

## Appendix 3 – Consultation Responses from Internal and External Agencies

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

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

<b>Stakeholder (LBH)</b>	<b>Comments</b>	<b>Response</b>
	<p>agree with the applicant and the QRP that the case has been made to consider this a suitable tall building proposal, that meets the other, more detailed criteria as itemised below and can be considered sufficiently close to the established tall building zone and of a sufficiently modest height to act as a transition between the tall building cluster and other, lower rise context.</p> <p>6. Considering each criterion from Haringey's tall building policy is set in SP11 of our Strategic Policies DPD (adopted 2013 (with alterations 2017) and DM6 of our Development Management DPD (adopted 2017), skipping the 3rd &amp; 4th bullets from the Strategic Policies, that reference the other document and the document used in preparing DM6:</p> <ul style="list-style-type: none"> <li>• The site is within the areas of both the adopted Tottenham AAP and the adopted District Centre Framework;</li> <li>• The council prepared a borough-wide Urban Characterisation Study (UCS) in 2016. The principle of tall buildings is not specifically endorsed in this location, but the UCS underestimated the demand for tall buildings in Tottenham Hale, blanketing the whole of this site, along with all the other sites around the eastern and southern sides of Down Lane Park for "mid-rise buildings" (12 – 21metres approx., 3-5 storeys). Development currently being built on the south side of the park range between 7 – 11 storeys, rising rapidly to a vibrant new tall buildings cluster at the heart of Tottenham Hale, around the new station square, rising to very tall buildings of up to 36 storeys;</li> <li>• Very high quality design of buildings and public realm is promised in these proposals, as detailed in later sections below;</li> <li>• The site is not close to any London wide strategic views corridors. It is close to only one Locally Significant View; View 20, "Watermead Way railway bridge - - - &gt; Alexandra Palace", which is considered in the applicants Heritage, Townscape and Visual Impact Assessment, which finds that the distant view of Alexandra Palace would not be obstructed, and assesses this proposal's impact on that view would be negligible, with which officers agree;</li> </ul>	

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

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

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

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

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	<p>16. Materials chosen promise to be robust, durable, appropriate to context and attractive of appearance, although they will of course be subject to condition.</p> <p><b><u>Residential Quality; Flat, Room &amp; Private Amenity Space, Shape, Size, Quality, Aspect, Daylight and Sunlight</u></b></p> <p>17. As is to be expected, room, flat and amenity standards meet or exceed nationally set minima and indeed generally significantly exceed to meet the council's higher housing standards. A great deal of thought has been put into layout and aspect to ensure all the proposed new homes have good practical and attractive relationships to their street, amenity space, day and sunlight and neighbours, whilst providing passive surveillance to all spaces within and around the site.</p> <p>18. The applicants provided Daylight and Sunlight Reports on levels within their development and the effect of their proposals on relevant neighbouring buildings, prepared in accordance with council policy following the methods explained in the Building Research Establishment's publication "Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice" (2nd Edition, Littlefair, 2011), known as "The BRE Guide".</p> <p>19. These find that the overwhelming majority of relevant habitable rooms within the proposed development will meet or exceed the BRE Guide recommended levels for daylight and sunlight. Of those that fall short of the recommendations, some living-dining-kitchens fall short of the higher kitchen standard but exceed the standard for living rooms, which is considered good, some living rooms and bedrooms fall just short, some rooms, generally second bedrooms, and fall more short where their windows have had to prioritise solar shading as part of the Passivhaus exemplary energy standard met. Sunlight to open spaces is good for public streets, but the three courtyard/podiums just fall short, inevitably due to the courtyard layout that prioritises to some extent good street layout over sunlit amenity space, but due to the high standard of landscaping proposed, including thoughtful placing of different landscape elements to best prioritise those most reliant on good sunlight, such as</p>	

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	<p>seating areas, the courtyard private communal amenity spaces should be very usable spaces, containing well sun lit areas.</p> <p>20. The applicants' consultants' assessment of the effect of the development on existing residential neighbours finds that with this proposed development, generally only minor losses of day and sun light will occur to an isolated number of windows and rooms. One window to the nearest end property on the west side of Havelock Street (running north from the north-west corner of the site) and 4 windows to the end property on the east side, would receive noticeable losses of daylight and/or sunlight, whilst a few windows to properties on the north side of Park View Road would receive noticeable losses, but generally the losses are minor, between 20 and 30% (where less than 20% loss is assessed by the BRE Report to not be noticeable), the occasional more affected window is usually a very much secondary window, such as in a side wall, and probably not vital to lighting an important habitable room. Where Vertical Sky Component (VSC) is calculated, and the recommended 27% is not achieved, generally at least 15% is retained. Officers agree that any loss in daylight and sunlight to existing neighbours is not considered significant.</p> <p>21. In the case of higher density developments, it should be noted that the BRE Guide itself states that it is written with low density, suburban patterns of development in mind and should not be slavishly applied to more urban locations; as in London, the Mayor of London's Housing SPG acknowledges. In particular, the 27% VSC recommended guideline is based on a low density suburban housing model and in an urban environment it is recognised that VSC values in excess of 20% are considered as reasonably good, and that VSC values in the mid-teens are deemed acceptable. Paragraph 2.3.29 of the GLA Housing SPD supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city. Therefore, full or near full compliance with the BRE Guide is not to be expected.</p> <p><b><u>Summary</u></b></p>	

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

<b>Stakeholder (LBH)</b>	<b>Comments</b>	<b>Response</b>
	<ul style="list-style-type: none"> <li>- Car-Capping – both residential and commercial, including £5,000 towards the amendment of the local Traffic Management Order (amount to cover all amendments to the local Traffic Management Order as a result of the highway works and alterations to on-street parking and other parking restrictions)</li> <li>- Car Club: <ul style="list-style-type: none"> <li>o Car club provision (2No. off-site spaces on Ashley Road) subject to monitoring and revision if additional demand arises (to be managed through the Residential Travel Plan and Parking Design and Management Plan)</li> <li>o Establishment or operation of a car club scheme</li> <li>o Contributions from developer to residents - two years' free membership for all residents and £50 (fifty pounds in credit) per year for the first 2 years and an enhanced car club membership for the residents of the family-sized units (3+ bedrooms) including 3 years' free membership and £100 (one hundred pounds in credit) per year for the first 3 years</li> </ul> </li> <li>- Parking Design and Management Plan including but not limited to: <ul style="list-style-type: none"> <li>o Operation during the School Street's operational hours</li> <li>o Vehicular access control arrangements</li> <li>o Provision of electric vehicle charging points – both active and passive</li> <li>o Space allocation strategy and priority order (wheelchair-accessible users, family dwelling residents etc)</li> <li>o Car club bay management</li> </ul> </li> <li>- Residential Travel Plan (including Interim and Full documents, monitoring reports and a £10,000 monitoring contribution) including but not limited to: <ul style="list-style-type: none"> <li>o Appointment of a Travel Plan Coordinator (to also be responsible for monitoring the Delivery Servicing Plan)</li> <li>o Provision of welcome induction packs containing public transport and cycling/walking information, map and timetables to every new household</li> </ul> </li> </ul>	

<b>Stakeholder (LBH)</b>	<b>Comments</b>	<b>Response</b>		
	<ul style="list-style-type: none"> <li>○ Car club demand monitoring</li> <li>- CPZ contribution to the ongoing review and expansion of existing Controlled Parking Zones – £20,000</li> <li>- Section 278 Highway Works – scope and extent of on-site and off-site works to be defined after obtaining detailed Section 278 drawings for costing estimate purposes</li> <li>- Transport Contributions towards the funding of Walking and Cycling Action Plan measures:</li> </ul> <table border="1" data-bbox="467 711 1596 1227"> <tr> <td data-bbox="473 716 1590 747">Requested for this application</td></tr> <tr> <td data-bbox="473 747 1590 1222"> <ul style="list-style-type: none"> <li>○ Walking routes along both sides of Down Lane Park – Improved accessibility and permeability to leisure routes – Dropped kerbs, tactile paving, signage, limited resurfacing - £120,000</li> <li>○ Lighting upgrade for the Park View Road (North) Underpass to Tottenham Marshes - £40,000 (subject to be revised upwards to include the contribution made by LBH Regeneration towards underpass improvements – the total would be £100,000 + £40,000 = £140,000)</li> <li>○ North Tottenham Low Traffic Neighbourhood - Planters, ANPRs, reducing rat running to improve walking and cycling environment - £50,000</li> </ul> </td></tr> </table>	Requested for this application	<ul style="list-style-type: none"> <li>○ Walking routes along both sides of Down Lane Park – Improved accessibility and permeability to leisure routes – Dropped kerbs, tactile paving, signage, limited resurfacing - £120,000</li> <li>○ Lighting upgrade for the Park View Road (North) Underpass to Tottenham Marshes - £40,000 (subject to be revised upwards to include the contribution made by LBH Regeneration towards underpass improvements – the total would be £100,000 + £40,000 = £140,000)</li> <li>○ North Tottenham Low Traffic Neighbourhood - Planters, ANPRs, reducing rat running to improve walking and cycling environment - £50,000</li> </ul>	
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<b>Carbon Management Officer</b>	<p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> <li>• Energy and Sustainability Statement and Appendices prepared by Etude (dated June 2022, Rev H)</li> </ul>	Comments have been taken into account. The		

Stakeholder (LBH)	Comments	Response																																																																																											
	<ul style="list-style-type: none"> <li>• Circular Economy Statement prepared by Etude (dated March 2021, Rev C)</li> <li>• Whole Life Carbon Spreadsheet Rev B</li> <li>• Circular Economy Statement Rev C</li> </ul> <p><b>Energy Strategy</b> The revised carbon reduction tables are noted below.</p> <table border="1" data-bbox="480 525 1590 1171"> <thead> <tr> <th colspan="7">DEN Connection Scenario (Plan A)</th> </tr> <tr> <th></th> <th colspan="2">Residential</th> <th colspan="2">Non-residential</th> <th colspan="2">Site wide</th> </tr> <tr> <th>(SAP10 emission factors)</th> <th>tCO<sub>2</sub></th> <th>%</th> <th>tCO<sub>2</sub></th> <th>%</th> <th>tCO<sub>2</sub></th> <th>%</th> </tr> </thead> <tbody> <tr> <td><b>Baseline emissions</b></td> <td>324</td> <td></td> <td>2</td> <td></td> <td>326</td> <td></td> </tr> <tr> <td><b>Be Lean savings</b></td> <td>96</td> <td>30%</td> <td>0.7</td> <td>35 %</td> <td>97</td> <td>30%</td> </tr> <tr> <td><b>Be Clean savings</b></td> <td>116</td> <td>36%</td> <td>0.2</td> <td>10 %</td> <td>116</td> <td>36%</td> </tr> <tr> <td><b>Be Green savings</b></td> <td>62</td> <td>19%</td> <td>0</td> <td>0%</td> <td>62</td> <td>19%</td> </tr> <tr> <td><b>Cumulative savings</b></td> <td>274</td> <td>85%</td> <td>0.9</td> <td>45 %</td> <td>275</td> <td>84%</td> </tr> <tr> <td><b>Carbon shortfall to offset (tCO<sub>2</sub>)</b></td> <td>50</td> <td></td> <td>1.1</td> <td></td> <td>51</td> <td></td> </tr> <tr> <td><b>Carbon offset contribution (+ 10% management fee)</b></td> <td colspan="6"><math>\text{£95} \times 30 \text{ years} \times 51 \text{ tCO}_2/\text{year} = \text{£145,350}</math></td></tr> </tbody> </table> <table border="1" data-bbox="480 1208 1590 1359"> <thead> <tr> <th colspan="7">ASHP Scenario (Plan B)</th> </tr> <tr> <th></th> <th colspan="2">Residential</th> <th colspan="2">Non-residential</th> <th colspan="2">Site wide</th> </tr> <tr> <th>(SAP10 emission factors)</th> <th>tCO<sub>2</sub></th> <th>%</th> <th>tCO<sub>2</sub></th> <th>%</th> <th>tCO<sub>2</sub></th> <th>%</th> </tr> </thead> </table>	DEN Connection Scenario (Plan A)								Residential		Non-residential		Site wide		(SAP10 emission factors)	tCO <sub>2</sub>	%	tCO <sub>2</sub>	%	tCO <sub>2</sub>	%	<b>Baseline emissions</b>	324		2		326		<b>Be Lean savings</b>	96	30%	0.7	35 %	97	30%	<b>Be Clean savings</b>	116	36%	0.2	10 %	116	36%	<b>Be Green savings</b>	62	19%	0	0%	62	19%	<b>Cumulative savings</b>	274	85%	0.9	45 %	275	84%	<b>Carbon shortfall to offset (tCO<sub>2</sub>)</b>	50		1.1		51		<b>Carbon offset contribution (+ 10% management fee)</b>	$\text{£95} \times 30 \text{ years} \times 51 \text{ tCO}_2/\text{year} = \text{£145,350}$						ASHP Scenario (Plan B)								Residential		Non-residential		Site wide		(SAP10 emission factors)	tCO <sub>2</sub>	%	tCO <sub>2</sub>	%	tCO <sub>2</sub>	%	recommended conditions and planning obligations will be secured.
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<b>Stakeholder (LBH)</b>	<b>Comments</b>			<b>Response</b>
		<b>Estimated carbon emissions</b>	<b>Meets GLA benchmark?</b>	
	Modules A1-A5	691 kgCO <sub>2</sub> e/m <sup>2</sup>	Meets GLA benchmark (<800 kgCO <sub>2</sub> e/m <sup>2</sup> ) but misses the aspirational target (<500 kgCO <sub>2</sub> e/m <sup>2</sup> )	
	Modules B-C (excl. B6 and B7)	116 kgCO <sub>2</sub> e/m <sup>2</sup>	Meets GLA target (<400 kgCO <sub>2</sub> e/m <sup>2</sup> ) and aspirational benchmark (<300 kgCO <sub>2</sub> e/m <sup>2</sup> )	
	Module D	-110 kgCO <sub>2</sub> e/m <sup>2</sup>	N/A	

The development currently meets LETI embodied carbon rating C (2020 Design Target) for Modules A1-B5, C1-C4. It misses target for Modules A1-A5 (rating D).

#### **Sustainability – Non-domestic**

A draft set of Employer Requirements was submitted to illustrate how measurable sustainability benefits should be delivered.

#### **Planning Obligations Heads of Terms**

- Connect to the DEN with an interim heating solution if phasing allows, this should be a communal gas boiler (Building Regulations Part L 2021 (para 2.7) allows dwellings to be completed on gas boilers as long as a low carbon alternative, in this case either the ASHP or DEN, is in course of being implemented by December 2027). If phasing does not allow, the development would need to be completed with a permanent solution (the DEN if connection has been resolved in time or the ASHP)
- DEN connection and feasibility (and associated obligations)

<b>Stakeholder (LBH)</b>	<b>Comments</b>	<b>Response</b>
	<ul style="list-style-type: none"> <li>- Submit justification and details of the backup ASHP heating solution if not connecting to the DEN</li> <li>- Re-calculation of the carbon offset contributions prior to commencement (which is one of the requirements of the Energy Plan)</li> <li>- Deferred offset contribution based on ASHP fallback option</li> <li>- A covenant to comply with the Council's standard DEN specification for the building DEN and for any components of the area wide DEN installed on site</li> <li>- Connection charge to be capped at the deferred offset contribution + the avoided costs of delivering an ASHP system, details of the avoided ASHP system costs should be agreed at an earlier stage</li> <li>- Be Seen commitment to uploading energy data</li> <li>- Energy Plan and Sustainability Review, to include confirmation that dwellings in Blocks B1 and C1 comply with a maximum average space heating demand of 20 kWh/m<sup>2</sup>/year within the block (calculated with PHPP software) and meets the same construction standards and methodology as the Passivhaus dwellings</li> </ul> <p><b>Planning Conditions</b> To be secured:</p> <p><u><b>Energy strategy</b></u>  <i>The development hereby approved shall be constructed in accordance with the Energy and Sustainability Statement and Appendices prepared by Etude (dated June 2022, Rev H) delivering a minimum 84% improvement on carbon emissions over 2013 Building Regulations Part L, with SAP10 emission factors, Passivhaus-level fabric efficiencies, connection to the Decentralised Energy Network with a centralised air source heat pump (ASHP) system as a backup solution, and a minimum 350 kWp solar photovoltaic (PV) array.</i></p>	

Stakeholder (LBH)	Comments	Response
	<p>(a) Prior to above ground construction, an updated Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:</p> <ul style="list-style-type: none"> <li>- Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;</li> <li>- Confirmation of the necessary fabric efficiencies to achieve a minimum 30% reduction, including details to reduce thermal bridging;</li> <li>- Location, specification and efficiency of the proposed Plan B ASHP system (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures;</li> <li>- Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR) with and without cooling coils, with plans showing the rigid MVHR ducting and location of the unit;</li> <li>- Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp);</li> <li>- A metering strategy.</li> </ul> <p>The development shall be carried out strictly in accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.</p> <p>(b) Within six months of first occupation, evidence that the solar PV installation has been installed correctly shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, a six-month energy generation statement, and a Microgeneration Certification Scheme certificate.</p>	

Stakeholder (LBH)	Comments	Response
	<p>(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.</p> <p>(d) Within one year of first occupation, evidence shall be submitted to and approved by the Local Planning Authority to demonstrate how the development has performed against the approved Energy Strategy and to demonstrate how occupants have been taken through training on how to use their homes and the technology correctly and in the most energy efficient way and that issues have been dealt with. This should include energy use data for the first year and a brief statement of occupant involvement to evidence this training and engagement.</p> <p>Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.</p> <p><u>DEN Connection</u></p> <p>Prior to the above ground commencement of construction work, details relating to the future connection to the DEN must be submitted to and approved by the local planning authority. This shall include:</p> <ul style="list-style-type: none"> <li>• Further detail of how the developer will ensure the performance of the DEN system will be safeguarded through later stages of design (e.g. value engineering proposals by installers), construction and commissioning including provision of key information on system performance required by CoP1 (e.g. joint weld and HIU commissioning certificates, CoP1 checklists, etc.);</li> <li>• Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification.</li> <li>• Detail of the pipe design, pipe sizes and lengths (taking account of flow and return temperatures and diversification), insulation and calculated heat loss from</li> </ul>	

<b>Stakeholder (LBH)</b>	<b>Comments</b>	<b>Response</b>
	<p><i>the pipes in Watts, demonstrating heat losses have been minimised together with analysis of stress/expansion;</i></p> <ul style="list-style-type: none"> <li>• <i>A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings should cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation;</i></li> <li>• <i>Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection is accessible by the area wide DEN, detailed proposals for installation for the route that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts;</i></li> <li>• <i>Details of the space allowance for the DEN main passing through the site from Park View Road to Ashley Road;</i></li> <li>• <i>Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals;</i></li> <li>• <i>Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DEN supply including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue;</i></li> <li>• <i>Details of a future pipework route from the temporary boiler location to the plant room.</i></li> </ul> <p><i>Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.</i></p> <p><u>Overheating (non-residential)</u></p>	

Stakeholder (LBH)	Comments	Response
	<p><i>At least six months prior to the occupation of each non-residential unit, an Overheating Report must be submitted to and approved by the Local Planning Authority if that space is to be occupied for an extended period of time or will accommodate any vulnerable users, such as office/workspace, community, healthcare, or educational uses.</i></p> <p><i>The report shall be based on the current and future weather files for 2020s, 2050s and 2080s for the CIBSE TM49 central London dataset. It shall set out:</i></p> <ul style="list-style-type: none"> <li><i>- The proposed occupancy profiles and heat gains in line with CIBSE TM52</i></li> <li><i>- The modelled mitigation measures which will be delivered to ensure the development complies with DSY1 for the 2020s weather file.</i></li> <li><i>- A retrofit plan that demonstrates which mitigation measures would be required to pass future weather files, with confirmation that the retrofit measures can be integrated within the design.</i></li> </ul> <p><i>The mitigation measures hereby approved shall be implemented prior to occupation and retained thereafter for the lifetime of the development.</i></p> <p><i>REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.</i></p> <p><u><b>Overheating (residential to confirm once pipework has been designed)</b></u></p> <p><i>(a) Prior to above ground works, an updated Overheating Report modelling future weather files shall be submitted to and approved by the Local Planning Authority. This assessment shall be based on the TM59 modelling undertaken by Etude (Energy and Sustainability Statement dated June 2022). This revised strategy shall include:</i></p> <ul style="list-style-type: none"> <li><i>- Modelling of dwellings based on CIBSE TM59, using the CIBSE TM49 London Weather Centre files DSY1 for the 2020s, high emissions, 50% percentile;</i></li> </ul>	

Stakeholder (LBH)	Comments	Response
	<ul style="list-style-type: none"> <li>- Modelling of mitigation measures required to pass the mandatory weather files, clearly setting out which measures will be delivered before occupation in line with the Cooling Hierarchy;</li> <li>- Updated as-designed heat loss calculations from heat interface units and pipework.</li> </ul> <p>(c) Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development:</p> <ul style="list-style-type: none"> <li>- Natural ventilation, with openable areas including fixed louvred side panel for accessible bedrooms and secure night latch for other accessible habitable rooms;</li> <li>- Glazing g-value of 0.50 or lower;</li> <li>- External shading to south-facing windows on top floors (min. 1m depth);</li> <li>- Brise soleil for other windows without balcony shading on south façades (1m full height, 0.8m for punched windows)</li> <li>- External shutters for west-facing bedrooms (perforated/slatted shutters for airflow)</li> <li>- Internal blinds on all façades (light-coloured, solar transmittance of 0.11);</li> <li>- MVHR with summer bypass (min. 0.55ach);</li> <li>- Minimal heat losses from heat interface units (HIU) and pipework;</li> <li>- Active cooling with 1.5 kW cooling coil only for 19 dwellings with habitable rooms facing south-east;</li> <li>- Any further mitigation measures identified as required in part (a).</li> </ul> <p><i>REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.</i></p> <p><u>Overheating Building User Guide</u>  <i>Prior to occupation of the residential dwellings, a Building User Guide for new residential occupants shall be submitted in writing to and for approval by the Local Planning Authority. The Building User Guide will advise residents how to operate their property</i></p>	

<b>Stakeholder (LBH)</b>	<b>Comments</b>	<b>Response</b>
	<p>during a heatwave, setting out a cooling hierarchy in accordance with London Plan (2021) Policy SI4 with passive measures being considered ahead of cooling systems. The Building User Guide will be issued to residential occupants upon first occupation.</p> <p><i>Reason: In the interest of reducing the impacts of climate change and mitigation of overheating risk, in accordance with London Plan (2021) Policy SI4, and Local Plan (2017) Policies SP4 and DM21.</i></p> <p><u>Passivhaus Certification</u></p> <p>Prior to the commencement of construction works to Buildings A1-5, B2-3 and C2, a Design Stage Passivhaus Strategy shall be submitted to and approved by the Local Planning Authority. This should show that a Passivhaus level space heating demand target of 15 kWh/m<sup>2</sup>/year is achieved, accompanied by Passive House Planning Package (PHPP) calculations.</p> <p>Within one month of completion of Buildings A1-5, B2-3 and C2, a Passivhaus Certificate will be submitted for approval demonstrating that Buildings A1-5, B2-3 and C2 meet the Passivhaus Standards, awarded by a suitably qualified independent Passivhaus Certifier.</p> <p><i>Reasons: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.</i></p> <p><u>Passivhaus Principles</u></p> <p>Prior to the commencement of construction works to Buildings B1 and C1, a Design Stage Passivhaus Strategy shall be submitted to and approved by the Local Planning Authority. Passive House Planning Package (PHPP) calculations should show that the design follows the Passivhaus methodology and achieve the highest level of energy efficiency that is technically feasible on this site, achieving a space heating demand target of 20 kWh/m<sup>2</sup>/year.</p>	

<b>Stakeholder (LBH)</b>	<b>Comments</b>	<b>Response</b>
	<p><i>Within one month of completion of Buildings B1 and C1, air tightness certificates should be submitted to demonstrate that the development achieves the level of air tightness targeted in the PHPP model at pre-commencement stage. The dwellings are to achieve a maximum 20 kWh/m<sup>2</sup>/year space heating demand target, evidenced with a PHPP spreadsheet.</i></p> <p><i>Reasons: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.</i></p> <p><b><u>Circular Economy Post-Completion Report</u></b>  <i>Prior to the occupation of any building or development, a Post-Completion Report setting out the predicted and actual performance against all numerical targets in the relevant Circular Economy Statement shall be submitted to the GLA at: circulareconomystatements@london.gov.uk, along with any supporting evidence as per the GLA's Circular Economy Statement Guidance. The Post-Completion Report shall provide updated versions of Tables 1 and 2 of the Circular Economy Statement, the Recycling and Waste Reporting form and Bill of Materials. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation.</i></p> <p><i>Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials in accordance with London Plan (2021) Policies D3, SI2 and SI7, and Local Plan (2017) Policies SP4, SP6, and DM21.</i></p> <p><b><u>Whole-Life Carbon</u></b>  <i>Prior to the occupation of each building the post-construction tab of the GLA's whole life carbon assessment template should be completed accurately and in its entirety in line with the GLA's Whole Life Carbon Assessment Guidance. The post-construction</i></p>	

<b>Stakeholder (LBH)</b>	<b>Comments</b>	<b>Response</b>
	<p>assessment should provide an update of the information submitted at planning submission stage, including the whole life carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. This should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation of the relevant building.</p> <p><i>Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM21.</i></p> <p><b><u>Sustainability standards for non-residential units</u></b></p> <p>(a) At least two months prior to the occupation of the commercial units, the employer requirements setting the sustainability requirements for the non-domestic units should be submitted to and approved by the planning authority. This should achieve the highest possible standard through measurable outputs to demonstrate how environmental sustainability has been integrated into the development, seeking to deliver as a minimum the credits as outlined in the BREEAM Pre-Assessment. These measures shall be maintained thereafter for the lifetime of the development.</p> <p>(b) Within six months after occupation, evidence of implementing the sustainability measures on site shall be submitted to the Local Planning Authority.</p> <p><i>Reasons: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.</i></p> <p><b><u>Living roofs and blue roofs</u></b></p> <p>(a) Prior to the commencement of above ground works, details of the living and blue roofs must be submitted to and approved in writing by the Local Planning Authority. Living roofs</p>	

Stakeholder (LBH)	Comments	Response
	<p><i>must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:</i></p> <ul style="list-style-type: none"> <li><i>i) A roof plan identifying where the living and blue roofs will be located;</i></li> <li><i>ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);</i></li> <li><i>iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roof, annotating contours of the varying depths of substrate</i></li> <li><i>iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m<sup>2</sup> of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m<sup>2</sup>, rope coils, pebble mounds of water trays;</i></li> <li><i>v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m<sup>2</sup>) and density of plug plants planted (minimum 20/m<sup>2</sup> with roof ball of plugs 25m<sup>3</sup>) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roof will not rely on one species of plant life such as Sedum (which are not native);</i></li> <li><i>vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and</i></li> <li><i>vii) Management and maintenance plan, including frequency of watering arrangements.</i></li> <li><i>viii) A section showing the build up of the blue roofs and confirmation of the water attenuation properties, and feasibility of collecting the rainwater and using this on site;</i></li> </ul> <p><i>(b) Prior to the occupation of 90% of the dwellings, evidence must be submitted to and approved by the Local Planning Authority that the living and blue roofs have been delivered in line with the details set out in point (a). This evidence shall include</i></p>	

Stakeholder (LBH)	Comments	Response
	<p><i>photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roof has not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living and blue roofs shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.</i></p> <p><i>Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.</i></p> <p><b><u>Biodiversity</u></b></p> <p><i>(a) At least 12 months prior to occupation of development, details of ecological enhancement measures and ecological protection measures shall be submitted to and approved in writing by the Council. This shall detail the biodiversity net gain, plans showing the proposed location of ecological enhancement measures, a sensitive lighting scheme, justification for the location and type of enhancement measures by a qualified ecologist, and how the development will support and protect local wildlife and natural habitats.</i></p> <p><i>(b) Prior to the occupation of development, photographic evidence and a post-development ecological field survey and impact assessment shall be submitted to and approved by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures is in accordance with the approved measures and in accordance with CIEEM standards.</i></p> <p><i>Development shall accord with the details as approved and retained for the lifetime of the development.</i></p>	

<b>Stakeholder (LBH)</b>	<b>Comments</b>	<b>Response</b>
	<p><i>Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.</i></p> <p><b>To be included within the landscape condition:</b></p> <p><i>Prior to the occupation of development, submit annotated plans and details on what measures will be delivered to the external amenity areas that will help adapt the development and its occupants to the impacts of climate change through more frequent and extreme weather events and more prolonged droughts.</i></p>	
<b>Regeneration Officer</b>	<p>We welcome this scheme and feel that this is a high-quality design which has responded to comments and input from Regeneration officers during the pre-application process and will make a positive contribution to the Tottenham Hale District Centre and surrounding area. It will be important to consider in the drafting of conditions, the need to retain some flexibility in the hard and soft landscaping details in order for this development and its public realm to successfully respond to the park, and the wider materials palette of the district centre area. As the co-designed park masterplan develops, this interface will be explored in more detail and materiality, lighting, planting and other treatments along this edge may need to respond.</p>	Comments have been taken into account.
<b>Nature Conservation Officer</b>	<p>Documents</p> <p>An Ecological Impact Assessment (4 March 2022) which considers potential for impacts upon the adjacent SINC; Biodiversity Metric &amp; Urban Greening Factor have been prepared to current good practice guidance covering relevant legislation and policy.</p> <p>Conclusion</p>	Comments have been taken into account. Appropriate conditions will be secured.

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

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

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

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

<b>Stakeholder (LBH)</b>	<b>Comments</b>	<b>Response</b>
	<p>required, completion of the remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied. Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p>2. Unexpected Contamination If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.</p> <p>2 Reasons: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework.</p> <p>3. Updated Air Quality Assessment Whilst the submitted Air Quality Assessment with reference A4538/AQ/03 prepared by ACCON UK Limited dated 3rd March 2022 is noted, this is however not considered to be sufficient for us to make an informed decision regarding the site AQ especially with the applicant conducting only modelling of existing baseline monitoring results which were a bit farther away from the site despite the site closeness to a very busy road. In addition, the applicant has also failed to carry out any AQ neutral assessment in the submitted report nor modelling of the operational impact on the proposed building floors which we understand will be as high as thirteen storeys rather than the ground floor only. Moreover, the assessment in the submitted report has only focused on traffic emission without any consideration for the emission from the construction works as well as other development within the vicinity and other emission sources. Therefore, in order to minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people),</p> <ul style="list-style-type: none"> <li>• Applicant will need to provide us an addendum AQ assessment of the proposed development taken into consideration the likely operational impact of the development beyond the ground floor as</li> </ul>	

<b>Stakeholder (LBH)</b>	<b>Comments</b>	<b>Response</b>
	<p>submitted for the purposes of reaching a conclusion on the development significance effects in the actual site and overall local air quality.</p> <ul style="list-style-type: none"> <li>• Monitoring will need to be undertaken at or within a closer proximity of the site itself rather than relying purely on baseline monitoring modelling farther away from the site nor Defra mapped background concentrations.</li> <li>• Provision of a revised predicted concentrations.</li> <li>• Submission of an AQ neutral report.</li> </ul> <p>Reason: To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction.</p> <p>4. NRMM a. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at <a href="http://nrmm.london/">http://nrmm.london/</a>. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.</p> <p>b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.</p> <p>Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ 5. Demolition/Construction Environmental Management Plans</p> <p>a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst b. Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority. The following applies to both Parts a and b above:</p> <ol style="list-style-type: none"> <li>The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).</li> <li>The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include:             <ol style="list-style-type: none"> <li>A construction method statement which identifies the stages and details how works will be undertaken;</li> <li>Details of working hours,</li> </ol> </li> </ol>	

<b>Stakeholder (LBH)</b>	<b>Comments</b>	<b>Response</b>
	<p>which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays; iii. Details of plant and machinery to be used during demolition/construction works; iv. Details of an Unexploded Ordnance Survey; v. Details of the waste management strategy; vi. Details of community engagement arrangements; vii. Details of any acoustic hoarding; viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance); ix. Details of external lighting; and, x. Details of any other standard environmental management and control measures to be implemented. c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on: i. Dust Monitoring and joint working arrangements during the demolition and construction work; ii. Site access and car parking arrangements; iii. Delivery booking systems; iv. Agreed routes to/from the Plot; v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the Plot during the demolition/construction phase; and vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching. d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include: i. Mitigation measures to manage and minimise demolition/construction dust emissions during works; ii. Details confirming the Plot has been registered at <a href="http://nrmm.london">http://nrmm.london</a>; iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection; iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection); v. A Dust Risk Assessment for the works; and vi. Lorry Parking, in joint arrangement where appropriate. The development shall be carried out in accordance with the approved details as well as on the applicant submitted proposed mitigation in the Air Quality Report following any addendum report. Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local</p>	

<b>Stakeholder (LBH)</b>	<b>Comments</b>	<b>Response</b>
	<p>Planning Authority prior to any works being carried out. Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality.” 6. Combustion and Energy Plant Whilst it is noted that it is proposed for the development to be connected to the District Energy Network however, where applicable, Prior to installation, details of the gas boilers to be provided for space heating and domestic hot water should be forwarded to the Local Planning Authority. The boilers to be provided for space heating and domestic hot water shall have dry NOx emissions not exceeding 40 mg/kWh (0%). Reason: As required by The London Plan Policy 7.14.</p> <p>4 7. Combined Heat and Power (CHP) Facility Whilst it is noted that it is proposed for the development to be connected to the District Energy Network however, where applicable, Prior to the commencement of the development, details of the NOx Natural Gas – Fired Boilers (CHP) facility of the energy centre or centralised energy facility or other centralised combustion process and associated infrastructure shall be submitted in writing to and for approval by the Local Planning Authority. The details shall include: a) location of the energy centre; b) specification of equipment; c) flue arrangement; d) operation/management strategy; and e) the method of how the facility and infrastructure shall be designed to allow for the future connection to any neighbouring heating network (including the proposed connectivity location, punch points through structure and route of the link) f) details of CHP engine efficiency The Combined Heat and Power facility and infrastructure shall be constructed in accordance with the details approved, installed and operational prior to the first occupation of the development and shall be maintained as such thereafter. Reason: To ensure the facility and associated infrastructure are provided and so that it is designed in a manner which allows for the future connection to a district system.</p> <p>Informative: 1. Prior to demolition of existing buildings where applicable, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out. 2. With contamination testing of ground water proposed to be carried out in the near future and results included in an updated report we suggest comment from Environment Agency be sought in this regard as well as that of water supply company to confirm their requirements</p>	

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

<b>Stakeholder (LBH)</b>	<b>Comments</b>	<b>Response</b>
	<p>greatest capacity for growth and it is expected that the majority of homes, jobs and infrastructure will be delivered in these areas over the plan period. The site also falls within the Lee Valley Opportunity Area.</p> <p>The Tottenham Area Action Plan (AAP) gives effect to the Council's spatial strategy for Tottenham by identifying and allocating development sites. The Tottenham Hale District Centre Framework gives further guidance on this, and envisages the transformation of this area into a high density new district centre and identifies this site as suitable for housing to achieve this vision. The site falls within the Ashley Road North site allocation (reference NT5). The allocation is expected to deliver a new residential development with an extension to Ashley Road to connect to Park View Road for pedestrians and cyclists comprising a minimum of 147 new residential units (net).</p> <p>The residential led development of the site generally accords with the Local Plan Strategic Policies document, the Tottenham AAP and Tottenham Hale District Centre Framework and the principle of the proposal is therefore considered acceptable.</p> <p><b><u>Masterplanning</u></b></p> <p>Policy AAP1 of the Tottenham Area Action Plan expects all development proposals in the AAP area to come forward comprehensively to meet the wider objectives of the AAP.</p> <p>The Council adopted a comprehensive Masterplan Framework for the District Centre area in 2015. It is not necessary therefore for the application to be accompanied by a masterplan, instead the application should accord with the principles within the Council's approved masterplan. The land uses proposed at the site accord with the masterplan framework and in general terms will support the creation of the District Centre.</p> <p><b><u>Quantum of development</u></b></p>	

<b>Stakeholder (LBH)</b>	<b>Comments</b>	<b>Response</b>
	<p>Policy SP1 of the Local Plan Strategic Policies document states that the Council expects development in Growth Areas to maximise site opportunities. The site is expected to contribute 272 homes against the overall target of a minimum of 147 residential units within the site allocation. Ashley Road Depot is within the Upper Lea Valley Opportunity Area in the London Plan. Policy SD1 of the London Plan supports regeneration in Opportunity Areas and ensure that they deliver the maximum affordable housing and create inclusive and mixed communities.</p> <p>Policy SP2 of the Local Plan Strategic Policies document sets out that high quality new residential development in Haringey will be provided by ensuring that new development, amongst other things, meets the density levels set out in the Density Matrix of the London Plan. In July 2021 the Mayor published the new London Plan. This moves away from the use of a density matrix to a more holistic approach to making the best use of land and achieving sustainable densities. Policy D3 seeks to optimise site capacity through a design-led approach. This approach is consistent with policy DM11 of the Council's Development Management DPD which expects optimum housing potential of a site to be determined through a rigorous design-led approach. The quantum of 272 residential use can therefore be supported in principle, subject to detailed comments on the form and massing from the Council's Design Officer.</p> <p><b><u>Safeguarded Waste Site</u></b></p> <p>Part of the Ashley Road Depot site is covered by a waste safeguarding designation which covers the former Park View Road Reuse and Recycling Centre, which is classified as a transfer station in waste management use classification. When the Park View Road Reuse and Recycle Centre closed, all activities on that site were transferred to the existing Western Road Recycling Centre which has a licenced maximum throughput capacity of 75,000 tonnes per annum. To accord with the North London Waste Plan (which was found sound and is awaiting adoption by the Council, anticipated in July 2022) and London Plan Policy SI9, the maximum throughput the site achieved needs to be</p>	

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

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

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

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

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

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

	<p>proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.<a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes</a>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.</p> <p><a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes</a>. Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.</p> <p>Water Comments On the basis of information provided, Thames Water would advise that with regard to water network infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters</p>	
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	<p>pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p>	
<b>Historic England (GLAAS)</b>	<p>The site lies in an Archaeological Priority Area (Tier III) and is roughly 1.2ha in size. It is located close to the Mesolithic flint working site found near Tottenham Hale and geotechnical investigations suggest that brickearth survives across much of the site at less than 1m below ground level, although there are some much deeper areas of made ground suggesting localised truncation. The presence of brickearth, the nearby prehistoric finds and easy access to the River Lea suggest that the site would have been attractive for prehistoric settlement. The Corcoran et al Lower Lea Valley study puts the site on the Low Terrace of the river and raises the potential for this zone in this area to preserve Arctic Beds (which could contain Palaeolithic material), as well as noting that its same situation is very productive elsewhere for later periods and that absence of records nearby is more likely a result of an absence of investigation in the past. This potential, and a discussion of the survival and levels of brickearth on the site have not unfortunately been provided in the desk based assessment (Oxford Archaeology 2022). The DBA does include a useful figure showing areas of previous truncation, indicating that much of the site has been affected only by the construction of hard standing. could affect a heritage asset of archaeological interest. I have looked at this proposal and at the Greater London Historic Environment Record. I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. NPPF paragraphs 190 and 197 and London Plan Policy HC1 emphasise the positive contributions heritage</p>	Comments have been taken into account. The recommended condition will be secured.

	<p>assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.</p> <p>I therefore recommend attaching a condition as follows:</p> <p>No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.</p> <p>If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:</p> <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. Where appropriate, details of a programme for delivering related positive public benefits.</li> <li>C. 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><b>Informative</b></p> <p>Written schemes of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town</p>	
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	<p>and Country Planning (Development Management Procedure) (England) Order 2015.</p> <p>This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this precommencement condition please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 205.</p> <p>I envisage that the archaeological fieldwork would comprise the following:</p> <p>Evaluation</p> <p>An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.</p> <p>The desk based assessment has highlighted that extensive contamination is present on the site. However, a review of the intrusive ground investigation report (GEA 2022) suggests that much of the contamination is concentrated in hotspots and in the thicker made ground where archaeological deposits are likely to have been truncated. The evaluation WSI should therefore consider if any areas of the site will need to be avoided during trenching and propose appropriate health and safety mitigation for the remaining areas.</p>	
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<b>Metropolitan Police Designing Out Crime Officer</b>	<p><b><u>Section 1 - Introduction:</u></b></p> <p>Thank you for allowing us to comment on the above planning proposal.</p> <p>With reference to the above application we have had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.</p> <p>It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1).</p> <p>We have met with the project Architects to discuss Crime Prevention and Secured by Design at both feasibility and pre-application stage and have discussed our concerns and recommendations around the design and layout of the development. The Architects have made mention in the Design and Access Statement referencing design out crime or crime prevention and have stated that they will be working in close collaboration with DOCOs to ensure that the development is designed to reduce crime at detailed design stage. At this point it can be difficult to design out fully any issues identified. At best crime can only be mitigated against, as it does not fully reduce the opportunity of offences.</p> <p>Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions and an informative. The comments made can be easily be mitigated early if the Architects/Developers ensure the ongoing dialogue with our department continues throughout the design and build process.</p>	Comments have been taken into account. The recommended conditions and informatives will be secured.

	<p>This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity.</p> <p>The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.</p> <p><b><u>Section 2 - Secured by Design Conditions and Informative:</u></b></p> <p>In light of the information provided, we request the following Conditions and Informative:</p> <p><b><u>Conditions:</u></b></p> <p class="list-item-l1">A. Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve '<b>Secured by Design</b>' Accreditation. Accreditation must be achievable according to current and relevant <b>Secured by Design</b> guide lines at the time of above grade works of each building or phase of said development.</p> <p style="padding-left: 40px;">The development shall only be carried out in accordance with the approved details.</p> <p class="list-item-l1">B. Prior to the first occupation of each building, or part of a building or its use, '<b>Secured by Design</b>' certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained.</p> <p class="list-item-l1">C. The Commercial aspects of the development must achieve the relevant <b>Secured by Design</b> certification at the final fitting stage, prior to the commencement of business and details shall be submitted to and approved, in writing, by the Local Planning Authority.</p>	
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	<p><b><u>Informative:</u></b></p> <p>The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available <b>free of charge</b> and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.</p> <p><b><u>Section 3 - Conclusion:</u></b></p> <p>We would ask that our department's interest in this planning application is noted and that we are advised of the final <b>Decision Notice</b>, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind.</p>	
<b>Metropolitan Police</b>	<p>I refer to the recent application at Council Depot, Ashley Road. As you may be aware Policing is a 24/7 service resourced to respond and deploy on an "on demand" and "equal access" basis, and is wholly dependent on a range of facilities for staff to deliver this.</p> <p>Where additional development is proposed the MPS aims to deploy additional staffing and additional infrastructure at the same level that is required to deliver Policing to the locality. It would be complacent not to do this because without additional support unacceptable pressure will be put on existing staff, and our capital infrastructure, which will seriously undermine our ability to meet the Policing needs of this development, and maintain the current level of Policing to the rest of Borough and the wider London area.</p>	Comments have been taken into account. The recommended obligation will be secured.

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

GREATER LONDON AUTHORITY

Planning report GLA/2022/0237/S1/01

9 May 2022

### Council Depot, Ashley Road

Local Planning Authority: Haringey

Local Planning Authority reference: HGY/2022/0752

#### Strategic planning application stage 1 referral

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

#### The proposal

Full planning application for the erection of 272 homes within blocks ranging from 4 to 13 storeys, 174 sq.m. of flexible Use Class E floorspace along with a new vehicular access to the site, car parking and two pedestrian north south routes.

#### The applicant

The applicant is London Borough of Haringey and the architect is Levitt Bernstein

#### Strategic issues summary

**Land use principles:** Any loss of this waste site without compensatory reprofiling equal to the maximum throughput of the site is contrary to Policy SI9 of the London Plan. As proposed the waste that had been processed by the Park View facility on site would be absorbed by the existing Western Road Recycling Centre without interventions to increase its relative throughput capacity. Clarifications are sought to determine whether Western Road could meet its emerging waste plan waste capacity apportionment, in conjunction with that of Park View, over the plan period. Following this, compliance with Policy SI9 will be assessed at the Mayor's decision making stage.

**Affordable housing:** The affordable housing offer is 63% by habitable room, which exceeds the 50% Fast Track Route threshold for industrial/ publicly owned sites. The affordable housing offer comprises entirely social rent homes. The Council planning officers have confirmed that this is acceptable in this instance due to housing need.

Other issues on urban design, sustainable development, environmental issues and transport also require resolution prior to the Mayor's decision making stage.

#### Recommendation

That Haringey Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 99. Possible remedies set out in this report could address these deficiencies.

## **Context**

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

## **Site description**

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

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

### **Details of this proposal**

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

### **Case history**

11. The proposal has been subject to a pre-application meeting in principle on 15 September 2021 (Ref. 2021/0846/P1). The principle of redevelopment for residential led mixed uses was supported. A further pre-application meeting with GLA and TfL officers was held on 3 December 2021 (Ref. 2021/0953/P2I). Meeting discussion centred around land use principles, housing, urban design and heritage, transport and energy.
12. The pre-application report concluded that subject to the relocation of the safeguarded waste site complying with Policy SI9, the introduction of residential units on the site would be supported and the 61% affordable housing offer, all at Social Rent level, would be strongly supported in strategic terms. In addition, other issues in relation to design, transport, sustainable development and environmental matters would need to be addressed in the future application.
13. The proposal has been presented to the Haringey Council's Quality Review Panel (QRP) twice. According to the submission, the height and massing was generally considered acceptable in principle. However, concerns were raised about the southeast portion of the site. This led to a reduction in height along Park View North and Buildings A3 and B2 were also reduced in height to improve their relationship with the park. These changes were subsequently supported at the follow-up QRP meeting. They were also generally supportive of the landscaping proposals. Other comments were made in respect of the hierarchy of entrances, production of a vehicular management strategy; encouraging further differentiation of architectural expression, particularly key buildings; and exploring the potential to push the sustainability credentials of

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

### **Strategic planning issues and relevant policies and guidance**

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

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

## **Land use principles**

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

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

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



Figure 1: Location of safeguarded waste sites

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

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

	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21
Number of recycling centres	2	2	2	2	2	1	1	1	1
Recycling	5,574	6,798	7,672	7,405	7,446	6,831	5,970	5,609	5,042
Residual	3,935	4,356	3,806	2,933	3,203	2,263	2,387	1,846	1,453
Total	9,529	11,154	11,478	10,338	10,649	9,094	8,356	5,255	4,495

Table 1: Waste being processed within Haringey per annum

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

### Commercial use

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

### **Housing**

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

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

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

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

#### Residential mix

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

#### Playspace

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

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

### **Urban design**

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

### Design scrutiny

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

### Development layout

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

### Scale and massing

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

### Public realm

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

### Internal quality

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

### Architectural quality

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

### Fire safety

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

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

#### Inclusive access

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

#### **Heritage**

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

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

## Sustainable development

### Energy strategy

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

#### Whole Life Carbon

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

#### Circular Economy

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

#### Digital connectivity

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

## **Environmental issues**

### Urban greening and SINC

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

### Biodiversity

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

### Sustainable drainage and flood risk

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

### Air quality

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

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

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

## Transport

### Healthy Streets and Active Travel Zone (ATZ) assessment

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

### Trip generation

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

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

#### Cycle parking

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

#### Car parking

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

#### Management Plans

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

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

#### Road Safety and vision zero

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

#### **Local planning authority's position**

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

#### **Legal considerations**

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

#### **Financial considerations**

98. There are no financial considerations at this stage.

#### **Conclusion**

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

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

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

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

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

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

## Appendix 5 – Summary of Representations from Residents

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

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



