**APPENDIX 2: Internal and External Consultee Response** 

Stakeholder	Question/Comment	Response		
Internal and external	The full consultee responses are set out below this table.	The consultee comments are directly addressed in the body of the report.		
LBH Transportation	This application follows on from an earlier Section 73 application 2023/3078, which was refused at committee. It is a similar natured Section 73 application seeking to vary original conditions from 2018/1897 relating to replacing the requirement of providing a new station entrance and footbridge from Hale Village to Tottenham Hale Station, to instead providing pedestrian and cycle network improvements on Ferry Lane and accessory works. The applicant has updated their public realm and highways proposals and provided further information since the previous application to improve the designs and address concerns discussed at the committee meeting.	Noted.		
	Planning History There is a long and complex planning history with the proposals to make improvements to Tottenham Hale Station, with a number of applications going back to 2013. This is covered in detail in the Planning Committee report for 2023/3078 and will no doubt also be referenced for any future committee for these proposals.			
	Briefly, the overall Tottenham Hale Station improvements package was originally submitted with 2013/2610, a second application making amendments was 2018/1897.			
	After this, TfL communicated that the footbridge connecting Hale Village to the front of the station is no longer practical or viable, for a number of reasons. Their proposals moved to enhancing the walk route that uses Ferry Lane to the front of the station. Considering the walk journeys between Hale Village, the Ferry Lane estate, the retail park, station and town centre, this route would only result in a longer walk for journeys from the centre of Hale Village to Tottenham Hale Station.			
	The Section 73 application in 2023/3078 was supported by planning officers including transportation officers, however, it was refused at planning committee. The member reasons for refusal were that the proposals failed to support Haringey's regeneration and local access to London, and provide the level of improvements to the Tottenham Hale interchange without sufficient mitigation through improvements to pedestrian and cycling infrastructure and road safety,			
	Updated scheme included in this application.  The applicant has made a number of changes from the proposed arrangements submitted in the previous S73 application, to both refine and improve the designs, and to address the concerns raised at committee with the previous s73 application.			
	The changes made all contribute to providing an alternative to the previously proposed footbridge, that provides an improved, safer arrangement and environment for pedestrians and cyclists, buses accessing the bus station, increased personal safety, and alignment with the Council's placemaking objectives.			
	The component parts of the proposed scheme will be commented on below.  A 20 mph speed limit is also to be implemented along Ferry Lane which will being highway			

safety benefits for all.

Features of the updated/revised design

Below is an overview of the physical changes made to the scheme.

- Conversion of the eastbound nearside approach to the bus station junction from a general traffic lane to a bus lane. These eases turning movements for buses and removes the traffic merge close to the bus station junction which provides a safer environment for cyclists heading eastbound.
- Upgrading the western arm of the Ferry Lane/Bus station junction. This will include conversion of the existing pedestrian crossing at the western arm of the bus station junction to a toucan crossing, enabling cyclists to cross safely from north to south and vice versa, and physical amendments to the central island that makes more space for pedestrians and cycles and enables buses to turn out more safely.
- Provision of a new pedestrian crossing adjacent to the station on the east side of the Ferry Lane/Bus station junction. This will provide a safe crossing facility and remove the hazardous practice of pedestrians crossing Ferry Lane informally, where up to 150 people per hour have been recorded crossing.
- Along Ferry Lane east of the railway station, the highway arrangements will change.

The Trief kerbs and safety guardrail arrangements will be moved inwards, as they are required to be retained to provide structural impact protection for the bridge. Moving these allows a reconfiguration of the running lane/footway/cycleway regime.

This will enable provision of wider segregated footways and cycle tracks, which will be physically separated from vehicular running lanes. A 3.5m carriageway running lane width in both directions will be retained, which will provide Highway Network resilience in that a combined 7m road width can accommodate highway incidents and still enable two-way traffic without the need to implement long diversion routes.

1.5m wide segregated cycle lanes will be provided which is an improvement on the existing on carriageway cycle lanes. This width and arrangement accords with the London Cycle Design Standards as produced by TfL, and 1.5m wide segregated lanes can comfortably accommodate twice the current recorded cycle flows.

At the bus stop on the north side of Ferry Lane east of the station, the cycle track will be continuous as part of a bus stop bypass arrangement. The areas of footway adjacent to the cycle lane and the bus island widths will all exceed the November 2024 Bus Stop Bypass Safety Review. The proposed arrangement will be improved compared to the previous proposals and safer.

Segregated footways will also be provided, 2.5m wide to the northern side and 1.85m to the southern side. Pedestrian counts from November 2024 recorded peak pedestrian flows of 1346 on the north footway and 316 to the south.

A Pedestrian Comfort Assessment has been undertaken in accordance with TfL's design tool and comfort levels will improve dramatically, increasing from 'F' on both sides to 'B' on the north side and 'A' on the south side. These improvements result from the relocation of the Trief kerb and handrail and removal of the existing kerb upstand increasing the effective width of the footway enabling improved comfort.

- Amended junction to retail park on the southern side of Ferry Lane. The corner radii will be tightened, and a raised table crossing provided to slow down vehicle manoeuvres and provide a continuous footway level across this junction. This will provide a safer junction and crossing for pedestrians and cyclists.
- The cycle lane offslip on the south side of Ferry Lane approaching the retail park access will be altered so that it comes off the carriageway further on from a pinch point on the south side footway thus increasing pedestrian and cyclist safety.
- The slip feature for westbound cyclists onto the segregated track to the south side of Ferry Lane will be amended to provide a safer arrangement for cyclists adjacent to the bus stop east of the station.
- Public realm signage and wayfinding will be improved, following the Tottenham Hale Strategy, and providing legible London signage. There will be improved

CCTV to improve personal security, and improved street lighting providing both highway safety and personal security improvements.

## Summarv

We have concluded that the proposed design will result in:

- 1) The enhancement of the pedestrian walk routes from the station to the west, east and south of the station by providing wider segregated footways.
- 2) Improve pedestrian safety by providing new and improved crossings.
- 3) Improve cycle safety by providing the benefit of segregated facilities and improved cycle infrastructure.
- 4) Improved cycle safety by providing new cycle bus stop bypass arrangement which is an improvement from the previous proposals and overall, a safer and more supportive environment for active travel modes.
- 5) Maintain the integrity and resilience of the high ways network by providing 3.5m carriageway running lane widths in each direction on Ferry Lane.
- 6) The proposed design will provide improvements to signage and wayfinding, improved CCTV, street lighing which will contribute towards creating an improved, safer environment and connectivity to and from the station and bus interchange and retail park.
- 7) Implementation of the 20mph speed limit on Ferry Lane will further enhance the environment for active travel users and provide highway safety benefits.

The revised scheme submitted with this application is an improvement compared to the earlier Section 73 application. The design has been the subject of an independent Stage 1 road safety audit and will be subjected a Stage 2 road safety audit before implementation. Post implementation the scheme will also be subjected to a Stage 3 road safety audit. The Transportation planning and highways authority have concluded that the design is safe and meets all current highways design guidance and standards.

	Subject to the committee's decision the design will also undergo further engagement and refinement. The transportation planning and Highways authority are supportive of this application	
LBH Design	Section 73 application to vary Conditions 1 and 11 of the approved development (application ref. HGY/2018/1897 which amended the original permission HGY/2013/2610 for changes to the works to extend the operational railway station at Tottenham Hale). The variations are to replace the requirement of providing a new station entrance and footbridge from Hale Village to Tottenham Hale Station, to instead requiring pedestrian and cycle network improvements on Ferry Lane and accessory works.	
	Thank you for asking me for my comments on this application.	
	The approved scheme, which primarily consisted of a new station entrance / ticket hall and new "Access For All" bridge to the platforms, included extending the existing bridge to the east side of the tracks into the entrance square to Hale Village; this would form and be designed as a secondary station entrance, with simple TfL & Network Rail branding, but the whole bridge would have been "outside the gate line" and therefore could have also acted as a public route between the communities either side of the railway, relieving some of the pressure on the narrow footways beside the roadway and cycle lanes over the older existing Ferry Lane road bridge, as well as being an entrance to and exit from the tube and rail stations from east of the tracks.	
	However, unfortunately, regulations on the height of new bridges over overhead rail electrification cables have changed since that planning permission, meaning the bridge as designed in that planning permission would not be compliant. The level change this would require, means that a cunning, economically cost-effective method of securing an eastern entrance to the station and additional pedestrian route across the railway, by reusing and repurposing the existing bridge, is no longer possible.	
	The separate proposal, in the Tottenham AAP and Tottenham Hale District Centre Framework adopted masterplans, for a pedestrian and cycle bridge on the "Green Link", aligned with pedestrianised Chesnut Road, the new east-west pedestrian-priority street between the Argent Related and Berkeley Square developments at Lower Ashley Road, the central green space in Hale Village and the new canal and river bridges in Hale Wharf, is still considered to be planned, and is not directly affected by this application, although the design of that bridge will also be affected by the changes to the overhead line electrification regulations. The recently approved "2 Berol Yard" development will contribute stairs and a lift to that bridge, and it is understood The Council will continue to seek funding sources to complete the bridge over the road and railway separately to this work.	
	This proposal consists solely of road, cycle lane and pavement changes to better accommodate pedestrians and cyclists within the existing street space on Ferry Lane, where is crosses the existing road bridge over the railway and to a short distance either side. In particular, over the bridge, the vehicular space will be shifted south and reduced to the minimum necessary for current traffic, with the current similar width pavements on the quieter south side and busier north rebuilt with a narrower (but still of adequate, standard width) pavement on the south side, wider on the north. New regulation-width cycle lanes will be built, with better segregation from vehicles, in place of continuous fences separating them from pedestrians. West of the bridge,	

there will be a new signalled pedestrian crossing east of the bus station entrance, making it easier and safer for pedestrians on the south side of the bridge to get into the station square. East of the bridge, a new "floating bus stop" will hugely clarify the separate route cyclists should take to both vehicles and pedestrians on the busier north side of Ferry Lane, with lower key changes to improve cycling and pedestrian safety on the quieter south side.

It is valid for Urban Designers to be concerned about the design of the *public realm*, including the design of streets and provision of space within streets for the movement of vehicles, cycles and pedestrians, as well as for more static uses of streets as part of the public ream. This palette of streetscape features, including cycle lanes segregated from vehicles by a high kerb and flexible posts ("wands") and from pedestrians by a further raised continuous kerb, as well as floating bus stops with clear visual separation between pedestrian and cycle space, and very obviously marked pedestrian crossing over the cycle lane, with tactile paving for the visually impaired and clear markings instructing cyclists to stop and give way to pedestrians, are considered urban design best practice, resulting from extensive research and trials, and should be effective at safely accommodating different road users, including vulnerable ones. New street art and "Legible London" wayfinding is promised, including to the bridge parapet wall, which is particularly to be welcomed.

It is comparatively unusual for the design of streets for movement to be subject to a planning application, and therefore to the consideration of the Council's Design Officers within the Planning Service. The detailed technical design of these elements, from a capacity and safety point of view, is properly purely the preserve of the Council's Transportation Planning Officers. But the provision of direct, convenient and legible pedestrian and cycle routes, is a matter of good urban design, and is considered to be achieved in this proposal. Also, from the point of view of attractiveness, elegance, absence of clutter and use of good quality materials, this proposal promises to be a robust, durable, attractive, high-quality design that will improve the appearance and effectiveness of the public realm in this growing, increasingly significant location.

It should be noted that the works to the station to which this is an amendment, which included a superbly designed new station booking hall by renown station architects Landolt and Brown, which does look excellent in some views in its completed state, has nevertheless been disappointingly and frustratingly finished / unfinished as actually built. In particular, the appearance of the wide, spacious, main entrance to the booking hall has been hugely compromised by the late insertion of a door to a rarely used maintenance stair, necessitating the entrance steps being partially replaced by a balustrade, over which station staff normally do not bother to completely open the unsightly, utilitarian, overnight closure gates; and the corridor connecting the booking hall to the access for all bridge, that runs in front of the elegant and distinctive Alsop & Lyall designed café and waiting room, from an earlier station upgrade, has been left incomplete, but with the completed portion built in a considerably clumsier, less transparent form than originally designed. Rail operators, as statutory undertakers, are not generally subject to the same planning controls as other developers over details such as these, but it remains to be hoped that these errors will one day be "cleaned up" so that the main, Station Square frontage to the station can be seen in all the elegant glory its originally approved design could achieve. However, neither the originally approved works to extend the older bridge to an eastern station entrance, nor these alternative streetscape improvements, can be considered to make any difference to the main station building's architectural qualities.

Transport for London.	I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application as submitted. This is a TfL project and any issues will be resolved internally.  This response is made as a Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.	Noted.
Ferry Lane Action Group (FLAG)	Response from FLAG Ferry Lane Action Group We have always supported the original plan for a bridge into the station. But we understand that that is not the current proposal. Whether or not the bridge into the station is built, there are real safety issues for our residents and others using the south side of the railway bridge and we believe these plans go some way to address these.	Signage Broadly both FLAG and HCC want improved signage and we can certainly investigate additional signage at the detailed design stage and this will be linked to conversations with between TfL and LBH as highway authority.
	<ul> <li>We welcome:</li> <li>the new pedestrian crossing which will make it safer for our residents and others to cross in and out of the station.</li> <li>the widened space on the station corner,</li> <li>the wider pedestrian and cycle space on N side</li> <li>the extended 20mph speed limit up to Jarrow Road which we originally suggested.</li> </ul>	Pedestrian protection at bridge The HCC have produced a detailed suggestion to raise the footway/lower the cycle lane however, this option was considered during earlier design development and unfortunately this is not possible due to drainage and loading restrictions on the existing bridge deck.
	the changes to cycle lanes at the retail park.  We understand that there will be better lighting and CCTV which we support.  We remain concerned about cyclists using the pavement, particularly on the South side to go east. We would like to see stronger physical separation between cycles and pedestrians on this stretch, as suggested by Haringey Cycling Campaign.	We also conducted some surveys of pedestrian and cycle use during 3-hour AM and PM peaks and also observed cycles in the footway. Widening the useable combined space of both the cycle lane and footway will provide more space for both pedestrians and cyclists, this combined with clear and visible signage will encourage users to stay within their respective spaces.
	We would like the addition of a condition to any planning permission to ensure there is strong and clear signage on the south side to encourage east-bound cyclists to cross at the crossing and use the cycle lane there, and to stress that they cannot use the pavement. This could be reinforced by saying that CCTV is in use (as we hope it will be). We would like a condition to any planning permission for better signage directing people going to the Wetlands to cross to Ferry Lane south-side by the station to further reduce congestion on the north side.	The point about sub-standard access to the cycle tracks is understandable in as much as this is only one link in what we hope will be a longer segregated route and therefore beyond this section, there may be sub-standard areas, such as Mill Mead Road junction. But if it is specifically about transitions from carriageway to cycle track / shared footway, then TfL believe the proposals conform with LTN1/20 requirements,
	We carried out a cycle survey, details below, which showed that a large number (anecdotally, a majority) of cyclists heading west went through the red lights at the first set. Our concern is that when this becomes a proper pedestrian crossing cyclists will continue to do this and present a danger to pedestrians using the crossing.  We therefore ask that there is a condition attached to any planning permission for strong	particularly after Project Centre made some improvements to the westbound entry into the cycle track.  Separation of cycles and pedestrians at the toucan crossing Regarding the point about the northward link through the island
	signage to discourage this. We also noted a large number of cyclists turning right into the station, sometimes crossing in front of traffic to do so. Cycling routes to and through the station are very unclear and we are disappointed that the proposals do not address this.	site; this isn't shown but nothing TfL have proposed would preclude that link from happening, via shared-use footway.

Haringey Cycle Campaign	clear routes for cyclists into Lane bridge cycle survey  We wanted to know how mutime how much of a problem crossing is installed. We cousplit pavement cyclists into and therefore more dangerous and therefore more dangerous lectric south side heading east lectric, 3 electric, 3 electric, 3 electric, 3 electric, 3 electric scooters  Tues 29 April 10 electric (plus one in bike lane going wrong way!), 7 pedal  Tues 29 April 1 electric (plus one in bike lane going wrong way!), 7 pedal  Tues 29 April 1 electric (plus one in bike lane going wrong way!), 7 pedal  Dear Mr Prosser, Tottenham revised proposals are very veronsultations have been incompleted and although the making two 90 deg. turns, we problem, encouraging unprefor cutting across the lights. Cycle route from the North composed in as a discussed, however strong division. A possible making the risk of pedal strimprovement to this importation. The survey of the particular emphasis on the composed in the	uch of a problem of a cyclists going the station to avoid the cyclists going the station pedal ous.  In the side ding west electric    In the station Plant welcome and we are cluded. In essence ments would great electrosing In our measures with pedestrians, of edictable behavior. The current scheme confirmed in the 20 electric electrosis would keep cyclistic. In conclusion and cycle route, however we note there of the current scheme as a conclusion and cycle route, however we note there contains the cycle route, however we note there cycle route, however we note the cycle route rout	Number of cyclists going through red lights  Number of cyclists going through red lights  9 delivery bikes, 16 others  23 (11 delivery, 12 others)  14  nning Applicate pleased to the HCC support of the island in a main cyclist, such as store also apper 17 Bus Station and the state of the island in a main cyclist, such as store also apper 17 Bus Station and the island in a main cyclist, such as store also apper 17 Bus Station and the island in a main cyclist, such as store also apper 18 bus station and the island in a main cyclist, such as store also apper 19 bus station and the island in a main cyclist, such as store also apper 19 bus station and the island in a main cyclist and the i	note some suggestions made in as the current scheme, however we separation of cycles and onths ago, we urged this to be welcome, the mingling of cycles aroute will continue to be a ying on the wrong side of the road are not to take in to account the in Planning Statement, as the dicate all cycle routes, with my to with flow cycling. Pedestrian pedestrians follows best practice a concern locally over the lack of a tway 60mm above the cycle track, otway more effectively, while still	IffL has provided a detailed explanation in the DAS of why a straight-across crossing would not be desirable or workable on the western arm so it has to stay staggered, on the ground and in time. For that reason, an effectively straight-across cycle crossing in parallel with the pedestrian crossing would not work – cycles would still need to cross in two stages and it would be unsafe for them to believe that they could cross in one. A straight-across, two-stage crossing would need a 5-metre-wide central island and there isn't space for this. As to whether the two parts of the staggered crossing could be separated between pedestrians and cycles, this may be possible but would depend on space and impact because stop lines would need moving well back – we'd need to get views from Network Performance again. Also, this would not solve the admittedly awkward two-ninety-degree-turns problem and it is doubtful the benefits justify it.  If L recognises that the crossing is not optimum but that it would be looked at again once the retail park site comes up for development, and that there's not much to gain at this stage from second-guessing what changes that development might require from the junction.
Network Rail		he applicant will n	eed to obtair	andon Underground Limited and any necessary Asset Protection works	Noted.

GLAAS	No further Comment on the revised scheme.	Noted.				
Local residents objections	Comments are discussed with main report					
Objections Material to Planning	The proposal is not a suitable replacement for the HVLB which should be retained and constructed as part of the approved development, due to the benefits to the community and noting the increase in people living in the area (such as Hale Wharf). Benefits cited include uplift in harmonious living, safety, reducing congested traffic.	Comments are discussed within Section 6 of the Planning Sub- committee report. The proposals have been revised in accordance with feedback from stakeholder's post refusal of the previous S73 application.				
	The Station requires more than one entrance, as it could not otherwise cope with the expansion the plan envisaged.  The initial plan upon which Hale Village and other future developments were approved to go ahead was an enhancement on infrastructure such as the remodelling of the station and construction of a new footbridge between the Hale Village and the Station with an alternative	Existing footpaths along the north side of Ferry Lane will be increased in width, aiding in pedestrian movement and those with disabilities and pushchairs.				
	direct access.  The proposal will not address pedestrian congestion, and may lead to impact on road safety as a result of pedestrians using roadways.	Proposed street works are indicative and will be subject to further development should permission be granted.				
	The existing pedestrian route over the bridge is inadequate at peak times, and for people with disabilities or with pushchairs or the elderly. This is even worse.  The proposed changes to the footpath will not help disabled access, as there will be conflict	TfL have also stated that they will work with key stakeholder groups through the detailed design process				
	between other users (cyclists and pedestrians) and will facilitate more accidents.  Objection to the reduction in width of the southern footpath and cycleway on Ferry Lane Bridge	The Applicant has revised the indicative design and undertaken a Pedestrian Comfort Level Analysis to assess the suitability of the footpath widths proposed,				
		Following these revisions, the proposed northern side of Ferry Lane would deliver a Pedestrian Comfort Level (PCL) of B+ at peak hour flow, whilst the southern footways are stated to deliver pedestrian comfort levels equivalent of 'A'. This is a both a significant increase in the PCL when compared to both the existing situation and an increase above the previously refused proposal.				
	Speed reductions on the road to 20mph should be considered to provide additional safety.	Accepted. Implementation of the 20mph speed limit on Ferry Lane will further enhance the environment for active travel users and provide highway safety benefits.				
	The introduction of a floating bus stop will create conflict between pedestrians and cyclists.	Proposal has been revised in accordance with feedback and TfL Guidance. Revised proposal supported by LBH Transportation				
	Additional lighting should be provided on the bridge.	Additional lighting and Wayfinding to be developed.				
	The proposal does not address the escalating crime activity such as phone thefts that occurs on this footpath/ bridge.	Noted. How the design will respond to crime and promote the prevention of crime will be developed further through the detailed design stage, with the Applicant noting that a key outcome of the final design will be to ensure reduced visibility spots across the bridge will be addressed.				
	Resurfacing of the footpath/ bridge to be provided.	Noted. The footways and cycleways are proposed to be repaved.				
	Another bridge is required, or another such solution if the HVLB is not to be provided.	Improvements to Ferry Lane are proposed to be undertaken in place of the HVLB. TfL are committed to further works should funding become available.				

Objection Non-Material to	The proposed changes should have been done years ago, perhaps funded by development	Noted. Council must however assess the proposal as it is
Planning	that has occurred within the area.	presented.
	Cyclists trying to cross from east to west on Ferry Lane use the northern side of Ferry Lane,	Noted. While this describes an existing circumstance rather
	causing conflict with pedestrians.	than related to the proposed changes, the matter of pedestrian/
		cyclist conflict is noted above.
	Consultation and the meeting with TfL should have been better advertised and extended to	Noted. It is understood that this relates to meetings undertaken
	Bream Close and Hale Wharf.	prior to submission of the proposal.
	People have invested in the area based on the original plan for the Station development,	In the context of planning, a condition of planning permission is
	including the HVLB. Changing this is illegal.	able to be changed via an application under s73 of the Town
		and Country Planning Act 1990.
	National Rail need to take responsibility for underestimating the traffic needs of the station.	Noted. This is outside the scope of the current application.
	The proposal is an attempt to merge two different projects into one, i.e. the Station	Noted. Council must however assess the proposal as it is
	development and the need to refurbish Ferry Lane Bridge that was not part of the original	presented.
	project.	
	Dissatisfaction with the quality of the pavement outside of the current entrance to the Station	Noted. The proposal primarily deals with works along Ferry
		Lane, rather than in front of the current Station entrance.