

## Berol Quarter (Berol Yard)

Local Planning Authority: Haringey

Local Planning Authority reference: HGY/2023/0261 & HGY/2023/0241

### Strategic planning application stage 1 referral

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

### The proposal

Full planning permission for the refurbishment and extension of Berol House to include Use Class E floorspace; and the redevelopment of 2 Berol Yard to provide new residential homes and Use Class E floorspace; with associated landscaping, public realm improvements, car and cycle parking, and other associated works.

### The applicant

The applicant is **Berol Quarter Limited**, the agent is **Lichfields**, and the architect is **Allies and Morrison LLP**.

### Strategic issues summary

**Land use principles:** The development of this brownfield site for a high-density, mixed-use development is acceptable in principle

**Affordable housing:** Overall, the affordable housing offering would comprise 35% Discount Market Rent housing, of which, 30% would be at London Living Rent levels and the remaining 70% at Discount Market Rent. With an appropriate tenure split between DMR and LLR the proposal is generally considered to be Fast Track compliant.

**Urban design:** Whilst the site is within a location identified as appropriate for tall buildings, there are some concerns about height, massing, separation distances and width of the green link, which indicates potential over-development.

**Transport:** Further information on the strategic transport issues arising from this development will be required to ensure full compliance with the London Plan.

Other issues on **sustainable development** and **environment** 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 108. Possible remedies set out in this report could address these deficiencies.

## Context

1. On 06 February 2023 the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following Category/categories of the Schedule to the Order 2008:
  - **Category 1A:** "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats"
  - **Category 1B:** "Development (other than development which only comprises the provision of houses, flats or houses and flats) which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres" and
  - **Category 1C:** "Development which comprises or includes the erection of a building of more than 30 metres high and is outside the City of London"
3. Once Haringey Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
4. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>

## Site description

5. The subject site comprises two plots, being 2 Berol Yard as well as Berol House. It forms an 'L' shaped parcel of land with a total area of 0.5 hectares. 2 Berol Yard is a vacant plot, most recently used as a construction site for neighbouring development and temporary car parking. Berol House is a three storey locally listed building utilised as an office building (circa 3,400 sqm).



**Figure 1: Site location (as outlined in red)**

6. The site sits within the Ashley Road South Masterplan (ARSM), Tottenham Hale, London. The brownfield site is located within the Lee Valley Opportunity Area. It is partly located within the Tottenham Hale Town Centre. The surrounding area is characterised by mostly redeveloped site comprising new residential buildings, new retail and commercial units at ground floor level along with new landscaped routes.
7. The site is highly accessible with a PTAL of 5-6a (where 1 is least accessible and 6b is most accessible). The nearest section of the Transport for London Road Network (TLRN) is the A503 The Hale, approximately 100 metres to the south-west of the site. Tottenham Hale Underground Station is 180m from the site. It is also within close proximity of Tottenham Hale Bus Station which is served by eight regular bus services.

## Details of this proposal

8. The proposal seeks planning permission for the refurbishment and extension of Berol House to include Use Class E floorspace; and the redevelopment of 2 Berol Yard to provide 210 new Built to Rent (BtR) residential homes as well as Class E floorspace; with associated landscaping, public realm improvements, car and cycle parking, and other associated works. The commercial portion of the development would deliver 6,359sqm.

## Case history

9. The applicant received planning permission at Berol Yard (ref: HGY/2017/2044) on 8 June 2018 for:

*“Application for full planning permission for the demolition of the existing buildings within the Berol Yard site and retention of Berol House. Erection of two buildings between 8 and 14 storeys providing 166 homes, 694 sqm (GEA) of commercial floorspace (Class A1/A3/B1), 7,275 sqm (GEA) of education floorspace (Class D1), car and cycle parking, open space, landscaping and other associated works. Application for outline planning permission (all matters reserved) for the alteration and conversion of ground, first and second floors of Berol House with up to 3,685 sqm (GEA) of commercial floorspace (A1/A3/B1) and the introduction of a two-storey roof level extension introducing up to 18 homes, cycle parking and other associated works.”*

10. The permission has been partially built out with Building 4 and the associated public realm, now known as the Gessner, having been completed and occupied in 2021. The remaining two plots (Berol House and the College building) of the original hybrid planning application have been unable to be progressed
11. There is a Section 73 linked to this application for a minor material amendment to the permitted scheme at Berol Yard (planning permission ref: HGY/2017/2044). This application seeks to delete and amend existing conditions and add a condition to ensure that phases 3, 4, and 5 will be severed from HGY/2017/2044 upon implementation of any new planning permission being granted in respect of these phases.

## Strategic planning issues and relevant policies and guidance

12. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Haringey Local Plan: Strategic Policies DPD (2013 with alterations 2017); Haringey Local Plan: Development Management DPD (2017); Haringey Local Plan: Site Allocations DPD (2017); Tottenham Area Action Plan (2016); Tottenham Hale District Centre Framework (2015); and the London Plan 2021.
13. The following are also relevant material considerations:
  - The National Planning Policy Framework (2021) and National Planning Practice Guidance;
  - National Design Guide (2021).
14. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:
  - Good Growth - London Plan;

- Economic development - London Plan; the Mayor's Economic Development Strategy; Employment Action Plan;
- Opportunity Area - London Plan;
- Town centre uses - London Plan;
- Housing - London Plan; Housing SPG; the Mayor's Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG; Housing Design Standards draft LPG;
- Affordable housing - London Plan; Housing SPG; Affordable Housing and Viability SPG; the Mayor's Housing Strategy;
- Retail / Office - London Plan;
- Urban design - London Plan; Character and Context SPG; Public London Charter LPG; Characterisation and Growth Strategy draft LPG; Optimising Site Capacity: A Design-Led Approach draft LPG; Housing SPG; Play and Informal Recreation SPG; Housing Design Standards draft LPG;
- Fire Safety – London Plan; Fire Safety draft LPG;
- Inclusive access - London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG;
- Sustainable development - London Plan; Circular Economy Statements LPG; Whole-life Carbon Assessments LPG; 'Be Seen' Energy Monitoring Guidance LPG; Energy Planning Guidance; Mayor's Environment Strategy;
- Air quality - London Plan; the Mayor's Environment Strategy; Control of dust and emissions during construction and demolition SPG; Air quality positive LPG; Air quality neutral LPG;
- Ambient noise - London Plan; the Mayor's Environment Strategy;
- Transport and parking - London Plan; the Mayor's Transport Strategy;
- Equality - London Plan; the Mayor's Strategy for Equality, Diversity and Inclusion; Planning for Equality and Diversity in London SPG;
- Green Infrastructure - London Plan; the Mayor's Environment Strategy; Preparing Borough Tree and Woodland Strategies SPG; All London Green Grid SPG; Urban Greening Factor LPG;
- On 24 May 2021 a Written Ministerial Statement (WMS) was published in relation to First Homes. To the extent that it is relevant to this particular application, the WMS has been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation. Further information on the WMS and guidance in relation

to how the GLA expect local planning authorities to take the WMS into account in decision making can be found [here](#). (Link to practice note).

## Land use principles

15. The site is within the Lee Valley Opportunity Area (OA). As identified in London Plan Policy SD1 and Table 2.1, the Lea Valley OA has an indicative capacity for 21,000 new homes and 13,000 jobs.

### Commercial and town centre uses

16. The site is partially located within the Tottenham Hale Town Centre. London Plan Policies SD6, SD7, SD8 and SD9 support mixed use development in town centres. Additionally, London Plan Policies E1 and E2 support new office provision and mixed-use development, with the focus on identified geographic areas and town centres; and states that new offices should take into account the need for a range of suitable workspace, including lower cost and affordable workspace.
17. The Site Allocation 'Ashley Rd South Employment Area' (Ref: TH6) envisages the wider site for an employment-led mixed-use quarter north of Tottenham Hale District Centre, with capacity for 444 homes and 15,300sqm of commercial floorspace
18. It is understood that approximately 6,500sqm of non-residential floorspace has been constructed, or is approved, as part of the other consented schemes within the Allocation.
19. The education floorspace of approximately 7,200sqm would no longer be delivered at this site; as the College is no longer coming forward. However, the proposals would include 6,359sqm of non-residential floorspace across the site, including an uplift of approximately 1,800sqm (3,685sqm existing and 5,492sqm proposed) in Berol House compared to that consented. Ground level non-residential uses would provide welcome activation to the public realm. The increase in non-residential uses in Berol House is welcomed in contributing to the Site Allocation aim for a mixed-use quarter. The proposals would deliver significant qualitative improvement in the commercial space on the site; replacing low grade accommodation with high quality units designed to appeal to a range of prospective end users, which is supported.
20. The applicant stated that much of Berol House is vacant and many other tenants are on short-term leases, understood to include below-market rents. The intention is for some tenants to be rehoused in the new Berol House. Details of the relocation strategy should be included in any application.
21. The non-residential uses have been established through the extant permission and these uses remain strongly supported in principle.

### Housing

22. London Plan Policy H1 sets out the requirements for boroughs to achieve the housing supply targets set out in Table 4.1, which identifies a ten-year housing completion target of 15,920 homes for Haringey. Additionally, Policy H1 recommends that boroughs optimise the potential for housing delivery on brownfield sites, especially sites with public transport access levels (PTALs) of 3-6 or which are located within 800 metres of a station or town centre; and housing intensification on low-density sites in commercial, leisure and infrastructure uses.
23. The site comprises a significant development opportunity within the Borough and the proposed residential use on this under-utilised site, partly within a town centre and with very good public transport connections, is supported in principle. The uplift in residential use compared to the consented scheme is also welcomed, subject to resolution of matters raised in this report.

### Summary

24. The development of this brownfield opportunity area site for a high-density, mixed-use development is acceptable in principle.

## **Housing**

### Affordable housing

25. London Plan Policy H4 seeks to maximise affordable housing delivery, with the Mayor setting a strategic target for 50% of all new homes to be genuinely affordable. London Plan Policy H5 states that the threshold level of affordable housing is a minimum of 35%. Schemes can follow the 'fast track' viability route and are not required to submit viability information nor be subject to a late stage viability review if they meet or exceed the relevant threshold level of affordable housing on site without public subsidy; are consistent with the relevant tenure split; meet other relevant policy requirements and obligations to the satisfaction of the Council and the Mayor; and demonstrate that they have taken account of the strategic 50% target and have sought grant to increase the level of affordable housing.
26. London Plan Policy H11 and the Mayor's Affordable Housing and Viability SPG recognises the contribution of Build to Rent in addressing housing needs and increasing housing delivery, and establish a set of requirements for this tenure, which would need to be secured in the section 106 agreement for any permission, including:
  - The homes must be held under a covenant for at least 15 years (apart from affordable units, which must be secured in perpetuity);
  - A clawback mechanism must be put in place to ensure that there is no financial incentive to break the covenant;
  - The units must be self-contained and let separately;



- There must be unified ownership and management of the private and affordable elements of the scheme;
  - Longer tenancies (three years or more) must be available to all tenants with break clauses for tenants;
  - Rent and service charge certainty for the tenancy period on a basis made clear before the tenancy agreement is signed including any annual increases, which should be formula-linked;
  - On-site management;
  - Providers must have a complaints procedure in place and be a member of a recognised ombudsman scheme; and
  - Providers must not charge up-front fees of any kind to tenants or prospective tenants outside of deposits and rent-in-advance.
27. London Plan Policy H11 states that where a Build to Rent development meets these criteria, the affordable housing offer can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably London Living Rent level. DMR homes must be secured in perpetuity. To follow the fast-track viability route, Build to Rent schemes must deliver at least 35% affordable housing, and the Mayor expects at least 30% of DMR homes to be provided at an equivalent rent to London Living Rent, with the remaining 70% at a range of genuinely affordable rents. Schemes must also meet all the other requirements of Policy H5. Further guidance is provided in the Affordable Housing and Viability SPG.
28. The Haringey Local Plan states that 40% affordable housing is the expectation, with a tenure mix of 60% low-cost rent and 40% intermediate. However, the Tottenham AAP confirms that the housing priority in this area is for intermediate accommodation, due to the existing concentration of social housing in Tottenham. A portfolio approach has been used for the planning permissions across the masterplan area, whereby 35% affordable housing has been achieved with a tenure split of 70% intermediate, 30% affordable rent.
29. In terms of the applicant's own portfolio of sites in the masterplan area and planning applications, the applicant stated that 37% affordable housing has been achieved, and a breakdown has subsequently been provided. Within this, the previous consent for the wider site secured 14% affordable housing, which was agreed taking account of the financial burden of the proposed College. It is understood that permission secured viability review mechanisms, including a late-stage review, which should have considered the removal of the College from viability considerations.
30. For the proposal site, 35% (by habitable room) affordable housing is proposed (refer to Table 1), which is welcomed, to be delivered at Discount Market Rent (DMR), of which 30% will be provided as London Living Rent (LLR).

Tenure	Studio	1 Bed	2 Bed	3 Bed	Total
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<b>Private</b>	20	96	228	24	368
<b>DMR</b>	0	0	78	64	142
<b>LLR</b>	0	0	36	24	60
<b>Total</b>	20	96	342	112	530

**Table 1: Total Affordable housing provision by habitable room**

<b>Tenure</b>	<b>Habitable rooms</b>	<b>Overall (%)</b>	<b>Affordable Housing (%)</b>
<b>DMR</b>	142	25	70
<b>LLR</b>	60	11	30
<b>Total</b>	202	36	100

**Table 2: Proposed number of affordable homes per habitable room**

31. The proposal would provide an uplift of 54 affordable homes above the extant planning permission (HYG/2017/2044).
32. Overall, 35% affordable housing is proposed as part of a Build to Rent scheme. The affordable housing would be Discount Market Rent housing, of which, 30% would be at London Living Rent levels and the remaining 70% at Discount Market Rent. With an appropriate tenure split between DMR and LLR the proposal is generally considered to be Fast Track eligible. However, qualification for fast track is subject to the other caveats being met including securing the affordability, and other requirements listed under Policy H11, through the s106. An update will be provided at the Mayor's decision making stage.

## **Urban design**

33. 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.

### Development layout

34. London Plan Policy D3 states that development proposals should provide active frontages and positive relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest. They should encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes and legible entrances to buildings.

35. The existing footprint of Berol House would largely remain unchanged whilst 2 Berol Yard would form a roughly square shape building to the east. This would allow for the creation of the new public space, Berol Square. The new position of Berol Square (compared to the previous permission) allows for the square to be activated by retail frontages and to become a destination point.
36. At pre-application stage, concern was identified regarding the southern footprint of the building which projects out with a 6 storey element, effectively narrowing the green link. The applicant stated that this is intended to mitigate against road noise from Watermead Way; however, this is not acceptable justification and increased planting for such aims it recommended. The route is considered too narrow and would not give the green link the prominence ascribed to it in the masterplan. Although a colonnade is proposed, the 6 storey element would be perceived as the end of the route, with only a narrow uninviting route continuing to Watermead Way.
37. The two buildings would also share an improved pedestrian street, known as Berol Walk, that would enhance the quality of the Green Link.
38. The layout of the residential building has been appropriately designed to maximise dual aspect thereby improving access to daylight and sunlight.

#### Height, scale, and massing

39. London Plan Policy D9 (Part B) states that tall buildings should only be developed in locations identified as suitable in development plans. Part C of Policy D9 also states that tall buildings must address their visual, functional, environmental, and cumulative impacts. Policy D9 further establishes that boroughs should determine where tall buildings are an appropriate form of development in Development Plans.
40. Tall buildings are defined in the Haringey Local Plan: Strategic Policies DPD as being buildings 10 storeys and over. Taller buildings are defined as those that are two to three storeys higher than the prevailing surrounding building heights.
41. Figure 2.2 in Haringey Council's Development Management DPD (July 2017) identifies the site as within the Tottenham Hale Potential Location Appropriate for Tall Buildings, although appropriate heights are not identified. As such, the proposal for a 30-storey (110.5 metre) residential building complies with the locational aspects of Part B of Policy D9. The 7 storey (20.8m) office building would not constitute a tall building.

#### Appropriateness of the site for tall buildings

42. Part C of Policy D9 also sets out requirements for assessing tall buildings, including addressing their visual, functional, environmental, and cumulative impacts.

#### *Visual impacts*

43. The context of the site has changed considerably in recent years as consented developments have been built out, with further sites under construction. The masterplan, as partly built out, clearly steps down from the Argent Related (38 storeys) and Hale Village (34 storeys) towers, both adjacent to the Station.
44. The applicant proposes a building of up to 30 storeys, made up of 5 massing blocks of 6, 18, 25 and two c.30 storey elements, around a central core. The proposed 30 storey elements would clearly be contrary to the masterplan generally reducing height along Watermead Way. Further refinement to the height of this proposal may be required in order to acceptably address the visual impacts of this building.
45. The site does not sit within any protected view corridor and the proposed buildings would not impede short or long range protected views.

#### *Functional impacts*

46. The functional impacts are generally considered acceptable in relation to the internal and external design, building materials as well as the maintenance and building management arrangements. The entrances and exit routes are well defined and the building constructions should not interfere with aviation routes. Lastly, consideration should be given to transport matters raised in the below transport section.

#### *Environmental impacts*

47. The applicant's technical information on microclimatic and environmental aspects is currently undergoing detailed review by the Council in order to assess the local impacts and identify whether additional mitigation measures are necessary to address these. This should include a full review of the potential daylight and sunlight impacts to neighbouring sites.
48. An update will be provided at the Mayor's decision-making stage.

#### *Cumulative impacts*

49. London Plan Policy D9(C) requires development proposals to address the cumulative visual, functional, and environmental impacts of proposed, consented and planned tall buildings in an area. This assessment will be concluded at Stage 2.

#### *Tall buildings conclusion*

50. The proposal is located within an area that is identified as suitable for tall buildings. Whilst the functional impacts are generally acceptable in strategic planning terms, the matters discussed above with respect to visual, environmental and cumulative impacts need to be addressed. A full assessment of Policy D9(C) will be concluded at Stage 2.

### Public realm and landscaping

51. Policy D8 states that development proposals should encourage and explore opportunities to create new public realm where appropriate. Proposals should ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain.
52. The applicant demonstrates consideration of access to public open space across the site, including Berol Square and Berol Walk with associated planting, in accordance with London Plan Policy G4.
53. As discussed above, the provision of the six-storey building would result in the provision of a narrow green link. This would not give the green link the prominence ascribed to it in the masterplan.

### Architectural quality

54. London Plan Policy D3 states that development proposals should be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well.
55. The architectural design of 2 Berol Yard has proposed a materials palette which complements the surrounding context. The use of brickwork incorporating a range of brick colours is generally supported.
56. The three-storey extension to Berol House is considered to be a sympathetic addition to the existing building, through the use of terracotta tiling to provide a cladded façade, with double-glazed windows.

### Fire safety

57. In line with Policy D12 of the London Plan the applicant has submitted a fire safety statement, prepared by a suitably qualified third-party assessor, AESG. This report demonstrates how the development proposal would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. It is noted that the tall residential building would be provided with two staircases. Haringey Council is required to secure the proposed measures within an approved Fire Statement.

### Inclusive access

58. 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 applicant has submitted design and access statement which ensured 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, and meets the requirements of paragraph 3.5.3 of Policy D5.

59. Haringey Council is required to secure the proposed measures with appropriate conditions.

## **Transport**

### Healthy Streets TA and Active Travel Zone (ATZ) Assessment

60. The applicant has provided a Healthy Streets TA and ATZ assessment as part of the submission document. The ATZ assessment has chosen several key routes from the site to an array of locations. However, it is recommended that amendments to the routes which should be carried out. This includes the inclusion of the nursery to the north of the site and exploring potential alternative routes to Cycleway 1.
61. It is also noted that the ATZ assessment has been carried out as a desk-based assessment. This method is no longer accepted and it is requested that this is carried out on site as per TfL guidance.
62. Whilst the ATZ has highlighted some key improvements to the area, further scrutiny is required once the onsite assessment has been carried out. As part of the assessment, the applicant should consider routes to Cycleway 1 and assess whether it these meet the TfL Cycle Route Criteria and consider how the requirements could be met as a link.
63. Further discussions are required to consider the appropriate walking and cycling improvements that should be secured through legal agreement as necessary.

### Vehicle, Pedestrian and Cyclist Access

64. There are several proposed pedestrian access points to the site from Ashley Road and Watermead Way. The application site will link up with proposed Green Link and it will also provide a new access route through Berol House – referred to as Berol Passage. This should be secured with 24hr access via the appropriate mechanism. Vehicular access is gained from Gessner Lane, which is deemed acceptable, but TfL has concerns over the management of this space which is discuss further below.
65. TfL has concerns over cyclist access points and how the site integrates into the wider cycling network. This will be discussed further in the detailed comments to the London Borough of Haringey.

### Trip generation and impact

66. TfL requests that the applicant should conduct link load analysis of Tottenham Hale Station. The cumulative impact of all small-scale developments may cause major impact to the system. It is request that the applicant should

provide the analysis based on NUMBAT 2019 data, with the scenarios of base, base + development and base + development + consented development.

### Safeguarding and Infrastructure Protection

67. The applicant should demonstrate that the relevant consultation and safeguards have been put in place to safeguard adjacent London Underground, TfL Buses and rail infrastructure. It should be show that this is being considered during construction and following completion of the development.

### Car parking

68. The applicant is proposing 7 blue badge parking spaces for 2 Berol Yard, which equates to 6 for the residential element and 1 for the retail element. This is London Plan compliant from the outset. However, the applicant has failed to identify potential future locations, should an additional 7% demand arise. The car parking for this element is located within an undercroft; TfL requests further information on how this is accessed, particularly for the residential space. For Berol House the applicant is proposing 1 blue badge space which is policy compliant.
69. TfL also notes that there are interim parking arrangements as part of the proposal. TfL request further details on this element and in particular the retention of parking spaces. This should be provided via a Parking Design and Management Plan (PDMP) and this should be secured via condition. Furthermore, all future occupants should be exempt from resident and business parking permits, and this should be secured via s106 agreement. Clarification is also sought on the levels of proposed Electric Vehicle Charging Points (EVCP's), which should be provided in accordance with the London Plan minimums.

### Cycle parking

70. TfL has concerns over the quantum and design of the cycle parking. The quantum on the plans appears to be below London Plan minimum requirements. In addition to this, design does not accord with the London Cycle Design Standards (LDCS). Further detailed will be within the borough comments.

### Travel planning

71. The applicant has submitted an outline Framework Travel Plan for the site. Given the location of the site to public transport and potential links to the cycling network, it is considered that the targets should be increased to reflect this. The final travel plan should be secured within the s106 agreement in accordance with London Plan policy T4.

### Servicing

72. The applicant has provided an outline Delivery and Servicing Plan (DSP) which shows all vehicles apart from refuse, servicing the site via two loading bays on Ashley Road and Watermead Way and swept path analysis has been provided.

73. It is noted that the application would result in the creation of a private road, referred to as Gessner Lane. Only refuse vehicles would be able to service the site using the road, however clarification is sought on the management of this space. The final DSP should be secured by planning condition.

### Construction

74. The applicant has provided an Outline Construction Logistics Plan (CLP). The plan should provide construction details including the expected number of trips, vehicle routing, working hours and practices. The applicant should commit to out of peak hours deliveries, particularly given the proximity of the site to Tottenham Hale Station. The applicant should also confirm the nearby bus stop will not be affected and confirm any potential footway closures.
75. The document should be secured by planning condition and TfL and other key London Underground Infrastructure colleagues should be consulted prior to any commencement of works.

## **Sustainable development**

### Energy strategy

76. The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2013 Building Regulations should be met on-site. Only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site a contribution to a carbon offset fund or reductions provided off site can be considered.
77. An energy statement has been submitted with the application. The energy statement does not yet comply with London Plan Policies SI2, SI3 and SI4. The applicant is required to further refine the energy strategy and submit further information to fully comply with London Plan requirements. Full details have been provided to the Council and applicant in a technical memo that should be responded to in full; however outstanding policy requirements include:
- Be Green – demonstration that renewable energy has been maximised, including roof layouts showing the extent of PV provision and details of the proposed air source heat pumps;
  - Be Seen – confirmation of compliance with this element of policy, with compliance to be secured within the S106 agreement;
  - Energy infrastructure – further details on the design of district heating network connection is required, and the future connection to this network must be secured by condition or obligation;
  - Managing heat risk – further details to demonstrate the cooling hierarchy has been followed.



78. For the domestic element, the development is estimated to achieve a 81% reduction in CO2 emissions compared to 2013 Building Regulations. For the non-domestic element, a 46% reduction is expected.

### Whole Life-cycle Carbon

79. In accordance with London Plan Policy SI2 the applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint.
80. The applicant has submitted a whole life-cycle carbon assessment. The WLC assessment does not yet comply with London Plan Policy SI2 and the applicant should review and respond to the accompanying WLC template (to be issued separately).
81. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA [website](#)<sup>1</sup>.

### Circular Economy

82. London Plan Policy D3 requires development proposals to integrate circular economy principles as part of the design process. London Plan Policy SI7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, following the Circular Economy Statements LPG.
83. The Applicant has submitted a Circular Economy Statement which is welcomed. However, it does not appear that the Applicant has submitted the completed GLA CE template.
84. Without the completed GLA CE template, the submission is missing some of the reporting tables. The Applicant should submit the completed GLA CE template in Excel format in line with the requirements of the GLA guidance.
85. Where the Applicant has replicated several of the reporting tables within the written report, comments have been provided based on the information received to date. Please refer to the attached document for detailed comments.
86. It is noted that some narrative in the written report is guided by the previous guidance version (Draft for Consultation, October 2020). The Applicant should update this narrative to reflect the relevant Circular Economy principles per the adopted (March 2022) guidance and its accompanying template and tables.
87. It is welcomed that the Applicant proposes to retain and refurbish the existing building on the site however there is additional information required across a number of areas.

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<sup>1</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>

88. A condition should be secured requiring the applicant to submit a post-construction report. The template and suggested condition wording are available on the GLA [website](#)<sup>2</sup>.

### Digital connectivity

89. A planning condition should be secured requiring the submission of detailed plans demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development in line with London Plan Policy SI6.

## **Environmental issues**

### Urban greening

90. The proposed development presents a well-considered approach to integrating green infrastructure and urban greening. This includes the incorporation of biosolar green roofing which supports multifunctionality, in accordance with Policy G1 of the London Plan. The site forms part of a new green link within the Tottenham Hale District Centre Framework and it is positive to see the proposed design puts this into practice.
91. The applicant has calculated the Urban Greening Factor (UGF) score of the proposed development as 0.35. The Planning Statement sets out that the proposals are an equal mix of residential and commercial, therefore it is considered that this application meets the target set by Policy G5 of the London Plan. This should be treated as a minimum and any improvements to the quality and quantity of urban greening made where possible.
92. The applicant should confirm that there are no existing trees to be removed to facilitate the proposed development. The applicant should also clarify the number of trees proposed.

### Sustainable drainage and flood risk

#### *Flood Risk Management*

93. 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 pluvial, sewer and groundwater flooding, which is considered to be low. The FRA provided for the proposed development generally complies with Policy SI12 of the London Plan.
94. A Flood Warning and Evacuation Plan (FWEP) will need to be prepared (secured by condition) including consideration of the identified risk of reservoir flooding.

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<sup>2</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance>

### *Sustainable Drainage*

95. Paragraph 8.4.8 of the drainage strategy proposes to restrict runoff to 5.7 l/s for the 100-year return period; however, paragraph 8.4.9 states the 'required attenuation to restrict the water flow to 17 l/s'; Microdrainage calculations in Appendix D use a restricted rate of 5.9 l/s. The proposed discharge rate needs to be consistent across the report and calculations. The proposed discharge rate should be restricted to the greenfield QBAR rate for all events up to the 100-year + 40% Climate Change. Correspondence with Thames Water confirming there is capacity to support the proposed flows should also be provided.
96. In terms of SuDS, the drainage strategy proposes green roofs, blue roofs and tree pits, which is welcomed. The strategy states that complexity, economic, and space constraints with the Proposed Development layout do not allow for the implementation of a rainwater harvesting system at the site. This is not considered appropriate justification. Every effort should be made to prioritise rainwater harvesting in line with the London Plan hierarchy.
97. The surface water drainage strategy for the proposed development generally complies with Policy SI13 of the London Plan.

### *Water Efficiency*

98. No water efficiency information has been provided for the proposed development. This is not in line with Policy SI5 of the London Plan.

### Air quality

99. An Air Quality Assessment has been prepared by WSP to accompany the planning application. The report has been reviewed and is of sufficient technical quality. However, the construction dust assessment has incorrectly labelled the magnitude of Trackout as 'large' instead of 'medium' based on 10 HDV outward movements and an unpaved road length of 50-100m. Whilst not correct, it is considered a conservative approach and thus acceptable.
100. The development is air quality neutral (London Plan Policy SI 1 (B) (2a)). The development is compliant with London Plan policies:
  - The development is partially located within an AQFA, and the assessment results and conclusions imply the constraints and impacts on the AQFA have been considered (London Plan Policy SI 1 (B) (2d)).
101. The following conditions are recommended:
  - On-site plant and machinery must comply with the London Non-Road Mobile Machinery (NRMM) Low Emission Zone standards (London Plan Policy SI 1 (D)).
  - Measures to control emissions during the construction phase relevant to a medium risk site should be 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 (London Plan Policy SI 1 (D))

### Biodiversity

102. London Plan Policy G6 states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain. Trading rules should also be satisfied.
103. It is recommended the applicant provide quantitative evidence that the proposed development secures a net biodiversity gain in accordance with Policy G6(D). If biodiversity net gain is not achievable on the site, the applicant should review opportunities for biodiversity offsetting in consultation with the borough.
104. The applicant should prepare an Ecological Management Plan (EMP) to support long-term maintenance and habitat creation. The EMP should be secured by planning condition and approved, if the proposed development is granted planning consent.

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

105. 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**

106. 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

107. There are no financial considerations at this stage.

## Conclusion

108. London Plan policies on office, residential development, affordable housing, design, transport, sustainable development and environment are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

- Land Use Principles: The development of this allocated, brownfield site for a high-density, mixed-use development is acceptable in principle.
- Affordable housing: Overall, the affordable housing offering would comprise 35% Discount Market Rent housing, of which, 30% would be at London Living Rent levels and the remaining 70% at Discount Market Rent. With an appropriate tenure split between DMR and LLR the proposal is generally considered to be Fast Track compliant.
- Urban design: Whilst the site is within a location identified as appropriate for tall buildings, there are some concerns about height, massing, separation distances and width of the green link, which indicates potential over-development.
- Transport: Further information on the strategic transport issues arising from this development will be required to ensure full compliance with the London Plan.
- Sustainable development: Further information on Energy, Whole Life Carbon and Circular Economy is required to ensure full compliance with London Plan requirements.
- Environment: Further information is required on sustainable drainage, air quality and biodiversity.

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