a welcome calm counterpoint to some of the neighbouring developments, and potentially promises high quality development. The panel supports the scale and massing, and welcomes the level of thought that is evident within the emerging architectural expression. Scope remains to improve the design of the public realm and landscape; and the panel would also support further work to visually enrich the lower levels of the building, the northern façade and the roofline. The relationship of the tower and its environs to the emerging (and proposed) pedestrian links around and across the site will also need to be carefully considered. Further details on the panel's views are provided below.

Massing and development density

- As noted at the previous review, the panel support the overall scale of the proposals as the location of the proposed tower is a key site in the approach to Tottenham Hale.

Place-making, character and quality

- Whilst the panel welcome the emerging details of the design, they would encourage further exploration of long distance and nearby views, to help refine and articulate both the roofline and the lower levels of the development.
- They would support further development of the top floors of the building, to ensure a stronger roof profile in distant views.
- The panel would like to see more detail of the proposed landscape and public realm design as this will be critical to ensure that the ground level of the scheme is successful.
- They feel that the proposals would benefit from further work in order to create

positive public realm; the location of planters, seating and other landscape features can help to mitigate microclimate issues whilst also defining a territory that will encourage pedestrians to linger.

- Drawing in references of furniture making (linking back to previous industries on site) within the public realm and landscape could provide a strong narrative for the development, and would help to enrich the proposals at ground level where they would be most visible.
- In addition, the panel notes that Spitfires were manufactured on site during World War II, which could also provide a source of inspiration for the scheme.

Relationship to surroundings: access and integration

- The design of the podium, tower and public realm needs to be considered in the context of changing routes and movement across and around the site.
- Increased volumes of pedestrians will cross the site when the Hale Wharf development to the east and the proposed footbridge and station entrance to the west are completed.
- The geometry of the podium is supported by the panel; they agree that it should sit close to Ferry Lane.

Scheme layout and architectural expression

- The panel welcomes the adjustments to the internal layout that have resulted in a more generous shared lobby adjacent to the lifts at each level.
- The architectural expression also promises to be calmer and more elegant than some of the surrounding developments.
- Expressing the individual apartments externally within the visual rhythm of the facades is supported; whilst the inclusion of muted panels of colour at soffit level is warmly welcomed, as this will create a striking view from ground level, whilst presenting a calmer elevation within long views.
- However, the panel feels there is scope to bring more richness and joy to the architecture – and make more of the concept of a building inspired by the history of furniture making in the area.
- Balconies provide welcome vertical articulation to the facades. Whilst to the north, winter gardens are a welcome alternative to balconies – the panel would encourage the design team to explore how to give this elevation more depth and interest.
- There may also be scope to give more texture to the lower floors of the building, which will be seen in nearby views. Upper floors could be simpler, and designed with more distant views in mind.

- Fritting of glass on residential balconies (with a pattern inspired by furniture details) is likely to be too subtle to be visible from ground level - especially as the podium will serve to screen views of the first few levels.

Inclusive and sustainable design

- The panel notes that a sedum roof is proposed for the podium; they would encourage more substantial planting, to enhance views from flats above – and if possible, give private gardens to flats at podium level.
- The panel note that it is difficult to achieve openable windows for natural ventilation within large sheets of glazing; and would like more information on how smaller opening panels or windows will be provided.
- They note that the proposed MVHR system will require a lot of energy in use. An alternative approach would be to design the building fabric to provide exposed thermal mass, to moderate internal temperatures, and reduce the need for mechanical systems.
- Whilst wind issues and down draughts will be largely mitigated through the use of the podium, there may be problems with overheating on the east and west facades where the angle of the sun is lower, and there are large areas of glazing and glass balconies.

Next Steps

- The panel would welcome a further opportunity to consider the proposals at a Planning Application / Chair's Review meeting.
- They look forward to seeing how the detailed design develops, and in this regard, highlight a number of action points for consideration by the design team, in consultation with Haringey officers.

Third Review – 5th July 2017

Given the existing permission that has been granted on this site for a tall building, the Quality Review Panel accepts the broad principles of the scheme, and the decisions that have been taken as the design has developed. Whilst understanding the rationale that has driven the reduction in podium height, they feel that further consideration is required for the design of the podium element in order to avoid it looking visually insubstantial compared to the tower above. They welcome the refinements to the articulation of the north façade, in addition to the castellation detail at the roofscape. Prior to planning permission being granted, they would like to see further refinement of some of the detailed design elements of the exterior of the podium and tower, in addition to aspects of the public realm and landscape design, to help ensure that the development frames and supports this important gateway into Hale Village. Further detail on the panel's views is provided below.

Massing, scale and architectural expression

- Given the previous permission on this site, the panel accepts the broad principles of the scheme, including the scale and massing of the tower and podium.
- They note that the podium has reduced in height since the previous QRP meeting, and that the proposed mezzanine level has been removed.
- They understand that this is to mitigate against the natural increase in height that occurs as the ground level falls across the site, and relative size of neighbouring buildings.

Architectural expression

- The panel recommends refinement of the podium design, to ensure that this appears visually strong enough to support the tower rising above.
- This could include exploring whether the roof garden on top of the podium could be made deeper and more substantial, so that its planting is more visible from street level. This would have potential to add colour, interest and depth to the podium design.
- In addition, a deeper fascia to the roof line of the podium could act as a balustrade to the roof garden whilst also giving increased visual 'weight' to the podium itself.
- The inclusion of a castellated roofline is welcomed by the panel; it will add interest and drama within views of the building locally and further afield.
- The articulation of the north façade is also improved since the previous review. The panel supports the inclusion of the fritted glass detail to the balconies; this could be very successful in providing a visual screen both in and out of the balcony spaces, whilst allowing good levels of light within the apartments.
- The full-width balconies on the south west façade of the tower are a very attractive feature that will celebrate the wonderful views across the city.
- They would encourage greater thought about the colour of the soffits to the underside of the balconies as these will be extremely visible at ground level and further afield.
- The panel remains to be convinced about the single soffit colour specified for the full height of the tower; they question whether a graded approach to the specification of colours would be more appropriate.
- The quality of materials and construction, for example the metal cladding to the tower, will be essential to the success of the completed scheme. The panel would support planning officers in securing this through planning conditions.

Public realm and landscape design

- Potential exists to create a unique and vibrant public realm around the podium. Playful elements could be included within the main public space to the west of the site, and within the pedestrian routes around the podium.
- There are also opportunities within the design of the public realm and landscape to express the history of the site and its links to cabinet-making. This could echo the fritted glass detail at high level in the tower referencing fine wood-working, making this theme more apparent at ground level.
- Awnings (pegged or fixed) adjacent to the café area at the west of the site could provide colour and visual interest, in addition to shade.
- Trees in pots could also help to create a comfortable microclimate for users of the space and the café area, whilst softening and enlivening the public realm.
- The panel notes that the bridge link to Tottenham Hale Station will need to ramp up in order to accommodate the two new rail lines that will be at a lower level. The landing of the bridge link will need to be well-integrated into the design of the public realm at the western end of the site.

Next Steps

- The panel supports the broad principles and ongoing refinement of the scheme. They highlight a number of detailed points for consideration by the design team, in consultation with Haringey officers.

Appendix 4: Development Management Forum – Briefing Note*Attendees*

14 attendees were present. Residents included those from Egret Heights and Coppermill Heights.

Overview

The Forum was advertised to residents by Haringey Council via A4 signs posted around the site. The Forum was held at The Engine Room cafe. The Forum was led by the Tottenham Strategic Applications Team Manager. Generally, the discussion was robust and attendees had the chance to raise any concerns or questions and have them answered by officers, the applicant, their architects or other representatives.

Issues

Issue	Detail
Fire Safety	The applicant is aware of concerns given the recent disaster at Grenfell Tower. The development would be of a modern design and would be fully sprinklered. Cladding will be high fire rated. Would meet Fire Brigade requirements.
Height	No further increases to the height are planned, above the 33 storeys submitted.
Affordability	Development would be an affordable product for London, with 90% of the units eligible for Help to Buy support. Shared ownership properties are also proposed.
Build Times	If development is heard at committee in October and receives approval, then anticipate starting in first quarter of 2018.
Bridge Connection to Station	Bridge is expected to start in Summer 2018. In discussion with TfL. Bridge is expected to be finished before the proposed building.

Other issues raised:

- None.

Appendix 5: Full Comments from the Greater London Authority**D&P/4180/01****23 August 2017**

**SW Plot Hale Village (Hale Works), Tottenham Hale
in the London Borough of Haringey
planning application no. HGY/2017/2005**

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

A full application for a mixed-use development ranging from 11 to 33 storeys, comprising 1,588 sq.m. of commercial space, 279 residential units, roof garden, landscaping, basement car and bicycle parking, and associated plant.

The applicant

The applicant is **Anthology**, and the architect **Hawkins Brown**.

Strategic issues summary

Affordable housing: 15% (by habitable room) of the total units, or 48% of the uplift, made up of 100% intermediate shared ownership. Across the masterplan site, this would result in the overall delivery of 47% affordable housing. GLA officers will work with the Council and the applicant to maximise affordable housing provision, and in the context of the Mayor's Affordable Housing and Viability SPG, will robustly scrutinise the viability assessment, including the affordability of shared ownership units and potential grant funding. Early and late viability reviews must be secured in accordance with the SPG. (Para's 19-26)

Urban design and tall buildings: The applicant should replace a proportion of those units that have additional internalised floorspace instead of private external amenity space, with winter gardens. (Para's 31-38)

Recommendation

That Haringey Council be advised that the application does not yet comply with the London Plan, for the reasons set out in 50 of this report; however, the possible remedies set out in that paragraph could address these deficiencies.

1 On 14 July 2017, 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 has until 23 August 2017 to 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 Categories 1A, 1B(c), and 1C(c) of the Schedule to the 2008 Order:

- 1A. *“Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.”*
- 1B(c) *“Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings (c) outside Central London and with a total floorspace of more than 15,000 square metres.”*
- 1C(c) *“Development which comprises or includes the erection of a building that 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 environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 has been taken into account in the consideration of this case.

5 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

6 The 0.27-hectare vacant site is the last remaining plot to be built out within the Hale Village masterplan area. The masterplan site formerly contained warehousing and associated structures, which were demolished in 2008-9. It is bound to the west and north by Daneland Walk, with a 12 storey Unite student block, with ground floor commercial uses, to the north (Emily Bowes Court); the 8-storey residential block, with office uses on lower floors, to the east (Coppermill Heights); Tottenham Hale Station and railway lines to the west; and to the south by Ferry Lane (A503), beyond which is a green public space.

7 The site is within the Upper Lee Valley Opportunity Area and the Tottenham Housing Zone (Phase 1).

8 The nearest section of the Transport for London Road Network (TLRN) is the Hale/Broad Lane junction, approximately 200 metres to the west of the site. The nearest section of the Strategic Road Network (SRN) is the A1010 High Road, approximately 1.4 kilometres to the north-west. The nearest station is Tottenham Hale,

which is approximately 100 metres to the west of the site, providing access to rail services between Liverpool Street, Cambridge and Stansted Airport; and underground services on the Victoria Line. With the forthcoming redevelopment of the station, a new pedestrian footbridge will link directly into Hale Village opposite the site. A taxi rank and bus station are also located at Tottenham Hale, with the latter providing access to six bus services. The nearest bus stops to the site are the pair of Mill Mead Road bus stops, which are located just south of the site on A503 Ferry Lane, served by routes 123, 230, N73 and W4. The public transport accessibility level (PTAL) of the site ranges from 5-6a (on a scale of 1 to 6, where 6 is excellent and 1 is very poor).

Details of the proposal

9 A full application for a mixed-use development ranging from 11 to 33 storeys, comprising 1,588 sq.m. of commercial space (flexible A1/A3/A4/B1/D1 uses), 279 residential units, together with roof garden and associated landscaping, the provision of 36 basement car park spaces, 466 bicycle spaces, and associated plant. The ground floor podium has been designed to provide three retail units, with opportunities to further sub-divide.

Case history

10 Outline planning permission was granted for the Hale Village masterplan site in October 2007 (GLA Ref: PDU/1322/02, 20 June 2007) for the '*development of a mixed use scheme comprising up to 1,210 residential units (Use Class C3), student accommodation (C2), office (B1), hotel (C1), retail (A1, A2, A3, A4, A5 and B1) uses, a health centre (D1), a health club (D2), creche (D1) and a primary school, with provision for underground and on-street car parking, within separate building blocks ranging in height from 1 to 18 storeys*', with 26.5% affordable housing. The parameter plans for the SW plot approved a tower of 18 storeys plus podium, maximum height 80 metres, with retail floorspace on the ground floor, residential accommodation and hotel on the upper floors. Unit numbers and floorspace were not set by the outline consent. There was a requirement that reserved matters applications were submitted (but no requirement for them to be determined) by 31 March 2015. In March 2015, a reserved matters application (LPA Ref: HGY/2015/0795) was submitted to extend the permission, and a Section 73 application (LPA Ref: HGY/2015/0798) to remove the hotel use from the consent. This proposed a 19-storey building accommodating 196 market residential units, consisting of one, two and three bedroom units, and 1,600 sq.m. of retail floorspace.

11 On 25 January 2017, a pre-application meeting was held for a residential-led scheme of up to 33-storeys, comprising approximately 290 residential units, 1,500 sq.m. of non-residential space at ground/mezzanine level, with 54 car parking spaces at basement level, and associated refuse, plant and cycle storage. The GLA's pre-application advice report of 9 February 2017 concluded that the principle of the proposal was supported; however, issues relating to affordable housing, housing, urban design and tall buildings, inclusive design, transport, and climate change should be addressed in any planning application.

12 A second meeting took place on 17 February 2017, for which further advice on urban design issues was provided.

13 A third meeting took place on 17 May 2017 in response to the concerns expressed by GLA officers over the approach to affordable housing provision. The GLA's pre-application advice report of 5 July 2017 concluded that there are valid reasons for the proposed approach to the benchmark land value and the calculation of affordable housing on the uplift in floorspace, subject to the outcome of viability assessment, as discussed later in this report.

Strategic planning issues and relevant policies and guidance

14 The relevant issues and corresponding policies are as follows:

- Opportunity Areas *London Plan*
- Housing *London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG*
- Affordable housing *London Plan; Housing SPG; Housing Strategy; Affordable Housing and Viability SPG*
- Density *London Plan; Housing SPG*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG*
- Transport *London Plan; the Mayor's Transport Strategy*
- Climate change *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*

15 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is made up of Haringey's Strategic Policies DPD (2013), the Alterations to Strategic Policies (July 2017), the Saved Policies within the Unitary Development Plan (July 2017), the Site Allocations DPD (July 2017), the Development Management DPD (July 2017), the Tottenham Area Action Plan (July 2017), and the London Plan (Consolidated with Alterations since 2011).

16 The following are also relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance.
- The Upper Lee Valley Opportunity Area Planning Framework (ULV OAPF) (July 2013).

Principle of development

Residential/town centre uses

17 The site lies within the Upper Lee Valley Opportunity Area, as identified in London Plan Policy 2.13 and Table A1.1, which states that the Opportunity Area is capable of accommodating at least 20,100 homes up to 2031. London Plan Policy 3.3 'Increasing Housing Supply' recognises the pressing need for new homes in London and Table 3.1 gives an annual monitoring target of 1,502 new homes per year in Haringey between 2015 and 2025. The site is also located within the Tottenham Housing Zone, which has a target for 2,000 new homes to be delivered by 2025. The Tottenham Area Action Plan (AAP) identifies the site as within the potential District Centre and identifies the site as part of site allocation TH8 Hale Village, which has a target of 253 residential units for the SW plot and 1,800 sq.m. of town centre uses. The proposal for 279 residential units is strongly supported on this long vacant site, in line with London Plan Policies.

18 London Plan Policies 2.15 'Town Centres', 4.7 'Retail and town centres', 4.8 'Supporting a successful and diverse retail sector' and supplementary planning guidance 'Town Centres' provide support for town centres as the focus for retail uses. The proposal for 1,588 sq.m. of commercial space (flexible A1/A3/A4/B1/D1 uses) at ground floor level, providing three units with opportunities to further sub-divide in response to market demand, is supported in line with London Plan and other policies.

Affordable housing

19 The proposal includes 279 residential units, as set out below:

Unit size	Intermediate (shared ownership)	Market	Total
Studio	0	10	10 (4%)
1 bedroom	23	87	110 (39%)
2 bedroom	20	129	149 (53%)
3 bedroom	0	10	10 (4%)
Total	43	236	279
	15% of total, or 48% of the uplift (by hab room)		

20 London Plan Policy 3.9 'Mixed and Balanced Communities' seeks to promote mixed and balanced communities by tenure and household income. Policy 3.12 'Negotiating Affordable Housing' seeks to secure the maximum reasonable amount of affordable housing. The Mayor's Affordable Housing and Viability SPG introduces a threshold approach, whereby schemes meeting or exceeding 35% (by habitable room) affordable housing without public subsidy are not required to submit a viability assessment, and are not subject to late-stage viability reviews.

21 The application proposes 15% affordable housing. Based on the uplift in floorspace of the current 279-unit proposal, compared to the 196-unit proposal, the affordable housing represents 48% (by habitable room), without grant funding. The original outline planning permission secured 26.5% of the 1,210 units as affordable housing; however, 542 affordable units have been delivered to date, which equates to 45% of the 1,210 units originally permitted, and 57% of the 959 units built to date. Together with the proposals for the SW plot, the total number of units would increase to 1,238, with 585 affordable units representing 47%. The original 26.5% affordable provision was delivered without public funding; however, the increase level was achieved through public funding from the Homes and Communities Agency. As the masterplan site has significantly over-provided affordable housing against that originally proposed, a reserved matters application could therefore come forward with no affordable housing provision.

22 It should also be noted that the site is within the Tottenham Housing Zone, which has a target for 2,000 new homes by 2025, of which a minimum of 700 (35%) will be affordable. The current 279 units proposed on the SW plot have been calculated within this overall 2,000 home target for the Housing Zone, but without any affordable provision. As a result, any affordable provision within the SW plot would be additional, and would result in an increase beyond the overall 35% Housing Zone target.

23 Notwithstanding this, GLA officers will work with the Council and the applicant to maximise affordable housing provision, and in the context of the Mayor's Affordable Housing and Viability SPG, will robustly scrutinise the viability assessment. The Mayor's SPG makes clear that applications that do not meet the 35% threshold without grant funding will be subject to an early and a near-end viability review. Both reviews must therefore be secured in the section 106 agreement, with full details contained within the SPG.

24 The Mayor's SPG also sets out a preferred tenure split of at least 30% low cost rent social rent, 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; however more flexibility is encouraged in Opportunity Areas.

25 The Council's AAP encourages alternative affordable tenures to the social rented accommodation that currently dominates Tottenham, and pre-application advice identified that this highly accessible site adjacent to a station is suited to smaller intermediate tenure units. Therefore, the provision of all affordable units as shared ownership is acceptable in this case.

26 Of the intermediate units, it is proposed that 50% are affordable to those with annual household incomes of between £30,000 and £40,000, which is in line with the Mayor's SPG and is welcomed. The remaining 50% are proposed as affordable to those on incomes up to £90,000. The applicant's viability assessment has considered scenarios with lower income limits, as well as grant funding, which will be rigorously assessed by the Council and GLA officers to ensure an appropriate range of affordability is secured.

Housing

Density

27 London Plan Policy 3.4 'Optimising Housing Potential' states that taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output within the relevant density range shown in Table 3.2. The site is within an 'urban' setting where the density matrix sets a guideline of 45-260 units or 200-700 habitable rooms per hectare with a PTAL of 4-6.

28 The density proposed is up to 1,029 units per hectare. While this is above the density range, it is symptomatic of a tall building on a small site. The London Plan notes that density ranges should not be applied mechanistically and other local factors support higher density development, such as the provision of open spaces in the wider masterplan area and within Lee Valley Regional Park; the location in the Upper Lee Valley Opportunity Area and the Tottenham Housing Zone; and the high accessibility of the site adjacent to Tottenham Hale Station, intended to be a Crossrail 2 stop. The density proposed may therefore be acceptable, subject to resolution of design and residential quality issues raised below.

Children's play space

29 Policy 3.6 of the London Plan seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor's supplementary planning guidance (SPG) 'Shaping Neighbourhoods: Play and Informal Recreation', which sets a benchmark of 10 sq.m. of useable child play space to be provided per child, with under-fives play space provided on-site as a minimum.

30 The child yield is expected to be 19, with 12 under-fives. A total of 198 sq.m. of play space is proposed on the 'sky garden' at level 11, which will be accessible to all residents, with an internal residents' lounge overlooking. Furthermore, Hale Village already includes 6,538 sq.m. of play space, and the facilities of Down Lane Park and the Paddock Community Nature Park are within a 5-minute walk from the site. The proposals are therefore acceptable.

Urban design and tall buildings

31 The applicant proposes a new residential building that completes the Hale Village masterplan, improving the surrounding streetscape, connecting to neighbouring routes, and creating a public space addressing the station, which is supported. Servicing is located in the basement, which allows very good levels of active frontage at ground floor level, including a generous residential lobby. The non-residential uses are contained within a podium, extending beyond the footprint of the residential tower, which improves privacy and limits noise impacts for the residential units on lower levels.

32 The constrained site results in a triangular building floorplan, which poses challenges in the layout of residential floors; however, the applicant has responded well to concerns raised at pre-application stage. The Mayor's Housing SPG states that each core should accommodate no more than 8 units on each floor; however, levels 1-10 have 11 units. Having considered layout options extensively at pre-application stage, this is acceptable in this case considering the generous lift lobbies, limited length of corridors, and the constraints of the building footprint.

33 The proposal maximises dual aspect units, and projecting bays to living spaces are provided for all single aspect units, allowing a degree of cross ventilation and improved aspect, which is welcomed.

34 All units facing to the south and west are provided with private outdoor amenity space, which also helps to mitigate against sunlight overheating. However, units facing north and east (approximately 40% of the units spread across tenures and sizes) are provided with additional internal amenity space in place of balconies, which the applicant justifies as a reflection of limited sunlight reaching any balconies; wind impacts on balconies at high levels; noise impacts at low levels; and market demand for a choice of units both with and without private external amenity space. The additional internalised amenity space is equivalent in size to the space provision required for external amenity space, configured to be an extension of the main living space, with generously sized windows to maximise light and a splayed window to increase aspect. The Mayor's Housing SPG states that in exceptional circumstances, where site constraints make it impossible to provide private open space for all dwellings, a proportion may instead be provided with additional internal living space equivalent to the area of the private open space requirement. However, the characteristics of this site are not particularly exceptional, being likely to apply to most tall buildings, and the large proportion of units with no private external amenity space therefore raises concern, as it limits prospective residents' choice. This is especially concerning as the applicant presented some innovative options for winter gardens at pre-application stage. Therefore, the applicant should replace a proportion of those units that have additional internalised space, with winter gardens. The Housing SPG suggests this as an alternative to open balconies; however, winter gardens must have a drained floor and must be thermally separated from the interior.

35 It is noted that all units have access to a landscaped 'sky garden' measuring 198 sq.m., and adjacent residents' interior amenity space on level 11, which adds to the residential quality of the proposal.

36 The site is appropriate for a tall building, being highly accessible adjacent to Tottenham Hale station, and the outline planning permission approved a building of up to 19 storeys. The proposed increase in height to 33 storeys will fully exploit the transport accessibility of the site, potentially including Crossrail 2. It is noted that sites to both the east and the west have recently been granted planning permission for buildings of 21-22 storeys and the townscape views provided do not raise concerns. The height of the building is supported.

37 The applicant's approach to amenity space results in a varied and dynamic facade, with a distinctive 'crown'. The building steps in above level 11, which allows the lower section to relate to the shoulder height of the neighbouring buildings. The massing of the building is supported.

38 The building is proposed to be clad in white metal panels, with warmer colours to balcony soffits. The applicants' intention for a simple palette of colour/material in contrast to the wide range of materials and colour that exist in Hale Village is supported. Detailed design should ensure that the highest standard of cladding is delivered in accordance with the London Plan.

Inclusive design

39 The aim of London Plan Policy 7.2 'An Inclusive Environment' is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum). Policy 3.8 'Housing Choice' requires that 90% of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and 10% meets Building Regulation requirement M4(3) 'wheelchair user dwellings', that is, designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. A total of 10% (28 units) will be wheelchair accessible or adaptable, including private and affordable tenures and spread across the building. The Council should secure M4(2) and M4(3) requirements by condition.

Transport

40 A total of 36 car parking spaces are proposed, 24 of which are Blue Badge. The restrained provision (ratio 1:8) in this highly accessible location is acceptable in line with London Plan policy; however, the applicant should consider increasing Blue Badge provision to 10% (28 spaces), in line with the London Plan.

41 A total of 438 long stay and 7 short stay cycle parking spaces are proposed for the residential element of the development, which is in line with London Plan standards. In addition, 10 long stay and 28 short stay cycle parking spaces are proposed for the flexible commercial space; however, as a worse-case scenario (in reflection of the flexible use), the London Plan requires 18 long stay and 46 short stay cycle parking spaces and provision should therefore be increased. The internal layout of some of the basement storage rooms requires re-consideration as the aisles are too narrow for users to manoeuvre and park their bicycles without blocking access; the upper level of the two-tier racks is likely to restrict access to the facility; the location of Sheffield stands is likely to restrict access to the cycle storage room; and spaces located behind car park bays have restricted access.

42 The proposed public realm will adjoin a new pedestrian footbridge being delivered as part of the forthcoming redevelopment of the station. The footbridge will benefit the scheme as it will provide residents and visitors with step-free access into the station, as well as a step-free route through the station for non-station users, providing a direct and convenient connection to Tottenham bus station and the emerging district centre. The section 106 obligations relating to the delivery of the

public realm should ensure that the applicant is required to work with TfL to enable the pedestrian footbridge to be linked to the site.

43 Tottenham Hale Station is proposed as a key interchange on the Crossrail 2 route; however, improvement works to the station would be required to create this interchange. Such is the proximity between the site and the station that careful coordination is required between the applicant and Crossrail 2 and a safeguarding condition must therefore be attached to any planning permission to secure detailed design and construction method statements for ground floor structures, foundations and basements and any other structures below ground level. The applicant should confirm that noise mitigation measures will be sufficient to account for the major Crossrail 2 worksite likely to materialise alongside the site.

44 Haringey Council should secure a full delivery servicing plan by planning condition and a construction logistics plan by pre-commencement condition. The travel plan should be secured and monitored through the section 106 agreement.

Climate change

Energy

45 Based on the energy assessment submitted, an on-site reduction of 156 tonnes of CO₂ per year in regulated emissions is expected for the domestic buildings, compared to a 2013 Building Regulations compliant development, equivalent to an overall saving of 48%. The domestic buildings are required to meet the zero-carbon target and the applicant should therefore ensure that the remaining regulated CO₂ emissions, equivalent to 169 tonnes of CO₂ per annum, are met through a contribution to the Council's offset fund. The carbon dioxide emissions and savings for the non-domestic uses should be submitted before compliance with the London Plan can be determined. The applicant should maximise the potential for on-site renewable technologies installation, including photo-voltaics, and revisit their proposed strategy. Further information has been requested from the applicant, which is required before it can be confirmed that the application meets London Plan requirements.

Climate change adaptation

46 The site is located within Flood Zone 2, and a flood risk assessment has been undertaken. The development proposals comply with London Plan policy 5.12 'Flood Risk'; however, the lack of a full drainage strategy should be provided before it can be confirmed that the application complies with London Plan policy 5.13 'Surface Water Drainage'. Full comments have been provided direct to the applicant.

Local planning authority's position

47 Council officers have engaged in pre-application discussions with the applicant and are generally supportive of the proposal. The application is expected to be presented to Committee in early October.

Legal considerations

48 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 decision on the application, in order that the Mayor may decide whether to allow the 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. There is no obligation at this present 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

49 There are no financial considerations at this stage.

Conclusion

50 London Plan policies on Opportunity Areas; affordable housing; housing; urban design and tall buildings; inclusive design; transport; and climate change are relevant to this application. Whilst the principle of the proposal is supported in strategic planning terms, further information is required regarding the following issues before it can be confirmed that the proposal complies with the London Plan:

- **Affordable housing:** 15% (by habitable room) of the total units, or 48% of the uplift, made up of 100% intermediate shared ownership. GLA officers will work with the Council and the applicant to maximise affordable housing provision, and in the context of the Mayor's SPG, will robustly scrutinise the viability assessment, including the affordability of shared ownership units and potential grant funding. Early and late viability reviews must be secured in accordance with the SPG.
- **Urban design and tall buildings:** The applicant should replace a proportion of those units that have additional internalised space, with winter gardens.
- **Transport:** The applicant should consider an increased level of Blue Badge parking; increase the cycle parking to London Plan standard; and reconsider the layout of basement cycle storage. The section 106 obligations relating to the delivery of the public realm should ensure that the applicant is required to work with TfL to enable the pedestrian footbridge to be linked to the site. Crossrail 2 safeguarding, a full delivery servicing plan, and a construction logistics plan should be secured by condition.
- **Climate change:** Further information has been requested from the applicant, including the potential for on-site renewables, which is required before it can be confirmed that the application meets London Plan requirements.

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