

#### Appendix 4: Consultation Responses from internal and external agencies

Stakeholder	Question/Comment	Response
<b>INTERNAL</b>		
LBH Carbon Management	<p><b>Carbon Management Response 17/06/2022</b></p> <p><b>Summary</b> Further to the Carbon Management response issued on 17<sup>th</sup> January 2022, and verbal discussions with the applicant in the meantime, this response seeks to clarify this response in relation to the carbon emission factors used. Revised planning conditions have been recommended in relation to the Energy Strategy.</p> <p><b>Energy – Update</b> Discussions with the GLA confirmed that the draft Energy Assessments Guidance (2020) is due to be updated imminently following the Department for Levelling Up, Housing and Communities' publication of the revised Building Regulations (BR) Part L in December 2021, which has taken effect from 15<sup>th</sup> June 2022.</p> <p>The GLA's guidance currently states that BR Part L 2013 should be used with SAP2012 carbon factors for development proposals in a Heat Network Priority Area and where there is the potential to connect to a new network using low-emission CHP (i.e. the energy from waste plant in Edmonton).</p> <p>With the impending update to the GLA guidance to reflect BR Part L 2021<sup>1</sup>, the GLA has advised that applications submitted before this update that are using BR Part L 2013 should use SAP10 carbon factors as this is more appropriate for developments connecting to a DEN in the interim. This response has therefore been updated to reflect the reporting under BR Part L 2013 with SAP10 carbon factors.</p> <p><b>Energy – Summary</b></p>	Recommended conditions and s106 heads of terms included. The proposal would therefore be acceptable.

<sup>1</sup> The GLA Guidance 2022 will only take effect once the Part L 2021 methodology software have been published.

The tables below have been prepared on the basis of Energy Statement v2, prepared by Aecom (dated December 2021).

	Connection to DEN scenario		ASHP backup scenario	
(SAP10 emission factors)	tCO <sub>2</sub>	%	tCO <sub>2</sub>	%
Baseline emissions	434.2		434.2	
Be Lean savings	-77.8	-18%	-77.8	-18%
Be Clean savings	348.4	80%	0	0%
Be Green savings	4.5	1%	304.1	70%
Cumulative savings	275.1	63%	226.3	52%
Carbon shortfall to offset (tCO <sub>2</sub> )	159.1		207.9	
Carbon offset contribution +10% management fee	£453,435 (to be recalculated)		£592,515 (to be recalculated)	
Initial carbon offset payment	Figure calculated under the Connection to DEN scenario			
Deferred carbon offset payment	Figure calculated as: ASHP back up carbon offset contribution minus the initial carbon offset contribution (DEN connection)			

These carbon offset figures are based on the Energy Statement v2 prepared by Aecom in accordance with advice from the Energy infrastructure Manager on the carbon performance of the DEN. The Council has since become aware of a BRE Technical note on heat from Energy From Waste systems<sup>2</sup> which requires they be treated differently and so these figures will need to be updated.

#### **Energy – Carbon Offset Contribution**

<sup>2</sup> [https://files.bregroup.com/SAP/BRE\\_Technical\\_Note-Energy\\_from\\_Waste\\_Facilities\\_%28ERF%29\\_1.0.pdf?](https://files.bregroup.com/SAP/BRE_Technical_Note-Energy_from_Waste_Facilities_%28ERF%29_1.0.pdf?)

	<p>The initial carbon offset contribution amount is expected to decrease, and the deferred carbon offset would therefore increase. The revised figures will be established through the Energy Plan process in the s106 which includes an updated carbon offset calculation prior to commencement.</p> <p>The Section 106 agreement will set out within what timeframe the Deferred Carbon Offset payment would be payable, based on the ultimate date by which the development should confirm whether they connect to the DEN.</p> <p><u>Connection charge</u></p> <p>In the event that the scheme connects to the DEN, a connection charge should be payable. In order that this is reasonable, the charge will be capped as follows.</p> <p>Maximum connection charge = deferred carbon offset contribution + any avoided costs of implementing the ASHP backup solution (depending on phasing, the ASHP solution may have been implemented in which case the avoided costs are zero).</p> <p>This is payable when they are connecting to the DEN.</p> <p><b>Energy – Be Clean</b></p> <p>The applicant will need to demonstrate that they will provide the following details prior to the commencement of construction:</p> <ul style="list-style-type: none"> <li>a) A detailed design and route showing how the pipe line and communications ducts into the development (to our specification) will be routed from the GF plant room to a manhole at the boundary of their site. The route should also demonstrate there are no obstructions in the highway adjacent to connection point;</li> <li>b) A good quality network within the building – this should be to the Council’s standard specification, with minor amendments to suit the site to be agreed between the Council and the developer, which should be secured through the S106;</li> </ul>	
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|  | <p>c) A clear plan for QA of the network post-design approval through construction and commissioning to operation, this plan should demonstrate how the system can be expected to perform as designed and should be based on the processes set out in CP1. The Council will in turn be seeking updates on the implementation of the scheme in line with the agreed specification at key stages through the build;</p> <p>d) A clear commercial strategy identifying who will sell energy to residents and how prices/quality of service will be set.</p> <p><b>Planning Obligations</b></p> <p>Regarding the planning obligations, the following is recommended:</p> <ul style="list-style-type: none"><li>- 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)</li><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>- 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>- Energy Plan</li><li>- Sustainability Review</li></ul> |  |
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**Revised Planning Conditions (Energy and Overheating only) + Additional DEN Connection Condition**

*Energy Strategy Condition*

*(a) Prior to the commencement of development, a revised Energy Statement shall be submitted and approved by the Local Planning Authority. This shall be based on the submitted Energy Statement v2, including the Appendices (dated December 2021), prepared by Aecom, delivering a minimum site-wide carbon emission reduction of 63% (SAP10 emission factors) from a Building Regulations 2013 Part L compliant development that will connect to the Decentralised Energy Network (DEN) in the future with an air source heat pump backup solution. The revised strategy shall include the following:*

- Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;*
  - A minimum 14.3 kWp solar photovoltaic array;*
  - A strategy to improve seek to meet the Be Lean requirement to improve the fabric efficiencies to a 15% reduction with SAP 2012 carbon factors, including calculations showing how thermal bridging will be reduced;*
  - Confirmation of the specification, efficiency, layout of the interim heating solution before connecting to the DEN;*
- A metering strategy.*

*(b) Prior to the occupation of development, evidence that the ASHPs (if installed) and solar PV panels comply with other relevant issues as outlined in the Microgeneration Certification Scheme or Heat Pump Product Certification Requirements shall be submitted to and approved by the Local Planning Authority.*

*(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.*

*Should the agreed target not be able to be achieved on site through energy measures as set out in the aforementioned strategy, then any shortfall should be offset at the cost of*

*£2,850 per tonne of carbon plus a 10% management fee. Should an increased level of CO<sub>2</sub> reduction be achieved, any carbon offset payment would be reduced by £2,850 per tonne.*

*The final agreed energy strategy shall be installed and in operation prior to the first occupation of the development. The development shall be carried out strictly in accordance with the details so approved energy strategy and shall be operated and maintained as such thereafter. The solar PV array shall be also installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.*

*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) Policies SI2 and SI3, and Local Plan (2017) Policy SP4.*

*This additional planning condition will ensure the detail of a DEN connection is submitted.*

**DEN connection**

*Prior to the above ground commencement of construction work, details relating to the future connection to the DEN must be submitted to and approved by the local planning authority.*

*This shall include:*

- Further detail of how the developer will ensure the performance of the DEN system will be safeguarded through later stages of design (e.g. value engineering proposals by installers), construction and commissioning including provision of key information on system performance required by CoP1 (e.g. joint weld and HIU commissioning certificates, CoP1 checklists, etc.);*
- Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification.*
- Detail of the pipe design, pipe sizes and lengths (taking account of flow and return temperatures and diversification), insulation and calculated heat loss from the pipes in Watts, demonstrating heat losses have been minimised together with analysis of stress/expansion;*

- *A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings should cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation;*
- *Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection is accessible by the area wide DEN, detailed proposals for installation for the route that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts;*
- *Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals;*
- *Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DEN supply including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue;*
- *Details of a future pipework route from the temporary boiler location to the plant room.*

*Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.*

Amendments to the overheating condition are also highlighted in tracked changes below.

*Overheating (Student Accommodation) condition*

*Prior to above ground works, a revised Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating risk with windows closed and for future weather files, and propose a retrofit plan. This*

*assessment shall be based on the Overheating Report by Aecom (dated 17 December 2021).*

*This report shall include:*

- *Annotated plans showing which habitable rooms will be affected by noise constraints;*
- *Modelling of DSY1 2020s weather file demonstrating how the rooms that are constrained by noise will not overheat when the windows are closed, with appropriate overheating mitigation measures in line with the Cooling Hierarchy and the Acoustics Ventilation and Overheating Residential Design Guide.*
- *Further modelling of the habitable rooms based on CIBSE TM59, using the CIBSE TM49 London Weather Centre files for the 2050s and 2080s periods, high emissions, 50% percentile;*
- *Modelling of mitigation measures required to pass future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan;*
- *Technical details of mitigation measures, including the fixing mechanism, specification, and shading coefficient of any internal and external shading features, and the energy demand of the active cooling for communal areas;*
- *Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy;*
- *Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.*

*Prior to occupation, the development must be built in accordance with the overheating measures as approved and retained thereafter for the lifetime of the development.*

*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.*



<p>LBH Conservation Officer</p>	<p>The proposed development is for a partly seven, partly 24 storeys building within the Upper Lee Valley Opportunity Area and Site Allocation TH4: Station Square West of the Tottenham Hale Site Allocations. This application follows previous consents for tall buildings in the wider area of the application site, including buildings within the Argent Masterplan Area, adjacent to the site. The impact of these buildings on the built historic environment has been assessed as part of the relevant applications.</p> <p>There are a number of designated and non-designated heritage assets in the vicinity of the application site. These include the locally listed Berol House, 25 Ashley Road; the Grade II listed late 18th century house on no. 62 High Cross Road; and a number of conservation areas, mainly located along the Tottenham High Road Historic Corridor, including the Tottenham Green and the Bruce Grove Conservation Areas.</p> <p>A heritage assessment has been submitted in support of this application which includes a number of verified views showing the proposed development from previously agreed points from the Tottenham Green and Bruce Grove Conservation Areas. These points were agreed as part of pre-application discussions with the applicants, taking into consideration the location of the proposed development, its height and scale, the distance from built heritage assets, intervening topography and townscape, along with the heritage significance of the assets, including any contribution made by their setting. VU.CITY was also used to understand how the proposed development might affect the built historic environment in the borough.</p> <p>The area around the site has changed dramatically in the recent years, following extensive redevelopment, including the construction of new tall buildings, some of which have already been constructed or are in the process of construction. The proposed building, when visible from the built heritage assets in the vicinity of the application site and beyond, it would be seen and experienced in the context of the wider regeneration of the area and the cluster of other tall buildings, some of which are taller than the proposed development. This would also be the case when the proposed development is seen from the Tottenham Green and Bruce Grove Conservation Areas and associated statutory and locally listed buildings. As seen in the submitted views, the proposed development would not appear overly prominent,</p>	<p>Conclusions on harm are noted.</p>
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	<p>but rather in the background and would be perceived as part of the existing and emerging cluster of tall buildings at The Hale.</p> <p>For the reasons above, it is not considered that the proposed development would have any considerable further impact on the built historic environment. Therefore, the proposed development would not result in any further harm to the significance of the built heritage assets in the borough.</p>	
LBH Design Officer	<p><b><u>Principal of Development, Masterplanning and Street Layout</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 the heart of Tottenham Hale into a high-rise, high-density new district centre clustered tightly around the transport interchange. Specifically the two city blocks that formerly formed a traffic island in the former Tottenham Gyratory, of which this site forms the north-western corner. This site is also the very last site within this “former traffic island” to start redevelopment, never mind apply for planning permission.</li> <li>2. Therefore the principle of development and form of the overall masterplan is established by the District Centre Framework and AAP, with high-rise point blocks sitting at the corners of medium rise perimeter blocks. The removal of the gyratory means these two blocks are directly connected to Tottenham Hale Station and its improved bus station, giving it excellent public transport connectivity, and town centre uses on the lower floors will provide town centre standards of amenities on the doorstep. The first part of the island to be redeveloped was the Premier Inn on the south-east side of this block (nine storeys), followed by Millstream Tower (part 7, part 9, &amp; part 21 storeys) which forms the eastern point of this block, and joins this application site’s Hale Road (northern) frontage; both of these buildings are complete. The whole of the rest of the island site is currently under construction, as part of a large development by Argent Related that also includes plots to the north of Hale Road, both east and west of this application site. Argent are building the south-eastern half of the</li> </ol>	Support noted.

	<p>island, including the southern corner of the triangular urban block of which <i>this</i> application site completes the north-western corner.</p> <ol style="list-style-type: none"> <li>3. The masterplanning principle established in the DCF is of urban blocks, lining public streets with almost continuous building form, but with occasional gaps opening into more private central courts, becoming more open and public immediately around the station square. As sites have come forward this has been implemented, with the Welbourne site to the north-west, by Argent, developed with a central private communal podium court over parking, similar to Argent's Ashley Road East block, whilst their Ashley Road West, forming the south-eastern quarter of the block, an L-shaped building with the courtyard to be completed by future developments on the rest of the block. On this application site's block, Premier Inn simply lines the street, with a small service yard behind; Millstream Tower has a small podium garden in the crook of its building form on the north side and north-eastern end of the block; and Argent's building currently under construction will front the street at the block's southern corner, with its private courtyard to its north poking into the plan of this application site. These proposals wrap around that garden and complete the internal block's private courtyard.</li> <li>4. The DCF proposed the built form on this block would form a continuous built form to the south-eastern and south-western edges, with the courtyard open to the north, on the principle that although the internal courts to city blocks form private space, in service of their buildings for either functional or amenity purposes (or both) they benefit from some opening to the public realm to aid light and ventilation. But it was quickly realised, in conversations between officers and applicants on earlier schemes, that a building wall to the north side would be more advantageous, to hide the more "functional" internal block elevations from visibility, allow the gap to permit sunlight into the courtyard and form a more continuous building form to better define streets and public space from private courtyard. This proposal therefore completes the building wall started by Millstream along the north side of the block and matches the narrow gap started by Argent in the south-western side of the block.</li> <li>5. The DCF also considered the third dimension, height, with an idea of a "wave", where height would gradually build up to maxima around the station square, dropping to a nevertheless taller central urban height, rising again to secondary tall buildings before dropping away gradually but fairly quickly to the surrounding existing</li> </ol>	
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context. Suggested heights were also included, but as time has passed, housing demand, development expectations and infrastructure capacity have increased to permit all the actually built developments to raise their heights over DCF expectations, whilst retaining the “wave” form. This proposal maintains the massing strategy, including the wave form, with

**Tall Buildings, especially Height, Form and Composition**

6. The proposal, at 24 storeys, definitively represents a tall building, as defined in the local plan and in normal understanding. Nevertheless, the site is within an area defined as suitable for tall buildings and part of an adopted masterplan for a range of tall buildings, with which, as noted above, it is in accordance.
7. 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 3<sup>rd</sup> & 4<sup>th</sup> bullets from the Strategic Policies, that reference the other document and the document used in preparing DM6:
  - The site is within the areas of both the adopted Tottenham AAP and the adopted District Centre Framework. Both support the principle of tall buildings in this location. The latter established in 2015 a principle that it would be acceptable to have a tall building at the north-west point of this block, precisely where this application proposes a tall building;
  - The council prepared a borough-wide Urban Characterisation Study in 2016, which supported tall buildings in this location, as part of a cluster marking the centre of Tottenham Hale;
  - High quality design especially of public realm is considered above in paras. 14-16, the protection of views below in paras. 11-13. Heritage assets and their settings are covered by the Conservation Officer’s comments;
  - The proposal will be capable of being considered a “Landmark” by being a wayfinder and a marker within the masterplan, marking the key junction of Monument Way, Hale Road and The Hale, and forming a gateway to the heart of Tottenham Hale;

	<ul style="list-style-type: none"> <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 from para. 20 onwards, 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, a large open space or open waterway, which this is not;</li> <li>• The proposed tall buildings will be in proximity to a number of other tall and less tall buildings, but impact on them and of them on this proposal is considered in detail in the relevant sections below;</li> <li>• And the urban design analysis and 3d model views of their proposal satisfactorily shows that the tower could be a successful and elegant landmark, contributing to the planned cluster of tall buildings.</li> </ul> <p>8. The detailed design of the tower has undergone extensive revision and refinement, in conjunction with numerous workshops with Officers, during the course of this application, particularly in making the tower more slender and elegant. The principal concept for the composition of the proposed tower is of a slender grid, growing out of the shoulders forming the north wing along Hale Road and frame on the south west side, which relate more to the street scale.</p> <p>9. 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, with the top floor being an open loggia to the roof terrace. In this it will have a strong family resemblance to other tall buildings in the vicinity, including neighbouring completed Millstream and currently under construction Argent tall buildings, which employ similar gridded elevational composition topped by a “crown”.</p> <p>10. Therefore, the proposed tall building is considered appropriate in this location, legible as a landmark and as part of a wider composition, striking and distinctive in design, in</p>	
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support of meaningful aspects of the design and of high quality architectural design capable of being seen as beautiful.

**Local, Wider & Strategic Views**

11. The development forms part of an emerging cluster of tall buildings, including taller buildings than this proposal already permitted, under construction and already completed, around Tottenham Hale. London and Borough Strategic View Corridors all happen to be distant from this development, and therefore are not considered to be affected by this development.
12. Given the number of other tall buildings already approved (including some now built) in the cluster immediately around this site, there would probably be no locations where this proposal would be visible but there are currently or approved no other tall buildings visible. Nevertheless, following consultation between the applicants and officers, a number of close and distant views of the proposals have been produced, in each case including a version at the time of assessment and with the “cumulative impact” from other approved but unbuilt or unfinished buildings collaged in. Furthermore, discussions between officers and the applicants have resulted in a number of improvements and corrections to those views, so that officers can now confidently confirm that they accurately show the townscape and visual impact of this proposal.
13. The applicants most recent and accurate views demonstrate that this proposal will sit within the cluster of built, under construction and planned all buildings marking the centre of Tottenham Hale. It will not stand out, but will sit assertively as one of the less tall buildings around the highest towers around the station square, as part of the wave of second ring taller buildings marking the edge of the new Tottenham Hale Centre, and in this particular case confidently marking its significant apex point on the major junction of Monument Way, The Hale and Hale Road, also marking the southern end of Down Lane Park. As such it will contribute appropriately to the legibility and distinctiveness of this important emerging centre and help make the cluster attractive and appealing in longer, medium and local views.

**Architectural Expression, Fenestration & Materiality**

14. The elevations are composed of a grid of vertical brick ribs at every window balanced against horizontal glass reinforced concrete (GRC) bands generally every three floors. The ribs and consequent vertically proportioned fenestration give the elevations a slenderness, whilst the horizontal bands give a human scale and allow the tall elevations to be read as a distinct two storey base, middle sections of five repeated groups of three floors and crowning top of five floors, with larger windows between fewer, wider brick ribs at the base more characteristic of town centre buildings and the crown opening up at the very top.
15. Infill spandrel panels of green glazed brick between windows and on the more blank sections of the flank elevations will add colour, vibrancy and changing reflected light effects. The shoulder element along Hale Road stretches the ribs over five storeys of a single “middle” with a loggia top continued across the communal amenity rooms of the seventh floor, making the tower appear to float over the shoulder on this side. The seven storey external frame on The Hale side, also in brick verticals and GRC horizontals matches this shoulder, as well as providing essential wind baffling to the side most exposed to prevailing wind and additional sun shading and create a canopy-portico to the main entrance.
16. Although precise materials and details will be secured by condition, those proposed in the application, especially the soft buff and green glazed bricks and stone-like GRC, will be beautiful, durable and complimentary to the existing and emerging context. The overall architectural approach, especially the gridded facades and use of brick, will also match the other new high and lower rise buildings making up this vibrant new town centre at Tottenham Hale.

**Residential Quality (flat, room & private amenity space shape, size, quality and aspect)**

17. The proposals are for Student Housing, to which the Nationally Described Space Standards on minimum room and flat sizes do not apply. However the applicants have

	<p>provided evidence that the bedroom sizes proposed are more generous than average for student housing currently being built, which itself would be considerably better than that historically provided, and is considered by educational institutions to meet or exceed their recommendations.</p> <p>18. As is expected in student housing, individual rooms / units do not have private external amenity space. However, the development includes generous external communal roof terraces; at the seventh floor and top (24<sup>th</sup>) floor, as well as generous internal shared amenities, including communal lounges at 7<sup>th</sup> and 24<sup>th</sup> floors, opening onto the roof terraces, communal laundry at 7<sup>th</sup> floor, gymnasium at 1<sup>st</sup> floor and smaller shared sitting-dining kitchens at each floor (on many floors with two per floor) related to smaller clusters of bedrooms.</p> <p>19. Almost all units are inevitably single aspect, with the exception of some wheelchair adapted corner units. As the layout currently follows the street pattern, some units will therefore be single aspect north facing. Where rooms wrap around the corners of the proposal, they are generally communal living-dining-kitchens or specialist communal facilities. Overall, the quality of private and communal accommodation is exemplary for student housing.</p> <p><b><u>Daylight, Sunlight and Wind Microclimate</u></b></p> <p>20. 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>21. These include amended reports following design amendments, particularly the 3m increased offset of the proposal from their south-eastern boundary, making the distance of their proposals from the neighbouring Argent block approximately</p>	
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	<p>13m. There has been detailed discussion between officers, these applicants and representatives of Argent regarding the impact of this proposal on their approved Building 3 immediately neighbouring development, currently under construction. Officers consider that on balance the impact is reasonable, given both sites are part of the same adopted site allocation and masterplanned high density development. In particular, the proposals on the two sites must be considered in context of the original masterplan, how they have interpreted and developed that masterplan in accommodation of rising density expectation, how each site performs against a mirror of their own development.</p> <p>22. The original Tottenham Hale District Centre Framework always envisaged the second tallest building on this block, after the eastern end of the block (i.e. Millstream) would be this site, at the north-western corner of the block, not Argent's site on its south-western corner. Albeit that the heights as developed have increased considerably since this, the principle of relative relationships remains the same and the most logical. Admittedly a number of changes have been made as well as heights in what has been is now being built or planned, compared to the DCF. These have generally improved development, including a more coherently enclosed form of development of the whole of this city block, with continuous wall of shoulder height development along the north-eastern and south-eastern side of this triangular block, with what will be only a narrower opening into the private middle of the block on its western side, between this site and the Argent site. In a location like this, essentially at "central" levels of business, intensity and density, intended to become a town centre and a major intermodal public transport hub, places where people live should be outward facing and more reliant on the public realm, public squares and parks, rather than private or private-communal gardens, for their open space, and it is appropriate for the middles of these city blocks to be little more than lightwells, with minimal of any landscaping, and with a variety of different public spaces nearby, catching the sun at different times of the day, the expectation for daylight and sunlight to dwellings to be much less than in dwellings in suburban locations.</p>	
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	<p>23. Therefore officers have always considered the most fair way to consider whether the effect of this Jigsaw development on day and sunlight to Argent's development is to compare it to a mirror of the Argent development. This is supported in the BRE Guide and is what this applicant's day and sunlight consultants have done, successfully demonstrating that their proposals are not significantly worse than the mirror development. They have also compared their proposals to</p> <p>24. The applicants day and sunlight consultants have also assessed the effect of their development on other neighbours, including the 19<sup>th</sup> century terrace of two storey houses on the north side of Hale Road and the mid 20<sup>th</sup> century housing estate west of The Hale. It should be noted that the former are part of another site allocation for comprehensive higher density town centre development, that is also part of the adopted masterplan, envisaging that they will be redeveloped; the assessment finds some of the existing houses would lose noticeable amounts of day and sunlight, but the envisaged redevelopment, with non residential uses on the ground and possibly 1<sup>st</sup> floor, should be able to achieve good levels. The applicants' assessment finds some windows in the nearest blocks of the estate to the west would lose some daylight, but not sunlight, mostly those that are below access balconies. It should be noted that the assessment was carried out before the tower was made narrower, which should reduce the impact on these homes. They all, like the houses to the north, benefit from dual aspect with their other aspect unaffected by this proposal.</p> <p>25. 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>	
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26. There is no assessment on the student accommodation in this application, as there is no accepted standard for daylight, as it is not considered the students permanent homes, and it is frequently observed that students don't spend much of their daylight hours in their rooms. However it is notable that the window sizes in the proposals are generous, and generally onto unobstructed surroundings, so it is likely they will benefit from good levels of daylight. The roof terraces should also benefit from good levels of sunlight.

27. To assess the impact of the proposals on wind microclimate, the applicants carried out wind tunnel testing of a physical model and measured the findings against long term wind statistics applicable to the site, in accordance with the industry standard "Lawson" criteria. Their assessment finds that the proposed tower would cause significant downdrafts and tunnelling of wind at the north-western corner of the site, without significant mitigation, due to the flank of this proposal and the neighbouring Argent block being exposed to prevailing westerly winds, but that the external frame proposed for this site will completely break up this wind effect, making the ground levels comfortable for walking and occasional sitting.

### **Summary**

These proposals are well designed and appropriate to the site. They are in accordance with the envisaged masterplan as it has continued to evolve to accommodate greater density expectations and the continued successful emergence of Tottenham Hale as a vibrant new town centre. In particular the proposed tower will mark a major gateway to the new town centre and complete this part of the masterplan in accordance with the envisaged wave of heights descending from the tallest buildings immediately around the station. The proposals support vibrant town centre activities, with retail and the communal facilities of the student housing on the ground and first floors creating lively active frontage to the streets around the site. The proposed student housing will meet a known need in higher quality than normal, with student housing complimentary to the high density, well connected, busy and vibrant town centre location. The proposals are well designed with elegant proportions

	<p>both overall and in their fenestration and detailing, and will be in appropriate, durable and beautiful materials.</p> <p>The Council's Quality Review Panel (QRP) agrees with officers that the proposals are "well considered and sophisticated", describing the profile and articulation of the tower as very successful, the layout and detail of the student accommodation and communal areas, the architectural expression and the proposals for amenity space and public realm re very well-considered. Minor concerns with the design of cycle storage have been addressed in full by the applicants in later amendments.</p>	
LBH Local Lead Flood Authority/Drainage	<p>Having reviewed the applicant's submitted Flood Risk Assessment and Drainage Strategy Report, document reference number 60644390 dated July2021, we would like to raise following concerns:</p> <ul style="list-style-type: none"> <li>• A management maintenance schedule will need to be in place for the lifetime of the development and details provided of who will be responsible for the SuDS. The pro-forma, that was submitted is out of date, we have attached an updated version that will need to be completed and returned to the LLFA, for review.</li> <li>• As this site has a medium risk of surface water flooding we would like to see a plan showing the overland flow path route.</li> </ul> <p>We may have further comments to make on receipt of this resubmission.</p> <p>This was subsequently submitted and the LLFA then had the following comments:</p> <ul style="list-style-type: none"> <li>• This is fine and acceptable.</li> </ul>	Noted the applicant has followed the London Plan hierarchy and the proposed SuDS features are acceptable subject to FRA recommendations being secured by condition.
LBH Pollution	<p>Having considered all the relevant supportive information especially the Air Quality Assessment report with reference 60644390 prepared by AECOM Ltd dated June 2021 taken note of sections 3 (Assessment Methodology), 4 (Baseline Conditions), 5 (Results), 6 (Environmental Design &amp; Management) and 7 (Summary &amp; Conclusions) as well as the Phase1 Land Contamination Report with reference 60644390 prepared by AECOM Ltd dated June 2021 taken note of sections 6 (Geo-Environmental Conceptual Model), 7 (Preliminary</p>	Noted conditions on Land Contamination, Unexpected Contamination, NRRM and Demolition/Construction

	<p>Risk Assessment), 8 (Conclusions &amp; Recommendations) and Table 7.4 (Preliminary Risk Assessment – Potential Sources, Pathways and Receptors), <b>please be advise that we have no objection to the proposed development in respect to air quality and land contamination but the following planning conditions are recommend should planning permission be granted.</b></p> <p><b><u>1. Land Contamination</u></b></p> <p>Before development commences other than for investigative work:</p> <ol style="list-style-type: none"> <li>Using the information already submitted on the Phase1 Land Contamination Report with reference 60644390 prepared by AECOM Ltd dated June 2021, an intrusive site investigation shall be conducted for the site using information obtained from the desktop study and Conceptual Model. The site investigation 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.</li> <li>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.</li> <li>Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and;</li> <li>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.</li> </ol> <p><b><u>Reason:</u></b> To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p><b><u>2. Unexpected Contamination</u></b></p> <p>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</p>	<p>Environmental Management Plans which are all recommended.</p>
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will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

**Reasons:** To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework.

**3. NRMM**

- a. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at <http://nrmm.london/>. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.
- b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.

**Reason:** To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ

**4. Demolition/Construction Environmental Management Plans**

- a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst

	<p><b>b.</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.</p> <p>The following applies to both Parts a and b above:</p> <p>a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).</p> <p>b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include:</p> <ul style="list-style-type: none"> <li>i. A construction method statement which identifies the stages and details how works will be undertaken;</li> <li>ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays;</li> <li>iii. Details of plant and machinery to be used during demolition/construction works;</li> <li>iv. Details of an Unexploded Ordnance Survey;</li> <li>v. Details of the waste management strategy;</li> <li>vi. Details of community engagement arrangements;</li> <li>vii. Details of any acoustic hoarding;</li> <li>viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance);</li> <li>ix. Details of external lighting; and,</li> <li>x. Details of any other standard environmental management and control measures to be implemented.</li> </ul> <p>c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on:</p> <ul style="list-style-type: none"> <li>i. Monitoring and joint working arrangements, where appropriate;</li> <li>ii. Site access and car parking arrangements;</li> <li>iii. Delivery booking systems;</li> <li>iv. Agreed routes to/from the Plot;</li> </ul>	
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- v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and
  - vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the Plot during the demolition/construction phase; and
  - vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching.
- d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:
- i. Mitigation measures to manage and minimise demolition/construction dust emissions during works;
  - ii. Details confirming the Plot has been registered at <http://nrmm.london>;
  - iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection;
  - iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection);
  - v. A Dust Risk Assessment for the works; and
  - vi. Lorry Parking, in joint arrangement where appropriate.

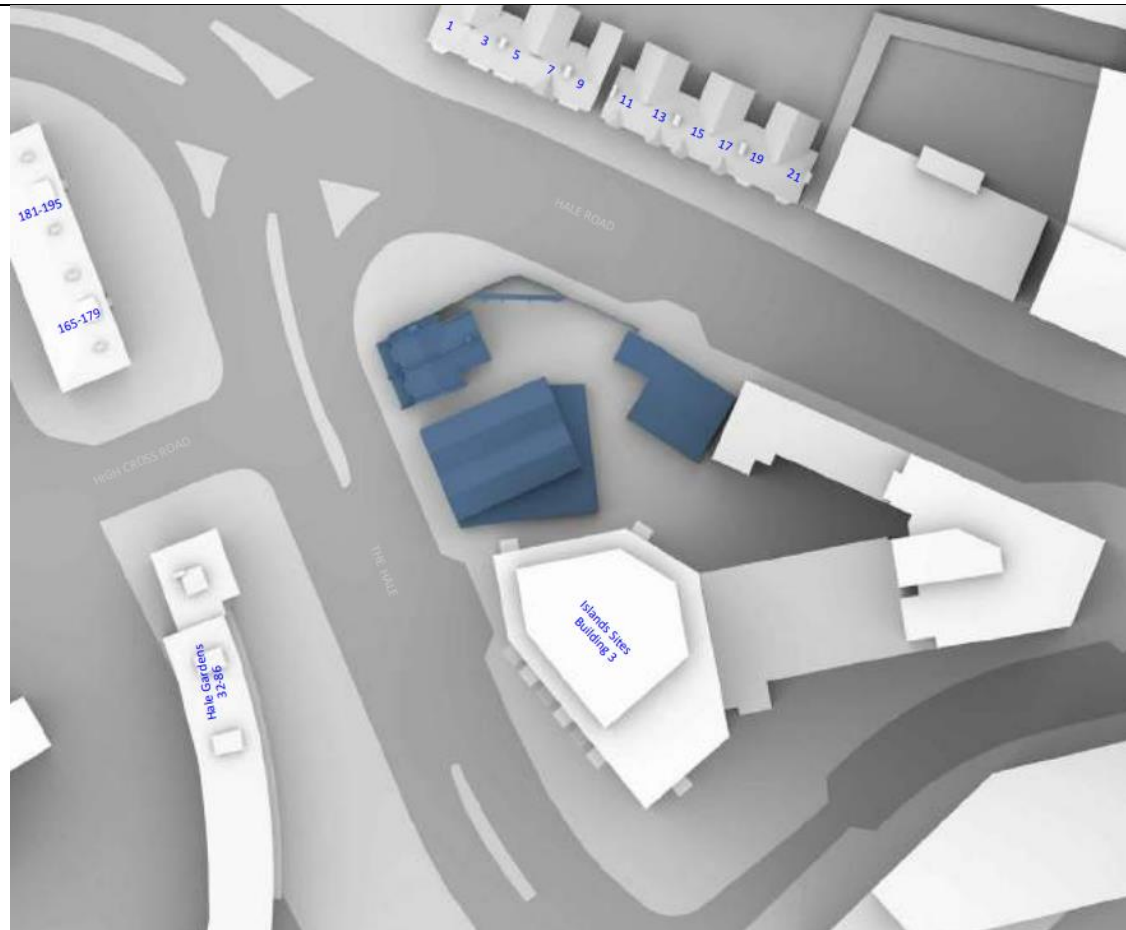
**The development shall be carried out in accordance with the approved details. Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out.**

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

**Informative:**



	<p>1. Prior to demolition or any construction work of the existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.</p>	
LBH Transportation	<p>This application is for the demolition of the existing structures on site and the erection of a part 7, part 24 storey building with 624 sqm of commercial floorspace at the ground floor within 3 units, and 473 student accommodation units in the remainder of the building</p> <p>A basement is proposed for the building that will accommodate plant, refuse and recycling bins, and cycle parking. This is proposed as a car free/permit free development and should accordingly be formally designated as such via the S106 Agreement.</p> <p><u>Location and access</u> The site is located on the north-west corner of an island site bounded by The Hale, Hale Road and Station Road in Tottenham. It currently comprises a mix of retail with a public house and a car wash. It is adjacent to both the Station Square development site, and the recently completed Premier Inn development that also occupies this island site.</p>	<p>Following satisfactory responses to queries, no objection subject to recommended conditions and s106 obligations.</p>



The Hale is part of Transport for London's Road Network (TLRN) and as such TfL are the highway Authority, whereas Hale Road and Station Road are both Haringey Roads.

	<p>The site has a PTAL value of 6a which is considered ‘excellent’ access to public transport services. Multiple frequent bus services are available within 2 to 7 minutes’ walk of the site, Tottenham Hale station with national rail and Underground services</p> <p>The site is within the Seven Sisters CPZ, which has operating hours of 0800 – 1830 Monday to Saturday.</p> <p>The site is part of the TH4 site designation within the Tottenham Area Action Plan, envisaged for a mix of retail/commercial and residential development.</p> <p><u>Proposed Access Arrangements</u></p> <p>The entrance to the development for pedestrians will be to the top/north end of the building, which will be accessible from the footways serving the site. There are continuous footways on The Hale and Hale Road and footway widths adjacent to the site range from approximately 2.5m to 3.7m on The Hale, and 2.4m to 1.7m on Hale Road. The applicant details the entrance will be set back.</p> <p>Access to cycle parking facilities will be from ground level to some cycle parking within a store however the bulk of the cycle parking will be within the basement, accessible via a lift.</p> <p><u>Active Travel Zone/Healthy Streets Assessment</u></p> <p>The TA includes a virtual assessment of 7 different routes to public transport and other local facilities to accord with the Active Travel Zone/Healthy Streets Assessment approach. Unfortunately, with COVID restrictions, a physical inspection was not carried out at the time of drafting the TA.</p> <p>Also, with the ongoing development related construction works and the works to public transport facilities at Tottenham Hale, there are temporary arrangements within the public realm which prevented assessing an ‘everyday’ situation.</p> <p>These route assessments did not highlight any particular issues as such but made references to how the eventual public realm arrangements need to contribute towards advancing the mayor’s agenda towards a safer highway environment and increasing the</p>	
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	<p>use of active travel modes. The assessments also include reference to the development making a contribution towards the area wide public realm improvements advancing with the redevelopment and regeneration taking place.</p> <p>Transportation do consider it appropriate for this development to make a financial contribution towards improving the public realm in the locality of the site and along the routes that users and residents will use to access local public transport and other facilities. The amount of this contribution is yet to be determined and it will need to be proportionate taking into account other development sites in the locality.</p> <p><u>Trip generation</u></p> <p>The TA predicts the numbers of new trips from both components of the development and these are not expected to be problematical with respect to movements on the public highway or public transport services. The majority of trips will connect to the east towards the public transport services at Tottenham Hale bus and rail stations and the wider walking and cycling routes in the locality of the site.</p> <p><u>Blue badge/disabled/Mobility impaired parking, drop off and pick up</u></p> <p>There are no blue badge/disabled parking spaces included in this pre application proposal. This falls short of the requirements of the London Plan. There are physical restrictions due to the footprint and location of the site making on site provision very difficult without considerable costs.</p> <p>The TA details there are two blue badge bays on Station Road, 100m walk from the entrance to this development. This does exceed the suggested maximum walk distance of 50m as included within mobility access guidance, however it is acknowledged that other recently consented developments at this locality do not include blue badge parking within curtilage.</p> <p>The applicant's proposals are for any mobility impaired persons drop off and pick up to take place from the available loading bays on Hale Road and the Hale, and there is a proposal to</p>	
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	<p>extend the loading bay on the Hale to facilitate provision of a facility for blue badge parking and drop off/pick up.</p> <p>This proposed arrangement would compromise the footway widths to a degree reducing available width, however this is not considered unacceptable as the pedestrian flows at this particular location will be relatively low.</p> <p>The applicant proposes a monitoring regime to assess demands for blue badge drop off and parking with respect to the potential provision of the blue badge parking facility on Hale Road. Full details of this must be provided for review prior to formalisation of arrangements, this can be covered by a pre commencement condition.</p> <p>As commented in the section on cycle parking, there are proposals for the provision of three spaces for mobility scooter parking and charging at ground floor level. These may be appropriate, however in order to fully form a view on the provision of these it needs to be clarified that scooters will be able to be accommodated in the units occupied by those residents that need them.</p> <p><u>Cycle parking arrangements</u></p> <p>Cycle parking is proposed to meet the London Plan numerical requirements for both student accommodation and the retail/commercial floor space.</p> <p>This is as shown in the table below;</p>	
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3.15 The minimum cycle parking requirements associated with the London Plan (March 2021) for the Proposed Development are set out in Table 2.

**Table 2: Cycle Parking Requirements (London Plan)**

Land Use	Units/ Floor area	Long Stay Minimum Standard	Short Stay Minimum Standard	Long Stay	Short Stay	Total
Student Accommodation	473 units	0.75 spaces per bedroom	1 space per 40 bedrooms	355	12	367
Retail (E(a)/A1 non-food retail above 100 sqm)	623.23 sqm	First 1000 sqm: 1 space per 250 sqm Thereafter: 1 space per 1000 sqm (GEA)	First 1000 sqm: 1 space per 125 sqm Thereafter: 1 space per 1000 sqm (GEA)	3	5	8
<b>Total</b>				<b>358</b>	<b>17</b>	<b>375</b>

Cycle parking for the residential component is accessed from a door directly off The Hale, with 5 non standard spaces available at ground floor level, along with three spaces for mobility scooters (including a charging facility).

The London Plan requirement is actually for 18 non standard sized cycle parking space, the applicant proposes that 15 will suffice as the demands for oversized cycles with trailers or tandem cycles given there will be no families occupying the development.

Transportation do not fully agree with this, whilst there may be no families within the development, some students may do part time work as cycle couriers or delivery of take away food and the like. Therefore, more larger cycle parking could be appropriate.

In addition to this, whilst it is recognised that a scooter parking/charging facility may be appropriate, it is expected that most mobility impaired residents would prefer to keep their scooters within their properties. It is not clear if this is physically able to be done.

This item needs to be clarified and if mobility scooters are able to be located/kept within residential units this space could be used to accommodate extra larger cycles.

	<p>The main bulk of the residential cycle parking will be in the basement with space for a further 10 non-standard cycles, as well as space for 337 standard cycles provided on two-tier racks. Access will be from a larger than standard lift and a wheel rail will be provided on the stairs to access the basement.</p> <p>Full details of the proposed arrangements for all long stay and short stay cycle parking, including fully dimensioned drawings showing spacing, centres and offsets/manoeuvring space should be provided, to confirm acceptability of the proposed arrangements and that they adhere to the requirements of the London Cycle Design guide as produced by TfL. These details can be covered by a pre commencement condition.</p> <p><u>75% Cycle parking provision for the residential component of the development</u></p> <p>Another consideration aside from the above is that the London Plan cycle parking standards only require 75% provision for these types of developments. Whilst the proposed cycle parking arrangements do meet the minimum numerical requirements of London Plan, transportation do consider it disappointing that for a student accommodation development with overall a young active demographic, at a car free development, with excellent access to walking and cycling routes along the Lea Valley and the Cycle superhighway, including to and from Waltham Forest and in other routes radiating from the Tottenham Hale area, will not have cycle parking available for every residential unit within the development.</p> <p>This was raised and commented on by both Haringey and TfL officers during the pre application process and options such as folding cycles to be accommodated within a number of units were discussed with the applicant as a means of providing effectively 1:1 cycle parking provision.</p> <p>It is noted in the Design and Access statement (section 7.5.1) there is reference to provision of <i>'100 bikes which will encourage cycle use in line with the Mayor's Transport Strategy and London Plan policy'</i>. However there does not appear to be any specific details beyond the statement. There is no reference to this in the Transport Assessment nor the planning statement. This should be clarified, as already mentioned the development does provide the minimum London Plan required quantum of cycle parking, it would be far preferable from</p>	
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the transportation perspective to go beyond this and enable every unit to have a cycle parking facility of some sort even if that is provided as folding cycles within some of the units themselves.

Delivery and servicing arrangements

The TA includes a derivation of the number of predicted delivery and servicing trips to and from the development.

This predicts that there will be 19 trips associated with the residential, and two trips per day to each of the three retail units.

The derivation of 19 trips for the 473 residential units is based on comparisons of servicing trip data for similar types of development in London and the methodology for arriving at this number of trips feels sound. It does sound like a relatively low number but given the type of development, and the likely number of delivery and courier companies that will make compound visits with deliveries for multiple addresses/occupiers it is considered satisfactory.

The TA proposes that the loading demands will be able to be catered for in conjunction with those from neighbouring developments from the three loading bays that will be available on Station Road, Hale Road and The Hale.

The TA includes an assessment of likely servicing trips, durations and available loading bay capacity and concludes that the three bays will collectively be able to accommodate the predicted demands they need to accommodate from the sites they service.

There may however be unforeseen circumstances such as a greater degree of non service vehicle use of these bays by blue badge holders or other private vehicles. It is suggested that the Delivery and Service Plan include considerations for different profiles and levels of delivery and servicing activity and what changes to management and/or provision may address any potential issues without comprising the free flow of the Highway and pedestrian facility around the site.



Refuse and recycling storage and collection arrangements

It is noted that private collections are envisaged. The arrangements for storage and handling/collections need to be approved by colleagues within the waste team in the Council.

Construction Phase

A detailed commentary on proposed and potential arrangements and considerations for the construction phase has been included.

The applicant will need to provide a detailed Construction Logistics Plan for the build out, which takes the points already considered, and in order to finalise this for a pre commencement condition submission, the applicant will need to work through their proposals and discuss/agree arrangements with the Borough's/TfL's Network Managers, to ensure construction activities are serviced in the appropriate manner given the site's location on the network and the adjacent and close by developments being constructed.

It is suggested that a CLP Monitoring fee is included to cover officer time and resource required to actively manage the site construction from the Highways and Network Management perspective. The appropriate amount for this can be determined taking into account arrangements for other major sites in the locality and wider Borough.

Summary

This application is for redevelopment of the north west corner of the 'island' site at 29 to 33 The Hale, to provide a student accommodation development with three retail units at ground level. It is in a highly accessible location and within a physically restricted site.

Overall, the trip generation implications of it are not considered to be problematical given the nature of the development and its car free nature. There are some considerations as to arrangements for blue badge/mobility impaired drop off/pick up and parking, and whilst there are no formal facilities proposed the applicant has suggested monitoring usage of the loading bays for this purpose and a solution to extend the loading bay on The Hale to

	<p>enable provision of a formal facility at the applicant's cost if demands require. This approach is acceptable and can be covered by a condition/S106 item, whatever is most appropriate in planning terms.</p> <p>The cycle parking proposed meets London Plan standards however this would mean there would not be cycle parking for all of the residential occupants. Potential solutions to this were discussed at pre application stage but there is no reference to this in the planning statement or TA.</p> <p>Transportation officers acknowledge that this does not make the application unacceptable in planning terms, but consider it would be highly appropriate for provision for each unit to be made. The Design and Access Statement does makes reference to the provision of 100 cycles for development use and further information clarifying the proposals for this should be provided, which can be covered by a pre commencement condition. Otherwise, sight of the detailed arrangements for long stay and short stay cycle parking will need to be reviewed and this can be covered by a pre commencement condition.</p> <p>Delivery and servicing arrangements appear sound however they are finely balanced with respect to potential demands and bay availability and there are concerns that any activity differing from the predictions in the TA may result in problems. Therefore, the DSP should include consideration of how to manage these issues/situations should they arise including any changes to physical provision and management arrangements.</p> <p>The development should also make a financial contribution towards the public realm improvements associated with the regeneration of the Tottenham Hale sites at this location, the amount to be determined.</p> <p><u>Suggested conditions and S106 contributions</u></p> <p><u>Conditions:</u></p> <ul style="list-style-type: none"> <li>• Delivery and servicing plan</li> <li>• Cycle parking details (including arrangements for 100 supplementary cycles)</li> </ul>	
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- Scooter parking provision
- Construction Logistics Plan
- Loading bay/blue badge provision monitoring

#### S106

- Permit free/car free status (£5000)
- CLP monitoring fee (suggested £10,000 tbc)
- Travel Plan and monitoring fee (suggested £5000 tbc)
- Contribution towards public realm improvements and enhancements being carried out by Haringey Council (amount tbc)
- Provision of blue badge bay/loading bay extension on Hale Road (if required – cost tbc)

Further response from Principal Transport Planning Officer 11/01/2022

#### **Cycle Parking**

I have to acknowledge we will not be able to see more parking than already shown on the plans, as the proposals were designed in line with the London Plan standards, and we have asked if more could be provided, over and above those requirements. I will therefore accept the proposed provision, including the slightly suboptimal provision of regular Sheffield stands at 4% of the total amount, in lieu of the minimum 5% we normally seek. I also recognise that the spatial constraints do not allow all larger Sheffield stands to be accommodated at ground floor level, but welcome that the 5% target is met overall.

In-room cycle storage would be a reasonable compromise to increase the overall provision across the proposed development, with 25% of rooms to benefit from dedicated storage for foldable cycles. This should be secured by planning condition.

Likewise, retail units and any non-residential uses should offer employees access to dedicated showers, changing rooms and changing facilities prior to occupation.

### **On-Street Disabled Persons' Parking**

As I stated previously, initial consultations within the Council indicate that there may be an opportunity to add a disabled persons' parking bay to the end of the loading bay on Hale Road. I recommend the addition of a Section 106 obligation to fund the study and design costs, cover the project-management fees, Traffic Management Order and Road Safety Audit costs, as well as the construction works themselves.

And on 02/03/2022:

### **Planning Conditions**

- Cycle parking details including in-room lockers for folding cycles in 25% of units
- Scooter parking details including charging point specifications
- Detailed Construction Logistics Plan
- Delivery and Servicing Plan

### **Section 106 Heads of Terms**

- Car-free development for both the student accommodation and commercial uses with £5,000 contribution to amend the Traffic Management Order accordingly
- Travel Plan (pre-occupation and operational, as well as monitoring reports) and monitoring fee (£5,000 contribution). The Travel Plan needs to include provisions for:
  - o cyclist facilities (lockers, changing rooms, showers, drying rooms for the non-residential uses)
  - o a mechanism whereby the proposed scooter charging spaces can be converted into spaces for larger cycles as and when required, based on regular monitoring of usage tied in with the travel surveys and surveys of cycle parking uptake
  - o the emergency cycle access arrangements via the passenger lifts should the large/cycle lift break down

	<ul style="list-style-type: none"> <li>- Contribution towards Walking and Cycling Action Plan funding (£70,000)</li> <li>- Feasibility, design and implementation of a disabled users' parking space along Hale Road (£77k cost comprising £25k on study and design, project management, Traffic Management Order and Road Safety Audit, and £52k on construction works)</li> <li>- Section 278 highway works including improvements to the footways around the site and contribution towards the landscaping of the semi-circle of land (amount to be determined).</li> </ul>	
LBH Waste Management	<p>Firstly, this is a detailed and well considered WMS. The waste generated from this development, both the student accommodation and the units occupying the ground floor, will be classed as commercial and as such will not be collected by LBH or its contractors as part of our statutory collection duties. This is acknowledged within the WMS with reference to commercial waste management companies collecting waste from the development in operation.</p> <p>While not set out in our guidance, I can confirm that the calculations used to estimate the waste arisings from this development and corresponding containment capacity needed are accurate. Inclusion of provision for the management of separately collected food waste is positive. While the ratios used for the recyclable and non-recyclable elements of waste streams from the development are accurate, capture at these levels, at least initially (although likely to be supported by solid internal collection infrastructure and communications) may not be achieved. I would advise that the developers/managing agents consider a 50:50 split of MDR:Residual initially. With commercial collection contracts adjustments to bin numbers and types can be made to reflect positive behaviours embedding with occupiers.</p> <p>Sizing of the bin store appear to have been based on a twice weekly collection of waste and recycling from the outset. While commercial waste collection companies can provide collections to suit the client, up to twice daily collections 7 days per week, we would</p>	Noted – Waste plan condition added.

	<p>however advise against sizing the bins store based on minimum size and maximum collections. The store should be sufficient to store waste for one week.</p> <p>Compaction of both mixed dry recycling and residual waste is referenced at 2:1 and 3:1 ratios respectively. These collection ratios would need to be agreed with the collection company contracted to collect the waste in operation. We would advise however against not compacting MDR on site to better ensure its ability to 'unmingled' at the MRF.</p> <p>While commercial operators assess individual locations prior to agreeing/beginning collection contracts and are often willing to carry these out outside the parameters of what the council would accept for its own domestic waste collections, many of the parameters set out in section 6 in the WMS align with our guidance, for example drag distances of bins to the waiting RCV from the student accommodation.</p>	
<b>EXTERNAL</b>		
Thames Water	<p><b>Waste Comments</b></p> <p>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.</p> <p>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.</p> <p>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."</p>	Noted conditions are recommended.

	<p>Reason: The proposed works will be in close 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-near-or-diverting-our-pipes</a>. Should you require further information please contact Thames Water. Email: <a href="mailto:developer.services@thameswater.co.uk">developer.services@thameswater.co.uk</a> Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB</p> <p>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. <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-near-or-diverting-our-pipes</a>.</p> <p>A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths, private swimming pools and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, commercial swimming pools, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc may be required before the Company can give its consent. Applications should be made at <a href="https://wholesale.thameswater.co.uk/Wholesale-services/Business-customers/Trade-effluent">https://wholesale.thameswater.co.uk/Wholesale-services/Business-customers/Trade-effluent</a> or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.</p>	
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	<p>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>As per Building regulations part H paragraph 2.21, Drainage serving kitchens in commercial hot food premises should be fitted with a grease separator complying with BS EN 1825-2:2004 and designed in accordance with BS EN 1825-2:2002 or other effective means of grease removal. Thames Water further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses. Please refer to our website for further information : <a href="http://www.thameswater.co.uk/help">www.thameswater.co.uk/help</a></p> <p>Water Comments</p> <p>The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <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-near-or-diverting-our-pipes</a>. Should you require further information please contact Thames Water.</p> <p>Email:<a href="mailto:developer.services@thameswater.co.uk">developer.services@thameswater.co.uk</a></p>	
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There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>

On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

#### Supplementary Comments

Thames Water has identified that the proposed development is located within Source Protection Zone 2 of a groundwater abstraction source. This zone is defined around a potable water source for public water supply for which Thames Water has a statutory duty to protect. This zone may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities that may impact groundwater resources, and the applicant was encouraged to read the Environment Agency's approach to groundwater protection (available at <https://www.gov.uk/government/publications/groundwater-protection-position-statements>) and to discuss the implication for their development with a suitably qualified environmental consultant. In the application documents now provided, there is insufficient information, so Thames Water recommend the following conditions be attached to any planning approval:

	<p>1) Thames Water require the following information on foundation design to assess the risk to groundwater resources</p> <ul style="list-style-type: none"> <li>a. the methods to be used</li> <li>b. the depths of the various structures involved</li> <li>c. the density of piling if used</li> <li>d. details of materials to be removed or imported to site</li> </ul> <p>We require this information to assess if there is a risk to water resource from construction of the foundations.</p> <p>Reason: To ensure that the water resource is not detrimentally affected by the development.</p>	
Greater London Archaeology Advisory Service (GLAAS)	<p><b>Recommend Pre-Determination Archaeological Assessment/Evaluation</b></p> <p>I have looked at this proposal and at the Greater London Historic Environment Record but I need more information before I can advise you on the effects on archaeological interest and their implications for the planning decision. If you do not receive more archaeological information before you take a planning decision, I recommend that you include the applicant's failure to submit that as a reason for refusal.</p> <p>The planning application lies in an area of archaeological interest.</p> <p>The site lies close to the 2020 discovery of a mesolithic "home base" site at the former Welbourne Centre. Well-preserved early prehistoric sites are of high heritage significance. The extent and detailed significance of the mesolithic site is not known, but it was deemed to be of regional importance based on the initial assessment during the fieldwork that took place.</p>	<p>Concern noted. The investigation can be carried out prior to development and any heritage assets found suitably displayed and recorded as necessary. Conditions and informatives achieve the asset protection.</p>

	<p>The application site lies on the same stream that fronted the Welbourne site and also lies closer to the early centre of The Hale, an early mediaeval settlement. Archaeological remains of the early mediaeval, mediaeval and post-mediaeval development of the Hale were recently found at the nearby Ferry Island and Ferry Island North sites to the immediate south of the application site.</p> <p>The applicants' desk-based heritage statement accompanying the application suggests a moderate potential for mesolithic remains and a high potential for early mediaeval and mediaeval remains.</p> <p>The proposed tower at the site would include a full basement which would not allow preservation of important remains. Modern impacts at the site appear to be limited.</p> <p>Given the potential for important remains and the desirability in local, national and London Plan policy of sympathetically managing such remains, this office previously advised the applicants' consultants (December 2020) that predetermination archaeological evaluation is appropriate at the site, as per NPPF 194.</p> <p>In the absence of this work and also without any geotechnical data to inform on the survival of key deposits, it is not possible to reliably advise on the policy compliant management of any important remains at the site.</p> <p>Because of this, I advise the applicant completes these studies to inform the application:</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>	
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	<p>I will need to agree the work beforehand and it should be carried out by an archaeological practice appointed by the applicant. The report on the work must set out the significance of the site and the impact of the proposed development. I will read the report and then advise you on the planning application.</p> <p>NPPF paragraphs 199 - 200 place great weight on conserving designated heritage assets, including non-designated heritage assets with an archaeological interest equivalent to scheduled monuments. Non-designated heritage assets may also merit conservation depending upon their significance and the harm caused (NPPF paragraph 203). Conservation can mean design changes to preserve remains where they are. If preservation is not achievable then if you grant planning consent, paragraph 205 of the NPPF says that applicants should record the significance of any heritage assets that the development harms.</p> <p>You can find more information on archaeology and planning in Greater London on our website.</p> <p>This response only relates to archaeology. You should also consult Historic England's Development Management team on statutory matters.</p>	
Health and Safety Executive	<p>HSE 'Advice to LPA' - Some Concern</p> <p><b>1. Fire safety</b></p> <p>1.1. At section 7, the fire statement indicates the corridors connecting the escape stairs on levels 1 to 7 will not be subdivided by fire doors. Persons attempting to escape could be overcome by fire, heat or smoke whilst attempting to reach the escape stairs in long corridors. A closed 'subdividing' fire door could prevent smoke permeating the whole length of the corridor and enable people to reach at least one of the escape stairs without being affected by smoke. Where it is proposed that the long corridors will not be subdivided then a detailed engineering analysis will be required. If fire doors are required in the future, then a redesign of the smoke vent system may affect the layout and design of the building.</p>	<p>The applicant has responded to these points and advises that they will develop the strategy as they move into more detailed design stages.</p> <p>The conditions would ensure that the commitments made in</p>

	<p>1.2. At section 6(h) a 'stay put' policy has been proposed for the student accommodation. In section 8, no rationale is given for this evacuation approach and section 4 of the fire statements states "No consultation has been undertaken". If following consultation a different approach to evacuation is advised then an external assembly point may be required. This would impact on the design and layout of the development.</p> <p><b>2. Roof terrace</b></p> <p>2.1. The staircase at the East side of building, links the basement to residential floors 2-6 and to the 7th floor which is the proposed roof terrace. According to the fire Statement, in the event of a fire evacuation; people on the roof terrace will have one means of escape, which is via the east-side staircase. Depending on the number of people seeking to escape, and where a fire starts (within the building or on the roof terrace itself e.g. as a result of a roof barbecue) – people trying to escape a fire could be at risk if there is no alternative means of escape.</p> <p><b>3. Water supply</b></p> <p>3.1. At section 11 of the fire statement, the response to the question about the reliance on the use of existing hydrants and whether they are currently usable / operable is given as "Don't know". While the response "Don't know" is a valid response on the form, without knowing that the hydrants are useable, the proposal might be relying on a disused water main or faulty hydrant.</p> <p><b>4. Advisory</b></p> <p>4.1. At section 7 of the fire statement, several deviations from the standards are proposed. This will be subject to Building Control regulations at development stage. If permission is not given the plans will have to be revised and that will have an impact on density and layout of the development.</p> <p>4.2. Parts of the fire statement are not completed in accordance with the guidance. This means we are unable to assess the application with certainty:</p> <ul style="list-style-type: none"> <li>• The site plans included in the planning application show fire doors subdividing the corridors connecting the escape stairs. However, in section 7 of the fire statement it says: "Corridors connecting the two escape stairs on levels 1 to 7 are not subdivided"</li> </ul>	<p>the submitted statements is realised.</p>
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	<ul style="list-style-type: none"> <li>• In section 6, separate blocks of the proposed development have been given the same block number of '1'</li> <li>• In section 6, site information on the 7-storey part of the proposed development is missing.</li> </ul>	
London Fire Brigade	<p>The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The Order) in London.</p> <p>The Commissioner has been consulted with regard to the above-mentioned premises and makes the following observations:</p> <ul style="list-style-type: none"> <li>• The Commissioner is satisfied with the proposals for fire fighting access as contained within the fire statement documents and if they provide them in accordance with what's highlighted within the fire service section it would provide satisfactory fire fighting facilities</li> <li>• The Commissioner strongly recommends that sprinklers are considered for new developments and major alterations to existing premises, particularly where the proposals relate to schools and care homes. Sprinkler systems installed in buildings can significantly reduce the damage caused by fire and the consequential cost to businesses and housing providers and can reduce the risk to life. The Commissioner's opinion is that there are opportunities for developers and building owners to install sprinkler systems in order to save money, save property and protect the lives of occupier. Please note that it is our policy to regularly advise our elected Members about how many cases there have been where we have recommended sprinklers and what the outcomes of those recommendations were. These quarterly reports to our Members are public documents which are available on our website.</li> </ul>	Noted- fire fighting access acceptable.
Metropolitan Police - Designing Out Crime Officer	<b>We have met with the project Architects or Agents to discuss Crime Prevention or Secured by Design (SBD). The planning application documents have not made mention within the Design and Access Statement referencing safety, security, design out crime or crime prevention and have not specified exactly what features of the design will reduce crime</b>	Noted, recommendation includes a planning condition requiring a 'Secured by Design'

	<p><b>We recommend the attachment of suitably worded conditions and an informative. The comments made can be easily mitigated early if the Architects or Managing Agency were to discuss this project prior to commencement, throughout its build and by following the advice given. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.</b></p> <p><b><i>Section 2 - Secured by Design Conditions and Informative:</i></b> In light of the information provided, we request the following Conditions and Informative:</p> <p><b>Conditions:</b></p> <p>(1) Prior to the first occupation of each building or part of a building or use, a '<b>Secured by Design</b>' accreditation shall be obtained for such building or part of such building or use and thereafter all features are to be permanently retained.</p> <p>(2) Accreditation must be achieved according to current and relevant Secured by Design guide lines at the time of above grade works of each building or phase of said development.</p> <p>3) The Commercial aspects of the development must achieve the relevant Secured by Design certification at the final fitting stage, prior to the commencement of business and details shall be submitted to and approved, in writing, by the Local Planning Authority.</p> <p><b><i>Reason: In the interest of creating safer, secure, sustainable communities.</i></b></p> <p><b>Informative:</b> The applicant must seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.</p>	<p>accreditation to be achieved for each building before the building is occupied and the inclusion of an informative.</p>
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	<p><b>Section 3 - Conclusion:</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 Decision Notice, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind.</p>	
Transport for London	<p><b>Access</b></p> <p>The proposal includes multiple access points for active modes via the Hale Road and The Hale, including a dedicated access door to the long stay cycle store for the student accommodation on The Hale. The proposed access provisions for active modes are considered acceptable.</p> <p>As the proposal does not include off-street parking or servicing, no vehicular access points to the site are proposed. The existing site's vehicular access from The Hale will be removed.</p> <p><b>Cycle Parking</b></p> <p>A total of 375 cycle parking spaces are proposed, including long and short stay spaces for residential units, as well as the commercial element. This is in line with the London Plan minimum quantitative standard. The scheme identifies a potential location for four short stay Sheffield stands on the footway buildout on the Hale Road. In principle, this is considered acceptable by TfL. This should not impact safety of delivery and servicing activities on the loading bay on the Hale Road or impede pedestrian flow in any way. As the LB of Haringey is the local planning and highway authority, the Council should determine the acceptability of this approach. The finalised location of short stay cycle parking and the long stay cycle parking for the commercial element should be clarified.</p> <p>Additional provision for three charging points for mobility scooters is proposed at ground level. However, further consideration is suggested in order to provide additional spaces for large bicycles as an alternative, including adapted cycles used by people with mobility impairments, given that mobility scooters are often charged in individual units and the recent increased use of cargo bikes, which the student demographic might be attracted to.</p>	<p>Support for car free and the proposed level of cycle parking noted.</p> <p>A Construction Logistics Plan is required by way of condition which would safeguard safety during construction.</p>



	<p>The quality of the cycle parking also needs to be improved, including minimum spacing between Sheffield stands and access aisle widths.</p> <p>Whilst wheel channels will be provided on the staircase providing alternative means of access for the majority of users using the main cycle parking area in the basement which is welcomed, there is concern in relation to users of the 10 non-standard cycle spaces in the event of the large lift breaking down, as this lift will be the primary means of access to the basement. The applicant should identify how the basement, primarily served by a large lift can continue to be accessed by all users in the event of the lift breaking down. Furthermore, the location of this lift's doors/access route in and out from the lift need to be clarified.</p> <p>Provision of showers, lockers and changing facilities for cyclists associated to commercial uses should be provided. Further detail on the cycle parking provision is therefore required at this stage and subsequently the provision secured by condition.</p> <p><b>Healthy Streets, Vision Zero, Walking and Cycling</b></p> <p>The submission of the Active Travel Zone (ATZ) assessment is welcomed. This appropriately includes a casualty analysis of clusters of KSIs. However, TfL has some concerns as the proposal has not demonstrated how it will positively contribute towards Vision Zero to actively address dangers on the local transport network. This is particularly important, as the proposed development will see an increase in pedestrian and cycle trips to/from the site and the local area, as well as public transport trips. Whilst the Transport Assessment (TA) states that the applicant is willing to contribute towards the provision of four cycle parking stands in the wider public realm near the site to fulfil the short stay cycle parking requirements set out by the London Plan; there is limited detail on how the development will deliver local improvements that supports the safety of users, especially as it is recognised that the highway network immediately around the site does not provide an optimum environment for cyclists.</p> <p>Therefore, active travel measures for future residents and particularly disabled people should be identified/provided within a local environment that meets their needs and those of people already in the area. Development proposals should connect to local walking and</p>	
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cycling networks, including CS1; and enable and deliver improvements to provide safe, inclusive and convenient connections for people, particularly disabled people, in line with Policy T2 Healthy Streets of the London Plan (2021). Further work is required to address TfL's concerns.

### **Delivery and Servicing Arrangements**

Provision for deliveries and servicing for the commercial and residential element would usually be expected to be off-street in accordance with the London Plan Policy T7G. In addition, TfL has concerns over the methodology used to derive the servicing trip rate for the residential element and the possible impact of increased demand associated with the neighbouring units, particularly on the loading/unloading bay on The Hale, as this bay is originally intended to be used by vehicles servicing the Tottenham Hale Centre (i.e. North Island Building). Furthermore, the loss of the small off-street servicing area, noticeable growth in online sales, likely demand for food (takeaway) deliveries by motorcycle and the possible use of the bay on The Hale for blue badge drop-off and parking, could result in the under-provision of delivery and servicing facilities. TfL recommends that pedestrian footway space in this location is retained. Nevertheless, if off-street provision is not possible, the applicant should demonstrate there is sufficient space within the bays to accommodate a 'worse case' scenario satisfactorily and the construction of the S278 works for the footway and kerb adjacent to the site could give the future physical flexibility to make any amendments to extend servicing bays should demand require it.

Therefore, alternative uses in the context of changing requirements should be considered to ensure that any amendments are encouraged to use non-car modes as much as possible. TfL welcomes further discussion about this matter.

### **Car Parking**

The proposed development is car-free. There will be no dedicated disabled persons parking provision for Blue Badge holders. Instead, the proposal intends to use on-street loading bays for Blue Badge pick-up/drop-off and Blue Badge visitor parking in line with future TLRN regulations, which TfL would be required to introduce on this bay. The applicant

	<p>should confirm the expected loading and servicing restrictions and enforcement from on-street bays.</p> <p>Given the location and nature of the proposed development, the step free public transport, high PTAL and the proximity of local services and facilities, subject to the necessary improvements for active travel, particularly by disabled people being secured, this proposal is considered acceptable by TfL.</p> <p><b>Trip Generation and Highway and Public Transport Impact Assessment</b>          Whilst there are some concerns about methodology, a more robust analysis of trip generation is unlikely to show detrimental impacts on the strategic road or public transport network.</p> <p><b>Travel Plan</b>          The applicant has submitted an interim Travel Plan (TP) which is generally acceptable. The focus on sustainable means of transport is welcomed. The final TP and all agreed measures should be secured, enforced, monitored and reviewed through the section 106 agreement, in accordance with Policy T4 Assessing and Mitigating Transport Impacts of the London Plan.</p> <p><b>Deliveries and Servicing and Construction Logistics</b>          The draft Delivery and Servicing Management Plan (DSMP) and outline Construction Logistic Plan (CLP) appear acceptable. The development should not impact on bus operation or bus journey times neither during construction nor at end state. The use of the loading bay on The Hale should be heavily monitored so that the need to accommodate an appropriate dedicated disabled persons' car parking provision is considered if necessary. Consolidation and timing of deliveries should be managed through the DSMP to facilitate safe, clean and efficient deliveries and servicing. This should include appropriated levels of co-ordination to encourage and support out-of-peak/different time deliveries and servicing. The full DSP and CLP should be produced in accordance with TfL's guidance and secured by condition.</p>	
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Post Stage 1 comments:

**Cycle Parking**

*The location of short stay cycle parking is shown on the Ground Floor site plan.*

*Long stay cycle parking for the commercial element is to be provided within individual units with access through secure service / refuse route.*

TfL's Response:

The above clarification on long stay cycle parking for commercial elements is helpful. The Council might wish to request the exact location of the commercial cycle parking provision within individual units to ensure that adequate facilities are available. This should include additional details regarding showers, lockers and changing facilities for cyclists.

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**Cycle Parking**

*The areas shown for the mobility scooters are large enough to be converted into non-standard spaces post occupancy should the need for mobility scooter charging be less than anticipated.*

*The spacing between bays and racks are in line with manufacture requirements. Changing the spacing would result in a loss of cycle parking spaces.*

TfL's Response:

The proposed amendments include 14 Sheffield stands (i.e. 4% of the total provision) to allow for larger cycles within the updated cycle store. Whilst the applicant has confirmed that spacing between the bays and racks are in line with manufacture requirements, TfL expects the applicant to demonstrate clearly how the proposals (design outcome) meet the recommended space requirements, as set out by the London Cycling Design Standards (LCDS) also required by policy T5 Cycling. This is particularly important for the non-standard spaces. It should be noted that the London Plan refers to the need for 'easy access' and catering 'for cyclists who use adapted cycles'. This is an accessibility requirement.

In terms of mobility scooter charging spaces, the use of this area should be frequently monitored and reviewed over time. Notwithstanding this consideration, TfL expects the applicant to show how the development proposal would be able to accommodate and convert this area into adequate non-standard cycle parking spaces post occupancy.

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### **Healthy Streets, Vision Zero, Walking and Cycling**

*There is a wheeled channel provided to the right-hand side of the stair. There are also 2x passenger lifts accessed from the reception. Although there would be more physical barriers to pass through, assistance could be requested at the 24hr concierge desk if required.*

*To confirm, the lift doors face different directions at ground floor and basement level.*

*The areas shown for the mobility scooters are large enough to be converted into non-standard spaces post occupancy should the need for mobility scooter charging be less than anticipated.*

#### **TfL's Response:**

The clarification on passenger lifts accessed from the reception area and potential assistance at the 24hr concierge desk is helpful. However, the provision of a separate door to the cycle store distant from the residential lobby/concierge desk is a point of concern for personal security reasons and for users being able to request assistance.

As previously indicated, TfL concerns remain unchanged in relation to accessibility requirements for users of the 14 non-standard cycle spaces (i.e. nine spaces available in the basement and five on the ground floor). Given the characteristics of the development proposals and the absence of designated disabled persons' parking bays, it is essential that there is sufficient cycle parking that can be adequately used and accessed by disabled people at least at ground floor level. This includes the necessity to meet the recommended cycle parking space requirement of 1.2m between the Sheffield stands to cater for non-standard cycles. Accessibility requirements need to be secured. This matter is resolvable. In terms of the lift doors clarification, this matter is resolved.

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*Provision of showers, lockers and changing facilities for cyclists associated to commercial uses can be provided within the individual retail units*

**TfL's Response:**

TfL is pleased that showers, lockers and changing facilities for cyclists associated to commercial uses can be provided within individual retail units. This matter is resolvable with an appropriate legal agreement.

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**Healthy Streets, Vision Zero, Walking and Cycling**

*The proposals include widening of the footways around the Site as well as providing a financial contribution to improvements to the footways around the Site and to landscaping of the semi-circle of land through S106.*

*TfL have not to date advised on measures they are proposing and it would be unfeasible / unrealistic for the development to be responsible for improvements given the nature of the gyratory.*

**TfL's Response:**

The clarification of the footways around the site and landscaping is noted. Footway improvements/financial contributions identified should be secured along with the eight potential short stay cycle parking on the footway buildout on the Hale Road through an appropriate legal agreement.

While it is accepted that the proposed changes to the footways around the site will contribute positively to addressing common issues in the public realm in relation to walking, TfL's position is that the development proposals do not strictly comply with policy T2 and T4 of the London Plan without mitigation. Specifically, development proposals should enable and deliver improvements to strategic cycle routes and local cycle links to provide a safe cycle network commensurate with the cycling demand anticipated in the MTS. This includes CS1 and TfL's Cycle Future Route 2 from Camden to Tottenham Hale, with the proposed future route beginning on Ferry Lane at the junction with Mill Mead Road, proceeding to Broad Lane and the A10. Although this project has been paused while TfL have worked on temporary initiatives to help people cycle and walk during the pandemic, TfL and the Mayor

are of the view that future cycleways will still be needed in future to support London's growth and will be restarted when the time is right.

The applicant should think innovatively working with the Council to identify any improvements, no matter how small, in order to make a possible contribution to the delivery of Healthy Streets and Vision Zero policies. Development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure. The Council in conjunction with the applicant's team could consider broadening the terms of any section 106/278 works to include complimentary measures/improved cycle infrastructure or financial contributions. This could consider possible techniques to rebalance priorities and increase active travel awareness through the provision of cycle friendly interventions at junctions and crossings, for example, The Hale/Ferry Lane/Broad Lane junction or signage to support wayfinding. This matter is resolvable.

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#### **Delivery and Servicing Arrangements**

*No suggestions as to what is not robust (LBH overall considered it to be 'satisfactory'). We would contend that the analysis is robust and the approach is clearly set out in the TA. Additional demand described in the response from TfL (e.g. takeaways) associated with student accommodation is likely to take place in the evening (which is allowed for in the analysis) when other demand is likely to be lower.*

#### **TfL's Response:**

The TA's approach employs a linear trend line, which is directly extrapolated to derive a servicing trip rate for the residential element. Whilst the selection of a servicing trip rate is often a matter of judgement, a range of plausible servicing trip rates with a 'worst case' scenario defined by the greater trip rate (i.e. 0.064 trips per bedroom per day) should be best considered in this assessment.

TfL concerns remain unchanged, considering: (i) the proximity to the strategic road network (i.e. The Hale, which forms part of the TLRN, is located directly adjacent to the site); (ii) that

	<p>it is important that design outcomes reduce the negative impacts of development on the transport network; and (iii) design principles/prioritisation preferences in relation to important decisions and trade-offs in the design process which set out that:</p> <ul style="list-style-type: none"> <li>• It is not feasible to accommodate on-site servicing facilities;</li> <li>• The development will not provide dedicated delivery and servicing facilities. Instead, it proposed to make use of the loading bay located on Hale Road and a bay that will be provided on The Hale, as part of the wider regeneration of the area originally intended to be used by vehicles servicing the Tottenham Hale Centre (i.e. North Island Building); and</li> <li>• There will be no dedicated disabled persons' parking provision associated with the development for Blue Badge holders. Instead, the development intends to use on-street loading bays for Blue Badge pick-up/drop-off and Blue Badge visitor parking in line with future TLRN regulations.</li> </ul> <p>The latter point of concern is especially problematic for TfL, considering the deficiencies discussed within the cycle parking sections in relation to the cycle provision for larger cycles, particularly cargo bikes and adapted cycles. As previously indicated TfL recommends that: 'pedestrian footway space in this location is retained ... and [that] the construction of the S278 works for the footway and kerb adjacent to the site could give the future physical flexibility to make any amendments to extend servicing bays should demand require it'</p>	
London Underground/DLR Infrastructure Protection	I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application as submitted.	No comment.
Natural England	<p>Natural England has no comment on this application with regards to statutory designated sites.</p> <p>Natural England has not assessed this application for impacts on protected species. Natural England has published Standing Advice which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.</p>	Noted.



	<p>It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.</p> <p>Your authority has a duty to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat.</p>	
Environment Agency	<p>We have assessed it as having low environmental risk and therefore have no comments.</p> <p>The site is located in Flood Zone 2 and therefore Flood Risk Standing Advice (FRSA) applies for this application. Standard comments can be viewed online here - FRSA.</p> <p>The site is also located in Source Protection Zone 2 however, the previous use of the site is of low polluting potential (As defined on gov.uk, Land contamination DoE industry Profiles) and therefore we would have no comments with respect to contaminated land.</p>	No comment.
GLA	<p><b>Strategic issues summary</b></p> <p><b>Land use principles:</b> The redevelopment and optimisation of the brownfield site and contribution towards the delivery of purpose-built student accommodation and contribution towards housing targets accords with the London Plan, subject to confirmation from the Council of the existing use of the site. The inclusion of retail uses within this town centre site is also accepted (paragraphs 17 to 33).</p> <p><b>Affordable student accommodation:</b> The scheme proposes 35% on-site affordable student accommodation, which is supported in accordance Policy H15 of the London Plan. This must be secured through a S106 agreement, as should the rent levels and eligibility criteria. The obligation to enter into a nominations agreement must be secured (paragraphs 34 to 41).</p> <p><b>Urban design and heritage:</b> While the principle of the provision of tall building within the site could be accepted in strategic planning terms, the proposed 24-storey building results</p>	The Council considers that the proposal meets the aims and objectives of the Development Plan.

in an abrupt change in urban scale and does not respond appropriately to the existing low-rise context, nor the emerging master-planned context. A proposal that creates a better transition between the scale of the existing and emerging development context should be further considered. Further consideration should be given to the fire strategy. The scheme will result in less than substantial harm to the significance of designated heritage assets which could be outweighed by public benefits of the proposal, subject to securing on-site student accommodation and subject to securing a high quality materiality (paragraphs 42 to 78).

**Transport:** The active travel assessment requires further work, and in accordance with Healthy Streets and Vision Zero objectives, improvements and contributions should be secured. The proposed servicing arrangements and disabled parking should be reconsidered to ensure on-street demand is met alongside meeting Vision Zero objectives. Active travel routes improvements should be identified and secured, and the quality of cycle parking should comply with LCDS guidance (paragraphs 98 to 112). Other strategic planning issues on **sustainable development** and **environmental issues** 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 116. Possible remedies set out in this report could address these deficiencies

### **Context**

1. On 20 August 2021 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.

	<p>2. The application is referable under the following Category of the Schedule to the Order 2008:</p> <ul style="list-style-type: none"> <li>• 1C: <i>The building is more than 30 metres high and is outside the City of London.</i></li> </ul> <p>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.</p> <p>4. The Mayor of London's statement on this case will be made available on the GLA's public register: <a href="https://planning.london.gov.uk/pr/s/">https://planning.london.gov.uk/pr/s/</a></p> <p><b>Site description</b></p> <p>5. The 0.098 hectare site is located at the western part of an "island" bounded by The Hale, Hale Road, and Station Road, known by the Council in the Tottenham Area Action Plan (AAP) as the "North Island".</p> <p>6. The application site is made up of three properties. 29 and 31 The Hale are a pair of terraced two-storey buildings that contain unused former shops and ground level with 2 x 1 bed residential flats on the first floor levels (45 sq.m. GIA at No.29 and 49 sq.m. at No.31). 33 The Hale is a two-storey warehouse building with a modern façade which is used as a menswear shop named 'Morelli'. At the back of the properties is a service yard, a shed a pigeon coop, and a number of large advertising hoardings fronting on to Hale Road. The application details that the site was previously considered to be in retail or light industrial use (former Use Classes A1 and B1(c), now Use Class E).</p> <p>7. The brownfield site is located within the Tottenham Hale District Town Centre and within the Lee Valley Opportunity Area. Though not planning designations, it is relevant to note that the site is also within the Tottenham Housing Zone and the Tottenham Creative Enterprise Zone.</p>	
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	<p>8. The site lies within the Council's adopted Tottenham Area Action Plan (2017) Site Allocation TH4 – "Station Square West", which covers the wider area within the North Island and the site known to the Council as Ferry Island. The allocation provides for the comprehensive redevelopment incorporating new District Centre uses at ground and first floor levels, including a hotel use, with residential and commercial above, and the creation of a high quality public realm including the extension of Ashley Road as the primary route through the site. Quantitatively, the site allocation provides an indicative development capacity of 297 new homes and 5,200 sq.m. of town centre uses.</p> <p>9. The site is not located within a conservation area and does not contain any designated heritage assets. The Tottenham Green Conservation Area is approximately 500 metres to the west of the site. Two Grade II listed buildings, No. 62 High Cross Road and Tottenham High Cross, are located within 500 metres of the site.</p> <p>10. The site adjoins the Transport for London Road Network (TLRN). Tottenham Hale station and its bus station are located 200 metres to the east of the site, providing Victoria line Underground and National Rail services to Central London, Cambridge and Stansted Airport. Six bus services are available within walking distance of the site. As such, the site records a high Public Transport Accessibility Level (PTAL) of 6a on a scale of 0 to 6.</p> <p><b>Details of this proposal</b></p> <p>11. The proposal is for the redevelopment of site including demolition of existing buildings to provide a part 7, part 24 storey building of purpose-built student accommodation (PBSA) (Sui Generis); with part commercial uses (retail) (Use Class E(a)) at ground and first floor; and associated access, landscaping works, cycle parking, and wind mitigation measures.</p> <p><b>Case history</b></p> <p>12. There is no strategic planning history relevant to the application site apart from pre-application discussions. Specifically, a pre-application meeting was held on the 17 December 2020 that covered a wide range of strategic planning issues. A follow up meeting was held on 8 June 2021. A written note (GLA ref: 2021/0552/P2F/EL) was</p>	
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	<p>issued following this meeting on 21 July 2021 that considered land use principles, affordable student accommodation, urban design, student accommodation quality, fire safety, historic environment, inclusive access, noise mitigation and agent of change, energy, flood risk, sustainable drainage, water efficiency, biodiversity, green infrastructure, trees, circular economy and transport.</p> <p>13. It is noted that the site forms part of a island site known as North Site which has permission for 482 homes and up to 1,883 sq.m. of commercial floorspace. Specifically, the wider island site forms part of a wider 2.17 hectare masterplanned development site that has been granted full planning permission for mixed-use development in buildings of up to 38 storeys, with 1,030 residential units, up to 4,306 sq.m. of retail, up to 2,288 sq.m. of leisure, up to 5,137 sq.m. of office, a 1,643 sq.m, health centre, new public spaces, and highways works. This scheme (GLA Ref: 4442) was considered at Stage II on the 18 March 2019 by Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and Skills, acting under planning powers delegated by the Mayor of London, who considered that he was content to allow Haringey to determine the case itself, subject to any action that the Secretary of State may take. Haringey Council subsequently granted planning permission on 27 March 2019.</p> <p><b>Land use principle</b></p> <p>17. Spatially, the site lies within the Lee Valley Opportunity Area and within the Tottenham Hale District Town Centre, as designated in the London Plan. The London Plan seeks to ensure that Opportunity Areas fully realise their growth and potential, and has identified that the Lee Valley occupies a strategic position in the London-Stansted-Cambridge-Peterborough Growth Corridor and provides a range of development opportunities for higher density development through growth at a range of localities, including Tottenham Hale. Quantitatively, the London Plan identifies that the Lee Valley Opportunity Area as having an indicative employment capacity for 13,000 new jobs and the potential for 21,000 new homes.</p> <p>Industrial land</p>	
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	<p>18. The site allocation TH4 for Station Square West states that the site has a local employment area designation as the 'Tottenham Hale strategic industrial location' (SIL). The application details that the site was previously considered to be in retail or light industrial use (former Use Classes A1 and B1c, now Use Class E).</p> <p>19. The land use of the existing site should be confirmed by the Council, noting that the existing site, with service yard and warehouse, indicates that the site may comprise an industrial site.</p> <p>20. If the site does comprise an existing industrial land use, or if the above-described allocation is relevant, then PolicyE7 of the London Plan will need to be addressed as part of this application.</p> <p>Housing and student accommodation</p> <p>21. London's higher education providers make a significant contribution to its economy and labour market. It is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation. Paragraph 4.15.1 of the London Plan sets out that the housing need of students in London, whether in Purpose Built Student Accommodation (PBSA) or shared conventional housing, is an element of the overall housing need for London, and that new flats, houses or bedrooms in PBSA all contribute to meeting London's housing need. The completion of new PBSA therefore contributes to meeting London's overall housing need and is not in addition to this need. In addition, it is noted that the provision of high-density student accommodation can help to free up existing housing stock in the private rented sector, noting that London Plan Policy SD1 seeks housing choice for Londoners.</p> <p>22. Policy H1 of the London Plan seeks to increase the supply of housing in the capital and sets a ten-year housing target for Haringey of 15,920 homes per year for the period 2019/2020 to 2028/2029. The London Plan also seeks to ensure the local and strategic need for PBSA is addressed, and the Mayor's Academic Forum has established that there is an annual requirement for 3,500 PBSA bed spaces over the plan period.</p>	
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	<p>23. The scheme proposes to deliver 473 new student bedrooms in a purpose-built student accommodation facility. This proposal would contribute to both PBSA bed space requirements and housing targets set out in the London Plan. Specifically, paragraph 4.1.9 of the London Plan sets out that “<i>net non-self-contained accommodation for students should count towards meeting housing targets on the basis of a 2.5:1 ratio, with two and a half bedrooms/units being counted as a single home</i>”. As such, reflective of the contribution of the student accommodation element of the scheme towards the achievement of housing targets, the delivery of 473 student beds is equivalent to 189 homes.</p> <p>24. Policy H8 of the London Plan sets out that a loss of housing should be resisted unless the housing is replaced at existing or higher densities with at least equivalent floorspace. There are two existing residential properties within the application site, comprising of a total of 94 sq.m. of residential floorspace and 4 habitable rooms. The scheme does not re-provide conventional (Use Class C3) housing, noting that the London Plan sets out that student accommodation should count towards meeting housing targets. However, GLA Officers are satisfied that due to substantial increase in density proposed within the site, comprising 7,500 sq.m. of student accommodation, the scheme accords with Policy H8 of the London Plan through the proposed student accommodation which is calculated as the equivalent of 189 homes.</p> <p>25. Policy H15 of the London Plan sets out that a nominations agreement must be in place from initial occupation with one or more higher education providers, to provide housing for its students, and to commit to have such an agreement for as long as the development is used for student accommodation.</p> <p>26. The accommodation will only be available during term-time to full time students studying at recognised Higher Education Institutions (HEI's). Specifically, the application sets out that the Applicant has received support from London universities, including the University of London. This occupation restriction must be secured through a S106 agreement.</p>	
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	<p>27. Paragraph 4.15.3 of the London Plan is clear that a nomination agreement is required to demonstrate need for student accommodation; in the absence of this paragraph 4.15.5 states that the development will not be considered as meeting a need for purpose-built student accommodation. As such, if the accommodation is not secured for use by students and secured through a nomination agreement at the Mayor's decision making stage (Stage II), it will not be considered as PBSA and will normally be considered large scale purpose-built shared living and will therefore be assessed against the requirements of Policy H16 of the London Plan.</p> <p>28. The requirement for the provision of on-site affordable student accommodation within the proposed purpose-built student accommodation scheme is discussed from paragraph 33 of this report.</p> <p>29. Paragraph 4.15.13 of the London Plan encourages flexibility for the temporary use of accommodation during vacation periods for ancillary uses. It is proposed that outside of term-time, the accommodation would also be available to students on courses at other institutions such as language schools or short-term summer courses. This is supported and should be secured through an obligation within a S106 agreement. The planning statement sets out that these temporary uses will not disrupt the accommodation of the resident students during their academic year. This should be secured through a S106 agreement.</p> <p>30. In summary, subject to a nomination agreement and appropriate occupation restrictions being secured, the principle of the use of the land for student accommodation could be acceptable in strategic planning terms.</p> <p>Retail</p> <p>31. Policy SD6 of the London Plan recognises that the vitality and viability of London's varied town centres should be promoted and enhanced, and that town centres should be a focus for commercial development as well as a focus for place and local identity. Policy</p>	
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	<p>SD8 of the London Plan seeks a range of sizes of commercial units to support the diversity of the town centre.</p> <p>32. The proposals comprise the redevelopment of the site for the provision of student accommodation-led development, with flexible retail uses (Use Class E(a)). proposed at the ground and first floor. It is noted that while the provision of retail use is included within the proposed description of development, the exact quantum of retail land use proposed should be clarified, noting that this has not been specified within the submitted planning application form. The planning statement sets out that this retail use could comprise coffee shops and other retail uses.</p> <p>33. Given the site's town centre location, the principle of retail land use is accepted. The principle of the creation of jobs through the provision of non-residential floorspace within the Tottenham Hale District Town Centre is accepted, and it is recognised the scheme would contribute to the wider regeneration aims of the Tottenham Hale District Town Centre and Lee Valley Opportunity Area. Furthermore, the inclusion of retail floorspace within the ground and first floor levels of the scheme provides activation and vitality in this town centre location, as well as responds to the site allocation which seeks "comprehensive redevelopment incorporating new District Centre uses at ground and first floor levels, including a hotel use, with residential and commercial above".</p> <p><b>Affordable student accommodation</b></p> <p>34. Policy H4 of the London Plan sets a strategic target for 50% of all new homes delivered across London to be genuinely affordable. The Mayor's Affordable Housing and Viability Supplementary Planning Guidance seeks to increase the provision of affordable housing in London and embed affordable housing into land prices. The Mayor's Affordable Housing and Viability Supplementary Planning Guidance sets out that Affordable student accommodation should be provided onsite in line with the Mayor's Housing SPG.</p> <p>35. Policy H15 of the London Plan sets out the parameters of providing student housing, stating that PBSA must provide the maximum level of affordable accommodation. The</p>	
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	<p>Mayor's Annual Monitoring Report (the most recent being the London Plan Annual Monitoring Report 16), sets the formula for determining the affordability of appropriate affordable student accommodation student accommodation, based on a maximum of 55% average student income. Paragraph 4.15.7 also encourages providers of PBSA to develop models for delivery of PBSA in London which minimise rental costs for the majority of the bedrooms in the development and bring these rates nearer to the rate of affordable student accommodation.</p> <p>36. The applicant is proposing approximately 473 beds within purpose-built student accommodation. The scheme proposes 35% on site affordable student accommodation. Policy H15 of the London Plan sets out to follow the Fast Track Route, at least 35% of the accommodation must be secured as affordable student accommodation or 50% where the development is on public land or industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution. The threshold would be 50% if the site comprises industrial land and industrial uses are not being re-provided.</p> <p>37. The affordable student accommodation should be equivalent to the non-affordable rooms in the development in terms of room sizes and room occupancy level. The rent charged must include all services and utilities which are offered as part of the package for an equivalent non-affordable room in the development. There should be no additional charges specific to the affordable accommodation. The initial annual rental cost for the element of affordable accommodation should not exceed the level set out in the Mayor's Annual Monitoring Report for the relevant year. For following years, the rental cost for this accommodation can be linked to changes in a nationally recognised index of inflation such as the Consumer Prices Index or CPIH. A review period, such as every three years, could be set by the borough to allow for recalibrating the affordable student accommodation to the level stated as affordable in the Mayor's Annual Monitoring Report. As per Policy H15 of the London Plan, the affordable student accommodation bedrooms should be allocated by the higher education provider(s) that operates the accommodation, or has the nomination right to it, to students it considers most in need of the accommodation. This should be secured within a S106 agreement.</p>	
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38. In accordance with paragraph 4.15.7, the applicant is encouraged to develop a model for delivery which minimises rental costs for the majority of the bedrooms in the development and brings these rates nearer to the rate of affordable student accommodation. As per paragraph 4.15.4 of the London Plan, where all the bedrooms in the PBSA development are provided at a rental cost that qualifies as affordable student accommodation and maintained in perpetuity through legal agreement or condition, there is no requirement for it to have a nomination agreement with a higher education provider.

39. The application states that *“it is understood that the LPA wish to explore an alternate payment in lieu scenario to on-site which could be utilised for the delivery of local family social housing. Therefore, and as an alternative, the applicant is prepared to potentially provide an equivalent off site payment towards affordable conventional C3 residential accommodation in lieu of on-site affordable student accommodation”*. However, London Plan Policy H15 does not allow for the delivery of conventional Use Class C3 affordable housing, either on-site or as a payment in lieu, as part of a student accommodation scheme. As such, this speculative statement included within the applicant’s planning statement is not supported by GLA Officers.

40. If the Mayor’s Fast-Track Route threshold is met and the scheme meets the Fast Track Route criteria, in accordance with the London Plan and the Mayor’s Affordable Housing and Viability SPG only an early review mechanism would be required (to be triggered if an agreed level of progress on implementation has not been made within two years of any planning permission). A draft of the S106 agreement must be agreed with GLA officers prior to any Stage II referral; example clauses are provided within the Mayor’s Affordable Housing and Viability SPG.

41. It is noted that if the level of on-site affordable student accommodation provision within the scheme is below the Fast-Track Threshold for the site at the Mayor’s decision-making stage, the scheme will proceed down the Viability Tested Route and the applicant will be required to submit a viability assessment which will be robustly scrutinised by GLA Officers in accordance with Policy H15 and H5(F) of the London Plan. Both an early and

late review mechanism will also be required to be secured within a S106 legal agreement in line with Policy H15 and H5 of the London Plan.

**Urban design**

42. 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.

43. Policy D4 of the London Plan sets out that development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made. It is noted that the scheme was presented to GLA and Haringey planning officers at pre-application stage. While a scheme has been considered at a Quality Review Panel (QRP) in December 2020, it is however noted that the proposal considered by QRP was for a large-scale purpose-built shared living proposal, and not the student living scheme proposed as part of this application.

**Height**

44. London Plan Policy D9 states that based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. It goes on to state that tall buildings should only be developed in locations that are identified as suitable in Development Plans. Policy D9 further identifies the requirements for tall buildings to identify visual impacts, including at different distances; aiding legibility and wayfinding; having exemplary architecture and materials; avoiding harm to heritage assets; not causing adverse glare; and minimising light pollution. Functional impacts should consider internal and external design; servicing; entrance capacity; area and transport capacity; maximise benefits to the area; and not interfere with communications. Environmental impacts should consider wind, daylight, sunlight, and temperature; air

	<p>movement (dispersal of pollutants); and noise creation. Cumulative impacts should also be considered.</p> <p>45. The proposal meets the definition of a tall building as set out in Policy D9 of the London Plan. The Haringey Strategic Policies Local Plan defines tall buildings as being buildings 10 storeys and over, and the site is identified in Figure 2.2 Development Management DPD of Haringey's Local Plan as a Potential Location Appropriate for Tall Buildings. As such, the proposal accords with Policy D9(B)(3) of the London Plan; albeit it is noted that Figure 2.2 of the Local Plan does not set out or identify the heights that are appropriate in this location.</p> <p>46. The site allocation, TH4 states "<i>tall buildings marking the key transport node at Tottenham Hale Station and the emerging District Centre may be acceptable on this site</i>" and it is noted that the neighbouring sites, have an approved extant planning permission, and there are buildings up to 39 stories in height located within the wider master planned island site. As such, any proposed tall building on the application site will be viewed as part of this master planned cluster and should accordingly respond to its context.</p> <p>47. Having regard to the town centre context and public transport accessibility, and noting that the site has been identified as suitable for tall buildings within the Local Plan, the principle of including tall buildings on the site is accepted in strategic planning terms, subject to addressing the criteria set out in Part C of Policy D9 of the London Plan.</p> <p>48. The tallest element of the proposal, which sits at 24 stories in height results in an abrupt change in urban scale towards the predominantly 3-4 storey existing context. The rationale for creating a marker at this location is unconvincing as the presence of a tall building cluster and the consented 39-storey building located next to the train station is considered sufficient as a marker for the area and to aid legibility. Furthermore, the proposed location of height may result in reduced western sunlight penetration into the cluster of tall buildings. The level of contribution to public realm is minimal given the scale of development proposed and its location in a busy traffic junction and air quality focus area.</p>	
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	<p>49. Given the site's location at the edge of a cluster of tall buildings, the proposed tall element at 24 stories is seen as disproportionate to the existing context. GLA Officers would support a revised proposal that creates a better transition between the scale of the existing and emerging development context. More specifically, the applicant should seek to provide a lower height building that creates a transition in height from the low-rise development located to the west of the site, to be demonstrated through townscape views.</p> <p>50. As set out by Policy D9(C), careful consideration should be given to the visual, functional, environmental, and cumulative impacts of tall buildings, as well as the provision of high quality residential and public facilities and spaces, the impact of tall buildings on environmental quality, including daylight, sunlight and wind impacts on access in spaces between buildings and on the amenity of communal and public spaces. While information submitted within the application to address Policy D9 (including the Design and Access Statement, technical documents), as set out above, GLA Officers are not satisfied that the proposals achieve Part C in respect of visual impacts. Further information is required to demonstrate that all the other functional and environmental criteria within the policy have been achieved, including light pollution impacts, and evidence that servicing, maintenance and building management has been considered since the start of the design process. The Council should scrutinise the daylight, sunlight and wind assessments to ensure that impacts resulting from the proposed height and massing are addressed.</p> <p>51. An update will be provided to the Mayor at his decision-making stage.</p> <p>Student accommodation quality</p> <p>52. Policy H15(A)(5) of the London plan requires that student accommodation provides adequate functional living space and layout, and paragraph 4.15.6 sets out that the design of the development must be high quality and in accordance with the requirements of Policy D3 Optimising site capacity through the design-led approach. Whilst there are no space standards for student accommodation, the development should be fit for purpose</p>	
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	<p>and provide for student well-being and activities, ensuring a range of high-quality and accessible, internal and external, communal amenity spaces.</p> <p>53. The proposed layouts generally demonstrate that an adequate functional living space and layout for the occupants can be achieved. Student units are organised in clusters with access to shared amenities on each floor. All bedrooms have en-suite bathrooms, storage and desk area. The larger rooms (post graduate/ independent rooms) will also have a kitchenette and eating/ relaxation space in the room.</p> <p>54. The proposal includes communal student spaces (totalling 523 sq.m. of internal communal amenity space and 322 sq.m. external amenity space) including a 24 hour gymnasium. The principle of the provision of this ancillary, communal student space which provides for student well-being and activities, is supported, and should be secured for use by students only within a S106 agreement. Further information, however, should be provided to demonstrate that a sufficient quantum and quality of student ancillary spaces have been provided for the quantum of student accommodation proposed within the development and should demonstrate that sufficient outdoor space has been provided for student use.</p> <p>55. While the proportion of single aspect north facing units would not be acceptable within a self-contained housing scheme, the arrangement proposed does not raise any particular strategic planning concerns in this instance, given the short term nature of student accommodation tenancies and the provision of communal amenity spaces with alternative aspects within the scheme.</p> <p>Architectural design</p> <p>56. The approach to architecture and articulation of the facade is supported. Key details such as window reveals, balconies and ground floor frontages should be secured as part of any planning application.</p> <p>Strategic views</p>	
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	<p>57. Policy HC4 of the London Plan states that development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements.</p> <p>58. A Townscape and Visual Impact Assessment (TVIA) has been included with the application which sets out that “The London View Management Framework and views towards St. Pauls Cathedral is not relevant to the TVIA as the Site is not situated within any of the London View Management Framework viewing corridors or consultation zones. A view from Alexandra Palace is included in the assessment”.</p> <p>59. The view from Alexandra Palace included within the TVIA has been taken from the viewing terrace at Alexandra Palace, which is Assessment Point 1A.2 (‘London Panorama: Alexandra Palace’) as set out in the LVMF SPG. While visible in the view, the proposal sits some distance east of the ‘Landmark Viewing Corridor’ and ‘Wider Setting Consultation Area’, well away from the Protected Vista of St. Paul’s Cathedral. The proposals will form part of the emerging cluster of tall buildings at Tottenham Hale, and the impact would be negligible, with no harm to the setting of St. Paul’s Cathedral.</p> <p>Fire safety</p> <p>60. In line with Policy D12 of the London Plan a fire statement has been submitted with the planning application. In accordance with Part B of Policy D12, as well as the Fire Safety D12(B) pre-consultation draft LPG, the fire statement should be amended to confirm that the author is suitably qualified and evidence of competency of the author of the Fire Statement should be detailed in a clearly identified section at the beginning of the Fire Statement.</p> <p>61. While GLA Officers recognise that all the headline requirements of part B of policy have been included at a high level under appropriate headings within the statement, there is very limited detail provided in respect of majority of the requirements in order to satisfactorily detail how the development proposal will function, and the fire statement does not include a statement of compliance. As such, notwithstanding the submitted statement, the Council should secure compliance with Policy D12 via condition. It is also</p>	
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	<p>noted that if there are any changes to the scheme which require subsequent Section 96a or Section 73 applications following the grant of any planning permission, an amended Fire Statement should also be submitted which incorporates the proposed scheme amendments so that the content of the Fire Statement always remains consistent with the latest scheme proposals.</p> <p>62. Further to the above, Policy D5 within the London Plan seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the buildings. The fire statement states that evacuation lifts are proposed to be provided per core. This should be suitably secured by the Council by way of condition.</p> <p>Inclusive access</p> <p>63. 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.</p> <p>64. The application sets out that a total of 10% of the bedrooms will be accessible with 5% wheelchair accessible and 5% adaptable, and that there are adaptable and wheelchair accessible rooms available on every floor, giving disabled students similar choices to non-disabled students.</p> <p>Noise mitigation and Agent of Change</p> <p>65. Policy D14 of the London Plan requires development to reduce, manage and mitigate noise by, amongst other things, separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials – in preference to</p>	
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	<p>sole reliance on sound insulation, and by reflecting the Agent of Change principles outlined in Policy D13 of the London Plan.</p> <p>66. A Noise and Vibration Impact Assessment is submitted with this application which concludes that suitable mitigation in the form of acoustic glazing and ventilation can be incorporated into the building envelope to provide appropriate internal and external noise conditions, and mitigation measures applied to the plant design to ensure that the design criteria are not exceeded. This should be secured by the Council.</p> <p><b>Heritage</b></p> <p>67. Policy HC1 of the London Plan states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The policy further states that development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process. 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 "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" and in relation to conservation areas, "special attention should be paid to the desirability of preserving or enhancing the character or appearance of that area". The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.</p> <p>68. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public</p>	
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	<p>benefits of the proposal, including securing its optimum viable use. Any harm must be given considerable importance and weight.</p> <p>69. Whilst the site does not contain any designated heritage assets nor is the site located within a conservation area, the site is located approximately 500 metres to the east of the site The Tottenham Green Conservation Area. A heritage statement has been submitted with the planning application which details that there are also two grade II listed buildings within 500 metres of the site.</p> <p>Conservation area</p> <p>70. The heritage statement sets out that the proposed development will be visible from within Character Area A of the Tottenham Green Conservation Area, from within the conservation area from the north side of Tottenham Green along Colsterworth Road. The heritage statement also sets out the proposed development will also be visible from locations within the setting of the conservation area on Chestnut Road and Park View Road that contribute to the conservation area's significance.</p> <p>71. The heritage statement sets out that in all cases the proposal will be viewed in the context of the existing tall buildings immediately to the east of the site and to the north of Ferry Lane east of the railway line and that the appearance of the proposal in these views will be as a distant part of the streetscape. GLA Officers consider that that there is an element of harm to significance through the visual impact of the proposal on the setting of the conservation area and consider the level of this harm to be less than substantial harm.</p> <p>Listed buildings</p> <p>72. The site is located approximately 300 metres east from a Grade II listed building at No. 62 High Cross Road. The heritage statement sets out that the proposal will be visible from within the asset's setting including locations on Monument Way and on Stainby Road to the south, and that from these locations the proposal will be viewed in the context of the existing tall buildings in the vicinity of the site.</p>	
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	<p>73. It is noted that the heritage statement sets out that the presence of the proposal in the streetscape will not affect the significance of the listed building which is manifested in its historic and architectural interest and that “the asset will continue to be readable as a remnant of 18th century Tottenham and will not be subject to harm”. GLA Officers agree that the designated asset will continue to be readable as a remnant of 18th century Tottenham; however, GLA Officers conclude that there is an element of harm to significance of the building through visual impact on the setting, and consider the level of this harm to be less than substantial harm.</p> <p>74. Tottenham High Cross, a Grade II listed building, is located approximately 500 metres west of the Proposed Development at the junction of High Road and Monument Way. The heritage statement sets out that the proposal will be visible in views along Monument Way from the junction including from a point immediately to the west of the asset on the east side of High Road and that in these views the proposal will appear as a distant tall building in the context of existing tall buildings immediately to the east of the Site and to the north of Ferry Lane east of the railway line. GLA Officers consider that that there is an element of harm to significance of the building through visual impact of the proposal on the setting of the listed building and consider the level of this harm to be less than substantial harm.</p> <p>Conclusion</p> <p>75. On the basis of the information provided within the heritage statement, GLA officers consider that the impact that will arise to the setting of the Tottenham Green Conservation Area and Grade II listed buildings through the delivery of the proposed scheme constitutes less than substantial harm to the significance of the designated heritage asset. Accordingly, the application conflicts with London Plan Policy HC1, and the NPPF heritage balance assessment would be engaged. In this regard it is noted that the scheme proposes a number of public benefits including the delivery of student accommodation and on-site affordable student accommodation, delivery of retail floorspace, as well as the creation of jobs during construction and operation.</p>	
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	<p>76. Having regard to the statutory duties in respect of listed buildings and conservation areas in the Planning (Listed Buildings and Conservations Areas) Act 1990, and NPPF requirements in relation to listed buildings, structures and conservation areas, GLA officers are satisfied that the less than substantial harm may be outweighed by the public benefits of the proposal, subject to the securing of the on-site student accommodation and subject to suitable conditions securing a high quality materiality.</p> <p>77. Policy HC1 of the London Plan relates to all heritage assets, including designated and non-designated heritage assets. In respect of non-designated heritage assets, the heritage statement sets out that there are also a number of non-designated heritage assets within proximity to the application site. The Council should confirm whether it agrees with the conclusions set out in the heritage statement in respect of the non-designated heritage assets, and should confirm if there are any additional non-designated heritage assets in proximity to the site (including, for example, locally listed buildings and structures) that should also be assessed as part of consideration of the application. GLA Officers will provide an update to the Mayor in respect of Policy D9 and Policy HC1 at decision making stage.</p> <p>78. The heritage statement also includes an assessment of the archaeological potential of the site. This should be considered by the Council and appropriate conditions secured as necessary.</p> <p><b>Sustainable development</b></p> <p>Energy strategy</p> <p>79. An energy statement has been submitted with the application. A district heat network (DHN) connection has been proposed. Further information is required in respect of a number of energy matters including, the DHN plans, decarbonisation strategy and bespoke carbon factor. Be Lean savings currently fall short due to modelling limitations and high hot water demand, and as such, further measures should be implemented and savings should be maximised. The Be Green strategy should be revised and opportunities for photovoltaic (PV) panels should be maximised. Detailed technical comments in</p>	
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	<p>respect of energy have been circulated to the Council under a separate cover to be addressed in their entirety.</p> <p>Whole Life Carbon</p> <p>80. A whole life-cycle carbon assessment has been submitted with the planning application. Detailed technical comments in respect of whole life carbon have been circulated to the Council under a separate cover. The applicant has provided all information required in line with the GLA Whole Life-Cycle Carbon Assessment guidance document.</p> <p>Circular Economy</p> <p>81. The proposal has considered circular economy principles, as required by Policy SI7 of the London Plan. Detailed technical comments in respect of circular economy have been circulated to the Council under a separate cover, and no further information is required.</p> <p><b>Environmental issues</b></p> <p>Urban greening</p> <p>82. The proposed development presents a well-considered approach to integrating green infrastructure and urban greening across the masterplan. The applicant has calculated the urban greening factor (UGF) score of the proposed development as 0.36, which is below the 0.4 target set by Policy G5 of the London Plan.</p> <p>83. The applicant has set out the constraints to meeting the 0.4 target following a series of reviews by the project Fire Engineer and has set out steps taken to try and mitigate the reduction in the UGF. The explanation provided demonstrates that urban greening has been considered as a fundamental element of site and building design.</p> <p>84. A final review of the urban greening should be completed prior to Stage 2 to ensure opportunities for greening have been maximised. In particular, the potential for additional tree planting on the southern roofs, which already include some tree planting, should be considered.</p> <p>Flood risk</p>	
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	<p>85. The site is located in Flood Zone 2. A Flood Risk Assessment (FRA) has been submitted as required under the National Planning Policy Framework (NPPF). The FRA adequately assesses the risk of flooding from fluvial/tidal, pluvial, sewer, groundwater, and reservoir flooding, which is considered to be low.</p> <p>86. The FRA provided for the proposed development generally complies with policy SI12 of the London Plan.</p> <p>Water efficiency</p> <p>90. The Sustainability Statement notes that three Wat01 BREEAM credits are targeted, with water consumption reduced by 40% in line with Policy SI5 of the London Plan.</p> <p>91. Water efficient fittings, leak detection systems, flow control devices, and water meters are proposed, which is supported.</p> <p>92. The proposed development generally meets the requirements of Policy SI5 of the London Plan however, water harvesting and re-use should be incorporated to reduce consumption of water across the site. This can be integrated with the surface water drainage system to provide a dual benefit</p> <p>Air quality</p> <p>93. The air quality assessment, as submitted, is not appropriate to determine air quality conditions at the proposed development, as air quality monitoring data and traffic survey data from 2020 have been used. The impact of Covid-19 on both annual mean pollutant concentrations and levels of road traffic in 2020 mean that data from this year does not represent a suitable baseline for informing an assessment of air quality impacts. Compliance with London Plan Policy SI1 cannot therefore be determined and a revised assessment should be submitted.</p>	
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	<p>94. A suitable assessment of future exposure can be carried out using a dispersion model derived from LAEI traffic data, TEMPro factors for traffic growth and 2019 monitoring data from Haringey Council.</p> <p>95. The risk of dust impacts during the construction phase in the context of cumulative development in the vicinity of the application site should be redetermined. This is likely to increase the number of receptors affected by construction works and potentially increase the risk of dust impacts. This is to suitably comply with London Plan Policy SI1 (D) and the Control of Dust and Emissions during Construction and Demolition SPG.</p> <p>96. A condition is recommended to secure that measures to control emissions during the construction phase are written into an Air Quality and Dust Management Plan (AQDMP), or form part of a Construction Environmental Management Plan, in line with the requirements of the Control of Dust and Emissions during Construction and Demolition SPG. The AQDMP should be approved by the LPA and the measures and monitoring protocols implemented throughout the construction phase as set out in London Plan Policy SI1 (D).</p> <p>97. A construction phase condition requiring that on-site plant and machinery complies with the London Non-Road Mobile Machinery (NRMM) Low Emission Zone standards in accordance with Policy SI1 (D) of the London Plan should be included in any permission.</p> <p><b>Transport</b></p> <p>Access</p> <p>98. The proposal includes multiple access points for active modes via the Hale Road and The Hale, including a dedicated access door to the long stay cycle store for the student accommodation on The Hale. The proposed access provisions for active modes are considered acceptable.</p>	
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	<p>99. As the proposal does not include off-street parking or servicing, no vehicular access points to the site are proposed. The existing site's vehicular access from The Hale will be removed.</p> <p>Cycle Parking</p> <p>100. A total of 375 cycle parking spaces are proposed, including long and short stay spaces for residential units, as well as the commercial element. This is in line with the London Plan Policy T5 minimum quantitative standard. The proposed location of short stay cycle parking and the long stay cycle parking for the commercial element should be clarified.</p> <p>101. Additional provision for three charging points for mobility scooters is proposed. However, further consideration is suggested in order to provide additional spaces for large bicycles as an alternative, including adapted cycles used by people with mobility impairments. The quality of the cycle parking also needs to be improved, including minimum spacing between Sheffield stands and access aisle widths.</p> <p>102. The applicant should identify how the basement, primarily served by a large lift can continue to be accessed by all users in the event of the lift breaking down.</p> <p>103. The provision of showers, lockers and changing facilities for cyclists associated with the commercial uses should be secured within the grant of any planning application. Further detail on the cycle parking provision is therefore required at this stage and subsequently the provision secured by condition.</p> <p>Healthy Streets, Vision Zero, Walking and Cycling</p> <p>104. The submission of the Active Travel Zone (ATZ) assessment is welcomed. This appropriately includes a casualty analysis of clusters of mortalities and injuries. However, the proposal has not demonstrated how it will positively contribute towards the Vision Zero Action Plan to actively address dangers on the local transport network. This is particularly important, as the proposed development will see an increase in pedestrian and cycle trips to/from the site and the local area, as well as public transport trips. The</p>	
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	<p>Transport Assessment (TA) states that the applicant is willing to contribute towards the provision of four cycle parking stands in the wider public realm near the site. However, there is limited detail on how the development will deliver local improvements that supports the safety of users, especially as it is recognised that the highway network immediately around the site does not provide an optimum environment for cyclists.</p> <p>105. Therefore, active travel measures for future residents and particularly disabled people should be identified/provided within a local environment that meets their needs and those of people already in the area. Development proposals should connect to local walking and cycling networks, including CS1; and enable and deliver improvements to provide safe, inclusive and convenient connections for people, particularly disabled people, in line with Policy T2 of the London Plan.</p> <p><b>Delivery and Servicing Arrangements</b></p> <p>106. Provision for deliveries and servicing for the commercial and residential element would usually be expected to be off-street in accordance with Policy T7(G) of the London Plan. In addition, Officers have concerns over the methodology used to derive the servicing trip rate for the residential element and the possible impact of increased demand associated with the neighbouring units, particularly on the loading/unloading bay on The Hale. Furthermore, the loss of the small off-street servicing area, noticeable growth in online sales, likely demand for food (takeaway) deliveries by motorcycle and the possible use of the bay on The Hale for blue badge drop-off and parking, could result in the under-provision of delivery and servicing facilities. Pedestrian footway space in this location should be retained. Nevertheless, if off-street provision is not possible, the applicant should demonstrate there is sufficient space within the bays to accommodate a 'worse case' scenario satisfactorily. The construction of the S278 works for the footway and kerb adjacent to the site could give the future physical flexibility to make any amendments to extend servicing bays should demand require it.</p> <p>107. Therefore, alternative uses in the context of changing requirements should be considered to ensure that any amendments are encouraged to use non-car modes as much as possible.</p>	
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	<p>Car parking</p> <p>108. The proposed development is car-free. There will be no dedicated disabled persons parking provision for Blue Badge holders. Instead, the proposal intends to use on-street loading bays for Blue Badge pick-up/drop-off and Blue Badge visitor parking in line with future TLRN regulations, which TfL would be required to introduce on this bay. The applicant should confirm the expected loading and servicing restrictions and enforcement from on-street bays.</p> <p>109. Given the location and nature of the proposed development, the step free public transport, high PTAL and the proximity of local services and facilities, subject to the necessary improvements for active travel, particularly by disabled people being secured, this proposal is considered acceptable.</p> <p>Trip generation and highway and public transport impact assessment</p> <p>110. Whilst there are some concerns about methodology, a more robust analysis of trip generation is unlikely to show detrimental impacts on the strategic road or public transport network.</p> <p>Travel plan</p> <p>111. The applicant has submitted an interim Travel Plan (TP) which is generally acceptable. The focus on sustainable means of transport is supported. The final TP and all agreed measures should be secured, enforced, monitored and reviewed through the section 106 agreement, in accordance with Policy T4 of the London Plan.</p> <p>Deliveries, servicing and construction logistics</p> <p>112. The draft Delivery and Servicing Management Plan (DSMP) and outline Construction Logistic Plan (CLP) are acceptable. The development should not impact on bus operation or bus journey times neither during construction nor at end state. The use of the loading bay on The Hale should be monitored so that the need to accommodate an appropriate dedicated disabled persons' car parking provision is considered if necessary. Consolidation and timing of deliveries should be managed through the DSMP to facilitate safe, clean and efficient deliveries and servicing. This should include appropriate levels of co-ordination to encourage and support out-of-peak/different time deliveries and servicing.</p>	
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The full DSP and CLP should be produced in accordance with TfL's guidance and secured by condition.

**Local planning authority's position**

113. Haringey Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

**Legal considerations**

114. 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**

115. There are no financial considerations at this stage.

**Conclusion**

116. London Plan policies on industrial land, student accommodation, town centres, retail, affordable student accommodation, urban design, fire safety, heritage, inclusive design, energy, whole life carbon, circular economy urban greening, flood risk, sustainable drainage, water efficiency, air quality, and transport are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

	<p><b>Land use principles:</b> The redevelopment and optimisation of the brownfield site and contribution towards the delivery of purpose-built student accommodation and contribution towards housing targets accords with the London Plan, subject to confirmation from the Council of the existing use of the site. The inclusion of retail uses within this town centre site is also accepted.</p> <p><b>Affordable student accommodation:</b> The scheme proposes 35% on-site affordable student accommodation, which is supported in accordance Policy H15 of the London Plan. This must be secured through a S106 agreement, as should the rent levels and eligibility criteria. The obligation to enter into a nominations agreement must be secured.</p> <p><b>Urban design:</b> While the principle of the provision of tall building within the site could be accepted in strategic planning terms, the proposed 24-storey building results in an abrupt change in urban scale and does not respond appropriately to the existing low-rise context, nor the emerging master-planned context. The rationale for creating a marker at this location is unconvincing. A proposal that creates a better transition between the scale of the existing and emerging development context should be further considered. Further consideration should be given to the fire strategy.</p> <p><b>Energy:</b> Further information is required in relation a number of different energy matters including connection to the district heating network, Be Lean savings and the Be Green strategy.</p> <p><b>Urban greening:</b> A final review of the urban greening should be completed prior to Stage 2 to ensure opportunities for greening have been maximised. In particular, the potential for additional tree planting on the southern roofs, which already include some tree planting, should be considered.</p> <p><b>Sustainable drainage:</b> Rainwater harvesting should be included in line with the London Plan drainage hierarchy or robust justification provided as to why it is not feasible. A management and maintenance plan should also be provided for the proposed SuDS.</p>	
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	<p><b>Water efficiency:</b> water harvesting, and re-use should be incorporated to reduce consumption of water across the site. This can be integrated with the surface water drainage system to provide a dual benefit.</p> <p><b>Air quality:</b> A revised air quality assessment is required that uses a suitable baseline for informing an assessment of air quality impacts. The risk of dust impacts during the construction phase in the context of cumulative development in the vicinity of the application site should also be redetermined. Conditions to control the impact on air quality during the construction period should be attached to any planning permission.</p> <p><b>Transport:</b> The active travel assessment requires further work, and in accordance with Healthy Streets and Vision Zero objectives, improvements and contributions should be secured. The proposed servicing arrangements and disabled parking should be reconsidered to ensure on-street demand is met alongside meeting Vision Zero objectives. Active travel routes improvements should be identified and secured, and the quality of cycle parking should comply with LCDS guidance.</p> <p>POST STAGE 1 COMMENTS:</p> <p>Please find Post Stage 1 comments in respect of this updated scheme, below:</p> <p><b>1. Removal of affordable student accommodation, payment in lieu offer</b></p> <p>As originally submitted, the applicant proposed approximately 473 beds within purpose-built student accommodation, of which 35% were proposed on site affordable student accommodation. The application set out: <i>“The accommodation will only be available during term-time to full time students studying at recognised Higher Education Institutions (HEI’s). The Applicant has received support from London universities, including the University of London. As per paragraph 8.13 below any nominations agreement in accordance with London Plan Policy H15 Part A (2 and 3) would be subject to affordable housing being delivered on site”</i>.</p>	
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Since Stage 1, the applicant has amended the scheme to propose a payment in lieu (PIL) of at least this 35% equivalence, which is "*anticipated to be in the region of £2.8-3m*". The revised application recognises that the approach of a PIL represents a departure from policy. This was also recognised in paragraph 39 the Stage 1 report, which set out that London Plan Policy H15 does not allow for the delivery of conventional Use Class C3 affordable housing, either on-site or as a payment in lieu, as part of a student accommodation scheme.

The revised application also sets out that "*the provision of a PIL instead of on-site affordable student rents would result in a departure from London Plan Policy H15 as the proposed development would not be able to secure a nominations agreement with a Higher Education Institution and therefore would be a direct-let scheme, which is not recognised under Policy H15 which requires the majority of bedrooms to be secured through a nominations agreement*".

If the scheme is unable to secure a nominations agreement with a Higher Education Institution, it would therefore comprise a direct-let scheme, and on this basis the proposal comprises "large-scale purpose-built shared living" (co-living) for the purposes of assessment under the London Plan, and therefore requires assessment under Policy H16 of the London Plan. GLA Officers note that as per the London Plan Guidance Programme 2021, It is expected that the draft Large-scale Purpose-built Shared Living LPG will be out for consultation in the near future.

[https://www.london.gov.uk/sites/default/files/london\\_plan\\_guidance\\_programme\\_2021.pdf](https://www.london.gov.uk/sites/default/files/london_plan_guidance_programme_2021.pdf)

In regards to the nominations agreement, GLA Officers note that the planning addendum states "*this is an established approach on other purpose-built student accommodation schemes across London. This approach has been accepted by the GLA previously on other schemes in Southwark including Capital House at 42-46 Weston Street (LPA ref: 18/AP/0900, GLA ref: GLA/6163/02). In this instance, the proposed development followed the direct-let route and therefore did not secure a nominations agreement*". There are several relevant factors to note in regards to that scheme that represent a materially different site and planning context than the proposal subject to this email. Notably, there

	<p>was an extant planning permission for a student scheme on the site that did not secure the on-site delivery of affordable homes/student accommodation or a contribution towards off-site delivery, and Southwark Core Strategy (Strategic Policy 8) requires student housing developments to provide 35% conventional affordable housing. As such the PIL and lack of nominations agreement was accepted by Southwark Council noting that the S106 agreement secured the use of the accommodation for students, and that the local planning policy context seeks a payment-in-lieu. The conflict in local plan and London Plan policy was noted as part of the Stage 2 report (ref: 6163). It is further noted that the PIL was significantly higher than the quantum of onsite affordable student housing that could be viably provided. It is also noted that this decision was made pre-adoption of the new London Plan.</p> <p>GLA Officers understand that there is no policy within the Haringey local plan that seeks the provision of conventional affordable housing with student schemes, however this should be confirmed by Haringey Planning Officers. GLA Officers maintain that on-site affordable housing should be provided as required by Policy H15 of the London Plan, and that the student accommodation should be secured by a nominations agreement.</p> <p><b>2. Large-scale purpose built shared living development</b></p> <p>As noted above, if no nominations agreement is secured, Policy H16 now applies to the scheme. Policy H16 of the London Plan recognises that large-scale purpose-built shared living developments may provide an alternative housing option for single people in the private rented sector, alongside conventional self-contained housing accommodation and other forms of shared private rented accommodation available in the existing housing stock. This is subject to meeting the criteria set out in Policy H16 (as set out below).</p> <p>The overall principle of purpose-built shared-living accommodation being provided is supported; however, this is subject to the resolution of the residential quality and viability position, as set out below; and appropriately securing the shared-living units by section 106 agreement</p>	
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Policy H16 of the London Plan states “*large-scale purpose-built shared living development must meet the following criteria:*

- 1) *it is of good quality and design*
- 2) *it contributes towards mixed and inclusive neighbourhoods*
- 3) *it is located in an area well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency*
- 4) *it is under single management*
- 5) *its units are all for rent with minimum tenancy lengths of no less than three months*
- 6) *communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and offer at least:*
  - a. *convenient access to a communal kitchen*
  - b. *outside communal amenity space (roof terrace and/or garden)*
  - c. *internal communal amenity space (dining rooms, lounges)*
  - d. *laundry and drying facilities*
  - e. *concierge*
  - f. *bedding and linen changing and/or room cleaning services.*
  - g. *the private units provide adequate functional living space and layout, and are not self-contained homes or capable of being used as self-contained homes*
- 7) *a management plan is provided with the application*
- 8) *it delivers a cash in lieu contribution towards conventional C3 affordable housing. Boroughs should seek this contribution for the provision of new C3 off-site affordable housing as either an:*
- 9) *upfront cash in lieu payment to the local authority, or*
- 10) *in perpetuity annual payment to the local authority*
- 11) *In both cases developments are expected to provide a contribution that is equivalent to 35 per cent of the units, or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution, to be provided at a discount of 50 per cent of the market rent. All large-scale purpose-built shared*

*living schemes will be subject to the Viability Tested Route set out in Policy H5 Threshold approach to applications, however, developments which provide a contribution equal to 35 per cent of the units at a discount of 50 per cent of the market rent will not be subject to a Late Stage Viability Review”.*

The revised application does not include a full assessment against these criteria, and this should be provided. In particular, the applicant must confirm that the scheme is under single management and its units are all for rent with minimum tenancy lengths of no less than three months to ensure the large-scale purpose-built shared living developments do not effectively operate as a hostel. These factors must be secured within the S106 agreement. A management plan must also be provided with the application as set out in Paragraph 4.16.4 of the London Plan, and the agreed management plan should be secured through a Section 106 agreement.

### **3. Quality of shared-living residential quality**

#### **Private internal space**

The qualitative and quantitative aspects of shared-living proposals are of paramount importance to their acceptability and to protect the amenity and quality of life of residents. Whilst the supporting text to Policy H16 of the London Plan acknowledges that there are currently no minimum private internal space standards for shared-living accommodation, it states that units should be appropriately sized and laid out to provide adequate functional living space for residents.

The proposed units are sized between approximately 13 sq.m. and 20 sq.m. in size. In comparison with other shared living schemes proposed in London, GLA Officers consider these are small units sizes. Every room is provided with a toilet, shower and basin, and some of the larger rooms have cooking facilities in the form of a hob and sink. However, not all of the units would have kitchenettes. All units are single aspect, and some units are north facing. No external private amenity space in the form of balconies are proposed, which is acceptable for shared-living accommodation however it should be confirmed and

secured that there is an openable window in each room. However, the lack of external private amenity space should be compensated for with a level of external communal amenity space.

#### Communal amenity space

In terms of shared-living communal amenity space, the supporting text to Policy H16 of the London Plan acknowledges that there are currently no minimum communal amenity space standards for shared-living accommodation; however, given the generally small size of private space, the communal amenity spaces are important elements in ensuring that the quality of the overall residential amenity is acceptable.

The London Plan also states that shared-living accommodation should be designed and managed in a way that lowers barriers to social interaction and encourages engagement between people through incidental meeting spaces; communal kitchen spaces designed for social interaction, such as shared kitchens with cooking stations facing each other; amenity spaces of a size and quality that actively encourage their use and community engagement; and where appropriate, entrance lobbies and public amenities that encourage use by the surrounding local community as well as the internal community.

The provision of the laundry and communal lounge on the 7<sup>th</sup> floor, and the communal lounge on the 24<sup>th</sup> floor is supported. As required by Policy H16, both laundry and drying facilities should be provided, and this should be secured.

Each cluster has their own amenity space consisting of a kitchen and lounge area totalling 1,098 sq.m. across the development which on average, provides 4.0 sq.m. of cluster amenity space per bedroom. In addition to indoor amenity space specific to each cluster, the development also proposes communal amenity space, which are open to all residents, totalling 523sq.m. of internal communal amenity space and 322sq.m. external amenity space. This consists of a mixture of internal communal lounges (at ground floor, 7th floor and 24th floor), external roof terraces/gardens (at 7th and 24th floor). A 24 hour gym, while not an essential facility, is provided at 1st floor level. It should be confirmed if

	<p>the gym floorspace is included within the above-mentioned total sq.m. of communal amenity space. The external amenity provision equates to 0.7sqm per resident, which GLA Officers consider is a low provision.</p> <p>While GLA Officers note that the every floor has a shared kitchen space, these are not arranged so that the cooking stations face each other, and due to the small size of these spaces, the kitchen spaces do not appropriately encourage engagement. GLA Officers typically see shared-living schemes that provide much larger, communal kitchen and dining facilities encourage social interaction. To ensure the functionality of the spaces, the applicant should demonstrate that the kitchen/dining facilities would be able to accommodate all residents using them at a similar time.</p> <p>As above, it should be confirmed if Policy H16 states that communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and offer at least convenient access to a communal kitchen; outside communal amenity space; internal communal amenity space (dining rooms, lounges); laundry and drying facilities; a concierge; and bedding and linen changing and/or room cleaning services. It should be confirmed and secured that bedding and linen changing and/or room cleaning services will be provided.</p> <p><b>4. Affordable housing and viability</b></p> <p>As set out in Paragraph 4.16.7 of the London Plan, large-scale purpose-built shared living is required to contribute to affordable housing. However, because it does not meet minimum housing space standards it is not considered suitable as a form of affordable housing itself. Therefore, a financial contribution is required for affordable housing provided through the borough's affordable housing programme. A borough can decide whether it would prefer the financial contribution as a single upfront payment for affordable housing (Part A9a of Policy H16 Large-scale purpose-built shared living), which will be based on a 50 per cent discount to market value of 35 per cent of the units, or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and</p>	
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	<p>substitution, or an ongoing in perpetuity payment linked to actual rental income (Part A9b of Policy H16 Large-scale purpose-built shared living). The ongoing payment should be based on 50 per cent of rental income for 35 per cent of units for as long as the development is used for this form of accommodation. Because of the immaturity of the market for this type of development, all largescale purpose-built shared living developments will be assessed under the Viability Tested Route as set out in Policy H5 Threshold approach to applications. However, schemes which meet the relevant threshold will not be subject to a Late Stage Viability Review.</p> <p>The planning addendum sets out that the <i>“revised affordable housing offer of a payment-in-lieu, that will directly contribute towards delivery of affordable homes on the Council-owned Ashley Road Depot site in Tottenham which we understand would otherwise not be viable with the contribution from the applicants proposed scheme”</i>.</p> <p>This scheme has been referred to the GLA Viability Team who are will review the submitted FVA. Their comments will be provided in due course.</p> <p><b>5. Urban design</b></p> <p>The GLA’s over-arching urban design comments remain unchanged since Stage 1. To summarise, while the principle of the provision of tall building within the site could be accepted in strategic planning terms, the proposed 24-storey building results in an abrupt change in urban scale and does not respond appropriately to the existing low-rise context, nor the emerging master-planned context. The level of contribution to public realm is minimal given the scale of development proposed and its location in a busy traffic junction and air quality focus area. A proposal that creates a more sensitive transition between the scale of the existing and emerging development context should be further considered. See the Stage 1 report, attached for further detail.</p> <p><b>6. Fire safety</b></p> <p>The GLA’s Stage 1 response stated the following in respect of fire safety:</p>	
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*“60. In line with Policy D12 of the London Plan a fire statement has been submitted with the planning application. In accordance with Part B of Policy D12, as well as the Fire Safety D12(B) pre-consultation draft LPG, the fire statement should be amended to confirm that the author is suitably qualified and evidence of competency of the author of the Fire Statement should be detailed in a clearly identified section at the beginning of the Fire Statement.*

*61. While GLA Officers recognise that all the headline requirements of part B of policy have been included at a high level under appropriate headings within the statement, there is very limited detail provided in respect of majority of the requirements in order to satisfactorily detail how the development proposal will function, and the fire statement does not include a statement of compliance. As such, notwithstanding the submitted statement, the Council should secure compliance with Policy D12 via condition. It is also noted that if there are any changes to the scheme which require subsequent Section 96a or Section 73 applications following the grant of any planning permission, an amended Fire Statement should also be submitted which incorporates the proposed scheme amendments so that the content of the Fire Statement always remains consistent with the latest scheme proposals.*

*62. Further to the above, Policy D5 within the London Plan seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the buildings. The fire statement states that evacuation lifts are proposed to be provided per core. This should be suitably secured by the Council by way of condition”.*

While a Fire Statement Form (Response to HSE Comments, prepared by Aecom) was located within the revised submission, GLA officers were unable to locate an amended fire statement that confirms that the author is suitably qualified and evidence of competency of the author of the Fire Statement should be detailed in a clearly identified

section at the beginning of the Fire Statement. As such, GLA Officers maintain the comments provided at Stage 1 in regards to fire safety. Please see suggested conditions which should be attached to the grant of any planning permission.

*Fire statements*

Prior to the commencement of the relevant phase or plot (other than demolition, site clearance and ground works), a Fire Statement for the relevant phase or plot, in the form of an independent fire strategy produced by a third party suitably qualified assessor shall be submitted to and approved in writing by the Local Planning Authority. The statement should detail how the development proposal will function in terms of:

1. The building's construction: methods, products and materials used, including manufacturers' details;
2. The means of escape for all building users: stair cores, escape for building users who are disabled or require level access, and the associated evacuation strategy approach;
3. Features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans;
4. Access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these;
5. How provision will be made within the site to enable fire appliances to gain access to buildings; and
6. Ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

The development shall be implemented in accordance with the approved Fire Statement and retained as such for the lifetime of the development. #

Reason: In order to achieve the highest standards of fire safety and ensure the safety of all building users.

*Fire evacuation lifts*

Prior to commencement for each building details shall be submitted to and approved in writing by the local planning authority demonstrating that a minimum of at least one lift per core (or more subject to capacity assessments) will be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building. The development shall be carried out in accordance with these details and maintained as such in perpetuity.

Reason: In the interests of fire safety.

### **7. Energy**

Please find updated, detailed energy comments, attached. The GLA Energy Team have requested various clarifications in respect of the strategy, to be addressed.

### **8. Whole-life cycle carbon**

The WLC Team have advised that nothing further is required. Please see suggested wording below for the post-construction monitoring condition, which should be attached to the grant of any planning permission:

*Prior to the occupation of each building the post-construction tab of the GLA's whole life carbon assessment template should be completed accurately and in its entirety in line with the GLA's Whole Life Carbon Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage, including the whole life carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. This should be submitted to the GLA at: [ZeroCarbonPlanning@london.gov.uk](mailto:ZeroCarbonPlanning@london.gov.uk), along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation of the relevant building. Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings.*

### **9. Circular economy**



The CE Team have advised that nothing further is required. Please see suggested wording below for the post-completion report condition, which should be attached to the grant of any planning permission:

*Post-completion report (required for all applications)*

*Prior to the occupation [of any phase / building/ 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:*

*[CircularEconomyLPG@london.gov.uk](mailto:CircularEconomyLPG@london.gov.uk), along with any supporting evidence as per the GLA's Circular Economy Statement Guidance. The Post Completion Report shall provide updated versions of Tables 1 and 2 of the Circular Economy Statement, the Recycling and Waste Reporting form and Bill of Materials. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation. Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials.*

#### **10. Urban greening**

The GLA Stage 1 response states that the applicant should seek to review the urban greening factor (UGF) score of the scheme to ensure urban greening opportunities have been maximised, as it was below the target score at Stage 1 (0.36). At Stage 1, the applicant clearly outlined constraints following a series of review by the project Fire Engineer and urban greening remains to be considered as a fundamental element of the site and building design.

The applicant has provided a plan showing that the UGF score has been increased to 0.37, following the inclusion of a new green roof provided on the second-floor level. This remains below the target set by Policy G5 of the London Plan however this is considered to be acceptable given the building regulation constraints. The scheme is considered compliant with GI policy.

### **11. Flood risk, sustainable drainage and water efficiency**

The GLA Water Team have advised that the Applicant has provided a plan showing a general surface water flow path route, which appears to be in response to the LLFA's comments. The GLA Stage 1 water comments stated that the proposed development generally complies with the relevant London Plan policies, but that rainwater harvesting should be incorporated or robust justification provided why it is not feasible. This should be provided.

### **12. Air quality**

The response to Stage 1 comments from AECOM (the applicant's air quality consultant), dated 4th November 2021, has been reviewed.

At Stage 1, concern was raised that the use of 2020 air quality monitoring and traffic data may underestimate air quality conditions for future occupants of the development, given the impact of Covid-19 on air quality and traffic volumes. AECOM responded that the use of 2020 data was appropriate for the purposes of model verification. It is acknowledged that for the purposes of model verification, the use of 2020 is acceptable.

However, the air quality assessment does not provide any evidence of the traffic data that has been used in the assessment. Provision of traffic data within an air quality assessment is a recommendation of the EPUK/IAQM guidance. As such, while the use of 2020 data to derive a verification factor is acceptable, it remains unclear whether the traffic flows used to determine air quality conditions for future residents have been underestimated. The assessment states that AECOM transport consultants have provided data based on 2020 surveys, which further casts doubt that predicted concentrations for future occupants are accurate.

The applicant must therefore either:

a) demonstrate that the traffic data used in the air quality modelling is appropriate and not underestimated due to surveys carried out in 2020; or

	b) provide an updated dispersion model using air quality monitoring and traffic flow data from 2019 (prior to impacts of the Covid-19 pandemic).	
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