

## Appendix x – External Consultation Responses

COMMENTOR	COMMENT	OFFICER RESPONSE
London Underground	<p>Thank you for your communication of 3rd August 2018.</p> <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 for each stage of the development.</p>	Comment noted.
Environment Agency	<p>Thank you for consulting us on the above planning application.</p> <p>We have reviewed the information submitted and have no objections to the proposals subject to the conditions set out below being invoked on any planning permission granted. Without these conditions we would object to the proposal in line with paragraph 170 of the National Planning Policy Framework because it cannot be guaranteed that the development will not cause, be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution. Condition EA1 Prior to each phase of development approved by this planning permission; a remediation strategy to deal with the risks associated with contamination of the site shall be submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:</p> <ol style="list-style-type: none"> <li>1. A preliminary risk assessment which has identified: all previous uses; potential contaminants associated with those uses; a conceptual model of the site indicating sources, pathways and receptors; and potentially unacceptable risks arising from contamination at the site.</li> <li>2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.</li> <li>3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.</li> <li>4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency</li> </ol>	Comments noted. The conditions recommended for imposition by the consultee are included in Appendix 1. The additional information provided is attached as an informative.

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	<p>action.</p> <p>Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.</p> <p>Reason To ensure that the development is not contributing to, put at unacceptable risk from, or adversely affected by unacceptable levels of water pollution in line with paragraph 170 of the National Planning Policy Framework. To prevent deterioration of groundwater within the principal aquifer underlying the site.</p> <p>The submitted ground investigation report and preliminary risk assessment has identified that the site has previously been used for a number of potentially contaminative land uses. The development includes extensive areas of landscaping and hard standing and the construction of roads and parking areas and will involve disruptive groundworks. These activities will alter the current site conditions, resulting in the creation of new pollutant pathways. The risk to the principal aquifer will need to be addressed to better constrain the conceptual site model and provide greater detail to the risk assessment. Condition EA2 Prior to each phase of development being brought into use a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.</p> <p>Reasons To ensure that the site does not pose any further risk to human health or the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 170 of the National Planning Policy Framework. To prevent deterioration of groundwater within the principal chalk aquifer.</p> <p>Condition EA3 The development hereby permitted may not commence until a monitoring and maintenance plan in respect of contamination, including a timetable of monitoring and submission of reports to the Local Planning Authority, has been submitted to, and approved in writing by, the Local Planning Authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to, and approved in writing by, the Local Planning Authority. Reasons To ensure that the site does not pose any further risk to human health or the water environment by managing any ongoing contamination issues and</p>	
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	<p>completing all necessary long-term remediation measures. This is in line with paragraph 170 of the National Planning Policy Framework. To prevent deterioration of groundwater within the principal chalk aquifer.</p> <p>Condition EA4 If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.</p> <p>Reasons To ensure that the development is not contributing to, put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 170 of the National Planning Policy Framework. To prevent deterioration of groundwater within the principal chalk aquifer. No investigation can completely characterise a site, this condition may be appropriate where some parts of the site are less well characterised than others, or in areas where contamination was not expected and therefore not included in the original remediation proposals.</p> <p>Condition EA5 No infiltration of surface water drainage associated with the development is permitted other than with the written consent of the Local Planning Authority. The development shall be carried out in accordance with the approved details.</p> <p>Reasons To ensure that the development is not contributing to, put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution caused by mobilised contaminants in line with paragraph 170 of the National Planning Policy Framework. To prevent deterioration of groundwater within the principal chalk aquifer.</p> <p>Infiltration of surface water has the potential to mobilise contamination present within the soil and made ground. Where the proposal involves the discharge of anything other than clean roof water via sealed drainage, within sensitive groundwater locations, a risk assessment and suitable level of treatment may be required. In certain circumstances the discharge may be classified as a groundwater activity and require an environmental permit. Due to the historic uses of the site we do not believe that the use of infiltration SuDS is appropriate in this location. Condition EA6 Piling or other intrusive ground works (investigation boreholes, tunnel shafts, ground source heating and cooling systems) using penetrative methods shall not be carried out other than with the written consent of the local planning authority. The development shall be carried out in accordance with the approved details.</p>	
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	<p>Reason To ensure that the proposed piling activities through potentially contaminated land is not contributing to, put at unacceptable risk from, or adversely affected by unacceptable levels water pollution caused by mobilised contaminants in line with paragraph 170 of the National Planning Policy Framework and the Environment Agency’s approach to groundwater protection. To prevent deterioration of groundwater within the principal chalk aquifer.</p> <p>Some piling techniques can cause preferential pathways for contaminants to migrate to groundwater and cause pollution. Developers proposing schemes that present a hazard to groundwater resources, quality or abstractions must provide an acceptable piling risk assessment to the environment Agency and the planning authority. Any activities that can adversely affect groundwater must be considered, including physical disturbance of the aquifer and appropriate mitigation measures should be proposed.</p> <p>Condition EA7 A scheme for managing any borehole installed for the investigation of soils, groundwater or geotechnical purposes shall be submitted to and approved in writing by the local planning authority. The scheme shall provide details of how redundant boreholes are to be decommissioned and how any boreholes that need to be retained, post-development, for monitoring purposes will be secured, protected and inspected. The scheme as approved shall be implemented prior to the occupation of the development.</p> <p>Reason To ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies in line with paragraph 170 of the National Planning Policy Framework and Position Statement A8 of the Environment Agency’s approach to groundwater Protection . We expect best practice regarding the development or backfilling of any shaft, well, borehole, tunnel, SuDs or adit in order to prevent pollution or loss of water resources. We expect operators to adopt appropriate engineering standards and comply with our publication, Good practice for decommissioning redundant boreholes and wells (Environment Agency 2012). Any contamination that is discovered during decommissioning or otherwise should be dealt with in accordance with our position statements on land contamination.</p> <p>Additional information</p> <p>Site Constraints</p> <p>We have no issues on flood risk grounds but would refer the applicant to our Flood Risk Standing</p>	
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	<p>Advice (FRSA).</p> <p>The previous use of the proposed development site as a landfill presents a high risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are considered to be particularly sensitive in this location because the proposed development site is;</p> <ul style="list-style-type: none"><li>• Sited on the regionally important principal chalk aquifer and the Thanet Sands deposit which are considered to be in continuity at this site.</li><li>• Within a source protection zone 2 for a public drinking water supply abstraction.</li></ul> <p>The Environmental Statement and associated Non-Technical Summary Dated July 2018 submitted in support of this planning application provides us with confidence that it will be possible to suitably manage the risks posed to controlled waters by this development. However, further detailed information will be required before built development is undertaken. It is our opinion that it would place an unreasonable burden on the developer to ask for more detailed information prior to the granting of planning permission but respect that this is a decision for the Local Planning Authority. In light of the above, the proposed development will be acceptable if the planning conditions listed above are invoked and a remediation strategy carried out by a competent person in line with paragraph 180 of the National Planning Policy Framework.</p> <p>Advice to Applicant on Model Procedures and Good Practice We recommend that developers should:</p> <ul style="list-style-type: none"><li>• Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.</li><li>• Refer to the Environment Agency Guiding principles for land contamination for the type of information that we required in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.</li><li>• Consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed.</li><li>• Refer to the contaminated land pages on GOV.UK for more information.</li></ul> <p>A Detailed Quantitative Risk Assessment (DQRA) for the principal chalk aquifer using the results of the site investigations with consideration of the hydrogeology of the site and the degree of any</p>	
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	<p>existing groundwater and surface water pollution should be carried out. This increased provision of information by the applicant reflects the potentially greater risk to the water environment. We feel that a DQRA for environmental health purposes should be sufficient to characterise near surface deposits.</p> <p>In the absence of any applicable on-site data, a range of values should be used to calculate the sensitivity of the input parameter on the outcome of the risk assessment. Where groundwater has been impacted by contamination on site, the default compliance point for Principal and Secondary aquifers is 50m. Following the DQRA, a Remediation Options Appraisal to determine the Remediation Strategy in accordance with CRL11. The remediation strategy should address the procedure for dealing with waste arising from piling activities in the historic landfill and appropriate materials management plan for reuse of suitable materials onsite.</p> <p>The verification plan should include proposals for a groundwater-monitoring programme to encompass regular monitoring for a period before, during and after ground works. E.g. monthly monitoring before, during and for at least the first quarter after completion of ground works, and then quarterly for the remaining 9-month period. Where SUDs are proposed; infiltration SUDs should not be located in unsuitable and unstable ground conditions such as land affected by contamination or solution features. As the site is a former landfill it may not be a practical options to use infiltration techniques for dealing with surface water and appropriate connections to the public sewer are expected. Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should have a suitable series of treatment steps to prevent the pollution of groundwater. For the immediate drainage catchment areas used for handling and storage of chemicals and fuel, handling and storage of waste and lorry, bus and coach parking or turning areas, infiltration SuDS are not permitted without an environmental permit.</p> <p>Further advice is available in the updated CIRIA SUDs manual. <a href="http://www.ciria.org/Resources/Free_publications/SuDS_manual_C753.aspx">http://www.ciria.org/Resources/Free_publications/SuDS_manual_C753.aspx</a> Waste on Site and Reuse of Materials The CLAIRE Definition of Waste: Development Industry Code of Practice provides operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste or have ceased to be waste. Under the Code of Practice, excavated materials that are recovered via a treatment operation can be re-used on-site providing they are treated to a standard such that they fit for purpose and unlikely to cause pollution treated materials can be transferred between sites as part</p>	
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	<p>of a hub and cluster project. Some naturally occurring clean material can be reused directly onsite.</p> <p>It will not be acceptable to reuse historic landfill material on site as this will remain waste and will need to be disposed in accordance with the relevant protocols. Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.</p> <p>The Environment Agency recommends that developers should refer to: the position statement on the Definition of Waste: Development Industry Code of Practice and the Environmental regulations page on GOV.UK.</p> <p>Advice to applicant on review of further documents If you would like us to review a technical report or document, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our planning advice service.</p> <p>If you wish to request a meeting, or document review, please contact our team email address at <a href="mailto:HNLsustainableplaces@environment-agency.gov.uk">HNLsustainableplaces@environment-agency.gov.uk</a></p> <p>Further information on our charged planning advice service is available at: <a href="https://www.gov.uk/government/publications/planning-advice-environment-agency-standard-terms-and-conditions">https://www.gov.uk/government/publications/planning-advice-environment-agency-standard-terms-and-conditions</a></p> <p>Decision notice: We record the outcome of planning applications and request that the decision notice is sent to <a href="mailto:hnl sustainableplaces@environment-agency.gov.uk">hnl sustainableplaces@environment-agency.gov.uk</a></p>	
<p>Greater London Archeological Advisory Service (GLASS) Historic England</p>	<p>Thank you for your consultation received on 03 August 2018.</p> <p>The Greater London Archeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter.</p> <p>NPPF section 16 and the London Plan (2011 Policy 7.8) make the conservation of archaeological interest a material planning consideration. NPPF paragraph 189 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.</p>	<p>Comments notes. The two-part condition and informatives are recommended for imposition in Appendix 1.</p>

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	<p>The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified for the Local Plan: Tottenham Hale Saxon Settlement.</p> <p>If you grant planning consent, paragraph 199 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.</p> <p>Whilst the submitted archaeological desk based assessment (CgMs, July 2018) does show some disturbance through the presence of modern made ground within the very limited number of geotechnical boreholes and window samples, I do not feel that this provide substantial evidence that the archaeological survival across the entire development site has been extensively compromised. I therefore do not agree with the recommendations set out within the assessment and instead a structured programme of archaeological works should be carried out to fully assess the archaeological significance of the site and any further mitigation. I am however happy for this to be carried out as part of an archaeological condition.</p> <p>In the first instance a geoarchaeological assessment and deposit model should be carried out. This should incorporate the existing geotechnical investigation results along with purposeful geoarchaeological boreholes in order to give a wider spread of borehole data and also allows for a better geoarchaeological interpretation of the site deposits.</p> <p>Additionally the geoarchaeological assessment should include a review of any hydrology reports which identifies the current and future hydrology within the site. Any changes in the site's hydrology could impact the long-term survival of any organic deposits/remains which will remain in situ following development. Any mitigation should also include a programme of public engagement. The nature of such should be discussed with this office.</p> <p>The above assessment will help to inform the scope for any subsequent targeted geoarchaeological/archaeological trenches.</p> <p>I therefore recommend attaching a condition as follows:</p> <p>Condition No demolition or development shall take place until a stage 1 written scheme of</p>	
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	<p>investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.</p> <p>If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:</p> <ul style="list-style-type: none"><li>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</li><li>B. The programme for post-investigation assessment and subsequent analysis, publication &amp; 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.</li></ul> <p>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.</p> <p>I envisage that the archaeological fieldwork would comprise the following: Geoarchaeological Assessment and Coring Geoarchaeology is the application of earth science principles and techniques to the understanding of the archaeological record. Coring involves boreholes drilled into the buried deposits to record (and sample) their characteristics, extent and depth. It can assist in identifying buried landforms and deposits of archaeological interest, usually by using the results in deposit models. Coring is often undertaken when the deposits of interest are too deep for conventional digging, or when large areas need to be mapped. It is only rarely used in isolation usually forming part of either an archaeological evaluation to inform a planning decision or the excavation of a threatened heritage asset.</p>	
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	<p>Evaluation</p> <p>An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.</p> <p>The scope of the archaeological mitigation will depend on the results of the above phases of work. You can find more information on archaeology and planning in Greater London on our website This response only relates to archaeology. You should also consult Historic England’s Development Management on statutory matters.</p>	
<p>London Fire Brigade</p>	<p>(Initial Comments 22<sup>nd</sup> August 2018)</p> <p>The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The Order) in London.</p> <p>The Commissioner has been consulted with regard to the above-mentioned premises and makes the following observations:</p> <p>The Commissioner is not satisfied with the proposals, for the following reasons: Insufficient information provided in relation to access and facilities for fire fighters, as set out in Section B5 Approved Document B</p> <p>Follow Up Comments (22<sup>nd</sup> September 2018)</p> <p>The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The Order) in London.</p> <p>The Commissioner has been consulted with regard to the above-mentioned premises and makes the following observations:</p>	<p>Initial and updated comments noted.</p>

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	<p>The Commissioner is satisfied with the proposals for fire fighting access as compliance with B5 of the Building Regulations following further consultation and information provided via email from Sam Liptrott representing Olssonfire.com.</p> <p>Any queries regarding this letter should be addressed to the person named below. If you are dissatisfied in any way with the response given, please ask to speak to the Team Leader quoting our reference.</p> <p>(Additional E-mail attached)</p>	
<p>Crossrail 2 Safeguarding Team</p>	<p>Transport for London administers the Crossrail 2 Safeguarding Direction made by the Secretary of State for Transport on 24 March 2015.</p> <p>Thank you for your letter dated 10 August 2018, requesting the views of the Crossrail 2 Project Team on the above application. I confirm that the application relates to land within the limits of land subject to consultation by the Crossrail 2 Safeguarding Direction. The development site is adjacent to the 2015 Crossrail 2 Limits of Safeguarding and Area of Surface Interest required for the future delivery of Crossrail 2. The Crossrail 2 project is currently undergoing an Independent Affordability Review which will consider the future deliverability of the scheme and how it can be made more affordable.</p> <p>Determination of the extent of the works required at Tottenham Hale is ongoing and no final decisions have been made. Nevertheless, the flexible retail / office / leisure uses on the ground floor and mezzanine levels within buildings 1 and 2 within the Island sites is supported as it will assist in reducing the possibility and impact on future residential occupants from the associated with Crossrail 2 works.</p> <p>TfL / Crossrail 2 would encourage an ongoing engagement between TfL /Crossrail 2, the borough and developer to ensure that the current proposals recognise and allow for, in the development design of the active spaces / public realm areas, the growth that Crossrail 2 will generate, particularly looking at the future pedestrian movements both through and to the development on the Island Sites in a Crossrail 2 scenario.</p> <p>The development will also be alongside the proposed Crossrail 2 work sites. It is therefore</p>	<p>Comments noted. Haringey Officers will continue to ensure developer liaises with Crossrail2 and TfL.</p>

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	<p>recommended that this is considered as when looking at the proposed building materials and soundproofing measures to be incorporated into the design.</p> <p>It would also assist the Crossrail 2 project if any details of foundation design and any ground condition / bore hole information can be shared with the TfL / Crossrail 2 Integrated Project Team. In addition, the latest project developments can be found on the Crossrail 2 website <a href="http://www.crossrail2.co.uk">www.crossrail2.co.uk</a> , which is updated on a regular basis.</p> <p>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 <a href="mailto:crossrail2@tfl.gov.uk">crossrail2@tfl.gov.uk</a></p>	
<p>Historic England</p>	<p>Thank you for your letter of 16 October 2018 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.</p> <p>Historic England Advice</p> <p>Significance and Impact</p> <p>The proposed master plan encompasses several sites gathered around the Tottenham Hale gyratory. None of the sites include any designated heritage assets, though the applicants have identified the former White Hart public house on the North Island site as a non-designated heritage asset. This, along with all other buildings, will be demolished. As the scheme would introduce buildings of exceptional height, there will be impacts on the setting and significance of various conservation areas and listed buildings in the wider area.</p> <p>The applicants' Townscape and Visual Impact Assessment, July 2018 (TVIA), demonstrates that there will be an impact on the setting of the following designated heritage assets:</p> <ul style="list-style-type: none"> <li>• Alexandra Palace (listed Grade II, Heritage at Risk);</li> <li>• Bruce Castle (listed Grade I);</li> <li>• Bruce Castle Conservation Area;</li> <li>• Bruce Grove Conservation Area (Heritage at Risk);</li> </ul>	<p>Comments noted. The application is judged in accordance with the Local Plan. Issues of Historic Conservation are set out in Section 6.9 of the report. Issues of townscape and building heights are set out in Section 6.5 of the report.</p> <p>The Clyde Circus Conservation Area was scoped out of the applicant's assessment as the plots do not currently and are unlikely ever to form part of the setting of the Conservation Area because there is no inter-visibility with the</p>

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	<ul style="list-style-type: none"> <li>• Tottenham Green Conservation Area;</li> <li>• Seven Sisters and Page Green Conservation Area;</li> <li>• The Ferry Boat Inn (listed Grade II, LB Waltham Forest);</li> <li>• The Pumping Station and Engine House at Markfield Park (listed Grade II);</li> <li>• Springfield Park (Grade II Registered Park, LB Hackney);</li> <li>• The White Lodge at Springfield Park (listed Grade II, LB Hackney).</li> </ul> <p>While they have not been assessed as part of the TVIA it is also possible that the setting of the following assets will have their setting altered by the visibility of the proposed towers:</p> <p>Clapton Common Conservation Area;  North Tottenham High Road Conservation Area (Heritage at Risk);  Scotland Green Conservation Area (Heritage at Risk);  Clyde Circus Conservation Area (Heritage at Risk);  Tottenham Cemetery Conservation Area;  Tower Gardens Conservation Area;  Georgian Orthodox Cathedral (Former Ark of the Covenant, Grade II* listed, LB Hackney);  Former almshouses at Edmanson's Close along Bruce Grove (Grade II listed)  William Morris Gallery (Grade II* listed, LB Waltham Forest).</p> <p>In addition to several of the conservation areas themselves, many of the area designations identified above include listed buildings that have been assessed as Heritage at Risk in the 2017 register published by Historic England.</p> <p>Legislation and Policy</p> <p>The Planning (Listed Buildings and Conservation Areas) Act 1990 (Section 66) establishes a statutory duty for decision makers to play special regard to the desirability of preserving the special architectural and historic interest of listed buildings and their setting.</p> <p>Guidance on the exercise of this duty is given in the Government's National Planning Policy Framework 2018 (NPPF) which recognises the conservation of the historic</p>	<p>plots themselves, or no known historical or functional association between the plots and the Conservation Area.</p>
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	<p>environment as part of the overarching environmental objectives necessary for the delivery of sustainable development.</p> <p>Chapter 16 of the NPPF deals with this in greater detail, and sets out a number of important statements relevant to this application. Paragraph 184 recognises heritage assets as an irreplaceable resource which should be conserved in a manner appropriate to their significance ‘so that they can be enjoyed for the contribution to the quality of life of existing and future generations’. Paragraph 185 goes on to encourage a strategic and plan-led approach to conservation.</p> <p>Proposals likely to affect a heritage asset should receive an assessment of significance from both the applicant and the local planning authority (Paragraphs 189 and 190). This should help to inform the planning process and to identify opportunities to avoid or minimise harm.</p> <p>Where harm to the significance of a designated heritage asset is identified, great weight should be given to the asset’s conservation. The more important the asset, the greater that weight should be (Paragraph 193). In order to be permissible, harm to the significance of a designated heritage asset must be clearly and convincingly justified, and should meet the tests of Paragraphs 195 and 196 of the NPPF according to the degree of harm in question. Both substantial and less than substantial harmful impacts must be outweighed by the delivery of public benefits in order to pass these tests. The NPPF also requires local planning authorities to look for new opportunities for development within the setting of heritage assets to enhance or better reveal their significance (Paragraph 200).</p> <p>Your Authority’s own Local Plan includes several objectives relating to the conservation of heritage assets under policy DM9 of the Development Management DPD (Adopted July 2017). There the need to account for, conserve and enhance the setting of heritage assets is set out at DM9.A, B, and C(a). DM9.D recognises the desirability of developing in a manner which is compatible with and/or complementary to the special characteristics and significance of the area.</p> <p>DM6.B(c) states that proposals for taller buildings that project above the prevailing height of the surrounding area should conform to the need to ‘conserve and enhance</p>	
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	<p>the significance of heritage assets, their setting, and the wider historic environment that would be sensitive to taller buildings’ and refers the reader to DM9.</p> <p>The Tottenham Hale District Centre Framework (December 2015) includes (Page 79) a set of proposed heights for the wider Tottenham Hale area. The tallest element illustrated in the DCF that is included within the proposed master plan area is 19 storeys.</p> <p>Historic England has published the following guidance of particular relevance they are: Historic Environment Good Practice Advice in Planning Note #3 - The Setting of Heritage Assets, 2nd Edition (December 2017); and, Historic England Advice Note #4 - Tall Buildings (December 2015). These set out a framework for the assessment of setting-based impacts on the significance of heritage assets, and need for a plan-led approach when dealing with tall buildings.</p> <p>Historic England’s Position</p> <p>While Historic England supports the principle of redevelopment across these sites, we are mindful of the exceptionally tall nature of the proposals in an area widely defined by low-scaled construction. This creates a zone of visual influence that is very wide and will reach across neighbourhood and borough boundaries. We draw your attention in particular to the very large number of conservation areas and listed buildings which will be affected by the appearance of the master plan buildings in their setting, several of which are considered to be Heritage at Risk.</p> <p>Historic England reminds your Authority of its duty to pay special regard to the setting of listed buildings, and the requirement of the NPPF and the Local Plan both to conserve the setting of conservation areas, and to seek opportunities to enhance or better reveal their significance. The scheme appears neither to enhance or reveal the significance of any of the heritage assets it impacts upon and will have no beneficial impact on the historic environment of any kind. It is also a shame that the only building on the development site identified by the applicants as a non-designated heritage asset (the former White Hart public house) will be demolished.</p>	
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	<p>As the tallest element of the proposed master plan doubles the height of that shown in the DCF for the same area, we would remind you of the desirability of ensuring that tall buildings are delivered in accordance with the policies established in the Local Plan. Where this is not the case, it may call into question the clear and convincing justification of any harmful impacts on the significance of heritage assets.</p> <p>By its nature this scheme will permanently alter the skyline of Tottenham and the surrounding area, and will appear in the setting of a great many heritage assets. Should your Authority wish to approve this scheme you should be convinced that it is not in conflict with the adopted Local Plan, and that the duties established in legislation and policy concerning the conservation of the historic environment have been satisfied.</p> <p>Recommendation</p> <p>Historic England does not object to the proposals, but we urge your authority to take the above representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.</p> <p>This response relates to designated heritage assets only. We recommend that you seek the view of the Greater London Archaeological Advisory Service as specialist archaeological adviser to the local planning authority.</p>	
Thames Water	<p>Waste Comments</p> <p>Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing a positive pumped device (or equivalent reflecting technological advances) to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.</p> <p>Fitting only a non-return valve could result in flooding to the property should there be prolonged surcharge in the public sewer. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water</p>	<p>Comments noted. Conditions and informatives recommended for imposition are contained in Appendix 1.</p>



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	<p>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 <a href="mailto:wwriskmanagement@thameswater.co.uk">wwriskmanagement@thameswater.co.uk</a>. Application forms should be completed on line via <a href="http://www.thameswater.co.uk/wastewaterquality">www.thameswater.co.uk/wastewaterquality</a></p> <p>Water Comments</p> <p>On the basis of information provided, Thames Water would advise that with regard to water network infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p> <p>There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes</a></p> <p>The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.</p> <p><a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-ordiverting-our-pipes">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-ordiverting-our-pipes</a>. Should you require further information please</p>	
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	<p>contact Thames Water. Email: <a href="mailto:developer.services@thameswater.co.uk">developer.services@thameswater.co.uk</a></p> <p>The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains and as such Thames Water request that the following condition be added to any planning permission.</p> <p>No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.</p> <p>Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.</p> <p><a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes</a> Should you require further information please contact Thames Water. Email: <a href="mailto:developer.services@thameswater.co.uk">developer.services@thameswater.co.uk</a>.</p> <p>The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface 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 infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.</p> <p><a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-</a></p>	
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	<p><a href="#">development/Working-near-ordiverting-</a> our-pipes. Should you require further information please contact Thames Water. Email:developer.services@thameswater.co.uk</p> <p>Following initial investigations Thames Water has identified that, the proposed development is located within Source Protection Zone of a groundwater abstraction source. The area is in a source protection zone, however the Ferry Island is a potential risk due to deep pilling. These zones are used for potable water sources for public water supply for which Thames Water has a statutory duty to protect. T</p> <p>hames Water have contacted the developer in an attempt to agree a Source Protection Strategy but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission.</p> <p>“Ferry Island development here by approved shall not commence until a Source Protection Strategy detailing, how the developer intends to ensure the water abstraction source is not detrimentally affected by the proposed development both during and after its construction has been submitted to and approved by, the local planning authority in consultation with the water undertaker. The development shall be constructed in line with the recommendations of the strategy.</p> <p>Reason - To ensure that the water resource is not detrimentally affected by the development. More detailed information can be obtained from Thames Waters' Groundwater Resources Team email GroundwaterResources@Thameswater.co.uk Tel: 0203 577 3603. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.</p> <p>Supplementary Comments</p> <p>We have no objection for surface water proposal however regarding foul water discharge we expect further developer's engagement and close work with our company to ensure suitable sewerage infrastructure is in place to serve the new development.</p>	
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	<p>24/08/2018 GWR: From discussions with the developer it has been confirmed that "for Ferry Island the combination of the building height and the requirement for a shared basement means that the proposed piles will exceed 30m below existing ground level based on the geotechnical information available to us at this time. We will be able to develop a Source Protection Piling Strategy in conjunction with a competent contractor during the technical design stage of the project." therefore the Source Protection Zone condition only applies to the Ferry Island Plot.</p>	
<p>Health and Safety Executive</p>	<p>HSE is a statutory consultee on relevant developments within the consultation distance of a hazardous installation or a major accident hazard pipeline.</p> <p>Planning Authorities should use the Web App to consult HSE on certain developments including any which meet the following criteria, and which lie within the consultation distance (CD) of a major hazard site or major hazard pipeline.</p> <ul style="list-style-type: none"> <li>• residential accommodation;</li> <li>• more than 250m<sup>2</sup> of retail floor space;</li> <li>• more than 500m<sup>2</sup> of office floor space;</li> <li>• more than 750m<sup>2</sup> of floor space to be used for an industrial process;</li> <li>• transport links;</li> <li>• or which is otherwise likely to result in a material increase in the number of persons working within or visiting the notified area.</li> </ul> <p>There are additional areas where HSE is a statutory consultee. For full details, please refer to annex 2 of HSE's Land</p> <p>Use Planning Methodology: <a href="http://www.hse.gov.uk/landuseplanning/methodology.htm">www.hse.gov.uk/landuseplanning/methodology.htm</a>  There is also further information on HSE's land use planning here:  <a href="http://www.hse.gov.uk/landuseplanning/">www.hse.gov.uk/landuseplanning/</a></p> <p>As this development does not lie within a CD, there is no need to consult us and HSE has no comments.</p>	<p>Comments noted.</p>
<p>Transport for London</p>	<p>(Initial Comments – 30.09.2018)</p>	<p>Comments noted. Relevant conditions</p>

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	<p>I write following receipt of the Transport Assessment (TA) dated July 2018 submitted in support of the above planning application to the London Borough of Haringey. This application was subject to TfL pre-application discussions and an advice letter was issued on the 24th April 2018.</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 five sites that make up the Tottenham Hale Centre development are located just west of Tottenham Hale interchange. The nearest sections of Transport for London Road Network (TLRN) are Monument Way and The Hale which run adjacent to the site.</p> <p>The nearest section of the Strategic Road Network (SRN) is A1010 High Road, which is approximately 1km to the north west of the site.</p> <p>The nearest station is Tottenham Hale, which is just across the Tottenham Hale Bus Station from the site providing access to rail services between Liverpool Street, Cambridge and Stansted Airport and underground services on the Victoria Line. A taxi rank and bus station are also located at Tottenham Hale, with the latter providing access to six bus services.</p> <p>Due to the aforementioned public transport connections, the Public Transport Accessibility Level (PTAL) of the site is 6a (where 1 represents the lowest accessibility level and 6 the highest).</p> <p>Proposed development</p> <p>We understand that the proposal is for demolition works and clearance of existing site to provide a mixed use development comprising:</p> <ul style="list-style-type: none"> <li>• Welbourne: 137 residential units, 267sqm (GIA) flexible commercial, 1,643sqm (GIA) health centre</li> <li>• Ferry Island (Building 1): 375 residential units, 1,323sqm (GIA) flexible commercial</li> <li>• Ferry Island (Building 2): 107 residential units, 689 flexible commercial</li> <li>• North Island (Building 3): 136 residential units, 448sqm (GIA) flexible commercial,</li> <li>• Ashley Road East: 183 residential units, 1,070sqm (GIA) flexible commercial, 831sqm</li> </ul>	<p>are contained in Appendix 1.</p>
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	<p>(GIA) office</p> <ul style="list-style-type: none"><li>• Ashley Road West: 98 residential units, 522sqm (GIA) flexible commercial</li><li>• Pavilion: 251sqm (GIA) flexible commercial</li></ul> <p>Based on the above information, therefore, we understand the total development proposal for Tottenham Hale Centre to be 1,036 residential units, 4,570sqm (GIA) flexible commercial, 831sqm (GIA) office and 1,643sqm (GIA) health centre.</p> <p>Trip Generation</p> <p>The trip generation forecast in its current form is unsatisfactory to TfL. Outstanding matters include: verification of 2011 Census data (e.g. with other data such as the Travel in London Report); further justification for the residential walking and cycling trip forecasts; provide further justification for the employment trip generation.</p> <p>The NCP near Blackhorse Road is being redevelopment by TfL, so it will not be available when Tottenham Hale Centre is operational.</p> <p>The cumulative schemes that have been accounted for have been listed in the transport assessment. However, there is no explanation of the type of development, planning status, and transport impact. We request summary information on each of the schemes in the cumulative scheme list.</p> <p>Healthy Streets</p> <p>The policy section refers to Healthy Streets approach, however, it is not clear how this has informed design or influenced the mitigation. We welcome further discussion with the applicant about this matter.</p> <p>We have a general concern regarding the definition of the public realm given that the blocks on the plan essentially don't have fronts and backs in the conventional sense, leading to some awkward, presumably publically accessible, spaces around and between buildings. We would like to understand more about how these spaces are going to work and how they are going to feel.</p> <p>Design and Access Statement, Vol.7, Section 4.3 / page 64</p>	
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	<p>Undelineated level surfaces, of the type shown here, are problematic for visually impaired pedestrians. It would be preferable to use street furniture and other physical or tactile features to define a ‘pedestrian only’ space that cannot be entered by vehicles and the extents of which can easily be understood by guide dog and long cane users. While there is no detailed guidance as yet, the Department for Transport’s Inclusive Transport Strategy makes it clear that it regards level surfaces as problematic and has asked local authorities to pause any scheme incorporating a level surface.</p> <p>Design and Access Statement, Vol.7, Section 4.4 / page 72</p> <p>Similar comments apply to Station Road, where flush kerbs are proposed in most of the street, with 50mm high kerbs elsewhere (noting that TfL Streetscape Guidance sets out a recommendation for at least 60mm for detectability). Here, it may be necessary to include at least one controlled pedestrian crossing rather than two uncontrolled crossing-points, as depicted. The use of corduroy paving “running along the main cycle routes of the plots” is not understood either from the description or the figure and appears not to be in line with national or London-wide guidance. A “two-way cycle route” running through the corner of the intersection between Station Road and Hale Road is not recommended. This kind of shared use facility may be workable where the flows of cycles and pedestrians are very low but this is not likely to be the case here. Cycle facilities, with-flow and contraflow, should be provided on the carriageway of Station Road.</p> <p>Cycle Parking</p> <p>1,817 long stay cycle parking spaces are proposed for the residential element of the development, with an additional 182 short-stay cycle parking spaces located within the public realm. The flexible commercial space is to be provided as shell and core capable of accommodating draft London Plan compliant cycle parking quantities. TfL is satisfied that the cycle parking quantity provision is draft London Plan compliant.</p> <p>The cycle parking should be fit for purpose, secure and well-located as well as being designed and laid out in accordance with the guidance contained in the London Cycling Design Standards (LCDS). As per LCDS guidance, at least 5% of stands ought to be able to accommodate larger cycles, including adapted cycles used by people with mobility impairments.</p> <p>Cycle Future Route 2</p>	
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	<p>You should note that the Cycle Future Route 2, a high quality cycle route from Camden to Tottenham Hale is due to be constructed in 2020/21. TfL is leading the scheme which is planned to begin on Ferry Lane, at the junction with Mill Mead Road proceeding to Broad Lane and the A10. With this investment in cycle infrastructure, the proposed development should maximise opportunities for cycling, including the provision of exemplary cycle parking referred to above.</p> <p><b>Car Parking</b></p> <p>The development will be car free, which is aligned to draft London Plan standards. A total of 31 accessible parking bays will be provided, which equates to one accessible bay per dwelling for 3% of dwellings. This aligns with the draft London Plan requirement for accessible parking provision from the outset.</p> <p>The applicant must demonstrate on plan and as part of the Car Parking Design and Management Plan, how the remaining bays to a total of one per dwelling for ten per cent of dwellings can be requested and provided when required as designated disabled persons parking in the future.</p> <p>The electric vehicle charging proposal is draft London Plan compliant with 20% provision, with a further 80% passive provision.</p> <p><b>Buses</b></p> <p>The development is forecast to generate 181 bus trips in the morning peak hour and 159 bus trips in the evening peak hour. This is a relatively large number of bus trips, which will likely need to be mitigated via a section 106 contribution. The distribution analysis presented in the transport assessment is not acceptable as it splits the bus demand by frequency of buses only. The applicant should provide a more detailed bus demand assessment that takes account of peak directions and popular destinations, rather than simply splitting demand evenly across buses. TfL will use this forecast to work out the necessary bus mitigation contribution. If the applicant fails to produce a satisfactory forecast in a reasonable timeframe then TfL may assume that bus trips will increase demand on the busiest routes and request mitigation accordingly.</p> <p><b>Crossrail 2</b></p>	
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	<p>The development site is adjacent to the 2015 Crossrail 2 Limits of Safeguarding and Area of Surface Interest required for the future delivery of Crossrail 2 (see Figure 1). The Crossrail 2 project is currently undergoing an Independent Affordability Review which will consider the future deliverability of the scheme and how it can be made more affordable. Determination of the extent of the works required at Tottenham Hale is ongoing and no final decisions have been made. Nevertheless, the flexible retail / office / leisure uses on the ground floor and mezzanine levels within buildings 1 and 2 within the Island sites is supported as it will assist in reducing the possibility and impact on future residential occupants from the associated with Crossrail 2 works.</p> <p>TfL / Crossrail 2 would encourage an ongoing engagement between TfL /Crossrail 2, the borough and developer to ensure that the current proposals recognise and allow for, in the development design of the active spaces / public realm areas, the growth that Crossrail 2 will generate, particularly looking at the future pedestrian movements both through and to the development on the Island Sites in a Crossrail 2 scenario. The development will also be alongside the proposed Crossrail 2 work sites. It is therefore recommended that this is considered as when looking at the proposed building materials and soundproofing measures to be incorporated into the design. It would also assist the Crossrail 2 project if any details of foundation design and any ground condition / bore hole information can be shared with the TfL / Crossrail 2 Integrated Project Team.</p> <p>Figure 1. 2015 Crossrail 2 Safeguarding Direction and Area of Surface Interest – Tottenham Hale.</p> <p>TfL Commercial Development</p> <p>TfL Commercial Development are providing a separate set of comments in response to this consultation.</p> <p>Freight</p> <p>A full Delivery and Servicing Plan should be secured by condition and a Detailed Construction Logistics Plan should be secured by pre-commencement condition.</p> <p>Travel Planning</p> <p>A full Travel Plan should be secured and monitored through the Section 106 agreement.</p> <p>2015 Crossrail 2 Limits of Land –edged in Red 2015 Crossrail 2 Area of Surface Interest –blue</p>	
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	<p>crosshatching</p> <p>I trust that the above provides you with a better understanding of TfL’s current position on the document. Please do not hesitate to contact me if you have any questions or need clarification on any of the points raised.</p>	
Bridge Renewal Trust	<p>On behalf of The Bridge Renewal Trust, I would like to support this planning application. In particular, we welcome the mixed tenure options on the proposed homes, new large health centre, serving 30,000 local people and potential use of the facilities by local community whilst it reaches full capacity.</p>	<p>Comment of Support noted.</p>
Network Rail	<p>Thank-you for consulting Network Rail on the above planning application. Please find below our comments.</p> <p>Network Rail is a part of the integrated project team enabling the development of Crossrail2. The development site is adjacent to the Tottenham Hale station, and therefore to allow for future growth of the station, Network Rail would recommend that the council and developer liaise with the Crossrail2 team to ensure that all proposals recognise and facilitate this growth, and mitigate any noise/disturbance that could be caused from the Crossrail2 works.</p> <p>The Developer must ensure that their proposal, both during construction and after completion of works on site, does not:</p> <ul style="list-style-type: none"> <li>• encroach onto Network Rail land</li> <li>• affect the safety, operation or integrity of the company’s railway and its infrastructure</li> <li>• undermine its support zone</li> <li>• damage the company’s infrastructure</li> <li>• place additional load on cuttings</li> <li>• adversely affect any railway land or structure</li> <li>• over-sail or encroach upon the air-space of any Network Rail land</li> <li>• cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future</li> </ul>	<p>Comments noted. Conditions and informatives are attached in Appendix 1.</p>

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	<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><b>Future maintenance</b> The development must ensure 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 facilitate works. The applicant / resident would need to receive approval for such works from Network Rail Asset Protection, 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><b>Drainage</b></p> <p>Storm/surface water must not be discharged onto 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 Network Rail Asset Protection. Suitable foul drainage must be provided separate from Network Rail's existing</p>	
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	<p>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><b>Plant &amp; Materials</b></p> <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><b>Scaffolding</b></p> <p>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><b>Piling</b></p> <p>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 approval to Network Rail Asset Protection prior to the commencement of works and the works shall only be carried out in accordance with the approved method statement.</p> <p><b>Fencing</b></p> <p>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</p>	
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	<p>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 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</p> <p>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 approval of their detailed proposals regarding lighting.</p> <p>Noise and Vibration</p> <p>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 hold 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>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>Network Rail strongly recommends the developer contacts Network Rail Asset Protection London South East at <a href="mailto:AssetProtectionanglia@networkrail.co.uk">AssetProtectionanglia@networkrail.co.uk</a> prior to any works commencing on site, and also to agree an Asset Protection Agreement with us to enable approval of detailed works. More information can also be obtained from our website at <a href="http://www.networkrail.co.uk/aspx/1538.aspx">www.networkrail.co.uk/aspx/1538.aspx</a>.</p>	
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<p>Metropolitan Police Designing Out Crime Officer</p>	<p>Thank you for allowing us to comment on the above planning proposal.</p> <p>With reference to 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>Observations</p> <p>At this stage we have studied the EIO Scope Haringey Island - Planning Statement and are satisfied that the requirements of the Metropolitan Police are met within the statement. The proposed development within the planning scope appears to positively seek engagement with Secured by Design to ensure that the current Police accredited standards are met.</p> <p>Legislation &amp; 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 <a href="http://www.securedbydesign.com/professionals/guides.aspx">http://www.securedbydesign.com/professionals/guides.aspx</a> )</p> <p>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>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>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);</p>	<p>Comments noted. A two part condition is attached in Appendix 1.</p>
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	<p>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>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. For a complete explanation of certified products please refer to the Secured by Design guidance documents which can be found on the website. <a href="http://www.securedbydesign.com">www.securedbydesign.com</a> . Conclusion:</p> <p>We would ask that our department’s interest in this planning application is noted and that we are kept appraised of developments. Additionally, we 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> <p>APPENDIX 1 + 2 (Policy + Crime Statistics)</p>	
<p>Canal and River Trust</p>	<p>Thank you for your consultation.</p> <p>The Canal &amp; River Trust (the Trust) is the guardian of 2,000 miles of historic waterways across England and Wales. We are among the largest charities in the UK. Our vision is that “living waterways transform places and enrich lives”. We are a statutory consultee in the development management process.</p> <p>The Trust has reviewed the application. This is our substantive response under the Town and Country Planning (Development Management Procedure) (England) Order 2015.</p> <p>The main issues relevant to the Trust as statutory consultee on this application are:</p> <p>a) Impact on the towpath due to the proximity of the development to the canal.</p>	<p>Comments noted. Given the distance of the development to waterway and the viability challenges associated with the scheme contributions around operational equipment used to manage aquatic weeds and towpath widening are not able to be secured. Issues of ecology and habitats</p>

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	<p>b) Impact on the biodiversity of the waterway corridor.</p> <p>On the basis of on the information available our advice is that a legal agreement is necessary to address these matters. Our advice and comments are detailed below:</p> <p>Impact on the towpath          The Trust is the owner and navigation authority of the Lee Navigation to the east of the development site. The site is within one mile, approximately 7 minutes walk (or less for cyclists), to our network. Towpaths make excellent places for people to walk and cycle considerably.</p> <p>Not only is this a recreational resource, it can be an attractive commuter route (the towpath acts as a key north to south route away from roads), reducing congestion, carbon emissions and poor air quality in the wider area and supporting people to lead healthier lives. Given the proximity of the site to our network and the likelihood that the development would result in additional users of our towpath for recreation and commuting, we would require a planning contribution or works in kind towards towpath, wayfinding and access point improvements to mitigate against the additional users. The stretch of towpath between Markfield Park and Ferry Lane requires widening in sections and re-surfacing, wayfinding from the site onto our network would be beneficial to assist people with connecting up to the towpath and widening of the access points from Ferry Lane onto the towpath would help assist cyclists and walkers.</p> <p>Promotion, protection and improvement of walking and cycling routes is consistent with Haringey’s Local Plan Strategic Policy, SP7 Transport and Development Management Policy DM31 Sustainable Transport and the Transport Strategy for 2018.</p> <p>Impact on the biodiversity of the waterway corridor</p> <p>The channel of the Lee Navigation is under a lot of pressure, urban pollution has made the aquatic habitat a volatile place. To help mitigate against the negative effects of urban pollution, aquatic marginal vegetation in form acts as a buffer to pollutants entering the water course and also in function helps filter pollutants out of the water. A development of this size should commit to a minimum of 150m of marginal aquatic habitat (floating reed beds) within the section of the River South of Tottenham lock.</p>	<p>are set out in Section 6.14</p>
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	<p>Aquatic weed in the Lee Navigation is a concern and causes smell and nuisance, impacting on visitors' enjoyment of the waterway. The Trust uses cutting and collection hoppers to manage weed. As development leads to increased demand on our resources, we would require a contribution towards the operational equipment used to manage aquatic weed. Haringey's Local Plan Strategic Policy, SP13 Open Space and Biodiversity seeks contributions towards wildlife and ecological habitats, the Lee Navigation is an ecological corridor and Development Management Policy DM28 seeking environmental enhancement of watercourses further supports this.</p> <p>Summary</p> <p>As described above, we would expect a contribution from the future development towards enhancement of the waterway environment. The development will bring many more people and visitors to the area, which will impact on the quality of the Lee Navigation environment and the Trust's management of it. If the Council is minded to grant planning permission, it is requested that a s106 contribution (or works in kind) be secured towards the works identified above to mitigate the impact of the development. We would be pleased to provide more detail of the works we consider would be appropriate.</p> <p>For the Trust to effectively 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>Natural England</p>	<p>Thank you for your consultation on the above dated 03 August 2018 which was received by Natural England on 09 August 2018</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>European sites – Lee Valley Special Protection Area</p> <p>Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on the Lee Valley Special Protection Area and has no objection to the proposed development.</p>	<p>Comments Noted. Ecological issues are set out in Section 6.14</p>

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	<p>SUMMARY OF NATURAL ENGLAND'S ADVICE</p> <p>NO OBJECTION</p> <p>Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on designated sites and has no objection.</p> <p>However, we do have additional advice on other natural environment issues which is set out below.</p> <p>Page 2 of 3</p> <p>To meet the requirements of the Habitats Regulations, we advise you to record your decision that a likely significant effect can be ruled out. The following may provide a suitable justification for that decision:</p> <ul style="list-style-type: none"><li><input type="checkbox"/> The use of green spaces such as Down Lane Park to the north of the development as an alternative to Walthamstow Wetlands will minimise the potentially for increased visitor pressure at Lee Valley SPA. We do, however, recommend you acknowledge any evidence that comes forward relating to increasing visitor pressures at Lee Valley SPA in the near future.</li></ul> <p>Green Infrastructure</p> <p>Whilst we have no objection to the application in terms of potential impacts on Lee Valley SPA we would like to comment on the development's Green Infrastructure (GI) proposals. GI is a network of connected, high quality, multi-functional open spaces, corridors and the links in between that provide multiple benefits for people and wildlife: this has been embodied locally in the Tottenham Green Grid Strategy. Policy SP13 of the Haringey Local Plan Strategic Policies looks to secure biodiversity gain from development which in turn contributes to the Tottenham's Green Grid.</p> <p>Natural England believes that more GI could be incorporated into this development proposal. After reviewing the documents to this application, we believe that there is opportunity to incorporate a wider range of GI measures in addition to street trees and green roofs (together with ecological measures recommended within the Ecological report) reflecting the ambition of "greening the grey" with the housing zone:</p> <ul style="list-style-type: none"><li>areas of hard landscaping could be redesigned into a greener courtyard or pocket parks;</li><li>where street trees are not feasible to install, consider creating rain gardens, planting shrubs and planters that provide forage for birds and insects as well as green walls and roofs;</li><li>elements of the SUDs system could be green engineered introducing water into the development;</li></ul>	
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	<p>in some cases public access and biodiversity could be combined to allow for greater access to green spaces. Others should remain unlit and provide specific habitats to support biodiversity.</p> <p>We recommend that developer contributions to enhance and maintain Down Lane Park (or other local spaces) are considered in order to secure high quality green space for the current and future community, thus generating further social, economic and environmental benefits for the local area as reflected in the Tottenham Hale Green Grid.</p> <p>Providing a high quality, natural greenspace that is seamlessly linked to the development site by well-maintained green routes will allow for greater access to nature for the public, particularly beneficial for health and well-being as well as creating wildlife corridors. Lighting levels should allow for a darker route for commuting bats. It would also provide net gains for the environment, satisfying Local Plan policies and NPPF paragraph 170.</p> <p>Development at the Cannon Factory (ref HGY/2018/2353) to the north of this development site proposes a more in-depth GI strategy, laying out its proposals to create greener public realms and access to the nearby Down Lane Park. We believe that the SDP development sites could benefit from a joint/interlinked strategy between the two development sites, using the Green Grid Strategy principles and goals. This would allow for a more interconnected GI of a high standard, securing benefits such as net gains for biodiversity, improved surface water management, climate change adaptation, improved access to nature and greener, healthier walking routes.</p> <p>Further information regarding Green Infrastructure can be found here Should the proposal change, please consult us again.</p>	
Greater London Authority	See Stage 1 Report – Appendix 12	Comments noted. Various planning issues are addressed in Section 6 of the report.
Haringey Citizens	Haringey Citizens is a broad based alliance of civil society organisations in Haringey. We have been following the process of the proposed development closely for the past two years and have met with representatives Argent Related LLP to discuss their plans for the area.	Concerns noted. Issues of Affordable Housing are set out in

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	<p>We have reviewed the information submitted and based on the plans above, Haringey Citizens considers that whilst the proposed development will have some significant positive impacts on the local area, we do have some major concerns.</p> <p>We therefore offer advice on how best the council and additional parties can work together to make some changes to the plans in the hopes of achieving our desired outcomes during the development stages.</p> <p>These are set out below:</p> <p>Affordability:</p> <ul style="list-style-type: none"><li>- We have serious concerns over the lack of genuinely affordable housing available across the sites.</li><li>- We do not consider shared ownership to be an 'affordable' housing model and struggle to see how people from Tottenham Hale will be able to afford to move into these new units.</li><li>- We feel strongly that affordability should be linked to average incomes, not the market rate. Other products of genuinely affordable housing would be preferable - for example London Living Rent, Community Land Trusts or Social Rent - all of which can be affordable to local people and are supported by the Mayor of London.</li><li>- We are aware that the current view of affordability adopted by the Council and developers includes the options such as shared ownership and argue that this is not 'genuinely affordable' in the context of Tottenham as it continues to neglect residents' ability to rent or buy within their means.</li><li>- We have consistently raised this issue with Argent Related on numerous occasions and are frustrated that our suggestions have been overlooked.</li><li>- We urge the Council, the GLA and Argent Related to urgently review the affordable housing offer for the development.</li><li>- We recognise the importance of new homes being built as vital to the area and call for a new deal to be struck that is a significant improvement to the current offer.</li></ul> <p>Community space &amp; Public Realm:</p>	<p>Section 6.4. The amount of affordable housing has been increased. The application will be required by legal obligation to ensure public access to key areas. Support of Health Centre noted.</p>
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	<ul style="list-style-type: none"> <li>- We would like to see existing and future local residents and the community play a more meaningful role in the management of the public spaces and public realm. We are concerned that the spaces provided will become overly commercialised and in affect private.</li> <li>- Friends of Tottenham Green for example have over the past 3 years presented good examples of how public space can be managed in a creative way to accommodate community activities - what has been significant is that they have been able to hold FOTG space for the community to engage and exchange with each other - and we'd like to see a similar dedicated space and role for community groups and residents across Tottenham Hale.</li> </ul> <p>Health Centre:</p> <ul style="list-style-type: none"> <li>- We are encouraged to see plans for a new health centre on the Welbourne site and recognise the importance of community health centres and how beneficial they are in providing care for increased numbers of local patients.</li> <li>- We are keen that the health centre offers a broad range of comprehensive services to assist in addressing the pressing health needs of local people but do so in a way that complements, and not replaces, the existing provision locally.</li> </ul>	
<p>Friends of the Earth – Tottenham and Wood Green.</p>	<ol style="list-style-type: none"> <li>1. The development does not meet the zero carbon standard. Haringey should look for higher energy standards and in particular question the high glazing ratios (&gt;25%) which must be less energy efficient than a lower glazing ratio.</li> <li>2. This high glazing ratio also increases the risk of overheating (and hence energy use for air conditioning).</li> <li>3. We support the proposed DEN but note that this will still rely on fossil gas. A transition plan to move away from gas to a renewable energy source as soon as possible should be required as part of a S106 agreement. We support proposed use of heat pumps, especially as these can be reversed to provide cooling; and they use electricity which can be sourced from renewable generation. A condition or S106 should require a renewable supply for the whole development.</li> <li>4. We welcome the inclusion of solar PV on some roofs and green/blue roofs on other buildings but we note that combining PV and green roofs helps improve the efficiency of the PV by reducing ambient temperatures, and can also protect green habitat by providing some shade during heatwaves such as summer 2018. So Haringey should ask if more PV cannot be provided by</li> </ol>	<p>Comments noted. The Carbon Manager has made updated comments following discussions with the applicant and supports the scheme. Issues of Energy and sustainability are set out in Section 6.12. Ecological issues are set out at 6.14 and Transportation issues at 6.11.</p>

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	<p>doing this.</p> <p>5. Where the development still does not standard the Council should impose the full zero carbon levy at £60. This should not be traded away for other gains. The income derived can be used for retrofit of homes in fuel poverty and at the same time reduce carbon emissions.</p> <p>6. We support the car-free policy. However we note that in previous developments some residents have got round it by parking off site. The Council needs to work to ensure a comprehensive CPZ throughout the area (and including HfH streets and land, especially Chestnuts Road) to prevent this.</p> <p>7. The car club should employ only all-electric vehicles to minimize air pollution.</p> <p>8. The area is important for starlings and house sparrows, both declining species. The trees behind nearby Tamar Way in particular have been an important winter roost site for starlings. The development should incorporate appropriate nesting sites for both species, and forage areas. House Sparrows require rough grassland and scrub. Some of the open areas should be planted and managed in an appropriate way to provide food for sparrows.</p> <p>9. Light pollution is caused not just be external lighting but by light escape from within buildings, including residential buildings. Conditions should be applied to require glazing that will minimize light transmission outwards.</p> <p>10. We welcome the proposed food-growing area on the roof of the Welbourne site but again query whether this cannot be combined with solar PV.</p>	
<p>Haringey Green Party</p>	<p>Our main objection is to the lack of social housing in this development, especially given the desperate need for social housing in the Borough, not to mention the GLA policy of ensuring that 40% of new built housing developments are social housing or 'affordable'. This is compounded by the fact that Argent are defining 'affordable' as 'shared ownership' which it really isn't.</p> <p>We are also concerned about the height of the tallest structure. Given that there is already a 23 storey building in the Borough and another 22 storey building is to be built close to this site.the smaller structures are not such a problem but a 38 storey building (over 100 metres tall) will be visible over a huge area.</p> <p>We recognise that there is a need for housing in London and that this close to Tottenham Hale station, with rail transport links to Stratford, Liverpool Street, Cambridge, Stansted Airport and via the Victoria Line to Central London, However, those routes are often filled to capacity and more so this development would require matching develops in infrastructure.</p> <p>It is also important to note that the housing we need is for people who work in London, many or most of whom cannot afford the cost of the flats included in this development even if they are shared ownership. The need is also for housing for families and we note that the majority of the</p>	<p>Comments noted. The Carbon Manager has made updated comments following discussions with the applicant and supports the scheme. Issues of Energy and sustainability are set out in Section 6.12. Ecological issues are set out at 6.14 and Transportation issues are set out at 6.11. Issues of Affordable Housing are</p>

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	<p>units in this development are one or two bedroomed.</p> <p>Finally, we note the introduction of 'new public squares'. We recognise that King's Cross Square, which was also built by Argent, is very attractive but, given that the majority of this development is on council property, they would need to be genuinely public (ie with the council and the police being the only ones with the power to restrict what goes on in those squares.</p>	<p>set out in Section 6.4.</p> <p>The amount of affordable housing has been increased. The application will be required by legal obligation to ensure public access to key areas.</p>
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<p>Chesnut Residents Association</p>	<p style="text-align: center;"><b>No to a 16-storey tower on the former Welbourne Centre</b></p> <p>We the undersigned Chesnut Estate residents and supporters demand the immediate withdrawal of the Argent Related proposal to build a 16-storey tower and side sides of 7 and 6 floors in height on the site of the former Welbourne Centre in Tottenham Hale N17.</p> <p>Further, we call upon Argent, and Haringey Council, to genuinely work with the Chesnut Estate residents and surrounding neighbourhood to develop a plan for buildings appropriate in height to the existing low-rise estate homes. This new proposal to have at least 50% social rent homes, replacement of the community facilities lost by the demolition of the Welbourne Centre, and to improve Chesnut Road as a safer more attractive space.</p> <p><b>We are aware that once presented in the planning process, the details below will be open to the public to scrutinise, and we have not included information about other parties (family members, friends etc.)</b></p> <table border="1" data-bbox="443 699 1592 1050"> <thead> <tr> <th>NAME</th> <th>EMAIL</th> <th>ADDRESS</th> <th>SIGNATURE</th> </tr> </thead> <tbody> <tr> <td>CHRIS Nicol</td> <td></td> <td>68 TAMARWAY</td> <td></td> </tr> <tr> <td>Zulku Bozdogan</td> <td></td> <td>78 Tamar way</td> <td></td> </tr> <tr> <td>M D Jarvis</td> <td></td> <td>75, Tamar</td> <td></td> </tr> <tr> <td>Mr. D. Wojcik</td> <td></td> <td>59 TAMARWAY</td> <td></td> </tr> </tbody> </table>	NAME	EMAIL	ADDRESS	SIGNATURE	CHRIS Nicol		68 TAMARWAY		Zulku Bozdogan		78 Tamar way		M D Jarvis		75, Tamar		Mr. D. Wojcik		59 TAMARWAY		<p>Objection noted. The proposal includes community facilities in the form of a health centre. Objection noted.</p> <p>The applicant has added Council homes to the scheme to be occupied by nominated occupiers.</p> <p>Issues of Affordable Housing (including affordable housing size) are set out in Section 6.5 of the report.</p> <p>The London Fire Brigade is satisfied with the proposals in fire safety terms.</p> <p>Issues of Fire Safety are set out in Section 6.19 of the report. The development would be air quality neutral and take traffic off local roads. Issues of Air Quality are set out in Section 6.10.</p>
NAME	EMAIL	ADDRESS	SIGNATURE																			
CHRIS Nicol		68 TAMARWAY																				
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	<p>We are writing with regards to planning Application HGY2018/2223, on behalf of Chesnut Residents Association which represents 400 households in Tottenham Hale</p> <p>We are initially concerned with the developer's method of putting forward a huge application for multiple sites because it makes it practically impossible for lay people to thoroughly scrutinise and consider the plans, in particular to look at individual sites with their specific areas of concern. We strongly object to the fact that council owned land, the Welbourne Site, is being sold to the developer and being bought back by the council in order for some units to be rented out as council housing. This is an unacceptable use of council funds as they should not be selling the land to the developer in the first place, but paying directly for housing to be built there that is solely for council social rent.</p> <p>There are 9,000 households on Haringey's waiting list, who would be unable to meet the eligibility criteria for accessing any of these currently proposed units. This planned portfolio does little to reduce the strain of housing benefit provision by Haringey. They are currently wasting a lot of money housing people in private and temporary accommodation, which is unsustainable; or breaking up communities by relocating households out of London as a gentrification strategy.</p> <p>Air quality is already poor in Tottenham Hale. This borough and this area specifically are already affected by toxic air. The building works will increase pollution for many years. The massive increase in population in the area will create a permanent increase in traffic, with more congestion, which is already appalling, with engines idling along the routes. There will be an increased burden on already strained education resources and community and recreation facilities such as Down Lane Park.</p> <p>The 38-storey tower is designed with a single escape stairway which contravenes London Fire Brigade safety recommendations for buildings beyond 10 floors in height. It would be a travesty for Haringey to be responsible for a future Grenfell.</p>	
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<p>Haringey Defend Council Housing</p>	<p>We wish to object to this planning application under six headings: Lack of Council or social rent housing, Tenure segregation, Equality Issues, Fire Safety, Unexplained site boundary, and use of GLA funding.</p> <p>ONE: Lack of Council or social rent housing With not a single Council or social rent dwelling, this application does not comply with Haringey’s Local Plan Strategic Policy 3.2.2, ‘The Council will seek to ensure that everyone has the opportunity to live in a decent home at a price they can afford and in a community where they want to live’.</p> <p>The scheme identifies only 25% affordable housing provision, all shared ownership. Shared ownership is not adequate for the great majority of people seeking housing as having to pay rent, service charges and a mortgage is deeply problematic and restrictive for most households.</p> <p>We demand 50% Council rented housing, with rents and service charges equal to the rents and service charges residents currently paid for council housing in Haringey. We demand 100% council housing on the Welbourne site. All other sites within this planning application should have a mixture of tenures including council rent.</p> <p>TWO: Tenure segregation</p> <p>The segregation of tenures by block, by core, and by floor, on this site is unacceptable and does not comply with Haringey Council’s Local Plan Strategic Policy SP 3.2.3, paragraph 10, ‘[High quality new residential development in Haringey will be provided by] Ensuring affordable housing units are designed to a high quality and are fully integrated within schemes.’ [our emphasis]</p> <p>Ferry Island and Ashley Road East are exclusively market dwellings. North Island is exclusively Shared Ownership. Ashley Road West is split between market and Shared Ownership but these are accessed via separate cores. Welbourne is split between market and Shared Ownership, but with 2 monotenure cores.</p> <p>The only mixed tenure core (no affordable renters) is then split by floors. The applicant’s Affordable Housing Statement Paragraphs 6.25, 6.26, and 6.34) is explicit that tenure segmentation has been designed-in to the scheme. It is claimed that this is for resident affordability regarding service charges, but we believe that the real reason is to increase market</p>	<p>Objection noted. The applicant has added Council homes to the scheme to be occupied by nominated occupiers. Issues of Affordable Housing (including affordable housing size) are set out in Section 6.5 of the report. Building 3 and Ashley Road West will be mixed tenure buildings. Issues of equalities are set out in Section 6.20. The proposal is not a breach of equalities legislation. The London Fire Brigade is satisfied with the proposals in fire safety terms. Issues of Fire Safety are set out in Section 6.19 of the report. The red line area is a decision for the applicant and it may encompass public highway.</p>
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	<p>value of private properties but guaranteeing separation from affordable residents. We say NO to poor doors and residential segregation!</p> <p>THREE: Equality Issues</p> <p>The applicant has not chosen to present an Equality Impact Assessment. However, see 'The Equality Act and its impact on Planning Law' (2010), John Halford, partner at Bindmans LLP, for the significance of the positive equality duties in section 149 of the Equality Act 2010 for planning policy. <a href="http://camdencen.org.uk/Resources/Planning/equality-act-and-planning-law.pdf">http://camdencen.org.uk/Resources/Planning/equality-act-and-planning-law.pdf</a></p> <p>The detrimental impact of this present scheme is evident when placed in the context of housing-related inequalities in this borough:</p> <p>Haringey Council's Housing Needs Survey</p> <p>Haringey's Housing Needs Survey (HNS) 2013, which formed part of the evidence base for the Strategic Housing Market Assessment and the Local Plan, shows that of the 48% of households in Haringey who had no savings or were in debt (excluding mortgages), 61% of households of mixed heritage, 69% of black households, and 74% of Asian households in Haringey had no savings or were in debt. The comparative figure was that 37% of White households in Haringey had no savings or were in debt. EVERY home in this scheme requires capital and savings for access, which many current residents of Tottenham Hale do not have.</p> <p>Haringey Council's Joint Strategic Needs Assessment</p> <p>Haringey Council's Joint Strategic Needs Assessment (JSNA) of 2015 demonstrates that housing policy is a main driver of social exclusion: Haringey residents are being priced out of the local property market, many residents are also being priced out of the private rental market; and unaffordable housing and welfare changes are driving increasing homelessness. <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/haringey_stat_-_social_inclusion.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/haringey_stat_-_social_inclusion.pdf</a></p> <p>In respect of ethnicity,</p> <ul style="list-style-type: none"><li>• Compared to the estimated working age population, there are 3x Black Caribbean JSA claimants, and 2x Black African JSA claimants [low income]</li><li>• There is an over-representation of Black ethnic groups claiming Housing Benefit [low income]</li></ul>	
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	<ul style="list-style-type: none"><li>• 44% of homelessness applicants are from Black ethnic groups, compared to a 19% share of the Haringey population [high risk of homelessness]</li></ul> <p>We are therefore concerned that the approving the proposed development would be a breach of Haringey Council's duties to promote equality for people with protected characteristics under the Equality Act 2010.</p> <p>The area impact would increase land values, house prices, and private rents in the surrounding area. pricing local people out. Tenure segregation would also disadvantage BME residents.</p> <p>FOUR: Fire safety It is unacceptable to build supertall towers with limited firefighters' access or resident escape in the event of a disaster.</p> <p>FIVE: Unexplained site boundary for the development project</p> <p>We are concerned to see that as well as the housing development sites which are the main focus of the planning application, the site boundary also extends:</p> <ol style="list-style-type: none"><li>1. North-Westwards along The Hale (a public highway, including both road and footpath) to embrace half of a small parcel of land on the South side of the junction between Hale Road and the Hale;</li><li>2. Westwards along Chesnuts Road (a public highway, including both road and footpath) past the Welbourne site;</li><li>3. Westwards along the public footpath in Monument Way.</li></ol> <p>It is not clear why the applicant has the right to use public highways and footpaths as part of its development, or what its purposes might be. The red line development area in locations 2 and 3 above encloses the grassland in front of 1-12 Fairbanks Road, giving rise to concern about 'mission creep', leading to future development of this area.</p> <p>SIX: Use of housing zone funding It is completely inappropriate that the site finances include £12.3 million Housing Zone funding which originated from the GLA. We do not believe that the GLA would agree to its funding being used for a socially exclusionary scheme like this.</p>	
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	<p>SEVEN: Conclusion</p> <p>Haringey Council must reject this scheme. The offer should be renegotiated according to Strategic Policy SP 3.2.3, paragraph 8, 'The preferred affordable housing mix, in terms of unit size and type of dwellings on individual schemes will be determined through negotiation, scheme viability assessments and driven by up to date assessments of local housing need, as set out in the Haringey Housing Strategy'. It appears that the ONLY 'regeneration' aim that this scheme delivers is to 'reduce the proportion of social housing in Tottenham'.</p> <p>This is not acceptable - we demand affordable, safe and secure housing for local people.</p>	
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<p>NHS Haringey Clinical Commission Group (CCG)</p>	<p>The application involves the redevelopment of five sites in Tottenham Hale, proposing 1,036 residential units. The application includes the former Welbourne Centre (site C) and proposes to redevelop the site for 137 residential units, 1,643m<sup>2</sup> (GIA) of health centre space and 267m<sup>2</sup> of retail/office floorspace. The health centre would incorporate two storeys of accommodation facing Monument Way. Of the 137 residential units proposed on Site C, 83 would be affordable shared ownership (61%) representing a significant concentration of affordable housing.</p> <p>The site lies within the Tottenham Area Action Plan (July 2017) and site allocation TH10 (Welbourne Centre and Monument Way). Site allocation TH10 promotes the comprehensive redevelopment of the Welbourne Centre for secondary town centre uses, which could include a health centre at ground floor level and residential uses above. The site falls within the proposed Tottenham Hale District Centre and the health centre would make an important contribution to the vitality and viability of the centre.</p> <p>There is a widely recognised need for a new health centre in Tottenham Hale. The provision of a new health centre on the former Welbourne Centre site would deliver three key objectives. Firstly, it will address both the site-specific impact from the development and the wider cumulative impact in the area. According to the Tottenham Area Action Plan, the Tottenham Hale neighbourhood has capacity for 5,600 new homes up to 2025/26, of which 2,200 have already been completed, predominately at Hale Village. Working closely with Council colleagues, the CCG has identified a need in Tottenham Hale and the surrounding wards over the next ten years for a site that can accommodate all these new residents into the area.</p> <p>Secondly it would provide a permanent, fit-for-purpose site for existing services. In 2016, the Tottenham Hale Medical Practice was opened on a temporary site at Hale Village, to accommodate the need for more primary care in the area, with the intention that the practice would move into the Welbourne Centre on completion of the building. That temporary site is a portakabin, only available for a limited period so it is vital that the Welbourne Centre is able to accommodate this practice. In addition, it is planned that the Dowsett Road Surgery will move into the new health centre. This Surgery is currently located in a converted terraced house, unsuitable for the delivery of modern healthcare and premises like this are unlikely to attract and retain staff in the future, calling into question the sustainability of primary care. The CCG considers that the Welbourne is an essential opportunity to move a successful, rapidly expanding practice into a fit for purpose site, able to serve the needs of local population.</p>	<p>Comments noted. Details of health centre provision are set out in Section 6.3. Social and Community Infrastructure issues are set out in Section 6.7.</p>
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## Appendix x – External Consultation Responses

	<p>Thirdly, the new facility would enable the general practice to provide enhanced services to patients that would not be possible in their current premises. This supports better patient care and aligns with the CCG's Care Closer to Home Strategy.</p> <p>Therefore, the CCG supports the planning application which accords with the Tottenham Area Action Plan and enables the provision of new primary healthcare infrastructure to accommodate existing and future demand for services in the Tottenham Hale area. The NHS is likely to receive a substantial capital grant to support the delivery of the health centre, which is subject to planning permission being granted. Discussions are ongoing with the Council and Argent regarding the design, specification and delivery options.</p>	
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<p>Haringey Health Watch</p>	<p>I am writing on behalf of Healthwatch Haringey to express our strong support for the proposed Health Centre on the Welbourne Road site. In our view the urgent need to address health inequalities in the borough makes it essential to progress this opportunity to ensure a new primary care facility for Tottenham. Time is of the essence in our opinion.</p> <p>The failure of GP services to meet the demands of a growing population in this part of the Borough was raised back in 2008 when the new development in Hale Village was underway and the developer failed to persuade the then Primary Care Trust to provide a new GP service in the area despite being offered a purpose built facility. The local GP service in Ferry Lane managed by the Charlton House GP Practice was closed which exacerbated the problem as it reduced the GP capacity in the local area at a time when more capacity was needed.</p> <p>In response to continuing complaints from local residents and some local Councillors Healthwatch undertook a four month research project to understand and quantify the availability of GP appointments in Tottenham Hale and the wider NE area of Haringey; <u>the results were shocking</u>. The Report published in 2014 showed how badly served the Tottenham Hale and NE Haringey area was for primary care services, see attached. In our view the situation had become so serious that it was an issue of patient safety rather than just service quality.</p>	<p>Comments noted. Details of health centre provision are set out in Section 6.3. Social and Community Infrastructure issues are set out in Section 6.7.</p>
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	<p>The Healthwatch Report was discussed at the Haringey Health and Wellbeing Board and NHS England (NHSE) attended the meeting along with a number of local residents who had submitted a petition and had speaking rights. The H&amp;WB Board was very concerned about the failures highlighted by the Report and the anecdotal stories from the local residents which raised serious issues of patient safety.</p> <p>NHS England received our Report and concerned about the findings they set up a steering group to examine the position further and report back to the next H&amp;WB Board. After a number of months NHSE produced their own very detailed Report which showed the GP capacity in the area was <u>even worse than we had suggested</u> and the medium term projections, taking account of GP retirements made the position even worse.</p> <p>In response to their findings NHSE approved a temporary GP surgery in Tottenham Hale. <u>This is almost unprecedented and reflected the seriousness of the situation.</u> The temporary surgery, opened in 2016, in Hale Village and was anticipated to be open until 2019 when a much larger permanent Health Centre would be complete on the Welbourne site - this is now likely to be in early 2021. This is a temporary facility which is a refurbished and brick clad second hand portacabin and will have to service the local area for two years longer than anticipated; it already has nearly 2,500 registered patients.</p> <p>The NHSE GP capacity study extended to the whole of Haringey and formed the basis for a comprehensive Primary Health Care Strategy which has been adopted by Haringey CCG. In response to the serious issues relating to primary care capacity NHS England has made an allocation of capital funding available to Haringey, subject to business case approvals, for three new Health Centres one of these being the Welbourne Road Health Centre. The capital funding has to be spent by March 2021 and before being released NHSE will want an assurance that the building programme can meet this deadline. <u>The process to release this funding involves outline business case approval followed by a more detailed business case approval and therefore any delay to the planning decision will put this funding at serious risk.</u></p> <p>This matter also touches on the Council's commitment to fairness. A new Health Centre offering a wide range of clinical and wellbeing services in this part of the Borough has the potential to make the biggest impact on reducing health inequalities of any potential public health intervention. A brand new purpose built health facility will also make it easier to recruit and retain GPs and other primary care health staff at a time when all these skills are in short supply. In the context of "fairness" the ability to give those residents in the East and North of Haringey the quality of primary care services as good as those enjoyed by residents in the West of the Borough is an opportunity not to be missed if our commitment to reducing health inequalities is to be more than just a headline in our Borough Plan.</p>	
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