

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE**1. APPLICATION DETAILS****Reference No:** HGY/2016/1719**Ward:** Tottenham Hale**Address:** Hale Wharf Ferry Lane N17

Proposal: Outline planning permission (for the entire site) for a residential led mixed use development comprising the demolition of existing buildings and structures; the construction of buildings across the site to include residential (up to 505 units) and flexible retail or business uses (Use Classes A1-A5 or B1); pedestrian/cycle footbridges, modification works to the existing vehicular access and associated highway works; refurbishment of existing infrastructure (including provision of an on-site energy centre, if required), landscaping and public realm works; new servicing arrangements; car/cycle parking; and associated and facilitating works.

All matters are reserved for the pedestrian footbridges, Phases 2 and 3 Buildings and detailed permission is sought with no matters reserved for the Phase 1 Buildings. The detailed component of the application (Phase 1 buildings only) comprises the demolition of existing buildings; the construction of buildings ranging from 16 to 21 storeys to accommodate 249 residential units and 307m² (GIA) of flexible retail or business uses (Use Classes A1-A5 or B1); modification works to the existing vehicular access and associated highway works; infrastructure (including provision of an on-site energy centre, if required), landscaping and public realm works; new servicing arrangements; car/cycle parking; and associated and facilitating works.

Applicant: Mr Michael Orr Muse Developments Limited and the Canal and River Trust**Ownership:** Private**Case Officer Contact:** Robbie McNaugher**Site Visit Date:** 21/10/16**Date received:** 07/06/2016 **Last amended date:** 20/10/2016**Drawing number of plans:**Detailed Element

535_02_07_000 PL1 Site Location Plan, 535_02_07_015 PL1 Demolition Plan, 535_02_07_400 PL1 Ground Floor Plan, 535_02_07_400_M PL1 Ground Floor Mezzanine Plan, 535_02_07_401 PL1 First Floor Plan, 535_02_07_402 PL1 Second Floor Plan, 535_02_07_403 PL1 Third Floor Plan, 535_02_07_404 PL1 Fourth Floor

Plan, 535_02_07_405 PL1 Fifth Floor Plan, 535_02_07_406 PL1 Sixth Floor Plan, 535_02_07_407 PL1 Seventh Floor Plan, 535_02_07_408 PL1 Eight Floor Plan, 535_02_07_409 PL1 Ninth Floor Plan, 535_02_07_410 PL1 Tenth Floor Plan, 535_02_07_411 PL1 Eleventh Floor Plan, 535_02_07_412 PL1 Twelfth Floor Plan, 535_02_07_413 PL1 Thirteenth Floor Plan, 535_02_07_414 PL1 Fourteenth Floor Plan, 535_02_07_415 PL1 Fifteenth Floor Plan, 535_02_07_416 PL1 Sixteenth Floor Plan, 535_02_07_417 PL1 Seventeenth Floor Plan, 535_02_07_418 PL1 Eighteenth Floor Plan, 535_02_07_419 PL1 Nineteenth Floor Plan, 535_02_07_420 PL1 Twentieth Floor Plan, 535_02_07_421 PL1 Roof Plan, 535_02_07_450 PL1 Ground Floor Plan Tenure Plan, 535_02_07_451 PL1 First Floor Plan Tenure Plan, 535_02_07_452 PL1 Second Floor Plan Tenure Plan, 535_02_07_453 PL1 Third Floor Plan Tenure Plan, 535_02_07_454 PL1 Fourth Floor Plan Tenure Plan, 535_02_07_455 PL1 Fifth Floor Plan Tenure Plan, 535_02_07_456 PL1 Sixth Floor Plan Tenure Plan, 535_02_07_457 PL1 Seventh Floor Plan Tenure Plan, 535_02_07_458 PL1 Eight Floor Plan Tenure Plan, 535_02_07_459 PL1 Ninth Floor Plan Tenure Plan, 535_02_07_460 PL1 Tenth Floor Plan Tenure Plan, 535_02_07_461 PL1 Eleventh Floor Plan Tenure Plan, 535_02_07_462 PL1 Twelfth Floor Plan Tenure Plan, 535_02_07_463 PL1 Thirteenth Floor Plan Tenure Plan, 535_02_07_464 PL1 Fourteenth Floor Plan Tenure Plan, 535_02_07_465 PL1 Fifteenth Floor Plan Tenure Plan, 535_02_07_466 PL1 Sixteenth Floor Plan Tenure Plan, 535_02_07_467 PL1 Seventeenth Floor Plan Tenure Plan, 535_02_07_468 PL1 Eighteenth Floor Plan Tenure Plan, 535_02_07_469 PL1 Nineteenth Floor Plan Tenure Plan, 535_02_07_470 PL1 Twentieth Floor Plan Tenure Plan, 535_02_07_490 PL1 Alternate Basement Plan General Arrangement, 535_02_07_491 PL1 Alternate Ground Floor Plan General Arrangement, 535_02_07_500 PL1 Proposed Elevations: West General Arrangement, 535_02_07_501 PL1 Proposed Elevations: East General Arrangement; 535_02_07_502 PL1 Proposed Elevations: South General Arrangement, 535_02_07_503 PL1 Proposed Elevations: North General Arrangement, 535_02_06_600 PL1 Proposed Sections: Block A General Arrangement, 535_02_06_601 PL1 Proposed Sections: Block B General Arrangement, 535_02_07_800 PL1 Bay Study 1: Block A Detail, 535_02_07_801 PL1 Bay Study 2: Block A Detail, 535_02_07_802 PL1 Bay Study 3: Block A Detail, 535_02_07_803 PL1 Bay Study 4: Block B Detail, 535_02_07_804 PL1 Bay Study 5: Block B Detail, 435.012 PL1 Landscape Proposal Plan Phase One – General Arrangement, 435.013 PL1 Landscape Proposal Plan Phase One – Interim – General Arrangement, 435.020 PL1 Landscape Masterplan Site Wide Levels, 435.021 PL1 Landscape Proposal Plan Phase One, - Levels and 460.101 PL1 Landscape Proposals Wharfside Detailed Section.

Outline Element

535_02_07_015 PL1 Demolition Plan, 535_02_07_020 PL1 Existing Site Levels Parameter Plan, 535_02_07_021 PL1 Proposed Site Levels Parameter Plan, 535_02_07_022 PL1 Development Zones at Ground Level Parameter Plan, 535_02_07_023 PL1 Development Zones at Upper Levels Parameter Plan, 535_02_07_024 PL1 Building Heights Parameter Plan, 535_02_07_025 PL1 Access and Public Realm Parameter Plan, 535_02_07_026 PL1 Car Parking Parameter Plan, THGL/234 PL1 Hale Wharf Bridge Parameter Plan.

Documents

Development Specification (October 2016); Design and Access Statement (incorporating Design Codes) (May 2016); Planning Statement (May 2016); Affordable Housing Statement (May 2016); Financial Viability Assessment (As updated October 2016); Transport Assessment (May 2016); Framework Travel Plan (May 2016); Delivery and Service Plan (May 2016); Transport Technical Note responding to TfL comments (04-08-16); Transport Technical Note responding to LBH comments (04-08-16); Transport Technical Note (21-09-16); Transport Technical Note (04-08-16); Consultation Statement (May 2016); Sustainability Statement (May 2016); Energy Strategy (May 2016); Hilson Moran Letter on Energy Strategy (08-08-16); Ramboll Memo on Energy and Air Quality (09-08-16); Internal Daylight Assessment Report (May 2016); Outline Site Waste Management Plan (May 2016); Arboricultural Impact Appraisal and Method Statement (May 2016); Habitat Regulation Assessment Screening Report (May 2016); Ecological Planning Response Technical Note (09-09-16); Water Framework Directive Assessment (May 2016); Environmental Statement – Non-Technical Summary, Volume 1 (Main Text), Volume 1A (Townscape and Visual Impact Assessment), Volume 2 (A3 Figures) and Volume 3 (Technical Appendices), Socio-Economic Memo 2 (18-10-16).

1.1 This application has been brought to committee because it is major development which is subject to referral to the Mayor for London.

1.2 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposed use of the northern tip of the site for landscaping purposes represents appropriate development in the Green Belt;
- The proposed net loss of business space and displacement of jobs is considered acceptable within the context of a high quality mixed-use that continues to provide job opportunities, with opportunities for local unemployed people and maximum regeneration benefits being secured by way of planning obligation.
- The scale of development would provide a significant number of new homes that would deliver Tottenham Housing Zone objectives and help to meet the Borough and London's wider future housing needs. The PRS element would provide greater high quality purpose designed new homes with stable management and security for occupants complementing the existing housing offer in the area.
- There would be at least 30% affordable housing based on habitable rooms, which an independent viability assessment has shown to be the maximum amount of affordable housing that the site can currently support and remain viable.

- The proposed mix of residential units is considered appropriate for a high density scheme at an accessible location with a larger number of smaller units but also some larger family units. The proposed residential accommodation would be high quality and meet all the required London Plan Standards and provide on-site the required amount of play space for 0-5 year olds. All the proposed dwellings would meet Building Regulation standard M (4) (2), accessible and adaptable dwellings, which is broadly equivalent to the former 'Lifetime Homes' standard and 10% would meet Regulation 4 (4) (3), wheelchair user dwellings.
- The principle of tall buildings is supported by existing and draft policy, subject to detailed consideration, in particular the impact on the natural environment, sufficiently high design quality, the need to safeguard residential amenity and the need to preserve or enhance the setting of heritage assets. The detailed proposals for Phase 1 achieve this and the proposed buildings are acceptable
- The visual and townscape assessments accompanying the application demonstrate that the scale of proposed development would not have a significant impact on the appearance of the area locally. The proposed design is considered to be high quality which justifies a higher density than recommended in the London Plan guidance. There would be no harm caused to nearby heritage assets.
- The development is in a highly accessible area where restricted car parking provision is acceptable in principle. Subject to the recommended conditions and obligations the proposed car and cycle parking facilities are acceptable and should not lead to additional parking stress in nearby streets. The proposed servicing and delivery arrangements are acceptable. The proposed pedestrian bridges would improve connectivity and access to public transport and would relieve pressure on Ferry lane at peak times. Works to Ferry Lane public highway would be controlled by way of a S278 agreement.
- Subject to a number of mitigation measures being secured by conditions, the proposed development would not have a significant adverse effect on the Blue Ribbon Network or on the Lee Valley SINC, the Lee Valley Special Protection Area or the Walthamstow SSSI. In the longer terms, the proposals would enhance the biodiversity value of the site.
- Having regard to the environmental information (the Environmental Statement and representations made by consultation bodies and others about the environmental effects of the proposed development), the likely significant environmental effects of the proposed, including impact upon local amenity in terms of daylight/sunlight, wind, noise, air quality and traffic impacts have been assessed and subject to the recommended conditions and obligations are considered to be acceptable.

- The level proposed carbon dioxide reductions meet policy requirements and provision is made to connect to an existing Hale Village heat network or provide an on-site communal heating network. The proposal would incorporate SUDs and would not increase flood risk and is considered to be a sustainable design.
- The proposed waste management arrangements are considered acceptable and would be controlled through a planning obligation.
- The proposals are not considered to give rise to any adverse equalities impact upon the protected characteristics of any individual or group.

2. RECOMMENDATION

- 2.1 That the Committee resolve to GRANT the application, taking account of the information set out in the Environmental Statement, and that the Head of Development Management is delegated authority to issue the planning permission subject to the conditions and informatives set out in the Appendices of this report, subject to the prior completion of a Legal Agreement to secure the obligations set out in the Heads of Terms below and subject to referral to the Mayor for London.
- 2.2 That the legal agreement referred to in resolution (2.1) above is to be completed no later than 09/12/2016 or within such extended time as the Head of Development Management or Assistant Director – Planning shall allow;
- 2.3 That, following completion of the agreements referred to in resolution (2.1) within the time period provided for in resolution (2.2) above, planning permission be granted in accordance with the Planning Application subject to the attachment of the conditions
- 2.4 That delegated authority be granted to the AD-Planning / Head of Development Management to make any alterations, additions or deletions to the recommended heads of terms and/or recommended conditions as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chairman (or in their absence the Vice-Chairman) of the Sub-Committee; and
- 2.5 That delegated authority be granted to enter into a section 278 agreements for necessary highways works.

Conditions

The recommended conditions are set out in full in Appendix 7 and are summarised below.

Phase 1 (Detail element) (All Matters submitted)	Phases 1,2 & 3 (Outline element)
<p>A1 Time limit – 3 years A2. Phases A3. Compliance with drawings A4. Commercial unit in Building A A5. Opening Hours (A1 to A5 uses) A6. Ventilation (A3 to A5 uses) A7. Shop fronts A8. Detailed Drawings & External Materials (Buildings) A9. Landscaping, Public Realm & Public Art A10. Temporary car parking A11. Open Space Management & Maintenance Plan A12. Flood Risk & Finished Floor Levels A13. Access Ramps A14. River Walls A15. Access to Pymmes Brook A16. Victoria Line Protection A17. Delivery & Servicing Plan A18. Cycle Parking A19. Noise – Fixed Plant A20. Noise & Vibration – Internal Residential Environment A21. External Lighting A22. Sustainability Standards Non-residential A23. Accessible & Adaptable Dwellings A24. Wheelchair User Dwellings A25. Secured by Design A26. Air quality - Boilers A27. Air quality – CHP A28. Surface Water Drainage A29. Biodiversity Enhancement Plan A30. Contaminated Land 1 A31. Contaminated Land 2 A32. Piling Method Statement – Excluded Works</p>	<p>B1. Time limit – <ul style="list-style-type: none"> • Approval of Reserved Matters - 5 years • Beginning development – 7 years B2. Phases B3. Compliance with Documents/ Drawings B4. Reserved Matters B5. Public Art B6. Open Space Management & Maintenance Plan B7. Bridges Management & Maintenance Plan B8. Managing Privacy & Overlooking B9. Productive Roofs B10. Overheating B11. Flood Risk & Finished Floor Levels B12. Access Ramps B13. River walls B14. Access to Pymmes Brook B15. External lighting B16. Accessible & Adaptable Dwellings B17 Wheelchair User Dwellings B18. Sustainability Standards – Non-residential B19. Surface Water Drainage B20. Biodiversity Enhancement Plan B21. Delivery and Servicing Plan B22. Contaminated Land 1 B23. Contaminated Land 2 B24. Piling Method Statement – Excluded Works B25. Piling Method Statement B26. CEMP – Excluded Works B27. CEMP B28. Management and Control of Dust</p>

A33. Piling Method Statement A34. CEMP – Excluded Works A35. CEMP A36. Management and Control of Dust A37. Feasibility Study – Use of Waterways A38. Construction Logistics Plan A39. Protection of Trees A40. Site Waste Management Plan A41. Archaeology A42. Architect Retention	B29. Construction Logistics Plan B30. Protection of Trees B31. Site Waste Management Plan B32. Archaeology
Informatives	
1) Co-operation 2) CIL liable 3) Hours of construction 4) Street Numbering 5) Sprinklers 6) Surface water drainage 7) Thames water – Groundwater Risk Management Permit 8) Thames Water – Fat Traps 9) Thames Water – Trade Effluent Consent 10) Thames Water - Water Pressure 11) CRT – Code of Practice 12) CRT – Encroachment 13) CRT – Surface Water Discharge 14) Asbestos survey	

Section 106 Heads of Terms:

1. Affordable Housing
 - a. Minimum 30% Affordable Housing and up to 35% Affordable Housing by habitable room (subject to viability) in Phase 2
 - b. Tenure split of 23:77 Affordable Rent: Intermediate Shared Ownership (for 30% affordable housing offer)
 - c. Rent levels for Affordable Rent to be:
 - i. 1-bed up to 80% market rent or Local Housing Allowance (LHA)
 - ii. 2-bed up to 65% market rent or LHA
 - iii. 3-beds up to 55% market rent or LHA
 - iv. Any 4+ beds up to 45% market rent or LHA
 - v.
2. Private Rented Sector (PRS) Housing
 - a. Minimum 15 year covenant
 - b. Provide in accordance with approved PRS marketing scheme
3. Local labour and training during construction to achieve:
 - i. 20% local labour during construction
 - ii. Provision of basic training to local labour

- iii. 25% of local labour to be full time apprenticeships
 - iv. Assistance for local suppliers and businesses to tender for work
 - v. Provision of opportunities for unemployed and economically inactive residents in work placements and priority groups
 - vi. No fewer than 5 career education workshops
 - vii. work with the Council, the Haringey 6th Form College to provide training and employment opportunities
- 4. Local labour scheme management contribution (£30,000) (Upon commencement of Phase 1 Excluded Works)
- 5. Transport
 - a. Traffic Management Order amendment to prevent future residents from applying for a parking permit in any future Controlled Parking Zone (£1,000) (Upon first occupation of dwellings in Phase 1)
 - b. Car Club provision (2 spaces)
 - c. 3 years Car Club membership and annual £50 credit for all households
 - d. Travel Plan
 - e. Travel Plan monitoring costs (£3,000) (Upon first occupation of dwellings in Phase 1)
 - f. Parking enforcement/management in nearby streets (£6,000) (Upon first occupation of dwellings in Phase 1)
 - g. Waste Management Plan
 - h. Parking Management Plan
 - i. TfL bus contribution (£50,000) (Upon first occupation of dwellings in Phase 1)
 - j. Toucan/Tiger crossing on Ferry Lane
- 6. Bridge provision –
 - a. In the event that District Wide CCHP is provided by the Hale Village Energy network then the Hale Village Green Link Bridge (HVGLB) (Bridge 1) and Bridge 2 shall be delivered prior to first occupation of Phase 1.
 - b. In the event that energy is delivered by on-site plant, the HVGLB and Bridge 2 shall be delivered prior to the first occupation of Phase 2 or 3.
 - c. Planning application to made for the Paddock Bridge prior to, or simultaneous with, the application for reserved matters for Phase 3.
 - d. Delivery of the Paddock Bridge before the occupation of the final unit in Phase 3.
 - e. Management and maintenance of the Bridges
- 7. Improvements to The Paddock (£500,000) (£250,000 prior to first occupation of Phase 1, £250,000 prior to the first occupation of dwellings in Phase 2).
- 8. Energy -
 - a. Updated Energy Strategy Report (to include a Community Energy Plan) to be approved by the LPA in advance of the main works in Phase 1 starting;
 - b. Use of all reasonable endeavours to connect Phases 1, 2 and 3 to the Hale Village Energy Centre (Community Energy Option 1)

- c. If Community Energy Option1 is confirmed as feasible and practicable, Lean (energy efficiency) measures shall be maximised and the following details shall be set out for approval:
 - i. The CO2 reduction to be delivered by connecting to the Hale Village Network
 - ii. The confirmed route of pipe work to connect to Hale Wharf from Hale Village if different from the HVGLB;
 - iii. Confirmation of the route of the pipe work to enable connection neighbouring and future development sites;
 - iv. The route of the pipe work across the site;
 - v. The Energy Centre requirements in Block A;
 - vi. The agreed operational practises across the site; and
 - vii. The carbon factor of the heat across the heat network
 - d. If the LPA accepts that Community Energy Option 1 is not feasible and practicable and approves Community Energy Option 2 (an on-site Energy Centre that serves Phases 1,2 and 3), the following details shall be set out for approval:
 - i. How the Energy Centre provides heating loads for Phases 2 and 3;
 - ii. Confirmation energy system will be CHP- led, with boiler back up;
 - iii. Schematic diagram of the plant room with all its requirements;
 - iv. How the Energy Centre enables future strategic connections to be made to adjoining sites;
 - v. The operating systems and the agreed operational practises across the Hale Wharf site ensuring that residents are protected and the system is designed to be efficient;
 - vi. Consideration of incorporating renewable technologies (e.g. Water Source Heat Pumps); and
 - vii. The carbon factors of heat.
 - e. Any shortfall in carbon savings below 35% reduction beyond Building Regulations 2010 (as amended 2013) to be offset at £1,800 per tonne
 - f. Overheating Mitigation Plan for each phase to be submitted and approved by the LPA in advance of the main works commencing
9. Block K
- a. Building shall be actively marketed as B1 from the commencement of development (details of which shall be provided to the Council for information).
 - b. Prior to the implementation of Phase 2, the Developer shall confirm which use it intends to take forward in Block K. Residential use can only be proposed if it has been demonstrated to the Council's satisfaction that there is insufficient demand for B1 having regard to the marketing undertaken.
10. Approval of Phasing Plan
11. Registration with Considerate Contractor Scheme
- 12.
13. Entering in to a s278 Agreement to manage works to Ferry Lane

14. Monitoring costs up to 5% of total contributions (Upon completion of the Agreement)

2.6 That, in the absence of the agreement referred to in resolution (2.1) above being completed within the time period provided for in resolution (2.2) above, the planning permission be refused for the following reasons:

1. The proposed development in the absence of a legal agreement securing the provision of on-site affordable housing would have a detrimental impact on the provision of much required affordable housing stock within the Borough and would set an undesirable precedent for future similar planning applications. As such, the proposal is contrary to policy SP2 'Housing' of the Council's Local Plan March 2013 and Policy 3.12 (Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes) of the London Plan.
2. In the absence of a legal agreement to manage the provision of Private Rented Sector housing there would be insufficient clarity on the role that this housing would play in helping to meet local housing need.
3. In the absence of an agreement to work with the Haringey Employment Delivery Partnership the proposal would fail to support local employment, regeneration and address local unemployment by facilitating training opportunities for the local population contrary to Local Plan Policies SP8 and SP9.
4. In the absence of planning obligations to secure mitigation measures to promote sustainable transport, service and delivery plans, and a parking management plan the proposed development by reason of its lack of car parking provision would significantly exacerbate pressure on on-street parking spaces in surrounding streets, prejudicing the free flow of traffic and conditions of general safety along the neighbouring highway and would be detrimental to the amenities of local residents. As such the proposal is considered contrary to the requirements of Policy 6.13 of the London Plan 2015, Saved Policies UD3, HSG11 and M10 of the Haringey Unitary Development Plan 2006.
5. In the absence of sufficient energy efficiency measures, extension of the existing Decentralised Energy Network or provision of an alternative on-site communal heating network and/or financial contribution towards carbon offsetting the proposal would result in an unacceptable level of carbon dioxide emissions. As such, the proposal would be contrary to London Plan Policy 5.2 and Local Plan Policy SP4.

2.7 In the event that the Planning Application is refused for the reasons set out in resolution (2.5) above, the Head of Development Management (or Assistant Director – Planning in consultation with the Chair of Planning sub-committee) is

hereby authorised to approve any further application for planning permission which duplicates the Planning Application provided that:

(i) There has not been any material change in circumstances in the relevant planning considerations, and

(ii) The further application for planning permission is submitted to and approved by the Assistant Director within a period of not more than 12 months from the date of the said refusal, and

(iii) The relevant parties shall have previously entered into the agreement contemplated in resolution (1) above to secure the obligations specified therein.

2.8 In the event that members choose to make a decision contrary to officers' recommendation members will need to state their reasons.

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APPENDICES:

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- Appendix 6: Planning Committee Pre-application
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3.0 PROPOSED DEVELOPMENT AND LOCATION DETAILS

3.1 Proposed development

This application is for the demolition of all of the existing buildings on the site and redevelopment to provide a residential-led mixed use development for the provision of up to 505 residential units and up to 1,607sqm of non-residential floorspace (although not together), as well as pedestrian footbridges, landscaping and public open space, car/cycle parking and associated works.

This is a 'hybrid' planning application, with all matters reserved for the outline component. The site is divided in to 11 blocks across three phases as follows:

- Phase 1 (southern part of the site nearest to Ferry Lane) – Detailed permission is sought for two buildings (Blocks A and B) comprising 249 new homes and outline permission is sought for two pedestrian bridges: (1) Hale Village Green Link Bridge - over Pymmes Brook and the River Lee Navigation, linking Mill Mead Road and the site and (2) ;Pymmes Brook Bridge - over Pymmes Brook, linking Mill Mead Road and the central towpath
- Phase 2 (north-western part of the site, next to the River Lee Navigation) – outline permission is sought for five buildings (Blocks C to G). This phase includes retained mooring facilities and car parking and servicing for the existing business barges; and
- Phase 3 (north-eastern part of the site, next to the Flood Relief Channel) – outline permission is sought for four buildings (Blocks H to K).

Phase 1

Vehicular and pedestrian access to the whole site would be from Ferry Lane, slightly to the west (closer to Tottenham Lock) than the existing access. Block A would front Ferry Lane (albeit set back by approximately 8m). The ground floor would include a commercial unit on the Ferry Lane frontage with a residential lobby area, cycle parking and refuse store and plant located further in to the site. The building would comprise a shallow 8-storey element (approx. 40m AOD) next to Ferry Lane, with the majority of the building rising to 21-storeys (approx. 84.1m AOD). The building would include 141 x flats for sale (a mix of studio, 1, 2, and 3-bed).

Block A would be a brick-clad building. The 4m high ground floor elevations would include glazed windows for the commercial unit and residential lobby area and timber screens for the cycle stores and plant areas. The upper floors would include recessed brick panels and aluminium panels and windows, recessed 'blind' windows, protruding metal balconies and a distinctive pitched zinc clad roof profile.

Block B, to the north, would be similar in design and incorporate a residential estate office at the southern end and a commercial unit at the northern end of the ground floor, with a residential lobby and cycle parking and plant areas in between. The building

would comprise 11-storey (approx. 48.7m AOD) and 16-storey (approx. 62.73m AOD) elements. The building would include 108 x flats for market rent (PRS) (a mix of studio, 1, 2, and 3-bed).

A total of 25 surface level car parking spaces (initially reserved for wheelchair accessible units) and 2 surface level car club spaces would be provided for Phase 1. Cycle parking for the new homes would be provided in ground floor store areas, with cycle parking for non-residential uses being in public realm areas. During the construction of Phases 2 and 3, a temporary car parking area of 25 spaces would be provided immediately to the north and west of Block B to cater for people living in Blocks A and B.

The parameter plans set minimum and maximum footprints and heights for the proposed bridge and associated structures, together with minimum clearance heights, and the Hale Wharf Bridge allows for a heat network pipe to be hung underneath.

It should be noted that whilst the applicant anticipates that the scheme would be connected to the off-site energy centre in Hale Village, an alternative option is proposed for on-site CHP provision to be made in the basement of Block A. To facilitate this possibility, alternative Ground Floor and Basement Plans for Building A have been submitted for approval.

Phases 2 and 3

The parameter plans for the outline component set site levels, minimum and maximum building footprints/upper floor horizontal limits, maximum building heights, together with parameters for access and public realm and car parking (allowing for both on-street parking and parking courts). These are supported by a Design Code that adds a further level of detail to inform the detailed design of buildings and spaces, which would be approved under Reserved Matters procedures.

An Illustrative Masterplan has been submitted to show one way in which the proposed parameters and Design Code principles could be implemented. This shows buildings ranging in height from 4-storeys (approx. 23.5m AOD) to the north east of the site in Phase 3, to 9-storeys (approx. 46.1m AOD) to the south-west of the site, In Phase 2.

The illustrative scheme assumes that Block K (in Phase 3) accommodates 1,100sqm of commercial office (B1) space. However, if at the time of implementing Phase 3 of the development there is no demonstrable demand for this use, the building would be built as housing.

A total of 25 surface level residential car parking spaces and 6 surface level businesses spaces (for the business barges) are proposed for these phases and cycle parking would be provided within buildings/the public realm to meet minimum standards.

Table 1: Summary

Use	Detailed component (Blocks A & B) Dwellings/sqm)	Outline component (Blocks C to K) Dwellings/sqm)	Total maximum Dwellings/sqm)
Residential	249	Up to 256	Up to 505
Retail (A1/A2/A3/A4/A5)	170sqm	200sqm	370sqm
Office (B1)	137sqm (site management office)	Min = 0 Max = 1,100sqm	Min = 137sqm Max = 1,237sqm

3.2 Site and Surroundings

The application site is located off the A503 Ferry Road at Tottenham Hale and comprises land bound by the River Lee Navigation Channel to the west and the River Lee Flood Relief Channel to the east. The application site measures approximately 2.28 hectares.

There are currently multiple light industrial units on the eastern part of the application site, including motor vehicle workshops, a waste transfer site, a pallet company and a wood joinery facility. At the southern end of the application site, there is an existing commercial office building, a restaurant and an electricity substation. Mooring of boats takes place along the western boundary, either on the bank or a jetty, which is accessible from the centre of the site. A footpath runs along the western boundary of the application site until it reaches the land occupied by the pallet company to the north. Temporary fencing separates the footpath from a series of car parking spaces used for either vehicles for repair associated with the motor vehicle workshops or porta cabins for the waste transfer site. The surface covering of the application site is predominantly hardstanding.

Road access is from the A503 Ferry Lane at the southern end of the application site. Public transport links include Tottenham Hale Station, approximately 300 m west, and bus stops on Ferry Lane opposite the application site. The southern part of the site has a high Public Transport Accessibility Level (PTAL) rating of 6A reducing to 5 to the north.

The application site is surrounded by the controlled waters of the River Lee Navigation Channel to the west and the River Lee Flood Relief Channel to the east, which form part of the Blue Ribbon network under the London Plan. In addition, the application site and its surrounding areas form part of the Lee Valley Regional Park. The Paddock, a Community Nature Park and area of Green Belt, is located to the east of the application site across the River Lee Flood Relief Channel. The Paddock and the River Lee channels to the east and west of the application site form part of a large composite Metropolitan Site of Importance for Nature Conservation (SINC). The associated areas to the SINC also include Walthamstow Marshes and Reservoirs, located within

approximately 15 m to the east of the application site across the flood relief channel from its closest point. These form part of the Lee Valley Special Protection Area (SPA), Ramsar site, Important Bird Area and Walthamstow Reservoirs Site of Special Scientific Interest (SSSI).

The site is within the London Plan Upper Lee Valley Opportunity Area and Strategic Cultural Area (Lee Valley Regional Park) and is also within the Tottenham Housing Zone.

The adopted Haringey Local Plan (March 2013) identifies the site as being within the Tottenham Hale Growth Area (SP1 Managing Growth) and allocates it as a Local Employment Area - Regeneration Area (SP8 Employment) (LEA7), that seeks to protect light industrial uses but allow uses appropriate in a mixed-use development, such as small scale “walk-to” retail, community and residential use. The site is also within an Area of Archaeological Importance (SP12 Conservation) and the Lee Valley Regional Park (SP13 Open Space and Biodiversity) and is partly within a SINC Metropolitan Importance, Ecological Corridor, the Blue Ribbon Network and the Green Belt (SP13).

Consultation on the pre-submission draft of the Tottenham Area Action Plan (AAP) closed in March 2016 and the Examination in Public in to this and other emerging Local Plans took place in August and September 2016. The emerging AAP identifies the site as a Local Employment Area Regeneration (Policy AAP4 Employment) and includes a specific site allocation for the site and adjoining “Paddock” (Site TH9). This proposed allocation includes a number of specific Site Requirements and Development Guidelines which are set out in detail in Section 6.

Other key relevant designations on the emerging LPSP Policies Map include Tottenham Hale Growth Area, Tottenham Hale Neighbourhood Area, Area of Archaeological Importance, Archaeological Priority Area, Lee Valley Regional Park. The site is also partially within a proposed SINC Metropolitan Importance, Ecological Corridor, the Blue Ribbon Network and the Green Belt.

3.4 Relevant Planning and Enforcement history

- An EIA Scoping Opinion has been provided under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 reference HGY/2016/0096
- An EIA Screening Opinion has been provided under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 reference HGY/2014/2689 stating that an EIA is required.
- HGY/2006/1741 GTD 30-10-06 Provision of 4 x business barges with associated mooring facilities, landscaping and associated parking.

- HGY/2007/1400 GTD 03-09-07 Construction of a new footbridge across the River Lee Navigation and a 'green' bridge across Pymmes Brook and associated landscaping.

4. CONSULTATION RESPONSE

4.1 Planning Committee Pre-application: pre-application briefing was held on the 28th January 2016.

4.1.1 The notes of the meeting are set out in appendix 6.

4.2 Haringey Quality Review Panel has considered the proposals as a whole on three separate occasions (18 November 2015, 20 January 2016 and 22 June 2016). It also considered the proposed bridges at a separate meeting on 27 April 2016.

4.2.1 The minutes of the meeting are set out in appendix 3 and summarised as follows:

Overall Scheme

4.2.2 *The Quality Review Panel feels that the scheme has responded well to the feedback from the previous review meetings. Whilst they acknowledge that the development may be controversial, they offer their support for the proposals. It is a big scheme, and in this respect, the panel strongly highlights that the quality of design detailing and specification of materials will be critical in ensuring that Hale Wharf reaches its potential as an interesting place to be, and a good neighbourhood to live in. The detailed design of the ground floor is also of fundamental importance; the extent of cycle storage limits the scope for ground level active uses. Careful thought will be needed to address this issue.*

The Bridges

4.2.4 *The Quality Review Panel find much to admire in the emerging proposals for the Hale Wharf Bridges. However, they caution against the use of outline planning approval for the bridges. Achieving the high quality promised by the current drawings will require continued skill and care in the construction detailing. The panel would therefore strongly encourage the detailed design phase of the bridges to be brought forward, to align with the main Hale Wharf development programme, enabling detailed planning applications for the western bridges. Critical elements such as the sectional details of the bridge and the management of lighting at the crossing points should be controlled by the permission, in order to ensure a high-quality outcome. The paddock bridge (to the east of Hale Wharf) may be acceptable as an outline application, establishing the principle of the crossing, and safeguarding the landing point.*

4.2.5 *The panel supports the emerging architectural expression and palette of materials within the bridge designs. They feel that this location requires bespoke*

detailing and construction, to ensure that the bridges are distinctive, high quality and enhance the special nature of the setting. An off-the-peg solution is not appropriate. The panel would welcome the opportunity to comment on the detailed design of the bridges.

4.3 Haringey Development Management Forum was held on 9 March 2016

4.3.1 The notes of the meeting are set out in appendix 4 and summarised as follows:

- Queries over rationale for low buildings in the south and taller buildings in the north
- Concerns at the two proposed tall buildings and queries over whether the massing strategy could be changed
- Proposed high density would have a negative impact on the environment
- Queries and concern about affordable housing (type and amount) and the implications of 'starter homes'
- Concern that the proposed non-residential units may not be occupied
- Queries about children play facilities
- Queries over proposed levels of car parking and impact on surrounding area
- Need for additional medical facilities
- Queries over GLA funding and CRT profits
- Queries over pedestrian links with Tottenham Hale Station
- Proposed bridge design is unacceptable
- Queries over the length of the construction period and possible impacts.

4.4 The following were consulted regarding the application:

Internal

LBH Arboricultural
LBH Building Control
LBH Conservation Officer
LBH Economic Regeneration
LBH EHS - Pollution Air Quality Contaminated Land
LBH EHS - Noise
LBH Emergency Planning and Business Continuity
LBH Flood and Surface Water
LBH Housing Design & Major Projects
LBH Nature Conservation
LBH Parks Head of Leisure
LBH Tottenham Team
LBH Transportation
LBH Waste management

External

Arriva London

Canals and Rivers Trust
Designing Out Crime Officer
Environment Agency
Greater London Archaeology Advisory Service
Greater London Authority
Historic England
Lee Valley Regional Park Authority
London Fire Brigade
London Underground
London Wildlife Trust
National Grid Property
Natural England
Thames Water Utilities,
Transport for London Road Network Area Manager

Neighbouring Boroughs:

L.B. Enfield
L.B. Hackney
L.B. Waltham Forest

Local Groups

Ferry Lane Action Group
Ferry Lane Estate Residents
Friends of The Earth
Friends of Tottenham Marshes

The responses are set out in full in Appendix One and are summarised as follows:

Internal:

1) Arboricultural

Re-development of the site would have minimal impact on existing tree cover – with two trees proposed to be removed. No objection subject to conditions to ensure trees to be retained are adequately protected during the demolition/construction phase.

2) Building Control

No comments received.

3) Heritage Conservation Officer

The scale of development is such that it is likely to have some impact on the Tottenham High Road historic corridor and the listed Markfield Beam Engine.

However, given the distance of the buildings, the impact is likely to be very low and would not be considered as harm. The proposal would be considered acceptable from a conservation point of view.

4) Economic Regeneration

Supportive of the proposed development which will retain the same level of employment but with a smaller floorspace provided this comes forward in subsequent phases. The Haringey Employment & Recruitment Partnership (HERP) will support the applicant in addressing the deficit of construction workers in the Borough. Request for £30,000 contribution towards HERP.

5) EHS - Pollution Air Quality Contaminated Land

Concerns over the submitted Air Quality Neutral Assessment have been addressed by clarifications received from the Applicant. No objections subject to conditions in relation to the specification of Combined Heat and Power (CHP) plant, the use of Ultra Low NOx boilers and standard conditions requiring remediation strategy for contaminated land and piling methodology, control of dust and fumes and confirmation of Non-Road Mobile Machinery during the demolition/ construction phase.

6) EHS – Noise

No comments received.

7) Carbon Management Team

Planning conditions/obligations are needed to secure the proposed energy efficiency measures and avoid overheating of proposed dwellings. The priority is to connect the site to the existing Hale Village Energy Centre and allow for further extension of this Decentralised Energy network to adjoining sites and deliver the estimated carbon savings. If it is demonstrated that this is not possible, then the alternative on-site energy centre should serve the whole development and deliver similar carbon savings. Opportunities for on-site renewable energy technologies should be pursued further and provided where possible. In all cases, if the estimated carbon savings cannot be fully delivered by on site measures, any shortfall should be offset by financial contributions towards the offset fund.

8) Emergency Planning and Business Continuity

Satisfied that the Applicant has taken sufficient account of flood risk and provided assurances about the resilience of the development.

9) Flood and Surface Water

Satisfied with the concept design and associated calculations for flow and volume. Need to see full calculations (including buoyancy) for the proposed below ground tanks and receive clarity discharge against a potentially surcharged system.

10) Housing Design & Major Projects

No comments received

11) Nature Conservation

LB Redbridge Nature Conservation Ranger Team commissioned to provide advice. Proposals acceptable subject to conditions addressing the following:

- Monitoring during construction – including Ecological Clerk of Works
- Confirmation that sheet piling for Block A takes place within June to August
- Air quality/dust and noise monitoring stations extended to the north, east and south of the site
- Bird counts during demolition/construction phase
- External lighting details to be approved before works start
- Details of integrated bat and bird boxes on all buildings to be approved before works start
- Details of floating habitat rafts to be approved before works start
- Details of grounds maintenance specification and management plan to be approved prior to commencement
- Independent post-construction report to be made at the end of each phase of construction activities
- All collected data on dust/air quality, noise, light and wildlife records to be made available to the LPA.

12) LBH Head of Direct Services (Parks)

The Council faces a real challenge of additional pressures on green spaces due to the increase in number of homes being proposed in the borough. Seeks financial contributions of between £500,000 and £625,000 towards the improvement of The Paddock – in lieu of direct provision of the required amount of open space on the site itself.

13) LBH Tottenham Team

No comments received.

14) LBH Transportation

The site is proposed as essentially a car free site, it has a High PTAL and this will improve upon opening of the HVGLB footbridge connecting to the Hale Village development. Cycle parking is to be provided to accord with London Plan requirements. Sustainable transport provision for this development would include cycle parking, car club provision, new footbridge connections and a Travel Plan.

In principle this application should be acceptable in Transportation terms, however there are a number of issues that require further work and resolution prior to Transportation being able to fully endorse the application. These include;

- Car Parking – secure migration for potential increases in on-street car parking pressures.
- Cycle Parking – the proposed provision needs to be revisited to increase the provision of Horizontal cycle parking and to ensure appropriate provision is made for each block (this can be secured by condition).
- Delivery and Servicing arrangements – iterations to the public realm/road/footway layouts are referred to in the application to provide a more appropriate arrangement for service vehicle parking on the site.

Following S106 obligations are appropriate;

- Car Club provision (two years membership per residential unit and driving credit, and provision of two bays/cars within the development including one for Phase 1)
- Provision of Toucan/Tiger crossing of Ferry Lane to replace the existing Zebra crossing east of the site access
- Travel Plan (revised as required in this response and structured for the staggered occupation of the development)
- Future permit free status in the event of a formal CPZ being implemented in the locality
- Possible parking mitigation measures (depending on further work to look at overspill parking potential)
- Highway changes for new site access (to be covered by S278)

Following should be secured by condition;

- Car Parking Management Plan
- Delivery and Servicing Plan
- Cycle Parking arrangements (to include scaled layout drawings and manufacturer's details/specifications)
- Detailed Highway design for site access
- Provision of Electric Vehicle Charging Points
- Construction Logistics Plan (phased for build out in the stages)

15)LBH Parking Schemes Manager

Planned introduction of Controlled Parking Zones in Bruce Grove and St. Ann's in 2016/17 would be likely to increase parking pressure in Jarrow Road and other

nearby uncontrolled roads. Need funding to introduce parking controls in this area – seeking financial contribution of £42,000.

16)LBH Waste management

Some detailed issues raised, but the application has been given a RAG traffic light status of GREEN for waste storage and collection.

External:

17)Arriva London

No comments received

18)Canals and Rivers Trust

In addition to being joint Applicant, the Canals and River Trust is the navigation authority and has a number of responsibilities. It has responded as a statutory consultee. The Trust raises no objection to the proposals (including the bridges that would go over the three waterways. It does, however, request that planning conditions are attached reserving details of a temporary surface water discharge scheme and the requirement for a feasibility study into the use of waterborne freight during the demolition and construction phase. It also supports the use of 'bat friendly' lighting.

19)Designing Out Crime Officer

Earlier concerns over the adequacy of proposed boundary treatment at the rear of homes and proposed lighting of bridges have been satisfactorily addressed at this stage. Will want to comment further at the detailed design stage.

20)Environment Agency

No objection subject to conditions relating to minimum floor level, compliance with Flood Risk Assessment, continuous access to vehicular ramps and integrity of river walls.

21)Greater London Archaeology Advisory Service

The proposal is unlikely to have a significant effect on heritage assets of archaeological interest. No further assessment or conditions are therefore necessary.

22)Greater London Authority

- Loss of the existing employment floorspace

- Re-provision of an element of employment floorspace supported.
- Private rented sector (PRS) tenure supported (subject to appropriate obligations)
- Large proportion of one and two bed homes is appropriate
- Proposed density acceptable
- Level of affordable housing should be increased and a portion of these affordable homes should be delivered in phase 1.
- No harm caused to Green Belt or designated nature conservation areas.
- Proposals would benefit the Blue Ribbon Network.
- Proposed height/massing appropriately respond to the sensitivities of the site.
- Layout, architecture and materials generally considered to be of a high quality.
- Some concerns over security of car parking courts.
- Applicant should clarify how the design principles for the bridges will be secured.
- Additional design code should secure ensure privacy within the courtyard spaces.
- Applicant should confirm proposed maintenance arrangements for the bridge access lifts
- Need to secure 90% 'accessible, adaptable dwellings' (Building Regulation M4 (2)) and 10% 'wheelchair user dwellings' (Building Regulation M4 (3)).
- Number of transport matters need resolving (see TfL comments below)
- Proposal would meet current London Plan carbon dioxide reductions (subject to verification)

23) Historic England

Do not consider that it is necessary for this application to be notified to Historic England under the relevant statutory provisions.

24) Inland Waterway Association

Objects to lack of specific consideration of effects on boat users using Tottenham Lock resulting from loss of sunlight and wind turbulence. The loss of sunlight is a safety issue as ground conditions could tend to remain wet.

25) Lee Valley Regional Park Authority

It is recognised that there will be considerable regeneration benefits from the development of this scheme. However, the scale of the proposed Block A is excessive. Its scale will dominate views from across and through the Regional Park to the detriment of visitor amenity. Its design does not reflect the 'sense of place' of this site in the Regional Park or provide visual interest. The proposed ecological measures and bridges whilst welcome are insufficient to overcome an objection.

26) London Fire Brigade

Fire fighting facilities are acceptable in principle. Full details can wait until the Building Regulations stage.

27) London Underground

No objection subject to condition reserving foundation design for Phase 1.

28) London Wildlife Trust

No comment.

29) London Borough Waltham Forest

Officer comments – No objection in principle to the development (subject to a high quality of design) – but some concern about the potential impact on the open character of the Wetlands as an important wildlife and ecological area. Seeking an “appropriate financial contribution” by way of mitigation is made towards the Wetlands.

30) National Grid Property

No comments received.

31) Natural England

No objection, subject to conditions.

32) The Regents Network

The application is unreliable and unacceptable:

- The Blue Ribbon Network is of strategic importance - the proposed development would do nothing for the waterways (it does not start from the water).
- Policy calls for the increase in use of the waterways for passengers and tourists - the wharf should be used for water transport and help remove lorries from the roads and the Borough has a responsibility to care for and develop their stretch of a national asset.
- The Lee Navigation is designated as a ‘commercial waterway’ (Transport Act 1968), loss of industrial land is against policy and unacceptable - the site should be used for industrial and possible waste transfer uses.
- London’s Blue Ribbon Network is categorised as a ‘public open space’ – the proposed location and scale of development next to the equivalent of a park is not acceptable.
- Unsuitable scale and bulk and appearance and design.

- The canal network represents an important heritage asset.
- The applicant should be concentrating on maintaining and improving waterway infrastructure, including the historic Tottenham Locks.
- The canals are owned by the nation and just managed by the CRT.

33)Thames Water Utilities

No objections subject to the provision of drainage strategy detailing any on and/or off site drainage works by condition, and informatives.

34)Transport for London

The Applicant responded to a number of initial queries raised by TfL and TfL now considers the proposals to be acceptable, subject to:

- Provision of £50,000 towards bus network improvements;
- Planning condition requiring provision of Bridge 1 before Phase 2/3 is occupied; and
- Financial contribution towards improving crossing of Ferry Lane.

5. LOCAL REPRESENTATIONS

5.1 The following were consulted:

- Approx. 2,750 neighbouring properties
- 4 Residents Association
- 10 site notices were erected close to the site

5.2The number of representations received from neighbours, local groups etc in response to notification and publicity of the application were as follows:

Number of individual responses:

- 166 Objecting:
- 0 Supporting:
- 0 Others:

5.3The following local groups/societies made representations:

- Commercial Boat Operators Association
- Ferry Lane Estate Residents
- Friends Of Tottenham Marshes
- Ferry Lane Action Group
- Stonebridge Boaters
- Tottenham Civic Society
- The Regents Network

5.4 The following Councillors made representations:

- Cllr Rice
- Cllr Reith
- Cllr McCartney (London Assembly Member)

5.5 The issues raised in local representations that are material to the determination of the application are set out in Appendix 1 and summarised as follows:

- Excessive Building height
- Overshadowing/loss of daylight/loss of sunlight
- Adverse impact on natural environment
- Adverse impact on schools, health and other community services
- Insufficient Affordable Housing
- Poor design/character
- Increase in traffic and increased car parking pressures in surrounding streets
- The proposals contravene planning policy
- No need for so much housing in order for the Council to meet its housing target
- Loss of privacy
- Loss of the wharf as a transport facility, adverse impacts on boats moored on the wharf and inadequate consideration of use of river by boats
- Loss of existing employment
- Inadequate provision of employment uses – also fear that it may remain vacant
- Public transport capacity - Tottenham Hale Station already at capacity and train services that use Tottenham Hale are already over-stretched.
- Adverse impacts during construction (noise, traffic, air quality & Impacts on wildlife)
- Proposed phasing will spread out these adverse impacts over a longer period
- Adverse noise when built
- General dwelling mix is inappropriate – too many 2-bed homes – not what Tottenham needs
- Concern at the nature of the planning application and fear that developers will come back for more
- Insufficient assessment of views
- Lack of community benefit
- Impact on users of the towpath – walkers/joggers etc.
- Increase in littering.

5.6 The following issues raised are not material planning considerations:

- Loss of a private views from residents in flats in Hale Village (Officer Comment: there is no 'right to a view' in planning – although general outlook as part of overall residential amenity is a material consideration)

- Conflict of interest – the architects are also advising the Council on the District Centre Framework (Officer comment: due to this potential conflict this site was not specifically addressed by the district centre framework masterplan)

6 MATERIAL PLANNING CONSIDERATIONS

6.1 The main planning issues raised by the proposed development are:

1. Principle of the development
2. Regeneration
3. Design, density and visual impact
4. Heritage
5. Daylight, sunlight, microclimate, impact on neighbouring amenity
6. Housing numbers, mix, affordable housing & quality
7. Transport
8. Ecology & Trees
9. Flooding and drainage
10. Energy/Sustainability
11. Waste
12. Contaminated land and air quality
13. Noise & vibration
14. Environmental Impact Assessment (EIA)
15. Equalities
16. Conclusion

6.1. Principle of the development

6.1.1 The NPPF establishes overarching principles of the planning system, including the requirement of the system to “drive and support development” through the local development plan process and supports “approving development proposals that accord with the development plan without delay”. The NPPF also expresses a “presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking.”

6.1.2 The NPPF has 12 core planning principles., These include clear statements about the importance of a plan led approach, and the need to plan creatively, and actively to promote growth whilst considering local characteristics, securing high quality design and amenities and supporting the move to a low carbon economy, whilst optimising land use and densities and conserving and respecting heritage interests.

6.1.3 The NPPF encourages the ‘effective use of land by reusing land that has been previously developed’. In respect of applications that include provision of housing, the NPPF highlights that delivery of housing is best achieved through

larger scale development. Paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by, amongst other things, protecting and enhancing valued landscapes and minimising impacts on biodiversity and providing net gains in biodiversity where possible.

- 6.1.4 Paragraph 81 makes clear that once Green Belts have been defined, LPAs should plan positively to enhance their beneficial use, such as outdoor sport and recreation, retained and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. Paragraph 87 and 88 make clear that inappropriate development is harmful to the Green Belt and should not be approved except in very special circumstances and Paragraph 88 states that when considering any planning application, LPAs should ensure that substantial weight is given to any harm to the Green Belt.
- 6.1.5 Paragraphs 126 to 141 seek to maintain and manage change to heritage assets and their settings in ways that sustains and, where appropriate, enhances their significance.

The Development Plan

- 6.1.6 For the purposes of S38(6) of the Planning and Compulsory Purchase Act 2004 the Development Plan consists of the London Plan (2016), Haringey's Local Plan Strategic Policies and the saved policies of Haringey's Unitary Development Plan (2006). Consultation on the Council's suite of pre-submission (reg 19) strategic policy documents, including the Tottenham Area Action Plan and Development Management Policies DPD, ended on the 4 March 2016. The Examination in Public in to these and other emerging Local Plans took place in August and September 2016.

London Plan

- 6.1.7 The consolidated London Plan (2015) and Minor Alterations 2015-2016 set a number of objectives for development through various policies, the key relevant ones are set out below:
- To promote and enable growth within London (Policies 2.7 and 4.1).
 - To promote growth in Opportunity Areas (Policy 2.13) (this site lies within the Lee Valley Opportunity Area) and investment in Regeneration Areas (Policy 2.14) (Tottenham is a Regeneration Area)
 - To promote, protect, expand and manage London's network of green infrastructure (Policies 2.18 and 7.16) (the site is partly within the Lee Valley Regional Park and part of it is Green Belt)
 - To promote the use of the strategically important Blue Ribbon Network for passengers and tourism and for freight transport (Policies 7.24 to 7.26), decisions should enhance the use of the Network and protect and improve existing access points and supporting infrastructure (Policy 7.27) and restore

and enhance the Network and protect its habitat value and character (Policies 7.28 and 7.30).

- To recognise the importance of increasing housing supply and choice (Policy 3.3), optimising housing output (Policy 3.7) and include complementary non-residential uses within large residential developments (Policy 3.7).
- To create mixed communities through meeting needs and fostering social diversity (Policies 3.1 and 3.9) and through providing affordable housing (Policy 3.10).
- Provide positive and practical support to sustain the contribution of the Private Rented Sector (PRS) in addressing housing needs and increasing housing delivery (Policy 3.8)
- Mitigate climate change, reduce carbon dioxide emissions, encourage decentralised energy and ensure environmental sustainability (Policies 5.1 to 5.9)
- To support high density development relative to accessibility and public transport capacity (Policy 6.1).
- To create lifetime neighbourhoods through designing to interface with surrounding land (Policy 7.1) and achieve high standards of accessible and inclusive design (Policy 7.2).
- To manage the location and design of tall and large buildings (Policy 7.7)
- To safeguard the setting of heritage assets (Policy 7.8).

6.1.8 The policies in the London Plan are accompanied by a suite of Supplementary Planning Guidance (SPGs) and Opportunity Area Frameworks (OAPFs) that provide further guidance. The key relevant SPG are set out below:

- a. Housing (March 2016) this sets out the required standards to ensure high quality residential developments
- b. Accessible London: Achieving an Inclusive Environment (October 2014)
- c. The control of dust and emissions during construction and demolition (July 2014)
- d. Town Centres (July 2014)
- e. Character and Context (June 2014)
- f. Sustainable Design and Construction (April 2014)
- g. Upper Lee Valley OAPF (July 2013)
- h. Play and Informal Recreation (September 2012)
- i. All London Green Grid (March 2012)

Haringey Local Plan Strategic Policies (2013)

6.1.9 Haringey's Local Plan Strategic Policies document highlights the importance of growth areas within the Borough. Policy SP1 of the Local Plan (2013) designates Haringey Heartland and Tottenham Hale as Growth Areas, where the Council expects development to:

- Provide approximately 5,000 new homes and the majority of new business floorspace up to 2026;
- Maximise site opportunities;
- Provide appropriate links to, and benefits for, surrounding areas and communities;
- Provide the necessary infrastructure; and
- Be in accordance with the full range of the Council's planning policies and objectives.

6.1.10 The Local Plan sets out the future aspirations for Tottenham Hale as being:

- Integration of new and existing communities. Clear and explicit links must be made between new opportunities in Tottenham and the existing community, to ensure regeneration benefits include local people;
- Returning the gyratory to two-way traffic. Currently the gyratory is part of the local one-way system, distributing traffic from Tottenham High Road towards Tottenham Hale. It carries a heavy volume of fast-flowing traffic which creates a dangerous environment for pedestrians and cyclists. Its future will be a crucial factor in the transformation of the area;
- The provision of additional open space, play areas and community facilities as required by development of the area in order to meet the needs of the resident population;
- Introducing measures to reduce flood risk such as the de-culverting of the Moselle Brook, application of sustainable urban drainage systems, and support for the introduction of measures to reduce water consumption to improve water efficiency;
- The creation of a new facility for Front Line Services including recycling at Marsh Lane which will promote green industries in the area; and
- A new high quality station square and a state of the art new public transport interchange at Tottenham Hale.

6.1.11 Other relevant policies are as follows:

- SP2-Affordable housing- borough target of 50% with maximum reasonable amount in individual sites
- SP4 Working towards a Low Carbon Haringey
- SP5 Water Management and Flooding
- SP6 Waste and Recycling
- SP7 Transport
- SP8 Employment – the Hale Wharf site is designated as a Local Employment Area 7 (Regeneration Area) - that seeks to protect light industrial uses but allow uses appropriate in a mixed-use development, such as small scale “walk-to” retail, community and residential use

- SP9 Improving skills and training to support access to jobs and community cohesion and inclusion
- SP10 Town Centres
- SP11 Design
- SP12 Conservation (the Hale Wharf site is within an Area of Archaeological Importance)
- SP13 Open Space and Biodiversity (the Hale Wharf site is partly within Lee Valley Regional Park and is partly within a SINC Metropolitan Importance, Ecological Corridor, the Blue Ribbon Network and the Green Belt)
- SP14 Health and Well-Being

Haringey Saved UDP Policies (2013)

6.1.12 Schedule 1 Site-specific Proposals designates Site 20 - Tottenham International (including Tottenham Hale Station, the retail park, Hale Wharf and Tottenham Marshes) for comprehensive mixed use development to include better integrated transport interchange, employment, university campus, retail, housing, and leisure including the enhancement of the open space, education and community facilities.

6.1.13 Key relevant saved UDP policies include the following:

- UD3 General Principles
- UD7 Waste Storage
- ENV 5 Works Affecting Watercourses
- ENV6 Noise Pollution
- ENV7 Air, Water and Light Pollution
- ENV 11 Contaminated Land
- EMP4 Non employment generating uses
- EMP5 Promoting Employment Uses
- TCR2 Out of Town Centre Development
- TCR3 Protection of Shops in Town Centres
- M9 Care-free residential developments
- M10 Parking for Development
- OS5 Development adjacent to Open Spaces
- CSV8 Archaeology

Emerging Tottenham Area Action Plan January 2016

6.1.14 The pre-submission draft of the AAP was considered by the Council at its meeting on 23rd November 2015 and was published for Reg 19 consultation 8th

January 2016. Consultation closed on the 4th March. An Examination in Public in to the emerging document took place in August and September 2016. As such the AAP is considered to be a material planning consideration that can be accorded some, although not the same weight as the development plan. The document provides site specific and area based policy to underpin the delivery of the spatial vision set out in the adopted and proposed alterations to the Strategic Polices DPD and the suite of DPDs' emerging alongside the Tottenham AAP to articulate the spatial vision for growth.

6.1.15 Policy AAP1 (Regeneration & Masterplanning) seeks to ensure all development proposals submitted to the Council proactively respond to the vision and ensure the regeneration objectives for the Tottenham AAP area are achieved.

6.1.16 Policy AAP3 (Housing) seeks to improve diversity and choice of homes to support mixed and balanced communities and to secure affordable housing in accordance with relevant policies.

6.1.17 Policy AAP4 (Employment) seeks to facilitate the regeneration and renewal of selected Designated Employment Areas (DEAs) through a reconfiguration of the local employment offer in order to intensify lan uses, maximise the amount of business space and to increase the number and variety of jobs. Hale Wharf is identified as a Local Employment Area: Regeneration Area.

6.1.18 Policy AAP5 (Conservation and Heritage) seeks, amongst other things, to identify and positively respond to the distinctive character and significance of heritage assets, including their setting.

6.1.19 Policy AAP6 (Urban Design and Character including Tall Buildings) sets out a comprehensive policy. It identifies the whole of the Hale Wharf site as being within a Tall Building Growth Zone and includes:

- Appropriate height being guided by the principles in Local Plan Policies DM1 and DM6, the reorientation of Tottenham Hale to a central area and the proposed Site Allocations.
- The expectation that the highest density development to be located adjacent to public transport nodes and in Growth Areas and Areas of Change and that at their boundary, development is expected to transition between these areas and the suburban areas of the AAP through appropriate transition/scaling of heights.
- Taller buildings will be appropriate along (parts of), amongst other places, Ferry Lane
- The impact of particularly tall buildings should be considered against the requirements to protect Local Views as asset out in DM5

- Where proposals fall within 500m of a Special Protection Area/ RAMSAR areas, specific measures should be set out to ensure there is no adverse effect on ecological integrity.

6.1.20 Policy AAP9 (Tottenham Green Grid) makes clear that development proposals next to the Green Grid will need to address routes along its built edges.

AAP Site allocation TH9: Hale Wharf

6.1.21 The emerging AAP designates the Hale Wharf site, the petrol filling station on Ferry Lane and the Paddock for comprehensive redevelopment to provide a mix of uses, with replacement employment, new residential and leisure destination linked to the Lee Valley Regional Park.

6.1.22 The Site Requirements are set out as follows:

- Development will be required to be accompanied by a site-wide masterplan showing how it will complement:
 - Existing/retained parts of the site;
 - Extant permissions; and
 - The requirements of this document.
- This site will hold a Designated Employment Area: Regeneration Area status to recognise the contribution to the local economy that this site can make.
- Part of the site (Hale Wharf) is in employment use and will need to reflect the Council's aspiration to create a mix of uses on this site through the replacement of existing employment levels with new employment space, and complementary leisure uses that provide amenities for the users of the Regional Park.
- Improve connections to, and the use and utility of, the Paddocks open space and ensure redevelopment of the former petrol station site to create high quality waterside development.
- The Development will need to accommodate part of the Green Grid, which will pass through this site linking Tottenham High Road to the Walthamstow Wetlands and Lee Valley Regional Park following the alignment developed through the Hale Village scheme.
- Redevelopment of the Hale Wharf site will need to ensure continued facilities for the house boat community north of the Hale Wharf site, and explore the potential provision of moorings on the western side of the site to accommodate employment barges/temporary moorings.
- The redevelopment of the garage site, within the Green Belt, will need to be included as part of a comprehensive plan for the overall site and demonstrate compliance with Green Belt objectives. Consideration will be given to previously developed land on this site within the Green Belt in accordance with the guidance in the National Planning Policy Framework.

- Development should be delivered in a coordinated manner. Comprehensive re-development for the site is required. The garage site across the Lea Navigation, and the Lock Keepers Cottage to the east should be developed as part of a comprehensive proposal.
- The design of the new development will need to have regard to environmental, ecological interests in the locality, particularly relating to the water environment and habitat of the Lee Valley Regional Park
- Any building on the garage part of the site should demonstrate compliance with Green Belt policy and complement this designation by improving appearance from openness within, and access to the Green Belt.

6.1.23 The Development Guidelines are set out as follows:

- New development should enable the ongoing operation and maintenance of the lock gates.
- New development should not adversely impact on the ecological assets in the area.
- The development shall include a range of unit sizes and types and take advantage of the site's suitability for family housing.
- The Environment Agency will be a key stakeholder in agreeing any new development proposals as the site is just outside of a high flood risk area. The site is in close proximity to the Walthamstow Marshes SSSI, Lee Valley Ramsar Site and Special Protection Areas.
- Building heights will have to respond to the proximity and 'openness' of the Green Belt.
- Buildings should be orientated to allow a continuous sight line from the Green Link into the Lee Valley Regional Park. The design and form of the development on the eastern side of the Wharf site (and on the former garage site) should be responsive to the natural environment of the park and river.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- The Lee Valley Regional Park Plan seeks to ensure improvement of the paddocks area and any proposal should have consideration of this plan.
- Improvement of the access into the Hale Wharf site is required.
- The development will need to be designed having regard to risks of flooding and in accordance with the Flood Risk Assessment.
- The site is surrounded by a network of main rivers (Pymmes Brook, Lee Navigation and Lee Cut). Development should ensure opportunities to enhance the ecological status of the rivers, reduce flood risk and ensure access for future maintenance and replacement of the river walls is realised. The condition of the flood defence must be commensurate with the lifetime of the development. A condition survey will need to be undertaken and any repair works identified carried out.

Alterations to Strategic Polices DPD

6.1.24 The proposed changes to Haringey's Strategic Policies reflect a number of changes in the overarching planning framework at the national and regional level, which affect planning locally. The most significant being the adoption of the Further Alterations to the London Plan (FALP) that significantly increased Haringey's strategic housing target from 820 homes per annum to 1,502 homes per annum, effective from April 2015 – an 83% increase. The plan also reflects the more challenging position in respect of affordable housing delivery.

6.1.25 The pre-submission draft of the proposed changes to Haringey's Strategic Policies were considered by the Council at its meeting on 23rd November 2015 and was published for Reg 19 consultation 8th January 2016 consultation closed on the 4th March. An Examination in Public in to the emerging document took place in August and September 2016. As such this is considered to be a material planning consideration that can be accorded some weight, although not the same weight as the current development plan.

6.1.26 The changes to the following strategic policies and draft DPD's are relevant to this application:

Policy SP1: Managing Growth, raises Haringey's strategic housing requirement to 19,802 net new homes between 2011 – 2026 (rather than 8,200 between 2011-2026). The number of new homes expected to be accommodated in the Growth Areas of Haringey Heartlands/Wood Green, Tottenham Hale and North Tottenham is also increased from 5,000 to 13,500 to 2026. Table 2 (Broad distribution of new housing) increases the number of expected homes in Tottenham Hale over the plan period from 3,410 to 5,080.

Policy SP2: Housing, is amended to reflect the increased housing target in SP1 and reduces the strategic affordable housing target from 50% to 40%.

Draft Development Management Polices DPD

6.1.27 This document introduces a set of detailed planning policies which give effect to the Spatial vision for the borough. The DM DPD will update local thematic planning policies for the borough, superseding the saved UDP policies Unitary, and a suite of Supplementary Planning Documents and Guidance notes. It will be used in the determination of planning applications in the borough. The pre submission draft of the DM DPD was considered by the Council at its meeting on 23rd November 2015 and was published for Reg 19 consultation 8th January 2016, consultation closed on the 4th March. As such the DPD is considered to be a material planning consideration that can be accorded some weight, although not the same weight as the development plan.

6.1.28 There are five main chapters in the document, each providing a set of policies covering the topics of Development and Design, Housing, Environmental Sustainability, Employment and the Economy, and Community Infrastructure.

6.1.29 A substantial number of the policies in the document are considered relevant to consideration of these applications reflecting changes in national policy as well as the outcome of the evidence based studies undertaken by the Council since the adoption of the previous plan. Amounting to a comprehensive suite of “development management polices” for the whole borough, and supplemented by the specific polices of the Tottenham AAP, the following are all considered to be relevant to the determination of the application:

Design & Character

DM1 Delivering High Quality Design (Haringey’s Development Charter)
DM2 Accessible and Safe Environments
DM3 Public Realm
DM4 Provision and Design of Waste Management Facilities
DM5 Locally Significant Views and Vistas
DM6 Building Heights
DM9 Management of the Historic Environment

Housing

DM10 Housing Supply
DM11 Housing Mix
DM12 Housing Design and Quality
DM13 Affordable Housing

Environmental Sustainability

DM19 Nature Conservation
DM20 Open Space and Green Grid
DM21 Sustainable Design, Layout and Construction
DM22 Decentralised Energy
DM23 Environmental Protection
DM24 Managing and Reducing Flood Risk
DM25 Sustainable Drainage Systems
DM27 Protecting and Improving Groundwater Quality and Quantity
DM28 Watercourses and Flood Defences
DM29 On-Site Management of Waste Water and Water Supply

Transport & Parking

DM31 Sustainable Transport
DM32 Parking

Employment & Town Centres

DM37 Maximising the Use of Employment Land and Floorspace
DM38 Employment led Regeneration

DM41 New Town Centre Development
DM44 Neighbourhood Parades and other non-designated frontages
DM45 Maximising the Use of Town Centre Land and Floorspace
DM47 Hot Food Takeaways

Community Infrastructure, Implementation & Monitoring

DM48 The Use of Planning Obligations
DM49 Managing the Provision and Quality of Community Infrastructure
DM55 Regeneration and Masterplanning

Urban Characterisation Study (part of the Local Plan evidence base)

- 6.1.30 Published in February 2015 as an evidence base for Haringey's Local Plan documents, the Haringey Urban Character Study is not adopted policy but is a useful guide for assessing development. It is intended to provide an objective, thorough and analytical outlook of the borough. It identifies the components of local character and distinctiveness and highlights those aspects which make Haringey unique. It will guide decisions on the location, type and form of new, including the location of tall buildings. The study evaluates and builds upon the existing evidence base, including conservation area appraisals, Upper Lee Valley OAPF, Open Space Strategy and other relevant documents.
- 6.1.31 In addition to being a formal evidence base to Haringey's planning documents, the study can be utilised as a general urban design reference document.
- 6.1.32 A key outcome of this study is to recommend suitable building height ranges across the borough, including proposing where 'high-rise' buildings may be suitable. The study notes that building heights across Tottenham Hale should respond to the existing built form whilst looking ahead to future development opportunities and areas where an increase in height would be welcome.
- 6.1.33 In relation to Tottenham Hale, the study notes (amongst other things); "Building heights should gradually and consistently rise from the low rise, 2-3 storeys residential hinterlands to an average mid-high rise, 6-10 storeys around the station, along Ferry Lane and Monument Way with a limited number of higher rise elements located at key node/junction points. There are likely to be additional constraints on where high-rise buildings can be located which this study is not able to determine." It goes on to say that..."There should be a sense of order and hierarchy to the skyline High rise elements should encircle (parts of) and frame, rather than encroach the historic 'Hale' and could step in height from west to east - culminating at the Hale Village Tower which could reach 20-25 storeys."

Other Relevant Publications/Documentation

6.1.34 In addition to the Development Plan Tottenham has been the focus of considerable public sector attention over the last 10 years, which has culminated in the production of a number of non statutory publications prepared following significant community engagement.

Upper Lea Valley Opportunity Area Planning Framework (SPG to the London Plan)

6.1.35 The Upper Lea Valley Opportunity Area Planning Framework (OAPF) (2013) covers over 3,000 hectares of land covered by the London Boroughs of Enfield, Haringey, Waltham Forest and Hackney and was produced by the GLA. The OAPF sets out the overarching framework for the area which includes the Site. The objectives for the Upper Lee Valley are set out as follows:

- Growth at Tottenham Hale, Blackhorse Lane, Meridian Water in Central Leaside and Ponders End.
- Optimised development and redevelopment opportunities along the A10/A1010 Corridor, in particular the Tottenham High Road Corridor and Northumberland Park.
- Over 15,000 new jobs by 2031 across a range of industries and a green industrial hub creating greater learning and employment opportunities.
- Over 20,100 new well designed homes by 2031.
- Full integration between the existing communities and the new jobs, homes and services provided as part of the new developments.
- A Lee Valley Heat Network linked to the Edmonton Eco Park.
- Significant investment and improvements to transport infrastructure, including four trains per hour on the West Anglia Main Line and improvements to help people walk and cycle more easily through the area.
- A fully accessible network of green and blue spaces which open up the Lee Valley Regional Park. The networks between them will be improved benefitting both people and wildlife.

6.1.36 The OAPF identifies Tottenham Hale as an area that is expected to be subject to substantial change over the next 15-20 years, including an aspiration of the Council for it to be designated as a district centre. It notes that this provides the opportunity to deliver new homes and jobs, a high class transport interchange with traffic calming; improved connections to the Lee Valley Regional Park and River Lee; and new retail and commercial spaces all set within a vastly improved public realm. The Hale Wharf site itself is identified for “Residential, retail, leisure, workspace. Landmark residential-led development with public realm maximising the waterfront location.”

6.1.37 In addition, the Lee Valley Regional Park Authority has an adopted Park Plan (April 2000) and adopted Park Development Framework Area Proposals for Area 3 (April 2013). The latter is informed by the Authority’s Landscape Sensitivity Study.

Other Plans and Strategies

6.1.38 There are a number of other plans and strategies which set the context for Tottenham's regeneration and have informed the preparation of the emerging AAP. These include:

- The Transforming Tottenham Hale Urban Centre Master Plan SPD (2006) provides strategic guidance on the delivery of sites, including Hale Wharf ;
- The Tottenham Physical Development Framework (PDF) (2012) which highlights the scale of opportunities across the area;
- The Tottenham Strategic Regeneration Framework (March 2014) to guide the Council's Tottenham regeneration programme and; and
- Tottenham Hale District Centre Framework (October 2014) – which has been prepared specifically to provide clarity and guidance relating to relevant development parameters for identified sites in Tottenham (including Hale Wharf), ensuring coordinated delivery of the strategic outcomes sought for the area.

Proposed uses and tall buildings

6.1.39 *Green Belt*. Local Plan Policy SP13 (Open Space and Biodiversity) requires new development to protect and enhance where possible the Green Belt and London Plan Policy 7.16 (Green Belt) states that the strongest protection should be given to Green Belt and that inappropriate development will be refused, except in very special circumstances . Saved UDP Policy OS5 (Development Adjacent to Open Space) makes clear that development adjacent to green belt will only be approved where it protects or enhances its value. Whilst the northern tip of the site is within the Green Belt, no buildings are proposed to be located within this area. Furthermore, the area is proposed to be set out as part of an ecological area – which the NPPF identifies as an appropriate use of Green Belt land and would enhance the retained adjacent Green Belt.

6.1.40 *Waterways – Blue Ribbon Network*. London Plan Policies 7.24 to 7.30 set out a comprehensive set of objectives for protecting and enhancing the character and biodiversity value of London's waterways and helping ensure that they are used for passenger, tourist and freight use. Haringey's Local Plan and emerging policies (including Policy DM28 and Tottenham AAP Site Allocation TH9) reinforce these policy objectives and apply them to the site.

6.1.41 Waterways surround the site on three sides and its relationship with water, its ecology and use for water-related activities are important material considerations. The potential negative effects on nature conservation during the construction period, and necessary mitigation measures, and the opportunities to enhance the nature conservation interest of the site in the longer term is addressed in Section 6.8. The proposed development would safeguard the existing business barges that are moored alongside the Lee Navigation Channel and integrate them in to the development. The proposed buildings and spaces would have an acceptable

relationship with the edges of the site and adjoining waterways and the parameters for the proposed Hale Village Green Link Bridge (HVGLB) ensure that Pymmes Brook and the Navigation Channel and associated towpaths remain open for use by boats, pedestrians and cyclists.

- 6.1.42 The findings of assessments of the proposed development's likely significant environmental effects on the business barges, Tottenham Lock and (where appropriate) leisure moorings have been reported in the ES and officers are satisfied that these would be acceptable. The Environment Agency has requested a number of conditions to safeguard river walls and protect access and these are recommended to be attached to any permission. The Canal and River Trust has asked that the potential use of waterways during the construction phase is more fully investigated and it is recommended that a feasibility study is secured by planning condition.
- 6.1.43 *Mixed use.* Haringey's Strategic Policies (2013) identifies the site as part of the wider regeneration of Tottenham Hale and the Saved UDP policies (2013) designates it as part of a wider area for comprehensive mixed-use development (including business, retail and residential space uses) The emerging Tottenham AAP allocates the site for comprehensive redevelopment to provide a mix of uses, with replacement employment, new residential and leisure destination linked to the Lee Valley Regional Park.
- 6.1.44 Emerging Policy AAP6 (Urban Design and Character including Tall Buildings) identifies the whole of the Hale Wharf site as being within a Tall Building Growth Zone and sets out Specific Requirements and Development Guidelines to help shape development proposals. Such buildings are to be guided by the principles set out in Policies DM1 and emerging Policy DM6.
- 6.1.45 The site and wider area are also identified as an area for growth (Opportunity Area) in the London Plan and the Upper Lee Valley Opportunity Area Planning Framework (OAPF). The OAPF identifies the site for residential, retail, leisure and workspace uses and a landmark residential-led development
- 6.1.46 *Business and sui generis uses and employment.* Strategic Policies Policy SP8 (Employment) states the Council will secure a strong economy and support local employment and regeneration. Saved UDP Policy EMP4 (Non Employment Generating uses) states that planning permission will be granted to redevelop or change the use of land and buildings in an employment generating use provided the redevelopment or re-use of all employment generating land and premises would retain or increase the number of jobs permanently provided on the site, and result in wider regeneration benefits. Emerging Policy DM40 (Loss of Employment Land and Floorspace) continues this approach.
- 6.1.47 The site currently accommodates a number of industrial, storage and distribution units and Heron House, an office building with a restaurant on the ground floor.

In addition, there are 3 business barges moored along the River Lee Navigation. The Applicant identifies the existing employment generating floorspace as being 6,124sqm plus 465sqm for the barges (6,589sqm in total). Based on standard employment densities, the estimated existing direct employment is 116-120 Full Time Equivalent (FTE) plus 8 for the business barges (124 to 128 in total).

6.1.48 The business barges (465sqm) would be retained, but the rest of the existing floorspace would be demolished and replaced by 370sqm of 'retail' (A1-A5) plus up to 1,237sqm of 'office' (B1) space, plus the proposed housing. The application seeks permission for the alternative uses for Building K (in Phase 3). The illustrative scheme is based on the use of this building for 'offices' (B1) (approx. 1,100sqm). This is subject to there being sufficient demand for B1 (office) space in the area at the point development in Phase 3 (in which the building sits) commences. If there is insufficient demand at this stage and no potential occupiers, then this building would be built as housing. Based on the same standard employment densities, the estimated direct employment for the proposed scheme is as follows:

- Block K in 'office' use – 103-109 plus 8 for business barges (111-117 in total);
- Block K in residential use – 25-31 plus 8 for business barges (33-39 in total).

6.1.49 Officers' consider that the most policy compliant option is that Building K is used for B1 offices and it is recommended that a planning obligation secures the development and active marketing of Block K as a B1 Office building, unless, prior the commencement of Phase 3, the Applicant can demonstrate to the Council's satisfaction that there is insufficient demand for such space in the area.

6.1.50 In any event, the proposals would result in the net loss of permanent direct employment of between 11 and 95 FTE jobs. However, the type of proposed employment uses are compatible with the proposed housing, enabling a viable mixed-use development to come forward on this site and the benefits associated with this (including significant new housing, some affordable housing and better connectivity and permeability). In addition, the proposals are estimated to generate approximately 143 FTE jobs during the construction period. Given this, officers consider both development scenarios to be acceptable.

6.1.51 Policy SP9 (Improving skills and training.) states that the Council will seek to address unemployment by increasing the employment offered in the borough and seek financial contributions from proposals that would result in a net loss of employment floorspace to invest in training and other initiatives. The Council's Economic Development Officer has highlighted the potential role of the Haringey Employment & Recruitment Partnership (HERP) to help provide, trained and qualified local candidates for jobs in a range of sectors, including construction and it is recommended that planning obligations in a s106 Agreement secures commitments to local labour and training during construction and a financial contribution towards managing the Local Labour Scheme.

- 6.1.52 *Retail Uses (A1-A5)*. The application seeks a flexible permission for a range of potential uses A1 (shops), A2 (financial & professional services), A3 (restaurants and cafes), A4 (drinking establishments) and A5 (hot food take-aways) for 2 x ground floor units (170sqm) in Phase 1 and up to 200sqm of floorspace in Phases 2/3.
- 6.1.53 The site is outside of Tottenham District Centre. Local Plan Policy SP10 (Town Centres) seeks to protect and enhance Haringey's town centres and direct new retail, leisure and entertainment uses towards them. The site's status as a Designated Employment Area in the adopted Local Plan and emerging AAP makes business and small scale retail (A1-A5) acceptable in principle, as part of a mixed-use development. Emerging Policy DM47 (Hot food take-aways) seeks to resist proposals for hot food take-aways within 400m of a primary or secondary school.
- 6.1.54 The proposed amount of A1-A5 floorspace is relatively small and the 170sqm in Phase 1 would replace the existing small restaurant on the site and be split in to two units and the proposed range, scale and format of uses is considered appropriate and would be unlikely to damage the vitality or viability of the District Centre. However, the proposed unit in Building A would be within 400m of Ferry Lane Primary School and it is recommended that a planning condition is used to prevent the use of this unit for A5 (Hot Food Take-away) purposes. It is also recommended that planning conditions be used to control the hours of use of the proposed A1-A5 floorspace to 07.00 to 23.30 and require ventilation equipment and shopfront details for these units to be submitted to and approved by the Council in order to safeguard the amenities for future residents and ensure high quality development.
- 6.1.55 *Housing*. The site's excellent accessibility to public transport, which would be improved by the proposed pedestrian bridge, and proximity to the retail and other uses in Tottenham Hale District Centre is considered to represent a sustainable location for new homes. The proposed quantum of housing responds positively to the growing need for new homes (including affordable homes) identified in the Borough by the London Plan, and through the emerging Local Plan and is welcomed. This would make a significant contribution to meeting London plan targets (which are minimums). The inclusion of Private Rented Sector (PRS) residential development, in addition to housing for sale and affordable housing, is supported by the London Plan to address housing needs and increase housing delivery.
- 6.1.56 *Tall buildings*. The principle of tall buildings is supported by existing and emerging policy, subject to detailed consideration, in particular the impact on the natural environment, sufficiently high design quality, the need to safeguard residential amenity and the need to preserve or enhance the setting of heritage assets.

6.1.57 *Phasing*. The assessment set out in the ES assumes that Phase 1 is built-out first (September 2017 to June 2019) and that Phases 2 and 3 are built-out together between June 2019 and June 2021. It is recommended that a planning obligation in a s106 Agreement requires development to be carried out in accordance with an approved Phasing Plan, unless otherwise agreed by the Council.

6.2 Regeneration

Background

6.2.1 The application site falls within the “top” 6% of deprived Local Super Output Areas in the Country. The 2010 Indices of Multiple Deprivation highlight that deprivation on the basis of access to suitable housing places Haringey in the top 5% of all Local Super Output Areas in the England. The 2011 Census meanwhile indicates that some 74.9% of Households in the area are classified as being deprived having regard to one of the four dimensions of deprivation.

Development Framework

6.2.2 The development framework is set out in detail in Section 6.1 (Principle of development). There is a pressing need for additional high quality homes, facilities and job opportunities across London and Tottenham Hale (including the Hale Wharf site) is identified as a growth area/opportunity area.

Regeneration Framework

6.2.3 The NPPF sets out the government’s definition of sustainable development. This includes consideration of economic, environmental and social effects and a presumption in favour of “sustainable development.” By way of the Localism Act 2011, Local Planning Authorities are now obliged to consider the economic effects of development.

6.2.4 In March 2014, following a significant consultation exercise (the results of which were summarised in the report “Tottenham Future”) Haringey Council adopted a Strategic Regeneration Framework. Although not planning policy the framework set out a new regeneration vision for the area:

By the age of twenty, a child born in Tottenham today will have a quality of life and access to the same level of opportunity that is at least equal to the best in London.

6.2.5 The Strategic Regeneration Framework (SRF) sets out “seven strategies for success:”

1. World-class education and training – including new schools, better access to apprenticeships and more Tottenham young people attending university;
2. Improved access to jobs and business opportunities attracting major investment and encouraging local business growth to boost employment;
3. A different kind of housing market – improving existing homes and building new, high-quality homes to meet demand at a range of prices and tenures;
4. A fully connected community with even better transport links – continuing to improve rail, Tube and bus links, including making the case for Crossrail 2, as well as opening up Tottenham to more walking and cycling routes;
5. A strong and healthy community – improved healthcare facilities, reduced crime and strong social networks for young people;
6. Great places – putting Tottenham’s character and heritage centre-stage while creating better public spaces to meet, shop and have fun;
7. The right investment and quality development – building partnerships and securing money to achieve these priorities with a focus on high quality design.

6.2.6 The SRF included a Delivery Plan with a focus on four priorities in the short to medium term to deliver the aspirations within the SRF and reflecting the aspirations collected through the ‘Tottenham’s Future’ engagement programme:

1. People: To deliver improved access to jobs and business opportunities; world-class education and training; and a strong and healthy community;
2. Place: Better caring for the place and delivering improved public realm in all of the local centres that comprise Tottenham).
3. North Tottenham including High Road West, a new stadium/leisure destination and a comprehensive estate regeneration and housing renewal programme; and
4. Tottenham Hale: a key area of opportunity in South Tottenham, building on the delivery of a new station and a range of mixed use development.

Contribution of the Development to Regeneration

6.2.7 The proposed scale of development would provide a significant number of new homes that would help to meet the Borough and London’s wider housing needs in the future. The PRS element would provide greater stability and security for occupants and would deliver a significant quantum of new, well managed rented accommodation. In addition, the scale, duration and content of the development, subject to the measures to be secured through a S106 agreement to maximise local employment and procurement, and support construction and service based training programmes, would present opportunities for a significant and direct improvement in the economic wellbeing of the area.

6.2.8 It impossible to precisely quantify the regenerative impacts (both in financial and non financial terms) of a development. However, the provision of a significant number of high quality new homes (including affordable housing) and employment opportunities are considered to result in significant, positive economic and social change in the locality. These factors weigh in favour of the scheme but must be considered in the round with the design and heritage impacts of the development.

6.2.9 The Environmental Statement submitted in support of the application estimates that, in addition to the benefit of direct employment of up to 143 employees from the local and sub-regional area, there would also be those who would benefit from skills training, resident employment opportunities and secondary effects. In the longer term, if the potential approximately 1,000sqm (GIA) Business (B1) space is included in Block K (within Phase 3), then the proposed development would bring forward a similar amount of employment opportunities to those that currently exist of the site.

6.2.10 Achieving the Vision under the Great Places theme of the SRF includes

- Secure investment in Tottenham's key entry points (the stations, the High Road, the Lee Valley Park) to create 'gateways' with high quality public realm, well designed directional way-finding initiatives and consistent design themes
- Provide a fantastic recreational offer in the Lee Valley Park promoting health, activity and leisure opportunities for residents and visitors
- Deliver a substantial and generous 'greenlink' alongside new pedestrian bridges that will connect and integrate the Lee Valley Park with Tottenham

6.2.11 The application proposals would make a significant contribution to achieving this part of the regeneration strategy by opening up the Hale Wharf site to public use and better connecting it and the surrounding area to the Regional Park.

Housing Zone

6.2.12 Tottenham Hale was designated as a Housing Zone by the Mayor of London in February 2015. The Zone is expected to deliver 2,000 new high quality homes in the area, with an ambition for 50% of those homes to be affordable. Alongside the new homes will come almost £45million investment in unlocking sites for development. The site is within the Housing Zone and low-interest loans and direct funding for Bridges 1 and 2 from the Mayor of London is earmarked to assist the delivery of this scheme, should permission be granted.

6.3 Design, density and visual impact

Constraints

6.3.1 The site and surrounding area is described in Section 3.2. There are a number of key physical, policy and deliverability constraints to its successful development and these can be summarised as follows:

- The site is a narrow (31 to 60m) strip running north-south – with narrowest points at the southern and northern ends;
- Providing access through the site – this is difficult, given its narrowness and continued access needs to be maintained for the existing leisure moorings ;
- Thames Water asset – a sludge pipe runs from the Paddock to the north eastern side of the site, requiring a 3 metre “no building” zone where it lands on the site;
- Ecological sensitivity – the site sits in a various sensitive location with a number of protected designations (as outlined in Section 3.2). Development needs to take full account of this and include carefully considered edge conditions. There are particular constraints over how and when construction takes place;
- Flood risk and drainage – the site sits in a complex water environment that needs careful attention;
- The northern tip is within the Green Belt;
- Policy/guidance aspirations for greater connectivity, including pedestrian bridges;

Master Planning

6.3.2 Emerging Policy AAP1 (Regeneration and Masterplanning) requires masterplans to accompany proposals which form part of a Site Allocation in order to demonstrate how they contribute to delivering the objectives of the site and wider area; integrate and complement successfully with existing and proposed neighbouring developments; and optimises development outcomes on the site. The emerging AAP Site Allocation (TH9) also calls for a site-wide masterplan and adds existing/retained parts of the site and extant permissions to the issues that the masterplan should address.

6.3.3 The applicant’s Design and Access Statement outlines the design objectives, design evolution and consultation that have led to the application scheme. This includes massing studies which explored a number of options in relation to tall buildings. The resulting comprehensive illustrative masterplan for the site, within which the detailed southern element sits, is based on the following three character zones:

- Park zone at the northern end – buildings of lower density and height (4 to 6-storeys) that seeks to safeguard the adjacent parklands and wetlands (including the Green Belt);
- Central connecting zone – medium rise buildings (4 to 9-storeys) and central connecting spaces that provide active frontages and a link through the site (via the proposed bridge between Mill Mead Road and the site, which forms part of this application, and a bridge between the site and the Paddock, that

does not form part of this application although its provision is secured by Grampian condition); and

- Urban zone – higher density taller buildings (8, 11, 16 and 21-storeys) that respond to the urban context of Ferry Lane and a new public space, including a place for the Mill Mead Road bridge to land.

6.3.4 The masterplan locates 11 buildings along the site edges, so that they face out over the water to the east and west. The landscape strategy is to complement the three character zones outlined above with three key publicly accessible open spaces, as follows:

- A park/green river frontage in the north, providing views over the River Lea;
- A courtyard – an enclosed space between edge buildings, providing a sheltered setting for outdoor play and a route for a future Green Grid pedestrian link over to The Paddock; and
- Wharfside – a west-facing space addressing the Lea Navigation and Tottenham locks (with a 1,100mm high railing along this edge).

6.3.5 *Access Strategy.* The above masterplan provides a central spine of interlinked spaces connected by a traffic calmed shared surface. Vehicular access is provided along 4.8m wide routes with 6m wide passing places to all refuse storage areas, which are grouped around small car parking courts. Two main turning heads would be provided in the middle and north of the site. There would be level access throughout the site and clear (unobstructed) footways of at least 2.m along the spine route (reducing to 1.2m with a 100mm up-stand kerb in a limited number of shared surface areas).

6.3.6 The parameter plans also set minimum and maximum footprints and heights for the proposed bridge and associated structures, together with minimum clearance heights, and the Hale Wharf Bridge allows for a heat network pipe to be hung underneath.

6.3.7 *Car and cycle parking.* The 50 residential car parking spaces, prioritised for use by disabled residents, would be located in small surface level areas throughout the site. Additional spaces for the Business Barges (6) and use by Car Club facilities (2) would be located on the western side of the site. A total of 387 resident cycle parking would be provided within internal cycle stores within Buildings A and B. An additional 56 cycle spaces would be located at surface level across the site.

6.3.8 *Accessible Public Space and Play Space.* The proposed public spaces are the western 'wharfside' space and along the central spine. This amounts to approx. 0.17ha. There would also be two 'doorstep' playable spaces for younger children within the central spine and on the eastern edge (between Buildings B and K). Elsewhere, the east eastern and western edges would not be publicly accessible – although controlled access would be provided for the business barges.

- 6.3.9 *Sustainable Urban Drainage (SUDS) Strategy*. Landscaping would include water attenuation measures, including water storage areas under porous paved hardstanding areas and water infiltration areas for soft landscaping. As discussed in Section 9 of this report (Flood Risk and Drainage), in line with policy objectives, the SUDS strategy is designed to restrict surface water flows to the public sewer network to 50% of existing peak rates.
- 6.3.10 *Biodiversity mitigation and enhancement strategy*. Opportunities have been taken to improve the biodiversity value of the site by planting the green edges of the site with native plant species that grow locally in the Lee Valley Regional Park. This includes a 3.8m wide bank to the Lee Navigation and Flood Relief Channel and the installation of floating reed beds in the Lee Navigation. 'Insect hotels' will also be provided in these areas. Likely impacts on biodiversity and ecology are considered further in Section 6.8.
- 6.3.11 Officers consider that the illustrative masterplan generally responds well to the site constraints set out above, takes full account of the site's planning history, and would make a positive contribution to delivering the objectives of the AAP and (as discussed under Density below) would optimise the development potential of the site.
- 6.3.12 The overall proposals would provide a series of public spaces which amount to approx. 0.17ha. Policy SP 13 (Open Space & Biodiversity) requires on-site or financial contributions towards open space – with the Council's Open Space and Biodiversity Study (2014) setting out a locally derived standard of 1.64ha open space and 0.16ha of allotments per 1,000 people. Officers consider that the provision of on-site open space has been optimised, given other demands on the site and that a financial contribution should be secured towards the improvement of The Paddock that adjoins the site in-lieu of further on-site provision.
- 6.3.13 Whilst not forming part of the Design Code itself, the Design and Access Statement includes Design Principles for the two bridges that are included within the planning application. It is recommended that these Principles are also bound in by planning condition, so that they control detailed design of these structures that come forward by way of Reserved Matters application(s).

Landscape Design

- 6.3.14 The detailed element of the application proposals includes specific hard and soft landscape proposals for approval at this stage, covering both the interim stage (including the proposed temporary car parking area to the north of Building B and a 'black top' carriageway whilst subsequent phases are to be built out) and the completed design solution. These specify a palette of surface materials, soft landscaping, street furniture (including benches, bollards, cycle stands and lighting).

- 6.3.15 Emerging Policy DM1 (Delivering high quality design) stresses the importance of landscaping being integrated within proposals and Policy DM3 (Public Realm) encourages enhancing local distinctiveness through the use of public art and requires new privately owned public spaces to be appropriately designed and managed. Emerging Policy AAP9 (Tottenham Green Grid) also makes clear that development proposals next to the Green Grid address routes along its built edges.
- 6.3.16 The landscape and public realm proposals are fully embedded within the proposed masterplan and would allow for high quality spaces to be created. The Access and Public Realm, Car Parking and Hale Wharf Bridge Parameter Plans, together with the guidance in the Design Code would provide a framework for the detailed landscaping of the outline element of the proposals. A chain of artworks already extends along the Lee Navigation and the Design and Access Statement highlights opportunities for additional works within the proposed publicly accessible spaces. It is recommended that planning conditions secure high quality landscaping and require proposals for public art to be submitted to and approved by the LPA.
- 6.3.17 The Hale Wharf site would be managed and maintained by a private management company, on behalf of the owners of the site (paid for by charges made to residents and tenants). If permission is granted, it is recommended that public access to the proposed publicly accessible spaces and the management and maintenance of communal play spaces and publicly accessible spaces is secured by way of a planning condition.

Density

- 6.3.18 London Plan Policy 3.4 (Optimising Housing Potential) states that taking into account local context and character development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. The site is within an urban location where the density matrix sets a guideline of 200-700 habitable rooms (or 45-260 units) per hectare on a site such as this where the existing PTAL ranges from 4 at the northern tip of the site (Block G) to 6a at the southern end of the site (Blocks A and B). The introduction of the proposed HVGLB would improve walk distances to Tottenham Hale Station and increase PTAL ratings for parts of the site, such that all of the site would be within PTAL 5 (including Block G) and the part of the site benefitting from PTAL 6a would increase to take in Blocks C and K.
- 6.3.19 The maximum number of proposed dwellings is 505, the number of proposed habitable rooms is 1,374 and the net residential site area (the land based part of the site) is 1.78ha. This would result in a residential density of 284 units/ha (772hr/ha). This exceeds the indicative density range set out in London Plan Policy 3.4. However, exceeding the density matrix does not mean that the development is automatically inappropriate for the site. In this regard the

Mayor's Housing SPG states that exceptionally, higher densities on individual developments may be acceptable where these can be clearly and robustly justified by local circumstances. They must be tested rigorously, taking account of different aspects of 'liveability' related to proposed dwelling mix, design and quality, physical access to services, long term management of communal areas, and the wider context of the proposal including its contribution to local 'place shaping' as well as concerns over 'place shielding'. It is particularly important to take account of its impact in terms of massing, scale and character in relation to nearby uses, and design should be exemplary.

6.3.20 In this instance the proposal is already located in a highly accessible location, close to Tottenham Hale Station (Underground and Network Rail services) and bus station and the proposed HVGLB (Bridge1) would improve the accessibility of parts of the site to public transport. This improved accessibility helps justify the proposed high density levels and it is recommended that any permission is subject to a planning obligation that ensures that the HVGLB is provided and open for use before such times as any housing in Phases 2 or 3 are first occupied.

6.3.21 As discussed in subsequent sections of this report, the proposed housing is generally of a high standard and would safeguard the amenity of residents living in nearby housing, there would not be an unacceptable impact on transport or social infrastructure and communal and public realm areas are expected to be maintained and managed to a good standard. As set out below, officers consider that the detailed element of the scheme represents exemplary high quality design and that the proposed Parameter Plans and Design Code (and potential use of the Quality Review Panel) should ensure that this exemplary standard of design is also delivered for the outline element of the scheme, when reserved Matters applications come forward.

Scale, Massing and Tall Buildings

6.3.22 *Detailed Element.* Block A would front Ferry Lane (albeit set back by approximately 8m). The ground floor would include a commercial unit on this frontage with a residential lobby area, cycle parking and refuse store and plant located further in to the site. The building would comprise a shallow 8-storey element (approx. 40m AOD) next to Ferry Lane, with the majority of the building rising to 21-storeys (approx. 84.1m AOD). The building would include 141 x flats for sale (a mix of studio, 1, 2, and 3-bed).

6.3.23 Building A would be brick-clad building. The 4m high ground floor elevations would include glazed windows for the commercial unit and residential lobby area and timber screens for the cycle stores and plant areas. The upper floors would include recessed brick panels and aluminium panels and windows, recessed 'blind' windows, protruding metal balconies and a distinctive pitched zinc clad roof profile.

6.3.24 Block B, to the north, would be similar in design and incorporate a residential estate office at the southern end and a commercial unit at the northern end of the ground floor, with a residential lobby and cycle parking and plant areas in between. The building would comprise 11-storey (approx. 48.7m AOD) and 16-storey (approx. 62.73m AOD) elements. The building would include 108 x flats for market rent (PRS) (a mix of studio, 1, 2, and 3-bed).

6.3.25 *Outline element.* Outline permission is sought for a further 9 buildings. The parameter plans for the outline component set site levels, minimum and maximum building footprints/ upper floor horizontal limits and maximum building heights. These are supported by a Design Code that adds a further level of detail to inform the detailed design of buildings and spaces, which would be approved under Reserved Matters procedures. This includes comprehensive guidance on building use and typology, roof design, gaps and views between buildings, appearance (building character, materials and detailing), plant, streetscape and waterside edges, refuse storage and services.

6.3.26 The Illustrative Masterplan submitted in support of the application illustrates one way in which the proposed parameters and Design Code principles could be implemented. This shows buildings ranging in height from 4-storeys (approx. 23.5m AOD) to the north east of the site in Phase 3, to 9-storeys (approx. 46.1m AOD) to the south-west of the site, In Phase 2.

6.3.27 The two tallest buildings proposed for the site (Buildings A and B), which are in part 21 and 16-storeys respectively, have given rise to a significant number of objections from local people. By way of context, it should be noted that the emerging scheme provided for a taller (25-storey) building closer to Ferry Lane, but that following review by officers, the GLA and the QRP, Building A in the application scheme has been reduced in height to 21-storeys and set back from Ferry Lane. Objections to these buildings include excessive height and prominence, poor design, out of character with the area, loss of light, overshadowing amenity, non-conformity with policy and loss of views (not a material planning consideration).

6.3.28 *Policy and guidance.* Policy SP11 (Design) states that tall buildings will be assessed against the following criteria:

- An adopted Area Action Plan or existing adopted masterplan framework for the site and surrounding area;
- Assessment supporting tall buildings in a Characterisation Study which should be prepared as supporting evidence for all AAP areas;
- Compliance with the Development Management Policies criteria for Tall and Large Building siting and design;
- Compliance with all the relevant recommendations as set out in CABE / English Heritage "Guidance on Tall Buildings", 2007.

6.3.29 The Tottenham Hale Urban Characterisation Study (February 2015) recommends building heights for the area. The majority of the Hale Wharf site is recommended for approx. 12-21 metres / 3-6 storeys mid-rise buildings, whilst towards the south of the site fronting Ferry Lane, building heights are recommended to approx. 21-39 metres / 6-11 storeys high to mid-high rise buildings. However, the emerging Tottenham AAP, discussed below, is not prescriptive over building height.

6.3.30 London Plan Policy 7.7 (Location and design of tall and large buildings) requires applications for tall buildings to include an urban design analysis demonstrating the proposal meets a range of criteria. The Hale Wharf site is identified as a suitable location for tall buildings within the Mayor's Upper Lee Valley OAPF.

6.3.31 In addition to adopted policy and guidance outlined above, the appropriate height of development sites within Tottenham will be guided by the principles in emerging Policies DM1 (Delivering high quality design), DM6 (Building heights) and AAP6 Urban design and character including tall buildings).

6.3.32 Emerging Policy DM1 contains the "Haringey Development Charter. This seeks to ensure that new development meets a number of requirements:

All development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. The Council will support design-led development proposals which meet the following criteria:

- a. Relate positively to neighbouring structures, new or old, to create a harmonious whole;*
- b. Make a positive contribution to a place, improving the character and quality of an area;*
- c. Confidently addresses feedback from local consultation;*
- d. Demonstrate how the quality of the development will be secured when it is built; and*
- e. Are inclusive and incorporate sustainable design and construction principles.*

6.3.33 Emerging Policy DM6 expects building heights to be of an appropriate scale which respond positively to the site's surroundings, the local context, and the need to achieve a high standard of design. Proposals for taller buildings that project above the prevailing height of the surrounding area must be justified in community benefit as well as urban design terms. It states that tall buildings will only be acceptable in areas identified on Map 2.2. The Map identifies the site as suitable for a tall building. In addition DM6 states that tall buildings should also act as landmarks, identifying locations of civic importance, major public transport interchanges, and areas of high visitation. They should also be elegant and well proportioned, and visually interesting when viewed from any distance or direction; and positively engages with the street environment.

6.3.34 Emerging Policy AAP 6 (Urban Design and Character including Tall Buildings) establishes the principle that building heights need to respond to the existing street hierarchy. In line with emerging Policy DM6 (Building Heights) it asserts that buildings should be taller on main streets and within town centres and decrease gradually away from these places. It goes on to state that taller buildings will be appropriate along, amongst other places, parts of Ferry Lane.

6.3.35 The Lee Valley Regional Park Authority's Landscape Sensitivity Study (2013) identifies this area as highly sensitive to large scale development and identifies the importance of maintaining east-west views across the area. The Authority's Park Development Framework for Area 3 (The Waterlands: Walthamstow Wetlands to Tottenham Marshes) seeks to develop this site in ways that are compatible with its location in the Regional Park, including new development of a scale and design compatible with its location which responds to the Walthamstow Wetlands.

6.3.36 *Townscape, Heritage and Visual Impact Assessment (THVIA).*

6.3.37 The application is supported by a THVIA, which forms part of the ES. The THVIA has assessed the visual impact of the proposed development using Accurate Visual Representations (AVRs) on :

- Townscape Receptors - Tottenham Hale, Wetlands, Bruce Grove, Blackhorse Lane and Springfield Park/Clapton Common Character Areas;
- Heritage Receptors Conservation Areas - Tottenham High Road Historic Corridor (6 co-joined conservation areas), Bruce Castle, Clyde Circus and Leucha Road (within LB Waltham Forest) Conservation Areas
- Heritage Receptors – Listed Buildings (Ferry Boat Inn, Forest, Pumping Stations Building and Engine, N0. 62 High Cross Road), Locally Listed buildings (Berol House and former Eagle pencil Works at No. 25 Ashley Road and The Green School (at rear of former Grammar School), Somerset Road and The bridge over Lee adjacent to the Ferry Boat Inn and the Marine House Pumping Station at Ferry Lane/Forest Road
- Heritage Receptors – Registered Parks & Gardens – Springfield Park; and
- Visual Receptors – the following 16 views:
 - View 1: Chalk Bridge, looking south west
 - View 2: Stonebridge Lock, looking south west
 - View 3: Lee Navigation Towpath (North), looking south west
 - View 4: Tottenham Marshes, looking south
 - View 5: Chesnut Road, looking east
 - View 6: Tottenham High Road at Monument Way, looking east
 - View 7: Green Link, looking east
 - View 8: Tottenham Hale Station at Ferry Lane, looking east
 - View 9: Lee Navigation / Towpath South, looking north east
 - View 10: Blackhorse Road Railway Bridge, looking west

- View 11: Forest Road at Dagenham Brook, looking west
- View 12: Forest Road / Ferry Lane, close to Ferry Boat Inn, looking west
- View 13: The Paddock, looking north west
- View 14: Springfield Park, looking north
- View 15: Walthamstow Wetlands, looking north
- View 16: Lockwood Reservoir, looking south west

6.3.38 The Assessment provides an assessment of the likely significant effects on the above Receptors, ranging from 'No change' to 'Major Beneficial'. No adverse effects are identified.

6.3.39 Proposed Buildings A and B are assessed to be of high quality design in relation to their context which would complement the character of the area and do no harm to the setting or significance of the limited number of heritage assets in the vicinity. The Assessment concludes that these proposed buildings are refined compositions, with simple, robust detailing and materials appropriate for their canalside location and that they are likely to contribute to positive townscape/landscape and visual effects in short and longer views.

6.3.40 The Assessment concludes that the proposals would not harm the character or appearance of those conservation areas and registered parks located some distance to the south and west, or to their settings. It also concludes that it would not give rise to any harm to the settings of listed building or other, non-designated, heritage assets – noting that owing to the distances involved, many of the effects are so small as to be negligible.

6.3.41 In terms of effects on townscape receptors, the Assessment concludes that the proposal would have a significant effect on local townscape and landscape, including providing a landmark, improving the permeability and legibility of its immediate context and the quality of the public realm. The layout of the proposed development would provide east-west connections across the application site and would contribute to the Green Grid principles established by LBH, including the improvement of views into the Lee Valley Regional Park and eventual connection to it via bridges. It continues by saying that the proposed bridge would be a major benefit of the proposed development in townscape terms and the first step in achieving this improved connectivity.

6.3.42 The Assessment continues by concluding that the visibility of the proposed development across the landscape of the Lee Valley Regional Park is considered to be appropriate, given the attractive skyline it creates, the articulation arising out of the separation and varied design of the individual blocks and the materials used. The tallest elements will be a worthy counterpoint to the horizontality of reservoirs which are so central to the character of the Lee Valley.

6.3.43 Officers accept the conclusion's of the applicant's Assessment. The proposed development would clearly result in significant change to the appearance of the

site from surrounding streets and spaces, including from within and across the Lee Valley Regional Park. Having carefully considered concerns raised by a large number of local people and the Lee Valley Regional Park Authority, officers consider that that the proposed tall buildings at the southern part of the site (Blocks A and B) would be a positive addition to the landscape and that their scale is not excessive. In response to Policy SP11, London Plan Policy 7.7, emerging Policy DM6 and the Upper Lee Valley OAPF, it is considered that the proposed development would:

- Be consistent with emerging policy and guidance that identifies the site as being suitable for tall buildings;
- Relate well to the character of existing and proposed buildings and form part of a cluster of well-designed tall buildings within the Tottenham Hale area.
- Contribute towards providing an appropriate transition in varying building heights;
- Significantly improve the permeability of the site and surrounding area;
- Provide a high proportion of active frontages that provide a positive relationship at ground floor within the site and with the surrounding area;
- Provide significant regeneration benefits (discussed in Section 6.2);
- Not significantly effect above ground heritage (N.B. This is considered further in Section 6.4); and
- Have acceptable impacts in terms of microclimate, wind, overshadowing, noise, glare, etc. (N.B. The likely impacts on Residential Amenity and microclimate are considered in Section 6.5).

6.3.44 Given that all uses above first floor would be predominantly residential, it is not considered appropriate to allow public access to these areas. Given this, the proposed scale and massing, including tall buildings, is considered to be in general compliance with the adopted and emerging policy framework.

Design Quality

6.3.45 The detailed and outline elements of the scheme are described above under the sub-headings 'Master Planning', 'Landscape Design' and 'Scale, Mass and Tall Buildings.'

6.3.46 The Council insists on high quality design. In accordance with government guidance in paragraph 64 of the NPPF, design should be high quality and take the opportunities available for improving the character and quality of an area and the way it functions. Policy SP11 (Design) sets out the Council's approach to ensuring that design in the borough is of the highest possible quality as well as being sustainable and conserving the borough's heritage. It makes clear that all new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use. Emerging Policies DM1 (Delivering High Quality Design) and DM 3 (Public Realm) are also particularly relevant.

6.3.47 Haringey's Quality Review Panel (QRP) has considered the proposals as a whole on three separate occasions (18 November 2015, 20 January 2016 and 22 June 2016). It also considered the proposed bridges at a separate meeting on 27 April 2016. The tables below summarise the QRP's comments at the most recent meetings and provide an officer response to them.

Table 2: QRP review of overall proposals (22 June 2016)

QRP Comments	Response
Massing, place-making and character	
<ul style="list-style-type: none"> - The panel notes that the essence of the scheme is about the skyline silhouette; they feel that the silhouette created by the revised proposals is very good. - Whilst the scheme looks very large, it performs the function of terminating a vista very well. - In the context of how Ferry Lane is changing, the proposal has become more justifiable in terms of its scale. 	<p>Noted.</p>
Scheme layout	
<ul style="list-style-type: none"> - The Panel notes that the current layout shows limited scope for active ground floor frontages. - The layout of the ground floor accommodation across phase 1 of the development requires further thought, in order to mitigate the negative impact of the bin stores and cycle storage on the building frontages. - The panel reiterates that the west-facing public space could be a really exciting place that becomes a desirable evening destination. - The provision, location and layout of restaurant and café uses within this space require careful thought to ensure that this evening vitality is enabled. 	<ul style="list-style-type: none"> - These buildings do not have basements and so the bins and bikes need to be accommodated at ground level. - Cycle storage can help create active frontages, as movement of cyclists adds to the activity of space. It also adds to the safety of using bike stores, etc. if they are visible from an inhabited space rather than tucked around a corner. - The viability, flexibility and adaptability of the proposed units are important to ensure that they do not remain boarded-up space. - The units would face on to a publicly accessible open space and relate to the bridge landing in order to capture all potential footfall. - The site is an island and commercial space will rely on 'destination' uses.
Architectural expression	
<ul style="list-style-type: none"> - The Panel feel that the articulation of the massing works very well at the different scales of the building. 	<ul style="list-style-type: none"> - The proposals are designed to provide layouts which meet various design criteria. The design of the facade is

QRP Comments	Response
<ul style="list-style-type: none"> - The dwellings lower down the building have a great connection to the ground and public realm around the buildings, whilst the dwellings higher up the buildings will have spectacular views. - As the architectural expression is quite repetitive in nature, the quality of the design detailing and the quality of the materials chosen will be of critical importance to ensure the success of the scheme. - The Panel notes that the palette of brick colours to be specified is still under consideration, and that the intention is to select a number of colours of high-quality brick to provide a close contrast, from within the same ‘family’ of tones. - It was noted that sometimes projecting balconies on the upper storeys of towers can sometimes feel psychologically unsafe, and that introducing increased solidity in the enclosure can help. - The Panel questions whether the option to break into the massing further (with sky gardens or ‘bites’ out of the overall massing) has been fully explored, as suggested in the previous review. This is especially relevant for the wide west-facing facade. - The way the massing of Block B is articulated provides a good example of this approach. However, further thought about the resulting cut-away areas (on Block B) would be encouraged, to avoid blank façades fronting onto external amenity space, whilst at the same time retaining privacy. 	<p>intended to maintain the warehouse aesthetic whilst providing an appropriate amount of variety.</p> <ul style="list-style-type: none"> - The proposed blank facades to Building B avoid overlooking private amenity space and officers consider that they positively contribute toward the overall composition of the building. - It is recommended that external materials are reserved by planning condition, enabling the Council to approve the brick and other details.
Inclusive and sustainable design	
<ul style="list-style-type: none"> - The Panel understands that provision of affordable housing within the development is limited to the second phase of development; whilst the accommodation within the first phase is 	<ul style="list-style-type: none"> - The proposed affordable housing would not come forward until Phase 3. - Officers are satisfied that the proposed affordable housing represents the maximum reasonable amount and that

QRP Comments	Response
<p>solely for private sale.</p> <ul style="list-style-type: none"> - They would strongly support planning officers in securing timely delivery of the affordable housing on site through a Section 106 Agreement. 	<p>the proposed type and dwelling mix would help Tottenham Hale's housing need.</p>
Delivery of development	
<ul style="list-style-type: none"> - The proposed phasing of development represents a significant challenge in terms of creating a high-quality 'finished' public realm at the phase one (Ferry Lane) end of the site to the south that is robust enough to withstand the passage of construction traffic to the northern section of site occupied by Phase two. - The Panel would encourage the specification of very robust and high-quality materials for the southernmost section of public realm on site to avoid degradation of finishes during the construction of phase two. - The quality of detailed design and construction will be critical to ensure that a visually prominent development of this scale is convincing and elegant. Careful thought will be needed to achieve this through the proposed Design and Build construction contract. 	<ul style="list-style-type: none"> - The public realm in the Phase 1 would be completed in two stages. <ul style="list-style-type: none"> * Stage 1 would complete the eastern side of the public realm, the frontage to Ferry Lane and the play space and gardens between Blocks A and B. * Stage 2 would complete the remaining areas of public realm, including the wharfside walk, Bridge Square and the western side of the proposed tree avenue. - This staged approach would allow for the construction phase to progress while providing a safe and attractive route for residents. - The proposed paving in vehicle accessible areas of Phase 1 would be high quality granitic aggregate concrete pavers in a variety of tones. -
Next steps	
<ul style="list-style-type: none"> - The Panel offers their support for the scheme, but reiterates that high quality design detailing and materials will be fundamental to the future success of the scheme. - The Panel would support planning officers in securing this through planning conditions. 	<ul style="list-style-type: none"> - Officers consider the proposals represent a high quality design solution to this challenging site. - It is recommended that planning conditions be attached to any permission reserving details of landscaping and external materials for subsequent approval – to ensure that the proposed high quality approach is maintained.

Table 3: QRP review of bridges (27 April 2016)

QRP Comments	Response
Design and planning process	
<ul style="list-style-type: none"> - The Panel would recommend a 	<p>The Applicant has stated that due to the</p>

<p>detailed planning application should be submitted for the western bridges, in tandem with the main Hale Wharf site</p> <ul style="list-style-type: none"> - The Panel also feels that it would be advisable for the detailed design of the western bridges to be established through the planning permission prior to transfer of the bridge design process to the Hale Wharf developer 	<p>project programme and ongoing discussions with stakeholders, it was not possible to submit detailed proposals for the bridges.</p> <ul style="list-style-type: none"> - In the circumstances, officers consider that 'outline' proposals for the bridges is acceptable. The proposed Parameter Plans, Design Code and Bridge Design Principles provide a good framework for securing high quality design at a Reserved Matters stage. - The Applicant has confirmed its willingness to present to the Panel ahead of any Reserved Matters application. This is welcome and an ongoing design review process would also help ensure a high quality detailed scheme. - The detailed design process is due to be managed by the Hale Wharf developer to ensure coordination of design and delivery of the preferred energy strategy (involving heat network pipes connecting with the Hale Village Energy Centre).
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Relationship to surroundings

<ul style="list-style-type: none"> - The Panel would welcome further consideration of the approach to the main Hale Wharf bridge from the Hale Village development to the west. 	<ul style="list-style-type: none"> - This could be satisfactorily addresses at a detailed design stage.
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Architectural expression and materiality

<ul style="list-style-type: none"> - Whilst the Panel welcomes the proposal to incorporate weathering steel (CORTEN) within the bridge designs, they highlight that it is not appropriate to form the hand-rails from weathering steel as it is not a comfortable material to touch. - At a detailed level, the Panel would welcome further information on the integration of the lifts within the main Hale Wharf bridge - Further thought is required around how the portal structure meets the ground, and how this relates to the tow-path 	<ul style="list-style-type: none"> - The proposed Bridge Design principles, which officers are recommending are bound in by planning condition, address these issues - Pre-application discussions and continued Panel involvement would help ensure that high quality designs that address these issues. -
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Management

<p>- The panel identifies that the management and security of the bridges and lifts will be critically important The roles and responsibilities of the different stakeholders involved in management and maintenance of the bridges should be clearly defined.</p>	<p>- It is recommended that a Management and Maintenance Plan for the proposed bridges is secured by planning condition, enabling the Council to carefully consider and control arrangements for the use of the bridges.</p>
<p>Inclusive and sustainable design</p>	
<p>- The Panel would recommend careful consideration around the integration of the CHP pipes within the bridge design, as there can be considerable thermal movement (expansion and contraction) associated with CHP pipes. - All of the design implications (with regard to the thermal movement of the CHP pipes) should be established prior to the final design of the bridge.</p>	<p>- Noted , these issues would be addressed as part of a detailed design process.</p>
<p>Summary</p>	
<p>- Caution against use of outline planning approval for the bridges - The Panel would welcome the opportunity to comment on the detailed design of the bridges.</p>	<p>- See above response.</p>

Accessibility

6.3.48 Local Plan Policy SP11 (Design), Saved UDP Policy UD3 (General Principles), London Plan Policy 7.2 (An inclusive environment) and emerging Policy DM2 (Accessible and Safe Environments) all support and encourage accessible and inclusive design.

6.3.49 London Plan Policy 3.8 (Housing Choice) requires all homes meet Building Regulation M (4) (2) (accessible, adaptable dwellings), broadly equivalent to the former ‘Lifetime Homes Standards’ and 10% are to Building Regulations M (4) (3) (wheelchair user dwellings).

6.3.50 All of the proposed homes in Phase 1 (Buildings A and B) would meet Regulation M (4) (2). In addition 25 of the proposed Market Rent homes in Building B would meet Regulation M (4)(3) – with these homes being served by two lifts, in line with guidance in the Mayor’s Housing SPG. Whilst this represents just over 10% of the number of homes proposed in Phase 1, it should be noted that all of the proposed ‘wheelchair user dwellings’ would be Market Rent homes and there would be no ‘wheelchair user dwellings for sale’. However, ‘accessible’ homes for sale are due to be provided in Phases 2 and 3 and it is recommended that the

delivery of accessible homes in Phase 1 and in subsequent phases is secured by planning condition.

6.3.51 The public realm around the site has been designed to be inclusive, provide physical accessibility to people of all ages and those with disabilities. All spaces and routes would be well illuminated and gradients of all paths would be less than 1 in 20 to avoid the need for ramped access. Street furniture has been located to avoid clutter or obstruction. The proposal is therefore considered to comply with the above policies.

Community safety

6.3.52 Local Plan policy SP 11 (Design) requires proposals to incorporate solutions to reduce crime and fear of crime. Emerging Policy DM2 (Accessible and Safe Environments) makes clear that development should comply with the principles of 'Secured by design'.

6.3.53 The illustrative masterplan provides a clear distinction between 'fronts' and 'backs' of buildings and all proposed publicly accessible spaces would be overlooked at ground and upper floors from active ground floor uses and/or residential windows. Generous sized residential entrances and lobby areas, the proposed commercial units and the inclusion of an estate office in Buildings A and B should help ensure that the large ground floor cycle stores and refuse stores remain safe and secure.

6.3.54 The Applicant has engaged with the Metropolitan Police Designing Out Crime Officer (PCPO), who has commented on the application. The PCPO raised some initial concerns about the boundary between the rear paths and the sides of the proposed Outline blocks of 1.2m in height and lighting of the proposed bridges. However, they accept that these issues could be addressed further at a detailed reserved Matters stage. The final comment is that there would need to be further consultation on the specification of individual blocks if a 'Secured by Design' award is sought.

6.3.55 The proposed lighting strategy has had to balance security with environmental sensitivities of the site, particularly ecology and biodiversity. It should be noted that the bridges form part of the outline element of the application and are subject to detailed design and the applicant has signalled a willingness to consider the proposed low level illumination at detailed design stage. Heights of proposed boundary treatments for the 'outline' element could be addressed at the Reserved Matters Stage and it is recommended that a planning condition secures Secured by Design accreditation for the detailed element of the scheme.

Design conclusions

6.3.56 Comments from the QRP have helped to shape proposals for this site and whilst the Panel is not entirely satisfied with the application scheme, it is generally very

supportive of the fundamental design decisions that have been made by the applicant and its design team. The illustrative masterplan for the whole site is considered to represent a good approach to structuring development.

6.3.57 The buildings and landscape/public realm that comprises the detailed Phase 1 of the proposal are of a high quality. A number of local people and the Lee Valley Regional Park Authority have raised concerns about the proposed heights of Buildings A and B. Adopted and emerging policy identify the site as being appropriate for tall buildings, in principle. Officers consider that (subject to conditions ensuring that the current or another approved architect oversee the scheme development and implementation and that high quality external materials are used) the proposed buildings are of a sufficiently high quality of design to make them acceptable and that they would not have an unacceptable adverse impact on amenity, microclimate, views or heritage assets.

6.3.58 Furthermore, subject to securing compliance with the proposed Parameter Plans, Design Code and Design Principles (for the bridges), officers consider that the 'outline' proposals for Phases 2 and 3 should also be of a high quality and are acceptable when considered against the relevant policies referred to above.

6.4 Heritage

Heritage Assets

6.4.1 The site is within the Lee Valley Archaeological Priority Area.

6.4.2 The Tottenham High Road Historic Corridor (comprising North Tottenham, Scotland Green, Tottenham Green, Seven Sisters and South Tottenham Conservation Areas) is approximately 1km to the west at its nearest point. Bruce Castle and Clyde Circus and Leucha Road (within LB Waltham Forest) Conservation Areas are about 1.5km away.

6.4.3 The nearest Listed Building to the site, The Ferry Boat Inn (Grade II), is within LB Waltham Forest and is approx 200m to the east of the site along Ferry Lane. The Pumping Station Building and Engine (Grade II) at Markfield Road, and No. 62 High Cross Road (Grade II) are within 1km of the site.

6.4.4 Locally Listed buildings within 1km of the site are Berol House and former Eagle pencil Works at No. 25 Ashley Road and The Green School (at rear of former Grammar School), Somerset Road and, within the LB Waltham Forest, the bridge over Lee adjacent to the Ferry Boat Inn and the Marine House Pumping Station at Ferry Lane/Forest Road.

6.4.5 Springfield Park, a Registered Park and Garden (Grade II) lies just under 2km to the south, within the LB Hackney.

Legislation, national guidance and policies

- 6.4.6 Section 66 of the Act contains a general duty as respects listed buildings in exercise of planning functions. Section 66 (1) provides: "In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall 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."
- 6.4.7 The Barnwell Manor Wind Farm Energy Limited v East Northamptonshire District Council case tells us that "Parliament in enacting section 66(1) did intend that the desirability of preserving listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given "considerable importance and weight" when the decision-maker carries out the balancing exercise."
- 6.4.8 The judgment in the case of the Queen (on the application of The Forge Field Society) v Sevenoaks District Council says that the duties in Sections 66 and 72 of the Listed Buildings Act do not allow a Local Planning Authority to treat the desirability of preserving listed buildings and the character and appearance of conservation areas as mere material considerations to which it can simply attach such weight as it sees fit. If there was any doubt about this before the decision in Barnwell, it has now been firmly dispelled. When an authority finds that a proposed development would harm the setting of a listed building or the character or appearance of a conservation area or a Historic Park, it must give that harm considerable importance and weight. This does not mean that an authority's assessment of likely harm to the setting of a listed building or to a conservation area is other than a matter for its own planning judgment. It does not mean that the weight the authority should give to harm which it considers would be limited or less than substantial must be the same as the weight it might give to harm which would be substantial. But it is to recognise, as the Court of Appeal emphasised in Barnwell, that a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted. The presumption is a statutory one, but it is not irrefutable. It can be outweighed by material considerations powerful enough to do so. An authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the strong statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering.
- 6.4.9 In short, there is a requirement that the impact of the proposal on the heritage assets be very carefully considered, that is to say that any harm or benefit needs to be assessed individually in order to assess and come to a conclusion on the overall heritage position. If the overall heritage assessment concludes that the proposal is harmful then that should be given "considerable importance and

weight" in the final balancing exercise having regard to other material considerations which would need to carry greater weight in order to prevail.

6.4.10 Paragraph 129 of the NPPF states that the LPA should assess the particular significance of any heritage asset that may be affected by development. Paragraph 131-2 states that the LPA should take account of the desirability of sustaining and enhancing the significance of heritage assets and that great weight should be given to their conservation.

6.4.11 Paragraph 134 of the NPPF sets out that where a development proposal would lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

6.4.12 Paragraph 135 of the NPPF sets out that the effect of an application on the significance of non-designated heritage assets should be taken into account in determining applications. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

6.4.13 Haringey Local Plan Policy SP12 (Conservation) requires the conservation of the historic significance of Haringey's heritage assets, their setting and the wider historic environment. Emerging Policy DM9 (Management of the Historic Environment) continues this approach. London Plan Policies 7.8 (Heritage Assets and Archaeology) and 7.9 (Heritage-led Regeneration) make clear that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

Heritage Assessment

6.4.14 Chapter 10 of the ES reports on an assessment of the likely significant effects on buried heritage. The free standing Townscape, Heritage and Visual Impact Assessment (THVIA), which forms part of the ES, assesses the likely significant effects on heritage receptors above ground.

6.4.15 *Buried Heritage (Archaeology)*. The ES identifies the potential of ground works during the construction stage to affect below-ground archaeological deposits. The known deposits are a mill complex of medieval to post-medieval date which stood in the south part of the site. The assessment also found that the site lies in an area with some potential for deposits of geoarchaeological and/or palaeoenvironmental value, Bronze Age activity and a Saxon weir.

6.4.16 In response, the ES recommends that a programme of archaeological works is undertaken to guide appropriate mitigation measures to minimise impacts to these known and potential deposits. Providing this is undertaken, no significant

effects to archaeological heritage assets are predicted. The Greater London Archaeological Advisory Service (GLAAS) has commented on the proposals, concluding that they are unlikely to have a significant effect on heritage assets of archaeological interest and, as such, no further assessment or conditions are necessary. Nevertheless, given the mitigation identified in the ES, it is recommended that a programme of archaeological works is secured by planning condition.

- 6.4.17 *Conservation Areas, Listed Buildings and Locally Listed Buildings.* The THVIA used AVRs of the proposal to assess the likely significant effects on the above ground Heritage Assets referred to above.
- 6.4.18 The assessment does find that the construction of Buildings A and B may negatively affect the few views out of the Tottenham High Road Historic Core Conservation Areas (owing to the presence of cranes and scaffolding etc.) but that any negative effects would be temporary and would be very small or 'Negligible' owing to the distances involved. There are few places within the conservation areas of the historic corridor, from which the proposed development would be visible. This is because the application site is some distance away and does not generally align axially with the residential roads which branch off the high road to the east. In that small number of views where it would be visible it would be experienced as a distant object providing some welcome additional legibility to the townscape. Its effect on the six conservation areas within the corridor, however, including their character and appearance and setting, is considered to be Negligible.
- 6.4.19 Each of the Listed Buildings identified above were assessed and the effects were found to range from 'No Change', 'Negligible' to 'Minor, Neutral', with no harm to aesthetic value or setting or significance being identified. In the cases of the Locally Listed No. 25 Ashley Road (Berol House) and Bridge over Lee, the assessment found that there would be a 'Minor, Beneficial' impact. The effect on the long distance views from Springfield Park was found to be negligible.
- 6.4.20 Historic England has written to confirm that it does not consider that it is necessary for this application to be notified to Historic England under the relevant statutory provisions. Officers agree with the applicant's assessment and consider that any temporary harm to the Tottenham Historic Core Conservation Areas would be outweighed by the high quality design of the proposed permanent buildings that would preserve the character and appearance and actually enhance the setting of these assets. As such, the duty included in s66 of the Act is satisfied.

6.5 Daylight, Sunlight, Microclimate, Impact on neighbouring amenity

- 6.5.1 Saved UDP Policy UD3 (General Principles) states that development proposals are required to demonstrate that there is no significant adverse impact on residential amenity or other surrounding uses in terms of loss of daylight or sunlight, privacy, overlooking. Emerging Policy DM1 (Delivering High Quality Design) calls for appropriate daylight and sunlight and emerging Policy DM6 (Building Heights) states that proposals for tall buildings should consider the impact on ecology and microclimate and that tall buildings within close proximity to each other should avoid a canyon effect and consider the cumulative climatic impact of the buildings.
- 6.5.2 London Plan Policy 7.6 (Architecture) requires buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy. In respect of tall buildings, London Plan Policy 7.7 (Location and design of tall and large buildings) states that tall buildings should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference.
- 6.5.3 The nearest existing permanent residential properties that would be most affected by the siting and scale of the proposed development are between approximately 40 and 80m (on plan) from the following homes::
- Coppermill heights (homes in Hale Village);
 - Crane Heights (homes in Hale Village);
 - Merlin Heights (homes in Hale Village);
 - Egret heights (homes in Hale Village);
 - Kingfisher Heights (homes in Hale Village);
 - Reedham Close (homes to the south of Ferry lane);
 - Thistle Court (homes to the south of Ferry Lane); and
 - Angelica Court (homes to the south of Ferry Lane).
- 6.5.4 A number of non permanent residential uses are either within or relatively close to the site, including the Leisure Moorings (and their amenity space), the now commercial Lock Keepers Cottage (and its amenity space) and the car wash/garage on Ferry Lane.

Daylight/Sunlight/Overshadowing

- 6.5.5 As outlined under Section 6.4 (Design, density and visual impact) above, the two tallest buildings proposed for the site (Buildings A and B), which are in part 21 and 16-storeys respectively, have given rise to a significant number of objections from local people. Many of these objections relate to loss of light and overshadowing.
- 6.5.6 Chapter 12 of the ES reports on an assessment of likely significant effects on daylight, sunlight and overshadowing – focusing on potential impacts on habitable rooms and open spaces within and adjacent to the site. In doing so it

uses the Building Research Establishment (BRE)'s 'Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice' (2011). This advocates the use of Vertical Sky Component (VSC), No-Skyline (NSL) and Annual Probable Sunlight Hours (APSH) methodologies for assessing likely impacts.

- 6.5.7 Vertical Sky Component (VSC) is a quantified measurement of the amount of skylight falling on a vertical wall or window. This is the ratio of the direct sky luminance falling on a vertical wall at the reference point for the simultaneous horizontal luminance under an unobstructed sky. The Commission International de l'Eclairage (CIE) 'standard' overcast sky is used, the ratio is then expressed as a percentage. The maximum value achievable is approximately 40% for a completely unobstructed vertical wall. VSC may be calculated by using the sky light indicator or Waldram Diagram.
- 6.5.8 The No-Skyline (NSL) method is a measure of the distribution of daylight at the 'working plane' within a room. In residential properties, the 'working plane' means a horizontal 'desktop' plane of 0.85 metres (m) in height. The NSL divides those areas of working plane in a room which receive direct sky light through the windows from those areas of the working plane which cannot. If a significant area of the working plane lies beyond the NSL (i.e. it receives no direct sky light) then the distribution of daylight in the room would be poor and supplementary electric lighting may be required. The likely impact of the daylighting distribution to the existing residential properties surrounding the Site is established by plotting the NSL in each of the main rooms. For residential properties living rooms, dining rooms and kitchens are assessed of primary concern. Bedrooms are also analysed, although due to their primary use (for resting and sleeping), bedrooms are deemed less important in terms of the amount of daylight received.
- 6.5.9 With regard to VSC, the British Research establishment (BRE) guidelines state that:
- "if the VSC, with the development in place, is both less than 27% and less than 0.8 times its former value, occupants of the existing building will notice the reduction in the amount of skylight. The area lit by the window may appear more gloomy and electric lighting will be needed more of the time".*
- 6.5.10 With regard to NSL, the BRE Guidelines set out the following:
- A room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area.*
- 6.5.11 Levels of sunlight are measured through an assessment of Annual Probable Sunlight Hours (APSH). With regard to existing surrounding receptors, the BRE Guidelines provide that *a window may be adversely affected if a point at the centre of the window receives for the whole year, less than 25% of the APSH, including at least 5% of the APSH during the winter months (21st September to*

21st March) and less than 0.8 times its former sunlight hours during either period, and if there is a reduction in total APSH which is greater than 4%.

6.5.12 *Daylight.* The ES reports on an assessment of 465 windows in the residential properties referred to above. Of the 465 windows tested, 413 (89%) met the relevant VSC criteria. All 183 of the residential windows to Reedham Close, Thistle Court and Angelica Court, to the south of Ferry Lane, met the criteria, and the proposals are assessed as having a 'negligible' impact on these homes. Of the 282 residential windows tested in the flats in the various Hale Village buildings, 230 (82%) met the relevant VSC criteria and the proposals are assessed as having a 'negligible' impact on these homes. However, 52 (12%) of residential windows fell below the relevant criteria and the impact for these windows is assessed as follows:

- Coppermill Heights (8 Minor, 4 Moderate and 1 Major);
- Cranes Heights (4 Minor and 5 Moderate);
- Merlin Heights (6 Minor and 5 Moderate);
- Egret heights (4 Minor and 5 Moderate); and
- Kingfisher Heights (7 Minor, 2 Moderate and 1 Major).

6.5.13 It should also be noted however that 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.

6.5.14 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.

6.5.15 *Sunlight.* In line with the BRE guidance, the sunlight assessment considered residential windows facing within 90 degrees of due south (i.e. it did not assess likely significant impact on homes to the south of Ferry Lane. The assessment is in two parts and considers Annual and Winter Probable Sunlight Hours.

6.5.16 In terms of Annual Probable Sunlight Hours, of the 238 windows tested, 213 (89%) met the relevant APSH criteria and the proposals are assessed as having a 'negligible' impact on these homes. However, 25 (11%) of residential windows fell below the relevant criteria and the impact for these windows is assessed as follows:

- Coppermill Heights (1 Minor, 3 Moderate and 2 Major);
- Cranes Heights (4 Minor and 2 Moderate);
- Merlin Heights (6 Minor, 1 Moderate and 1 Major);
- Egret heights (1 Minor); and
- Kingfisher Heights (3 Minor and 1 Moderate).

6.5.17 In terms of Winter Probable Sunlight Hours, of the 238 windows tested, 235 (99%) met the relevant WPSH criteria and the proposals are assessed as having

a 'negligible' impact on these homes. However, 3 (1%) of residential windows fell below the relevant criteria and the impact for these windows is assessed as follows:

- Cranes Heights (1 Moderate); and
- Kingfisher Heights (2 Major).

6.5.18 The assessment considered the likely cumulative effects of the proposed development and the approved 19-storey tower on Plot SW of Hale Village but concluded that given the relative distance of the sites, it was not considered likely that this development would have significant additional cumulative effects on the surrounding receptors.

6.5.19 It should be noted that the BRE standards are not policy but are recognised guidance which is used to determine the acceptability of levels of daylight/sunlight within development. 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.

6.5.20 Overall, given the location of the site in an urban area, the proposal is not considered to have a significant impact on sunlight or daylight and as such is in line with planning policy.

Overshadowing

6.5.21 The findings of the assessment reported in the ES provide an indication of the swept path of the shadow created by the development on surrounding amenity spaces. The method for assessing sun on the ground is the 'sun-on-ground indicator'. The BRE Guidelines suggest that the Spring Equinox (March 21st) is a suitable date for the assessment. Using specialist software, the path of the sun is tracked to determine where the sun would reach the ground and where it would not. This assessment reviews the total percentage of an area that receives at least two hours of direct sunlight on the March 21st.

6.5.22 The BRE guidelines recommend that at least half of a garden or amenity area should receive at least 2 hours of sunlight on March 21st or the area which receives 2 hours of direct sunlight should not be reduced to less than 0.8 times its former value (ie no more than a 20% reduction).

6.5.23 The ES reports on an assessment of the overshadowing impacts on amenity areas next to the Lock keepers Cottage, Reedham Close, Thistle Court and the Leisure Moorings. This found that all of these spaces met the relevant BRE guidelines and the impact on these spaces was assessed as 'negligible'.

Lighting

- 6.5.24 Paragraph 125 NPPF states that “By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.”
- 6.5.25 Saved UDP Policy ENV7 (Air, Water and Light Pollution) states that the Council will control potential pollution by (amongst other things) (b) requiring developments to include measures to avoid, reduce and only then mitigate the emissions of pollutants and (c) separating potentially polluting activities from sensitive areas (green belt, Metropolitan open Land or ecologically valuable sites or uses (schools, hospitals or homes). London Plan Policies 7.5 (Public Realm), 7.6 (Architecture) and 7.18 (Protecting Open Space and Addressing Deficiency) also calls for carefully designed and specified lighting to minimise adverse effects.
- 6.5.26 Chapter 13 of the ES reports on an assessment of likely significant effects of external lighting (light spill, sky glow and glare) on sensitive residential and wildlife/habitat receptors. Residential receptors are sub-divided in to those homes that have a direct view of the site (flats in the various Hale Village buildings fronting Mill Mead Road) and others. Wildlife receptors are sub-divided in to habita/forarging and Ramsar/SSSI/SPA. The assessment assumes the implementation of the ‘Hale Wharf Lighting Management Plan’ (Appendix 13. B of the ES) during construction and that permanent external lighting complies with the ‘Hale Wharf Lighting Design Code’ (Appendix 12.C C of the ES). It is recommended that compliance with an approved Construction Environmental Management Plan (CEMP) that covers external lighting and compliance with the permanent Lighting Code are secured by planning condition.
- 6.5.27 *Light Spill.* With mitigation in place, during both the construction and operational phases there is expected to be a ‘Negligible’ to Slight’ impact on residential properties and a ‘Negligible’ to ‘Slight Adverse ‘ impact on wildlife receptors.
- 6.5.28 *Sky Glow.* With mitigation in place, during the construction phase there is expected to be a ‘Negligible’ to ‘Slight to Moderate’ impact on residential properties and a ‘Slight to Moderate Adverse’ impact on wildlife receptors.
- 6.5.29 With mitigation in place, during the operational phase there is expected to be a ‘Negligible’ impact on residential properties and wildlife receptors.
- 6.5.30 *Glare.* With mitigation in place, during both the construction and operational phases there is expected to be a ‘Negligible’ to Slight Adverse’ impact on residential properties and a ‘Negligible’ to ‘Slight ‘ impact on wildlife receptors.
- 6.5.31 The Assessment concludes that, in summary, potential effects are expected to occur within 500m of the site, with the majority being limited to 100m. Construction phase impacts are likely to contribute to more substantial effects, but this will be limited primarily to days with limited daylight hours. Operational

phase impacts are expected to contain high degrees of in-built mitigation and are generally 'Negligible' 'Slight Adverse'.

Wind

- 6.5.32 London Plan Policies 7.6 (Architecture) makes clear that development should not cause unacceptable harm to the amenity of surrounding land and buildings and 7.7 (Location and design of tall and large buildings states that tall buildings should not affect their surrounding adversely in terms of (amongst other things) microclimate and wind turbulence.” The Mayor’s Sustainable design and Construction SPG identifies the Lawson Criteria as a means for identifying suitability of wind conditions. Emerging Policy DM 5 (Siting and design of tall buildings makes clear that a tall building must “consider the impact on ecology and microclimate”.
- 6.5.33 Chapter 14 of the ES reports on an assessment on wind microclimate. The Assessment was based on both Computational Fluid Dynamics (CFD) and Wind Tunnel Testing, as requested in the Council’s Scoping Opinion. Sensitive Receptors that were assessed include locations at ground floor around the site, including the proposed entrance at ferry lane, Ferry lane footpath and carriageway, the River Lee Navigation lock and towpaths and the garage to the east of the site. Within the scheme itself, proposed open spaces and a significant number of proposed private amenity spaces (balconies) were tested.
- 6.5.34 A number of mitigation measures were identified following the results of the CFD modelling, including trees to prevent high wind speeds along Ferry Lane, dense planting around the lock gates and play area to the north of Block B and increased screening for balconies above the 8th floor of the proposed housing. The Wind Tunnel Testing assessed the wind environment with and without the wind mitigation measures and specific measures – including a mix of solid and porous balcony parapets and soft landscaping (hedges at 1.5m and trees at heights of between 5 and 12m) have been embedded within the proposed development.
- 6.5.35 An assessment of potential significant effects has been undertaken, based on meeting the Lawson Criteria 2 (Leisure thoroughfare/strolling) for the intended pedestrian uses within and around the proposed development. The Assessment concludes that, with mitigation in place, there would be no residual significant adverse effects within or around the proposed development and that the resulting wind speeds area appropriate for the intended uses.
- 6.5.36 The Council commissioned an independent review of the wind assessment contained in the ES by RWDI, an engineering wind consultancy specialising in wind/microclimate issues. Following clarification from the applicant with regards to potential effects during construction and from the permanent development on the Garage Site on Ferry Lane, RWDI is satisfied that the assessment within the

ES is satisfactory and that the wind environment of the site and surrounding area would be acceptable.

Privacy

6.5.37 Saved UDP Policy UD3 (General Principles) seeks to ensure that there is no significant adverse impact on residential – including privacy and overlooking. Emerging Policy DM1 (Delivering high quality design) requires, amongst other things, that development provides an appropriate amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and the residents of the development

6.5.38 London Plan Policy 3.5 (Quality and Design of Housing Developments) focuses on standards in new development, with the Mayor of London's Housing SPG (March 2016) (2.3.36) noting that former commonly used minimum separation distances between habitable rooms of 18 – 21m may be useful yardsticks, but advocates a more flexible approach to managing privacy.

6.5.39 There have been a number of concerns from residents in the various Hale Village buildings that front the site over a loss of privacy that would result from the proposed development. All of the existing residential buildings that front Mill Mead Road are in excess of 80m (on plan) from the proposed housing. The existing homes to the south of Ferry Lane are between about 50 and 80m (on plan) from the proposed homes. This is significantly in excess of the yardstick distances of 18-21m referred to in the Mayor's Housing SPG, and there should be no loss of privacy to existing homes.

Overall conclusion on impact on amenity

6.5.40 Local Plan and London Plan policies makes clear that that there should be no significant adverse amenity impact from new development. This is emphasised particularly in cases where densities are above the indicative ranges in the London Plan density matrix. The proposed development would undoubtedly change the character and scale of development on the site and its relationship with existing surrounding properties. The proposed scale and massing would have an impact upon outlook from these surrounding homes and would be an obvious change from the existing building on the site. Surrounding residents would accordingly experience both actual and perceived changes in their amenity as a result of the development. Nevertheless, taking account of the findings of key relevant assessments in the ES and the urban setting of the site, officers do not consider that the proposal would result in an unacceptable impact on local amenity and as such is considered to satisfy planning policy.

6.6 Housing numbers, mix, affordable housing and quality

Housing numbers and mix

- 6.6.1 Local plan Policy SP2 (Housing) requires dwelling mix to comply with the Council's Housing SPD (2008). However, this has been formally revoked and no longer forms part of planning policy. The Council's Strategic Housing Market Assessment (SHMA) (May 2014) identifies a preference for larger homes, although it estimates that around 67% of future demand will be for one and two bedroom properties.
- 6.6.2 Emerging Policy DM 11 (Housing Mix) requires the mix of housing to have regard to individual site circumstances.
- 6.6.3 London Plan Policy 3.8 (Housing choice) requires new residential developments to offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors, including the private rented sector.
- 6.6.4 *Detailed element (Phase 1)*. Building A would comprise 141 homes for sale and Building B would be a Private Rented Scheme (PRS) providing 108 homes for market rent, as set out in Table 4 below.

Table 4: Phase 1 Housing

	Building A Market – for sale		Building B Market – for rent		Overall	
Studio	7				7	
1-bed	54		50		104	
2-bed	80		51		131	
3--bed	0		7		7	
	141		108		249	

- 6.6.5 *Outline element (Phase 2 & 3)*. The outline application for the site as a whole seeks permission for 'up to' 505 dwellings, meaning that Phases 2 and 3 could provide up to 256 homes.
- 6.6.6 *Overall (Phases 1, 2 and 3)*. The revised Development Specification sets out the following indicative dwelling mix, broken down by tenure, for the proposed overall development.

Table 5: Overall Indicative dwelling mix

	Market – for sale		Market – for rent		Affordable Rented		Shared Ownership		Total	%
	No.	%	No.	%	No.	%				
Studio	10	4%	-	-	-	-	-	-	10	2%
1-bed	87	35%	50	46.5%	-	-	55	47%	192	38%

2-bed	103	42%	51	47%	17	50%	61	53%	232	46%
3-bed	47	19%	7	6.5%	17	50%	0	-	71	14%
Total	247	100%	108	100%	34	100%	116	100%	505	100%

6.6.7 The indicative dwelling mix is largely non-family housing, with 86% of proposed homes being 1 and 2-bedroom. This reflects the high-density nature of the proposals and the provision of PRS housing, which is particularly suited to smaller homes. However, half of the proposed 34 Affordable Rent homes (discussed in detail below) would be family-sized homes.

6.6.8 The illustrative masterplan for the outline element of the scheme is based on a mix of apartments and maisonettes, with the family-sized maisonettes being located on the ground and first floors of buildings, with access to small gardens. The proposed type and mix of dwellings is supported by the Council's Housing Design and Major sites team and would help deliver a range of housing across the Tottenham Housing Zone that addresses local housing need, with some sites providing greater opportunities for family-sized homes.

Affordable Housing

6.6.9 London Plan Policy 3.11 (Affordable housing targets) seeks to maximise affordable housing provision across London and seeks to provide an average of 17,000 more affordable homes per year up to 2031 and requires 60% of affordable housing to be for Social/Affordable Rent and 40% Intermediate.

6.6.10 London Plan Policy 3.12 (Negotiating affordable housing on individual sites) notes that in negotiating affordable housing on individual private housing and mixed use schemes, Local Planning Authorities "should take account of their individual circumstances including development viability, the availability of public subsidy, the implications of phased development including provisions for reappraising the viability of schemes prior to implementation ('contingent obligations'), and other scheme requirements."

6.6.11 Policy SP2 (Affordable housing) requires that, subject to viability, schemes meet the 50% affordable housing borough-wide target (based on habitable rooms) and a tenure split of 70% Affordable Rent and 30% Intermediate. The emerging revised Local Plan Policy SP2 (Affordable housing) and emerging policy DM 13 (Affordable housing) reduce this requirement to 40%, based upon evidence of development viability and proposes a 60%:40% split (Social/Affordable Rent/Intermediate), in line with London Plan Policy 3.11.

6.6.12 In terms of mix, the Council's draft Housing Strategy (2015-2020) sets out the desired Affordable Rent mix of 1-bed – 15%, 2-bed – 43%, 3-bed – 32% and 4-

bed – 10% and Intermediate of 1-bed – 20%, 2-bed – 50%, 3-bed – 25% and 4-bed – 5%

- 6.6.13 Emerging Tottenham AAP Policy AAP3 (Housing) states that the Council will expect affordable housing in the area to be delivered in accordance with the above borough-wide policies, with the exception of the tenure split, which is reversed to the rest of the Borough and should be 60% Intermediate and 40% Affordable Rent in the Tottenham AAP area.
- 6.6.14 Emerging Policy DM 12 (Housing Design and Quality) requires mixed tenure development to be designed to be 'tenure blind'.
- 6.6.15 The application as submitted provided for 34 Affordable Rented units (17 x 2-bed and 17 x 3-bed) or 119 Habitable Rooms out of a total of 1,374. This amounted to 7% by unit and 9% by Habitable Room, with all the affordable accommodation being provided in Phase 3 (Blocks H to J). A number of local people objected to this relatively low amount.
- 6.6.16 The Mayor of London's Stage 1 Report stated that the level of affordable housing should be increased and a portion of the affordable housing should be delivered in Phase 1. It encouraged discussions to examine a more varied mix of tenures and unit sizes to achieve an increased level of affordable housing and that the Council should provide the GLA with their independent assessment prior to the referral of any Stage 2 application in order to confirm that the proposal would provide the maximum reasonable amount.
- 6.6.17 Following further discussions between the Applicant, the Council and the GLA over financial viability issues, the GLA has agreed to provide additional housing grant funding of £7.75m (in addition to the £11.95m grant towards the cost of the proposed bridges) to enable the inclusion of additional affordable housing in the form of Shared Ownership homes. Discussions have also taken place over the inclusion of some affordable housing being provided in Phase 1, but officers are satisfied that this is not viable. However, it is proposed that all of the increased amount of affordable housing would be provided in Phase 2 (Blocks C to G) rather than in Phase 3.
- 6.6.18 The increased affordable housing offer is set out in Table 5 above. This would comprise 150 affordable dwellings – 34 Affordable Rent and 116 Shared Ownership dwellings, amounting to 30% by unit and 30% by habitable room. This represents a 23:77 split between Affordable Rent and Shared Ownership by unit.
- 6.6.19 The amount of proposed affordable housing is below the adopted policy target of 50% and the emerging policy target of 40% by Habitable Rooms . The tenure split is also not fully aligned with the policy target split of 70:30 Affordable Rent: Intermediate and the emerging policy target split of 40:60 Affordable Rent: Intermediate.

6.6.20 The Applicant has provided a revised Financial Viability Appraisal (FVA) which has been reviewed by BNP Paribas's viability consultants on behalf of the Council. Following discussions and clarification on build costs and sales values, BNP has confirmed that the proposed scheme cannot currently support in excess of 30% affordable housing. Officers therefore consider that the proposed amount and type of affordable housing represents the maximum reasonable amount. It is understood that the additional housing grant funding will be subject to a recycling mechanism to achieve up to 35% affordable housing should the viability of the development improve. This additional 5% is not secured in the section 106 agreement. Should values improve further the GLA would recoup some of its housing zone infrastructure funding.

6.6.21 All the affordable homes would be provided in Phase 2 of the development on the south side of the site on the ground to fourth floors. All homes would have access to gardens or other private amenity space. The Council would be able to ensure at Reserved Matters stage that these homes met all of the required housing standards and that they are of a high quality design, with no discernible difference in external appearance from homes for sale

6.6.22 At 50%, the proportion of family-sized Affordable Rent homes is above the 43% called for in the Council's emerging Housing Strategy. This is welcome as there are limited opportunities to secure family sized affordable homes at ground and lower floors in the Tottenham Housing Zone and all opportunities to do so should be maximised.

6.6.23 The Council's draft housing strategy 2015- 2020 seeks to ensure that rents are affordable for local people. Given this it is recommended that planning obligations ensure that rent levels are as follows:

- 1 beds can be provided at up to 80% market rent or Local Housing Allowance (LHA)
- 2 beds can be provided at up to 65% market rent or LHA
- 3 beds can be provided at up to 55% market rent or LHA
- 4+ beds can be provided at up to 45% market rent or LHA

6.6.24 Through the emerging Tottenham AAP policy AAP3 the council has committed to a 'portfolio based approach to sites'. The council is working collaboratively with landowners through the planning system to coordinate the provision of housing tenure and types. This means that each site will be considered in terms of its specific characteristics and suitability for different housing types and tenures and balanced against proposals for other sites in Tottenham Hale, with the council playing a key role in managing the distribution across the area. For example, some sites may be more appropriate for family or smaller units, while others may suit particular tenure types. The Hale Wharf site has been identified as particularly suitable for affordable rented family housing as well as smaller

shared ownership units. The portfolio approach currently projects 40% affordable housing across the sites.

6.6.25 As such the level of affordable housing now proposed has been confirmed to be the maximum reasonable amount. The tenure and size mix, taking into account the portfolio approach to sites, accords with Council policy and is therefore considered to be acceptable.

Layout and standard of accommodation

6.6.26 Local Plan Policy SP2 (Housing) requires high quality new residential development and adopts the GLA Child Play Space Standards of 2009. Policy SP13 (Open Space & Biodiversity) underlines the need to make provision for children's informal or formal play space. Emerging Policy DM 12 (Housing Design and Quality) requires new housing to meet the Mayor's Housing SPG and homes to have access to private amenity space.'

6.6.27 London Plan Policy 3.5 (Quality and Design of Housing Developments) requires the design of all new housing developments to enhance the quality of local places and for the dwellings in particular to be of sufficient size and quality. The Mayor's Housing SPG (March 2016) sets out the space standards for all new residential developments to ensure an acceptable level of living accommodation offered.

6.6.28 London Plan Policy 3.6 (Children and Young People's Play & Informal Recreation Facilities) seeks to ensure that development proposals include suitable provision for play and recreation. The Mayor of London's Play and Recreation SPG (2012) sets a benchmark of 10 sq.m of useable child playspace to be provided per child, with under 5s child play space provided on-site as a minimum.

6.6.29 The following sub-sections consider the acceptability of the detailed element of the scheme (Buildings A and B) and, where possible, the outline element of the scheme (Buildings C to K) against the above key relevant planning policy and guidance. It should be noted that, if approved, the subsequent detailed design of Buildings C to K would be subject to Reserved Matters applications and the Council would be able to consider all remaining the quality of the proposed homes in more detail at that stage. In general, officers consider that the proposed Parameter Plans and Design Code should enable detailed designs to meet the detailed aspects of the housing standards that cannot be assessed at this stage.

6.6.30 *Orientation, layout and floorspace.* The majority of homes in Buildings A and B would be dual aspect and there would be no single-aspect north or south facing properties – generally meeting the Mayor's standards.

6.6.31 The number of homes per floor served by the proposed single stair/lift cores would be between six and nine. At nine flats per floor, the lower floors would

exceed the recommended the Mayor's standard of eight. Officers consider that this is acceptable, given the generally high quality of the proposed homes

6.6.32 The proposed homes would generally meet and in many cases exceed the minimum spaces standards set out in table 3.3 of the London Plan. The only exceptions are that a small number of i-bed units in Building B would fall short by approx. 0.1sqm. All flats would meet the minimum floor-to-ceiling height of 2.5m.

6.6.33 *Open space, children's playspace and amenity space.* The overall proposals would provide a series of publicly accessible spaces amounting to approx. 0.17ha. Whilst officers consider that such space is optimised within the proposed scheme and welcome its provision, the level of provision does not meet the Council's locally derived standard of 1.64ha of open space and 0.16ha of allotments per 1,000 people. A financial contribution towards improving the adjoining Paddock is therefore recommended.

6.6.34 In addition, the proposals would provide 450sqm of 'doorstep' play space for 0-5 year olds (100sqm in Phase 1 and 350sqm in Phase 2). The proposed space would be integrated with the proposed publicly accessible spaces and public realm without compromising the amenity needs/enjoyment of other residents and would more than meet the on-site play requirements of the 40 x under 5-year olds that are predicted to live in the proposed development (based on methodology in the Mayor's SPG).

6.6.35 The expected child yields from the proposed development also generate the need for 290sqm of space for 5-11-year olds and 190sqm of play space for children over 12. Officers accept that it is not practicable to incorporate this space on site and that it may be provided off-site within 400 to 800m. The recommended financial contribution towards The Paddock could help provide enhanced play facilities for older children.

6.6.36 All of the proposed flats in Buildings A and B would have private amenity space (gardens/ terraces/balconies) and these generally meet the standards in the London Plan/Mayor of London's SPG (which calls for 5sqm for 1-bed homes, plus 1sqm additional space for each additional bedroom). Having said this, a small number of the proposed 2-bed and 3-bed homes would fall slightly below. Officers consider that this is acceptable, given the generally high quality of the proposed accommodation.

6.6.37 *Internal Daylight Conditions.* The application is supported by an Internal Daylight Assessment Report. This sets out findings of an assessment in to the daylight conditions for the habitable rooms in the proposed housing in the detailed element of the scheme (Buildings A and B). In line with the BRE Guidelines, the assessment considered the Average Daylight Factor (ADF) of habitable rooms against standards. It found that about 80% of proposed bedrooms and combined living/kitchen rooms in Building A and B met the relevant standard. The reason

why some of the proposed rooms fall below standards is primarily because of proposed protruding balconies for flats above them – necessary to meet the amenity space standards called for by the London Plan. It should be noted that the proposals avoid non-daylit internal kitchens and that calculations are based on the combined area represented by the open plan kitchen/living space.

- 6.6.38 There is a trade-off here between competing objectives of providing private amenity space and internal day lighting standards. Officers consider that the proposals optimise residential amenity of the proposed homes and that these shortfalls are acceptable given the generally high quality of the proposed accommodation.
- 6.6.39 *Wind/microclimate.* The assessment set out in the ES informed the detailed design of Buildings A and B, including balcony details and the likely wind conditions for future residents is considered acceptable.
- 6.6.40 *Noise.* Building A is close to Ferry Lane and it is recommended that a planning condition requires that the detailed glazing and ventilation specification ensures a satisfactory internal noise environment for sleeping.
- 6.6.41 *Privacy and overlooking.* The Mayor of London's SPG notes that, in the past, planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18 – 21m between habitable rooms (as opposed to between balconies or terraces or between habitable rooms and balconies/terraces). It goes on to acknowledge that these can still be useful yardsticks for visual privacy, but adhering rigidly to these measures can limit the variety of urban spaces and housing types in the city, and can sometimes unnecessarily restrict density.
- 6.6.42 Facing habitable rooms in Buildings A and B would be about 17m apart and primary windows generally face east and west, rather than each other. Where primary bedroom in Building B do face south this has been managed so that they face secondary bedroom windows (rather than a primary bedroom or living room window). Officers consider that this arrangement would provide an acceptable level of privacy.
- 6.6.43 The proposed Parameter Plans for the outline element of the proposal generally allow for similar separation distances, although habitable rooms in Blocks C and K could be about 12m apart at their closest point (if Building K was in residential rather than office use). The detailed design of homes here would need careful consideration, although it would be possible to use a combination of room use/layout and detailing to satisfactorily manage privacy and overlooking. Rather than include an additional Design Code topic to cover this point, as suggested in the Mayor of London's Stage 1 Report, it is recommended that a planning condition requires applications for approval of Reserved Matters to be accompanied by a statement demonstrating how the proposed access, appearance, layout and

scale of the permitted buildings would ensure adequate levels of privacy for future residential occupiers.

6.6.44 *Overall*. The quality of the proposed housing is considered to be generally good and meets the policy objectives of Local Plan Policies SP2 and SP13, London Plan Policies 3.5 and 3.6 and the Mayor's Housing SPG.

6.7 Transport

6.7.1 Local Plan Policy SP7 (Transport) states that the Council aims to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by promoting public transport, walking and cycling and seeking to locate major trip generating developments in locations with good access to public transport.

6.7.2 London Plan Policy 6.1 (Strategic Approach) sets out the overall approach to transport, including encouraging the closer integration of transport and development, encouraging patterns and nodes of development that reduce the need to travel, increasing public transport/walking/cycling, increasing the use of the Blue Ribbon Network for passenger and freight use. London Plan Policy 6.3 (Assessing effects of development on transport capacity) makes clear that proposals should ensure that likely impacts are fully assessed (in line with Best practice Guidance).

Background

6.7.3 *Tottenham Hale Station and Gyratory*. The Site has a Public Transport Accessibility Level (PTAL) of 6a/5 at the southern end of the site and 4 at the northern end. It is in close proximity to Tottenham Hale station, being around 260m to the southernmost tip of the Site, providing regular links via the Victoria Line and national rail services. The Site is also served and within walking distances of bus route 41, 76 and 192, accessed from Tottenham Hale Station. The proposed Hale Village Green Link Bridge (HVGLB) (Bridge 1) would connect the site to Hale Village and hence enable an alternative pedestrian and cycle route towards Tottenham Hale station and improve direct accessibility to the station from the development.

6.7.4 Tottenham Hale Station has recently had a reconfiguration of the bus station and consent has been granted for improvements to the rail station, which will include accessibility and facility improvements. These include a new entrance, an enlarged concourse and improved gate lines, step free access to national rail services and improved interchange, plus a footbridge that will connect to the Hale Village development. It is planned for these works to be complete by Autumn 2017. In addition to this the Tottenham Hale Gyratory was remodelled to two way working which has provided an improved arrangement for highway users, pedestrians and cyclists in the locality.

- 6.7.5 *Crossrail 2*. The proposed Crossrail 2 (a new railway serving London and the wider South East running from National Rail networks in Surrey and Hertfordshire via new tunnels and stations) includes a station at Tottenham Hale.
- 6.7.6 *Planning application documents*. The application is supported by a Transport Assessment (supplemented by Technical Notes), which assesses likely transport impacts, together with a Travel Plan, which identifies a range of management strategies and measures to support sustainable travel and a Delivery and Servicing Plan, which identifies areas where delivery and service vehicles could access the site and identifies strategies to negate any potential negative impacts. Chapter 5 of the ES draws on the Transport Assessment and reports on an assessment of likely significant environmental effects.

Highway Access

- 6.7.7 The proposed site access off Ferry Lane would be slightly to the west of the existing access to suit the building lines proposed for the site. The progression of the detailed design and highway works to create this would need to be covered by a Section 278 Agreement between the applicant and the Highway Authority. Swept path analysis demonstrates acceptable arrangements for HGV's, refuse vehicles and cars passing through into the site and leaving the site onto Ferry Lane, although the S278 process would undertake all formal design checks that would be necessary.

Pedestrian and cycle access

- 6.7.8 London Plan Policy 6.10 (Walking) requires proposals to provide high quality pedestrian environments. London Plan Policy 6.9 (Cycling) requires the provision of secure, integrated and accessible cycle parking facilities for long-stay users (staff and residents) and short-stay users (visitors). Emerging Policy AAP7 (Transport) requires, amongst other things, developments to seek improvements to connectivity and permeability for pedestrians and cyclists.
- 6.7.9 Pedestrian and cycle access would be retained from Ferry Lane. The illustrative masterplan for the 'outline' element shows Internal footways varying in width, between 2.7m and 1.2m. The narrowest footways sections (about 64m in total) would be to the north of Block C, where they would pass between gardens and adjacent landscaping areas. Whilst this is adequate in terms of accommodating wheelchairs/pushchairs and parents, for such a major development, it would be desirable to achieve minimum footway widths of 2.0m. the proposed 'Access and Public Realm' and 'Development Zones at Ground Level' Parameter Plans would enable such a minimum width to be secured at the Reserved Matters stage and the Applicant has signalled its willingness to discuss this issue further at that stage.

6.7.10 The proposals make provision for two footbridges, both in 'outline. Bridge 1, the Hale Village Green Link Bridge (HVGLB) and Bridge 2, an additional footbridge that crosses Pymmes Brook, to provide step free access to the towpath, from which lift access would be provided to the HVGLB. A third bridge from the site to Paddock is not included in this application however its provision prior to occupation of the final unit in Phase 3 will be conditioned.

6.7.11 The introduction of the HVGLB would improve walk distances to Tottenham Hale Station and increase PTAL ratings for parts of the site, such that all of the site would be within PTAL 5 (including Block G) and the part of the site benefitting from PTAL 6a would increase to take in Blocks C and K. This improved accessibility helps make the proposed high density scheme acceptable from a transport perspective and the Hale Village Green Link Bridge (HVGLB) would also carry the pipes that connect the site with the Energy Centre in Hale Village. It is therefore recommended that any permission is subject to a planning obligation that ensures that Bridge 1 is delivered as follows:

- In the event that the scheme is connected with the Energy Centre in Hale Village then the bridge shall be delivered prior to the first occupation of any accommodation in Phase 1; or
- In the event that energy for the scheme is delivered by way of an on-site Energy Centre, the bridge shall be delivered prior to the first occupation of any accommodation in Phase 2 or 3.

6.7.12 Proposed cycle access would be the same as pedestrians, via Ferry Lane and the proposed bridges. The proposals do not include any formal cycle facilities within the development, other than cycle parking, and given the predicted relatively low numbers of vehicle movements, this is considered acceptable. Mandatory Cycle Lanes exist on Ferry Lane, and there are formal cycle route facilities in both directions from the site including Toucan Crossings.

6.7.13 Whilst the detailed design of the Paddock Bridge is not applied for in the application the Parameter Plans allow for the provision of the bridge and the Section 106 agreement will secure that a Planning Application for the Paddock Bridge should be made prior to, or simultaneous with, the application for reserved matters for Phase 3 and that the Bridge will be delivered before the occupation of the final unit in Phase 3.

PERS Audit and Pedestrian Impacts

6.7.14 The proposed development is expected to generate 365 walk trips in the AM peak, which of course includes the walk trips to bus, tube and rail services at Tottenham Hale. A Pedestrian Environment Review System (PERS) audit was undertaken for the routes connecting the site with Tottenham Hale station, Tottenham Hale Retail Park and Harris Academy, as well as routes to key facilities and recreation grounds. The audit generally rated links, crossings and public transport waiting areas as 'green', apart from the pedestrian crossing of

Ferry Lane east of the site, the public transport waiting area at Watermead Way (east) and the pedestrian route to Harris Academy. All of these rated 'yellow'. It is recommended that financial contributions be secured by a planning obligation in a s106 Agreement for the provision of Toucan/Tiger crossing on Ferry Lane to the east of the site to replace the existing zebra crossing.

6.7.15 .Pedestrian comfort levels have also been assessed to and from the site, carried out in accordance with TfL's guidance on Pedestrian Comfort Assessments. This assessment has identified that by 2021 and with the development in place, the north footway of Ferry Lane would experience a decrease in pedestrian comfort level, with the ES concluding that the proposed development would have a 'negligible' impact. With Bridge 1 in place and assuming a rather conservative redistribution of 20% of pedestrians away from Ferry Lane, the existing comfort levels along Ferry lane are maintained at peak times.

Operational Phase Trip Generation and Servicing

6.7.16 London Plan Policy 6.3 (Assessing effect of development transport capacity) makes clear that impacts on transport capacity and the network must be fully assessed and that, amongst other things, Delivery and Service Plans should be submitted to support strategic development proposals. London Plan Policy 6.14 (Freight) states that development proposals should promote the uptake of Delivery and Service Plans and the use of the Blue Ribbon Network for freight transport.

6.7.17 The Council's Transportation Team has confirmed that predicted trip generation has been derived in accordance with the methodology agreed with the Council and TfL, partly by adopting separate trip rates for flats that would be allocated a car parking space and those that would be 'car free'. Iterations were carried out using both the TRICS and TRAVEL databases and for the sake of robustness the higher car trip results were used.

6.7.18 The Trip Generation predictions are based on the 2011 census 'journey to work' mode shares in the Tottenham Hale Ward and are adjusted to reflect the proposed parking provision. The absolute numbers of peak car trips is predicted to be low (8 in the AM peak and 6 in the PM). Overall the residential element of the development is predicted to generate 338 all mode trips in the AM peak and 258 all mode in the PM peak. Public transport mode shares for the homes with parking are predicted to be 65% and 83% for those without. The cycle mode is predicted to be around the Borough average of 3%. The trips from the proposed non-residential floorspace bring the total trip generation to 402 (two-way) in the AM peak and 326 (two-way) in the PM peak, with the majority utilising public transport.

6.7.19 The application allows for two land use scenarios; 505 homes and 507sqm of non-residential uses and (if Building K is used for B1 offices), 505 homes and

1,607sm of non-residential uses. In order to robustly assess these different scenarios, the TA assumes that Building K is occupied as B1 offices and that the maximum numbers of proposed homes (505) are delivered. The TA also makes allowance for the continued use of Business barges (which would be allocated 6 car parking spaces).

6.7.20 Summarising the predicted trip generation for the whole proposed development, the TA predicts the AM Peak hour two-way trips (inbound and outbound) as follows (note that the AM and PM peaks are largely similar, with the AM peak slightly higher):

- Underground 150
- Train 52
- Bus 125
- Car 8
- Car passenger 10
- Cycle 13
- Foot 38
- Taxi/Other 5

6.7.21 Delivery and servicing vehicle trips have been derived using data from similar sites and are predicted to number around 26 a day for the residential component of the development and 19 to 25 a day for the non-residential component. The site access and internal roads have been designed to accommodate vehicles expected to visit the development, including construction vehicles such as 16.5 metre articulated lorries. It is envisaged that smaller vehicles will use spaces in the public parking courts, and locally widened carriageway in a number of locations to enable stopped larger vehicles to be passed by another car or delivery vehicles.

6.7.22 The Delivery and Service Plan submitted in support of the application includes swept path analysis for refuse vehicles of both the 'detailed' element of the proposal and the indicative masterplan for the 'outline element and finds that these are acceptable. Officers agree. It is recommended that implementation for the proposed Delivery and Service Plan is secured by way of planning condition. It is noted that in the Delivery and Servicing Plan reference is made to some redesign of the carriageway and public realm layout to provide an improved layout that could better accommodate service vehicle manoeuvres and stopping. Detailed arrangements can be provided as part of applications for Reserved Matters approval for Phases 2 and 3.

6.7.23 Taking account of the proposed residential and non-residential uses and associated servicing trips, the TA predicts that there would be a reduction in car/vehicle trips to and from the site from the existing baseline position – a decrease in the daily flow of approx. 476 trips (just under 2%). The ES concludes that this would represent a negligible effect and officers agree.

Parking

- 6.7.24 Saved UDP Policy M9 (Car-Free Residential developments) sets out that proposals for new development without the provision of car parking will be permitted in locations where there are alternative and accessible means of transport available; public accessibility is good; and a controlled parking zone exists or will be provided prior to occupation of the development. Emerging Policy M10 (Parking for Development) requires proposals to be assessed against parking standards.
- 6.7.25 London Plan Policy 6.13 (Parking) requires the inclusion of minimum amounts of car parking for disabled people and Electric Vehicle Charging Points. It also sets out maximum car parking standards in Table 6.2 and minimum cycle parking standards in Table 6.3.
- 6.7.26 Overall, the proposals include 58 car parking spaces, of which 6 would be allocated to the Business Barges, 2 would be for car club provision, and the remaining 50 for 'blue badge holders' (derived from the 10% of all units being fully accessible and requiring a parking space). The following paragraphs discuss proposed car and cycle parking provision for each of the phases.
- 6.7.27 *Phase 1 ('Detailed' element)*. A total of 25 surface level car parking spaces (initially reserved for wheelchair accessible units) and 2 surface level car club spaces would be provided for Phase 1. During the construction of Phases 2 and 3, a temporary car parking area of 25 spaces would be provided immediately to the north and west of Block B to cater for people living in Blocks A and B. Given that Phase 1 would accommodate approximately half of the proposed residential units, officers consider that this would be acceptable. However, the proposed Car Parking Management Plan (discussed below) should secure the inclusion of a car club bay during these interim arrangements and also provide the required amount of Electric Vehicle Charging Point (EVCP) bays.
- 6.7.28 Cycle parking for the new homes in Phase 1 would be provided in ground floor store areas. The application provides for 221 cycle parking spaces in a ground floor and mezzanine floor cycle parking area in Block A and 166 spaces in a ground floor area in Block B, with visitor cycle parking within the external landscape area. This accords with the requirements of the London Plan. However, all of the proposed internal cycle parking spaces would be semi-vertical and both LBH Transport and TfL would prefer at least some horizontal spaces, which are more convenient and easier to use, in order to maximise use by residents. The Applicant submitted a Technical Note (04-08-16) proposing different arrangements to enable horizontal parking, but this would mean a shortfall of space in Block B, with residents here having to use cycle parking in Block A. Whilst the Applicant's proposal would numerically meet the demands of the two blocks, officers consider that it would be an awkward arrangement, especially when the overall development is being proposed as highly sustainable

in transport terms and essentially 'car free'. Cycle Parking needs to be practical, accessible and go towards encouraging residents to use their cycles. Officers are confident that an acceptable solution can be found, with a mixture of semi-vertical and horizontal parking, and it is recommended that details are reserved by condition for subsequent approval.

6.7.29 *Phases 2 & 3 ('Outline' element)*. A total of 25 surface level residential car parking spaces and 6 surface level businesses spaces (for the business barges) are proposed for these phases and cycle parking would be provided within buildings/the public realm to meet minimum standards. Details of these arrangements would follow as part of subsequent applications for approval of Reserved Matters.

6.7.30 Officers have some concern about the proposed 6 car parking spaces for the existing Business Barges. The Applicant has stated that these are attached to the ongoing leases for the Barges. Whilst this is accepted, given the proposed low car parking provision for the remainder of the development, it seems counter intuitive for this provision to remain in the longer term. It is recommended that that use of these spaces are monitored as part of a Parking Management Plan process (to be secured by planning obligation) and further information provided as to the remaining length of leases to enable the Council to consider the appropriate use of these spaces in the longer term.

6.7.31 The TA notes that semi vertical racks are proposed for cycle parking. The Applicant has made reference to difficulties in physically accommodating the required quantum of cycle parking in the 'outline' element if semi vertical cycle parking is not utilised. However, officers consider that it is essential that the cycle parking provided is of the highest quality, and easy to use to encourage the uptake of cycling and assist in meeting the Travel Plan mode share targets and of course mitigate the very low parking provision. Officers will expect to see a good proportion of horizontal cycle parking within subsequent applications for approval of Reserved Matters.

6.7.32 *Overspill Car parking*. Whilst it is accepted that the site has very good accessibility to public transport services, and would benefit from more direct access to Tottenham Hale Station upon completion of the proposed footbridges, officers have concerns about the potential for the creation of a parking nuisance in the locality. Whilst opportunities for overspill parking are limited, officers consider that some is likely to happen without appropriate mitigation measures.

6.7.33 Census figures from 2011 for the Tottenham Hale Ward recorded car ownership as 0.49 cars per household ward wide and the proposed indicative dwelling mix includes 53 x 3-bedroom family-sized units (of which 7 are included in Phase 1). It is likely that there will be some demand for car parking from the proposed new homes, especially from tradespersons that have vans with equipment, and

families or individuals where a vehicle is needed for mobility issues (whilst not being blue badge holders) or for family or work reasons.

6.7.34 Homes for Haringey has reported issues with overspill car parking following build-out of the Hale Village development, and have extended enforcement hours but still report issues and pressures outside of enforcement hours. Given the potential for further additional pressures, the Applicant has carried out a car parking stress survey of the Ferry Lane Estate to the south of the site and submitted a Technical Note (21-09-16). The survey found that the Estate was heavily parked at present and the Note recommends, amongst other things, that parking controls on the Estate could be revised and extended and that the Council could introduce a small Controlled Parking Zone (CPZ) for Jarrow Road. The Applicant was unable to complete a similar survey for Bream Close, but a review of parking controls is likely to be needed here to.

6.7.35 Officers are concerned that the proposed development, with its limited on-site car parking provision, could result in increased car parking pressures in nearby controlled streets (Ferry Lane Estate, Bream Close and Jarrow Road in particular) and the existence of such car parking opportunities could undermine the modal split assumptions for the proposed development (with more people driving than predicted). To mitigate against these likely adverse impacts, it is recommended that planning obligations be used to secure a financial contribution to (a) enable Haringey Homes who manage Ferry Lane Estate and the Heron Wharf Management Company that manages car parking on Bream Close to consult with local residents about revising existing car parking controls (if this proves necessary) and (b) enable the Council to consult, design and implement a small CPZ along Jarrow Road.

6.7.36 In addition, officers recommend that a planning obligation in a s106 Agreement secures the implementation of an approved Parking Management Plan in order to manage the proposed car parking. This should cover the following:

- Number, location, design and allocation of 'blue badge' car parking spaces in each Phase (10% minimum, available to other residents if not used);
- Number and location of EVCP bays (20% of all car parking spaces to be EVCP bays on day 1 and passive provision for a further 20%);
- Detailed plans (Scale 1:50) and manufacturer specifications for the proposed cycle parking spaces in Buildings A and B; and
- Arrangements for the monitoring of use of and potential re-allocation of use of the existing Business Barge car parking spaces.

6.7.37 *Car Club Spaces and Arrangements.* The Applicant has been in discussion with Zipcar and originally proposed that one year membership is provided for each future residence, plus £50 driving credit (provided 50% by the applicant and 50% by the car club operator – which may or may not be Zipcar). The proposal is to include 2 car club spaces close to the access off Ferry Lane (as they would be

accessible to other car club members not living at the development) and this is considered appropriate.

6.7.38 It is 'custom and practice' at Haringey for three years' membership to be funded by a developer, to ensure there is a greater uptake over time of the car club, along with a £50 driving credit for each residence. Given the size of the development, and the very low level of car parking proposed, the Applicant has now agreed to fund three years membership for each residential unit. It is therefore recommend that a planning obligation in a s106 Agreement secures three years free membership for future residents to a local car club and that 1 space is provided before any home in Phase 1 are first occupied and that a second space is provided before any homes in Phases 2/3 are first occupied.

Public Transport

6.7.39 London Plan Policy 6.2 (Providing public transport capacity and safeguarding land for transport) seeks to ensure that development safeguards existing and proposed public transport and improves the integration, reliability, quality, accessibility and frequency of public transport. Policy 6.4 (Enhancing London's transport connectivity) seeks to improve public transport by, amongst other things, implementing Crossrail and developing proposals for Crossrail 2.

6.7.40 Emerging Site Allocations Policy SA1 (Indicative Crossrail 2 Areas) requires sites within 400m of a proposed Crossrail 2 station to optimise the future accessibility provided by Crossrail 2. Emerging Policy AAP7 (Transport) requires, amongst other things, development proposed within 1km of a proposed Crossrail 2 station to demonstrate how they meet the requirements of emerging Site Allocations Policy SA1.

6.7.41 *Bus Routes.* The TA has derived the additional bus and tube/train trips, and predicted that the uplift in demand for bus trips in the peaks would be 125 (am) and 101 (pm). The TA breaks this down to Route 76 (48 trips), Route 123 (14 trips) and Route 192 (26 trips). TfL has assessed this uplift against their own records for capacity of the services that would be used by residents and visitors to the development, and have sought financial contributions to fund capacity uplifts for Routes 23 and 192, with £50,000 sought to mitigate and provide the necessary capacity uplifts for 5 years.

6.7.42 *Underground and National Rail Services.* With regards to the London Underground, the TA predicts 150 trips in the am peak and 120 in the pm. TfL agree with the applicant's derivation and have commented that they do not consider any mitigation necessary for this level of uplift in demand. Future capacity improvements are already earmarked for the Victoria Line and the accompanying interchange improvements forthcoming with the Tottenham Hale station works will also accommodate the development underground trips.

6.7.43 The southern part of Phase 1 (Building A) sits above the existing Victoria Line running tunnels and, at the request of London Underground, it is recommended that a planning condition reserves the details of all ground works in Phase 1 – to make sure that they do not adversely affect the the Underground.

6.7.44 For national rail services from Tottenham Hale, 52 trips are predicted in the AM peak and 43 in the PM peak. Officers consider such an increase to be negligible.

Travel Planning

6.7.45 London Plan Policy 6.3 (Assessing effect of development transport capacity) makes clear that impacts on transport capacity and the network must be fully assessed and that, amongst other things, workplace and residential travel plans should be provided in support of significant applications.

6.7.46 The submitted Framework Travel Plan is considered acceptable in terms of its format and structure. It is recommended that the approval and implementation of separate detailed Travel Plans for Phase 1 and Phase 2/3 before any of the proposed housing in the respective Phase is first occupied are secured by way of a planning obligation in a s106 Agreement and that a £3,000 monitoring fee is also secured in a similar way.

6.7.47 Officers have the following observations and comments that they expect the subsequent detailed Travel Plans to take account of:

- Lifespan of the Travel Plan - to clarify, given Phases 2 and 3 are not going to be occupied until two years after occupation of Phase 1, the initial 5 year period should run from occupation of Phases 2 and 3 i.e. the whole development. Baseline surveys could be carried out as proposed upon 75% occupancy of Phase 1, so that the travel planning process can begin, and an end of year 1 survey can also be carried out for Phase 1 prior to the occupation of Phases 2 and 3. The 5 year period may be extended should Haringey consider further scope/potential for mode change still exists beyond year 5 after full occupation of the development.
- Targets – splitting them between units with and without car parking is acceptable. However a target to reduce public transport usage does feel counter intuitive and this should not reduce by 5%. It is understood that the other targets to increase cycling and walking may take mode share from public transport however it is not considered appropriate to have a target to reduce public transport usage.
- The Travel Plan wording needs to be updated for the revised car club provision (longer membership and driving credit package) and to have reference to the provision of Electric Vehicle Charging Points.

Construction Phase

6.7.48 London Plan Policy 6.3 (Assessing effect of development transport capacity) makes clear that impacts on transport capacity and the network must be fully assessed and that, amongst other things, Construction Logistics Plans should be submitted to support strategic development proposals. London Plan Policy 6.14 (Freight) states that development proposals should promote the uptake of Delivery and Service Plans and the use of the Blue Ribbon Network for freight transport.

6.7.49 Chapter 5 of the ES reports on the findings of an assessment of the likely significant effects of construction. Assuming that the demolition and construction phase is serviced solely by road. This finds that the number construction vehicles would vary from about 40 per day two-way (with fewer than 10 in any one hour) to 100 per day (up to 30 in any one hour). At its peak, this would represent a 4% increase in daily HGV movements on Ferry Lane. Subject to the implementation of a Construction Environmental Management Plan (CEMP) to avoid, where reasonably practical, similar periods of peak construction activity across this and other development sites in the area, the likely environmental effect of construction traffic is assessed as 'Negligible'. Officers agree with this conclusion and recommend that compliance with an approved Construction Environmental Management Plan (CEMP) that includes construction traffic timing is secured by planning condition.

6.7.50 The application is not supported by a Construction Logistics Plan (CLP) and TfL has voiced its disappointment at this, recommending that a CLP be secured by condition and that include site access arrangements, booking systems, construction phasing and vehicular routes. Both TfL and the Canal and River Trust (CRT) have recommended that, given the characteristics of the site, a CLP specifically consider the scope for load consolidation or modal shift to water use in order to reduce the total number of road trips generated. Officers accept that it is reasonable that a CLP is approved later, prior to works starting, and recommend that a planning condition secures the submission and approval of a CLP that includes the feasibility of using the adjoining waterways prior to demolition/construction commencing.

Transport Conclusion

6.7.51 The proposed development incorporates a number of measures to encourage walking and cycling, principally the proposed footbridges and cycle parking facilities, and would essentially be 'car free' apart from 'blue badge' parking for disabled residents and staff. Subject to securing the mitigation measures referred to above by either planning condition or planning obligation, officers consider the proposals are acceptable from a transport perspective.

6.8 Ecology and trees

Ecology

- 6.8.1 The solid land parts of the site primarily comprise hard surfaces, and where planting does occur it is self-seeded, ruderal species – that are the first to colonise disturbed land. Along the eastern side of the site, the boundary with the Flood Relief Channel has become overgrown with self-seeded Salix (Willow) and Bramble (Rubus). Having said this, the site is in a very sensitive with respect to ecology. Parts of the site are within the Lee Valley (Metropolitan) Sites of Importance for Nature Conservation (SINC) – namely approx. 500sqm at the northern tip, the span and landing areas for the proposed Hale Village Green Link Bridge (HVGLB) and a sliver of land on the eastern edge. The site is also within 500m of three others SINC's, namely, Tottenham Marshes SINC (Borough Grade I), Tottenham Hale to Northumberland Park Railside SINC (Borough Grade II) and East Hale Allotments (Local). The site is also adjacent to the Lee Valley Special Protection Area (SPA), Ramsar site, Important Bird Area and within 20m of the Walthamstow Reservoirs Site of Special Scientific Interest (SSSI), which is protected for wetland habitats and species.
- 6.8.2 Local Plan Policy 13 (Open Space and Biodiversity) states that all development must protect and improve sites of biodiversity and nature conservation, including SINC's. Paragraph 6.3.24 states that the Council will not permit development within SINC's unless there are exceptional circumstances and where the importance of any development coming forward outweighs any nature conservation value of the site, or where the site has more than one designation. Emerging Policy DM19 (Nature Conservation) require that where possible, development should make a positive contribution to the protection, enhancement, creation and management of biodiversity and should protect and enhance SINC's.
- 6.8.3 London Plan Policy 7.19 (Biodiversity and access to nature) makes clear that wherever possible, development should make a positive contribution to the protection, enhancement, creation and management of biodiversity. It gives the highest priority to protecting sites of international (including SPAs and Ramsar sites) and national importance (including SSSIs).
- 6.8.4 *Demolition and Construction Phase.* The proposals would involve substantial demolition and construction works within and adjoining ecological sensitive areas – including the clearance of vegetation to accommodate the proposed HBGLB, coppicing of trees within the Lee Flood Relief Channel on the eastern edge and changes to northern tip of the site The ES considers potential effects from noise, lighting disturbance, reduction in air quality, change to habitats and accidental spills on (where appropriate) water voles, birds, bats, terrestrial and aquatic habitats/fish species.
- 6.8.5 The ES concludes that, providing satisfactory mitigation measures are in place, effects during this phase would not be significant. The measures that were

assumed to be in place, and which are recommended to be secured by condition are: a Construction Environmental Management Plan (CEMP) (to include controls on invasive plants, prevention of accidental spills and pollution-prevention plan, avoidance of clearance during the nesting season, or the presence of and Ecological Clerk of Works (ECoW)), a Lighting Management Plan, the use of a 2m acoustic hoarding on the eastern boundary of the site and particular measures for water voles (including further surveys/re-location and the creation of aquatic vegetation through the use of floating reed beds). The ES also highlights the opportunity to remove and prevent re-colonisation of invasive non-native species on the site.

- 6.8.6 The Council also commissioned independent advice from the Nature Conservation Ranger Team at the LB Redbridge on ecological issues. This raises no objection in principle to the proposals, but recommends a number of conditions to mitigate potential adverse impacts on ecology during the construction phase. It is recommended that compliance with an approved CEMP that covers the issues identified in the ES and by the Council's consultant is secured by planning condition.
- 6.8.7 *Operational Phase.* The ES considers potential effects from collision/severance/displacement caused by buildings, overshadowing of aquatic habitats, noise and visual/lighting disturbance and increased visitor pressure.
- 6.8.8 Development would take place on about 500sqm of the designated Lee Valley SINC at the northern tip of the site. However, the area is predominantly hard standing used by an operational pallet business (approx. 400sqm), with limited existing scrub and trees (approx. 100sqm). The ES notes that the proposed development would bring forward a native wildflower, grassland and reinforced grass surface in this area which would result in a gain in habitat of approx. 35sqm.
- 6.8.9 In addition to enhancing the biodiversity value of the northern tip of the site, the Design and Access Statement and ES identify a number of design interventions proposed landscape masterplan incorporates measures to enhance the biodiversity of the site, including
- Revised massing: Proposals incorporating revisions to earlier massing proposals to allow for buildings to 'rake away' from the closet parts of the adjoining designated areas;
 - Open space: provision of new open space, including play space;
 - Aquatic planting: Floating reed beds will be installed in the Lee Navigation, in the gap between the bank and the pontoon for the business barges. This will provide support for aquatic plant species, and a protected underside for fish to breed in.
 - Banks to Flood Relief Channel: a 3.8m wide verge will be established between the top of the bank and the east face of adjacent buildings. This will be porous, and reinforced using "geocell" trays which will allow herbaceous

- planting, such as grasses and forbs to thrive, while providing periodic access for maintenance purposes. Access to these areas will be restricted to maintenance staff only.
- Fauna: Insect Hotels will be located within the biodiversity zones outlined above, to provide additional habitat for fauna and landscape planting is to include native or nectar-rich species.
 - A Lighting Design Code that sets the technical parameters for the operational phases of the proposed development that improve the lighting environmental performance with regard to aspects such as light spill, sky glow, and glare.

6.8.10 In addition, the Design and Access Statement highlights opportunities for the following (with the Design Code that is embedded in it providing guidance on some of these matters):

- Built-in swift and/or starling boxes, where appropriate, at high-level on the northern elevations – with Building A being highlighted;
- Built-in house sparrow boxes, where appropriate, at mid-level on the eastern elevations, such as in the lower gables of Block B; and
- Built-in bat boxes, where appropriate, near the edges of the elevations – with Buildings J or K being highlighted;

6.8.11 Based on the above design interventions being in place, the ES concludes that the operational phase would not have significant effects on ecology. Natural England agrees that providing the proposed mitigation package is implemented there are unlikely to be significant effects on the Lee Valley SPA and Ramsar site or the Walthamstow Reservoirs SSSI.

6.8.12 The Council's independent advice on ecological issues also highlights the need for on-going monitoring of bird movements and management and maintenance of soft landscaping as being additional issues that should be secured by condition. Subject to the Design Code and separate Bridge Design Principles and the proposed mitigation measures outlined above being secured by condition, officers consider that the proposed development generally meets to key relevant policy objectives set out in Local Plan Policy 13, emerging Policy DM19 and London Plan Policy 7.19 and are acceptable in terms of ecology and biodiversity issues.

6.8.13 *Habitat Regulation Assessment.* The Applicant has submitted a Habitat Regulation Assessment Screening Report to provide information to the Council and Natural England on the proposed development and to help the Council (as the competent authority) to determine whether an appropriate assessment under Regulation 61 of the Conservation of Habitats and Species Regulations 2010 (as amended) is required. The HRA Screening Report concludes that with appropriate mitigation measures in place, as also identified in the ES and discussed above under Construction and Operational phases, significant effects on the Lee Valley SPA and Ramsar site alone or in combination with cumulative schemes are unlikely, and no further assessment is considered necessary. The

Report considers the likely effects of the proposed development relating to noise, lighting, air quality, overshadowing, reduced sight lines, bird strikes, pollution, invasive weeds and increased visitor pressures. It concludes that the proposed development would not undermine the integrity of the Lee Valley SPA and Ramsar sites or impact on their conservation objectives.

- 6.8.14 Natural England has considered Screening Report and confirms that, with the proposed mitigation package in place, it agrees with its conclusions that significant effects on designated sites alone or in combination with cumulative schemes are unlikely, and no further assessment is considered necessary. Officers agree and conclude that an appropriate assessment is not required.

Trees

- 6.8.15 Local Plan Policy SP 13 (Open Space & Biodiversity) seeks the protection, management and maintenance of existing trees and the planting of additional trees where appropriate. London plan Policy 7.21 (Trees and Woodlands) call for existing trees of value to be retained and the planting of additional trees where appropriate.

- 6.8.16 The planning application is supported by an Arboricultural Impact Appraisal and Method Statement. This identifies a relatively small number of existing trees on the site located on the eastern and western edges; four individual trees and three groups of trees. These consist mostly of self-seeded natural regeneration, including Sycamore, Hawthorn and Willow. Most trees within the site are assessed as being of low quality and value (Category C) and none are graded as high quality and value (Category A).

- 6.8.17 The Appraisal, together with the Landscape Masterplan (435.010 PL1) make clear that the proposals would result in the loss of two existing trees, an apple tree near the existing Ferry Lane Entrance and a Hawthorn tree located towards the north-western corner of the site. Groups of trees on the strip of land between Pymmes Brook and the River Lee Navigation may also need to be removed to make way for the proposed HVGLB.

- 6.8.18 The Council's tree officer considers that the proposed loss of trees is acceptable, but that existing trees to be retained on and adjacent to the site should be protected during demolition and construction works and it is recommended that this is secured by way of a planning condition. Substantial new tree planting is specified in the landscape proposals (including London plane, oak, alder and hornbeam) and this would significantly increase the local tree cover and improve the biodiversity value of the site itself.

6.9 Flooding and drainage

- 6.9.1 Local Plan Policy SP5 (Water Management and Flooding) makes clear that (amongst other things) development shall reduce forms of flooding, implement

Sustainable Drainage Systems (SUDS) to improve water attenuation, quality and amenity, apply the NPPF Sequential and Exceptions Tests and restore and enhance the Blue Ribbon Network (Including Pymmes Brook and the River Lee and its tributaries).

- 6.9.2 Saved UDP Policy ENV 5 (Works affecting water courses) makes clear that development which is likely to adversely affect defined watercourses must take measures to provide appropriately designed drainage works.
- 6.9.3 Emerging Policies DM24 (Managing and reducing flood risk), DM 25 (Sustainable Drainage Systems) and DM28 (Watercourses and Flood Defences) call for measures to reduce and manage flood risk, and incorporate SUDS.
- 6.9.4 London Plan Policy 5.12 (Flood risk management) and 5.13 (Sustainable drainage) call for measures to reduce and manage flood risk and Policy 7.28 (Restoration of the Blue Ribbon Network) calls for the restoration and enhancement of the Network

Flood Risk

- 6.9.5 The application is supported by a Flood Risk Assessment (FRA) and Chapter 11 of the ES assesses the likely significant effects of flooding and drainage. The site is within Flood Zone 2 and is allocated for development in adopted and emerging site-specific policies. "More vulnerable" uses such as housing are appropriate in Flood Zone 2 and the Sequential Test is passed. There is no need to apply the Exceptions Test.
- 6.9.6 The FRA concludes that the site has a low probability of flooding (tidal, fluvial , groundwater and reservoirs) and establishes a Finished Floor Level for the site of 9.00mAOD, which is broadly in line with existing ground levels. The proposed development sets ground levels at this height, which allows for a minimum 450mm freeboard above the 1-in-1000 year flood level. This should ensure that the proposed development remains at low risk of flooding and there would be no loss of floodplain volume or corresponding increase in flood risk to downstream receptors. Officers accept this assessment and consider that routes from the site would be safe in a flood event.
- 6.9.7 The Environment Agency raises no objection to the proposals, subject to the development being carried out in accordance with the FRA, including implementing a Finished Floor Level of 9.00mAOD, the conclusion of a legal agreement to ensure maintenance of access to the Pymmes Brook, and conditions that ensure continues access to access ramps and safeguarding of the structural integrity of river walls. It is recommended that these are secured by planning conditions.

Drainage

- 6.9.8 *Construction phase.* The ES identifies the risk of pollution to groundwater and adjoining water courses during demolition and construction works. However, providing that an effective Construction Environmental Management Plan (CEMP) is implemented (and that it includes pollution mitigation measures compliant with Environment Agency Guidance and temporary drainage infrastructure to control surface water runoff and foul drainage and oil interception), no likely significant effects are identified. Officers recommend that the approval and implementation of a CEMP that covers these issues is secured by planning condition.
- 6.9.9 *Operational phase.* New drainage infrastructure is proposed as part of the proposed development. New below ground drainage is expected to reduce the risk of blockages within the on-site infrastructure and the public sewer network. The site is currently predominantly impermeable. In line with policy requirements, the drainage strategy is designed to restrict surface water flows to the public sewer network to 50% of existing peak rates.
- 6.9.10 The proposed masterplan and landscaping would include water attenuation measures, including water storage areas under porous paved hardstanding areas and water infiltration areas for soft landscaping. Surface water would be served by a series of drains along the proposed access road and would flow to the designated outfall locations in to the River Lee Flood Relief Channel. On this basis, the significance of effects on the water environment is assessed as 'minor-negligible', with some moderate benefits.
- 6.9.11 Thames Water has asked that a planning condition be applied to any permission such that development cannot commence until a detailed drainage strategy has been submitted to and approved by the Council (in consultation with them). Officers recommend that such a condition be included as part of granting permission.

6.10 Energy/Sustainability

- 6.10.1 The NPPF and London Plan Policies 5.1 (Climate change mitigation), 5.2 (Minimising carbon dioxide emissions), 5.3 (Sustainable design & construction), 5.5 (Decentralised Energy Networks), 5.6 (Decentralised energy in development proposals), 5.7 (Renewable energy), 5.8 (Innovative energy technologies) and 5.9 (Overheating and cooling) and Local Plan Policy SP4 set out the approach to climate change and requires developments to meet the highest standards of sustainable design, including the conservation of energy and water; ensuring designs make the most of natural systems and the conserving and enhancing the natural environment.
- 6.10.2 The London Plan requires all new homes to achieve a 35 per cent carbon reduction target beyond Part L of the Building Regulations Regulations 2010 (as

amended in 2013) (this is deemed to be broadly equivalent to the 40 per cent target beyond Part L 2010 of the Building Regulations, as specified in Policy 5.2 of the London Plan for 2015).

Energy & carbon reduction

- 6.10.3 The Energy Strategy submitted in support of the application addresses the overall proposals in relation to the energy hierarchy of 'be lean' (use less energy), 'be clean' (supply energy efficiently) and 'be green' (use renewable energy).
- 6.10.4 *Be lean.* The illustrative masterplan and detailed element of the proposals seek to minimise north-facing single aspect homes, that require more artificial lighting and heating and south-facing single aspect homes that are prone to 'overheating' /mechanical cooling. The Applicant is also proposing that the building fabric be designed to high energy efficiency standards (including optimised U-values for windows and air tightness, a medium level of internal thermal mass, mechanical ventilation and openable windows, solar control glazing and energy efficient lighting).
- 6.10.5 Officers and the GLA have asked that the Applicant investigate introducing additional passive design measures, particularly for the upper floor flats in Buildings A and B, as these have larger windows and, unlike flats on lower floors, do not benefit from shading from balconies above. The Energy Assessment does identify potential additional measures (including use of internal blinds/curtains, installation of external blinds for South West and North East facing windows, installation of high-level or roof vents to release accumulated hot air, increasing mass and installing higher specification glass to windows). It is recommended that, a planning obligation requires the approval of an Overheating Mitigation Plan for each phase before the main works on that phase commence to ensure that overheating is avoided. It is also recommended that Reserved Matters applications for buildings in Phases 2 and 3 are accompanied by a written statement demonstrating how detailed passive design features have sought to ensure that these dwellings do not overheat.
- 6.10.6 *Be clean.* The Applicant intends to make use of the existing Hale Village Heat Network, which is managed by Veoila, providing that the existing energy centre is expanded by installing a Combined Heat and Power (CHP) plant to work alongside the existing gas boiler and biomass boiler, or that the biomass boiler provides an increased proportion of the heat supply. This would entail running pipes from Hale Village under the HVGLB bridge to Building B. The proposed parameters and Bridge Design Principles for the 'outline' element and the detailed design for Phase 1 allow for this.
- 6.10.7 Whilst connecting to the Hale Village Network is officer's preferred option, it is the subject of on-going discussions and is not certain. Prior to the commencement of

Phase 1 of the proposed development, the applicant intends to verify this strategy. In the event that it is not feasible to connect to off-site facilities, an energy centre would be provided in the basement in Building A to house a CHP plant and boilers, so that this could service the proposed development. This would also entail the installation of a flue up through Building A to exit 1.5m above ridge height (shown on the drawings submitted for approval). This option could deliver a similar level of carbon dioxide savings, but would not extend an existing District Energy network. It is therefore recommended that a planning obligation in a s106 Agreement secures the connection of an approved scheme to the Hale Village Energy Centre, unless demonstrated to the Council's satisfaction that this is not reasonable or practicable – in which case this alternative option would be implemented.

6.10.8 *Be green.* The Applicant investigated the potential to incorporate a number of renewable energy technologies, including photovoltaic panels, solar thermal, bio fuelled heating, ground/water source heat pump, aerothermal energy, wind power and hydro/ocean energy). However, the Applicant has concluded that these technologies are either not compatible with the proposed CHP system and/or not financially or environmentally feasible. Given that the proposed scheme is predicted to meet the required carbon savings without on-site renewable energy technologies by following the energy hierarchy, officers are unable to insist on the inclusion of such technologies. However, it is recommended that a planning obligation requires further consideration of incorporating such technologies if the on-site energy centre option is implemented.

6.10.9 *Energy conclusion.* The proposals are capable of achieving or exceeding the 35% carbon dioxide savings over the Building Regulations, as required by London Plan policy for applications submitted prior to October 2016. However, it is recommended that planning obligations require an updated Energy Strategy Report to be submitted to and approved by the Council in advance of the main works starting and that this addresses a number of specific requirements as set out in the recommended Heads of Terms. It is also recommended that a planning obligation requires that any shortfall in carbon dioxide savings from the scheme is offset by way of financial contributions. This should help incentivise the Applicant to incorporate on-site measures to achieve the required savings.

Environmental Sustainability

6.10.10 Environmental sustainability is a cross-cutting theme that is considered under a number of other headings in this report, including Transportation, Ecology and Trees, Flood Risk and Drainage Noise and Vibration, Contaminated Land and Air Quality and Waste.

- 6.10.11 Local Plan Policy SP4 (Working towards a low carbon Haringey) calls for all new housing to meet Code for Sustainable Homes level 4 and for non-residential development to be built to at least BREEAM “Very Good.”
- 6.10.12 Local Plan Policy SP11 (Design) calls for development to minimise impacts on health, climate change, natural resources and biodiversity by adopting sustainable design and construction techniques. Emerging Policy DM21 (Sustainable Design and Construction) calls for development, amongst other things, to use materials with a high environmental performance and seek opportunities for locally sourced labour. London plan Policy 5.2 (Sustainable design & construction) calls for the highest standards of sustainable design and construction and the Mayor’s Sustainable Design and Construction SPG (2014) sets out guidance for achieving this.
- 6.10.13 The Applicant has submitted a Sustainability Statement to support the planning application. Whilst the Code for Sustainable Homes (CfSH) has been abandoned, the Applicant is targeting the equivalent of a Level 4 CfSH rating or an equivalent Home Quality Mark Rating. It is also targeting a BREEAM ‘very good’ rating for non-residential floorspace and, where possible, to specify Green Guide A+-B rated building elements. It is recommended that the commitment relating to BREEAM is secured by way of planning condition.

6.11 Waste

- 6.11.1 Local Plan Policy SP6 (Waste and Recycling)’ and Saved UDP Policy UD7 (Waste Storage) require development proposals make adequate provision for waste and recycling storage and collection. Policy SP6 also requires Site Waste Management Plan for all major applications in relation to demolition and construction waste. Emerging Policy DM4 (Provision and Design of Waste Management Facilities) makes clear that all proposals should consider how to sustainably manage waste arising from the development during the design, construction and occupation phases of new developments.
- 6.11.2 London Plan Policy 5.17(Waste Capacity) requires adequate provision during for waste and recycling storage and collection and Policy 5.18 (Construction, Excavation and Demolition Waste) requires developers to produce Site Waste Management Plans to arrange for the efficient handling of construction, excavation and demolition waste and materials.

Demolition & Construction Waste

- 6.11.3 The Applicant has submitted an Outline Site Waste Management Plan (SWMP) to identify high level waste objectives and set the direction for the Principal Contractor’s SWMP associated with the demolition and construction phase. This sets out objectives, roles and responsibilities, encourages better resource efficiency and sets out an outline material management strategy. It is

recommended that a planning condition is used to ensure that all appointed contractors' SWMP comply with the Outline SWMP

Operational Waste

6.11.4 The operational waste strategy for the proposed development can be summarised as follows:

- Each residential block would be provided with a dedicated bin store at ground floor accommodating communal bin storage for each waste stream.
- The stores would be located so that residents do not have to travel more than 30m to access them (excluding vertical change)
- The stores would be located so that the Council's appointed contractor would not have to exceed a 10m drag distance for communal bins (or where this threshold cannot be met, an estate management team will be employed to relocate bins from their store to a designated presentation area immediately prior to collection day.
- The quantum of bin storage would accord with the relevant Building Regulations and Haringey standards and provide the following:
 - Refuse 1100 litres/ 6 flats
 - Recycling – 1100 litres/ 10 flats
 - Food Waste – 360 litres/ 40 flats
- Adequate provision to be made for commercial waste (separate from residential waste)

6.11.5 The 'detailed' element of the scheme includes ground floor refuse stores that comply with the above strategy. Subsequent applications for approval of Reserved Matters applications for the 'outline element' would enable the Council to consider waste storage and collection details at that stage. The Design Code (embedded in the Design and Access Statement) sets out guidance for Refuse.

6.11.6 The Council's Waste Management Team has requested that a Waste Management Plan in place to ensure regular cleansing arrangements and storage and rotation of waste facilities. It is recommended that this is secured by a planning obligation in a S106 Agreement.

6.12 Contaminated land and air quality

Contamination

6.12.1 Saved UDP Policy ENV11 (Contaminated Land) and emerging Policy DM23 (Environmental Protection) require development proposals on potentially contaminated land to follow a risk management based protocol to ensure contamination is properly addressed and carry out investigations to remove or mitigate any risks to local receptors.

6.12.2 Saved Policy ENV 5 (Works Affecting Watercourses) makes clear that the Council will work with the Environment Agency and others to ensure that works in, under over or adjacent to watercourses are appropriately designed and implemented.

6.12.3 London Plan Policy 5.21 (Contaminated land) supports the remediation of contaminated sites and to bringing contaminated land back in to beneficial use.

6.12.4 Chapter 9 of the ES reports on the findings of an assessment of ground conditions and likely significant contamination effects – including the alternative scenario of including a basement in Building A. The site's current industrial/storage use and its history means that some contamination is likely. This focuses on the construction phase and considers a range of issues including disturbance/mobilisation of contaminants, ground gas, leakages and spillages, chemical attack and contaminated soil 'arising'. In summary, the following issues have been identified:

- Ground gas: Concentrations of carbon dioxide in excess of the 5%v/v guidance threshold for CS₂ (29) were recorded on numerous occasions;
- Elevated concentrations of contaminants were found in made ground;
- Asbestos containing material was encountered within the made ground in the northern half of the application site.
- Leachable contaminants: heavy metals, ammonium, polyaromatic hydrocarbons within the made ground; and
- Perched Water: (nickel and TPH).

6.12.5 The summary recognises that much of the site was inaccessible at the time of the ground investigation due to the continued occupation of the industrial and commercial units and recommends further plot by plot intrusive investigation to refine the conceptual model. However, it concludes that with appropriate mitigation, the residual effects range from 'Negligible Adverse' to 'Moderate Beneficial', where removal of contaminants would improve matters.

6.12.6 The Council's Environmental Services and Community Safety Officer has recommended that planning conditions be used for both the detailed and outline phases of the development requiring investigative work and assessment and a Piling Impact Study. Subject to these, and a condition requiring the approval and implementation of an appropriate Construction Environmental Management Plan, officers consider that the proposals are acceptable from a contamination point of view.

Air Quality

6.12.7 Saved UDP Policy UD3 (General Principles) requires proposals to demonstrate that there is no significant adverse impact on residential amenity or other surrounding uses in terms of (amongst other things) air quality and Saved UDP

Policy ENV 7 (Air, Water and Light Pollution) requires development to include measures to avoid, reduce and mitigate emissions

6.12.8 London Plan Policy 7.14 (Improving air quality) seeks to ensure that new development minimises increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) and be at least 'air quality neutral'.

6.12.9 Chapter 6 of the ES reports on the findings of an assessment of the likely significant effects on air quality, including the alternative scenario of including an on-site CHP plant in a basement in Building A, and the applicant has also submitted an Air Quality Neutral Assessment. The whole of Haringey, and adjoining Waltham Forest, has been declared an Air Quality Management Area (AQMA) for nitrogen dioxide and particulates (PM10)

6.12.10 *Construction.* The overall risk of dust effects during demolition and construction without mitigation is considered very high and there is also the risk from vehicle exhaust emissions. However, subject to following best practice to reduce dust emissions from works, the likely effects are assessed as being 'Negligible'. The Council's Environmental Services and Community Safety Officer has recommended that a planning condition require that approval and implementation of an Air Quality and Dust Management Plan (AQDMP). Subject to this, officers consider that the likely temporary effects on air quality during the construction period are acceptable.

6.12.11 *Operational.* The main polluting operations associated with the proposed development once built includes emissions from traffic movements and the 5 x natural gas powered CHP plant units and 3 x gas powered boilers – if they are located on site. Design interventions include mechanical ventilation for proposed homes in the detailed element of the application (Buildings A and B) and for certain facades in some of the 'outline' blocks and a flue for the potential energy centre, exiting 1.5m above the ridge height of the tallest building, Building A.

6.13 Noise & vibration

6.13.1 The NPPF states that planning policies and decisions should (amongst other things) aim to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development. The NPPF is supported by the Noise Policy Statement for England (2010).

6.13.2 Saved UDP Policies UD3 (General Principles) and ENV 6 (Noise Pollution) seek to locate noise sensitive development away from existing or planned noise sources and require development proposals to demonstrate that there is no significant adverse impact on noise.

6.13.3 Local Plan Policy SP13 (Open Space and Biodiversity) seeks to protect and enhance open spaces and manage the impact of development in areas adjacent to designated open spaces.

6.13.4 Emerging Policy DM23 (Environmental Protection - Noise and Vibration) seeks to ensure that new noise sensitive development is located away from existing or planned sources of noise pollution and that a noise assessment will be required to support planning applications where appropriate.

6.13.5 London Plan Policy 7.15 (Reducing and managing noise) sets out a range of ways in which noise from development should be managed.

6.13.6 Chapter 7 of the ES reports on the findings of the likely noise and vibration effects of the proposed development during both the construction and operational phases.

6.13.7 *Construction phase.* Potential significant effects are identified from demolition and construction activities and construction traffic. Assuming that an adequate Construction Environmental Management Plan (CEMP) (covering hours of works, use of Best Practicable Means, 'quiet piling' techniques, erection of hoardings etc. and the specific measures outlined in Section 6.8 in relation to Ecology and Trees) the likely significant effects for identified receptors is assessed as ranging from 'negligible to 'substantial adverse'. The key residual impacts can be summarised as:

- 'Substantial Adverse' construction noise effects on future residents of Buildings A and B whilst Phases 2 and 3 are built out;
- 'Moderate Adverse' construction noise effects on the Lock keeper cottages, leisure moorings, Ferry lane House and the Tottenham Hale Kidney and Diabetes Centre
- 'Slight Adverse/Negligible' construction noise effects for other nearby homes
- 'Negligible' construction traffic noise; and
- Generally 'Negligible' construction vibration effects (although the future residents of Buildings A and re likely to experience a Moderate Adverse effect and residents living south of Ferry lane a Slight Adverse effect.

6.13.8 Demolition and construction works inevitably cause some adverse effects, but they are temporary and the identified residual effects are considered acceptable. It is recommended that planning conditions secure CEMPs for various phases of the works and that a planning obligation ensures that contractors sign up to the 'Considerate Contractor' scheme. .

6.13.9 *Operational phase.* Whilst not assessed in the ES, the proposed non-residential uses are compatible with housing and it is recommended that a planning condition manages the hours of use of the proposed A3 (cafes/restaurants), A4 (Drinking Establishments) and A5 (Take-aways) to safeguard residential amenity.

The ES focuses on potential building service noise emissions and invites a planning condition to manage noise levels from fixed plant installations. Subject to this, the likely noise effects are considered to be 'Negligible'. Officers agree with this assessment and recommend that any permission is subject to such a condition. Officers also recommend that a condition ensures that the detailed glazing and ventilation specification for Building A ensures a satisfactory internal noise environment for sleeping.

6.14 Environmental Impact Assessment (EIA)

6.14.1 The proposed development falls within the category of developments specified at Section 10(b), Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended).

6.14.2 As the proposed development is likely to have significant effects on the environment, it is required to be subject to an Environmental Impact Assessment (EIA) before planning permission is granted. Regulation 3 of the EIA Regulations 2011 (as amended) prohibits the grant of planning permission unless prior to doing so, the Council has taken into account the 'environmental information'. The environmental information comprises the Environmental Statement and representations made by consultation bodies and others about the environmental effects of the proposed development. The Applicant has confirmed that it believes that the assessment of likely significant effects set out in the Environmental Statement are not affected by the revised affordable housing offer. The environmental information demonstrates that subject to mitigations and controls, the development does not give rise to environmental impacts that cannot be satisfactorily addressed so that the principle of the development is not acceptable. The findings of the ES are referred to throughout this report, where appropriate.

6.15 Equalities

6.15.1 In determining this planning application the Council is required to have regard to its obligations under equalities legislation including the obligations under the Equality Act 2010. In carrying out the Council's functions due regard must be had, firstly to the need to eliminate unlawful discrimination, and secondly to the need to promote equality of opportunity and to foster good relations between persons who share a protected characteristic and persons who do not share it. Members must have regard to these duties in taking a decision on this application.

6.15.2 The proposed development would engage primarily with people with protected characteristics around physical access and have been designed to contemporary Building Regulations. The proposed development would offer step free access throughout including all entrances to private and affordable housing, as well as commercial spaces. All floors of the residential accommodation would be served

by two lifts. All residential units would be built to Part M4 (2) 'accessible and adaptable dwellings' and 10% will be built to Part M4 (3) 'wheelchair user dwellings' of Building Regulations.

6.15.3 The proposed development would be likely to provide a range of socio-economic and regeneration outcomes for the Tottenham Hale area including the provision of new housing including affordable housing to increase affordability and reduce overcrowding. It would also result in local employment impacts including displacement of existing employment but the generation of construction employment and new employment opportunities to the benefit of all priority groups that experience difficulties in accessing employment.

6.16 Conclusion

6.16.1 This would be a significant development on a prominent site within Tottenham Hale that has generated a significant amount of comment from local residents and businesses. Having considered all material planning considerations including the development plan and the environmental information submitted with the application, officers consider that:

- The proposed use of the northern tip of the site for landscaping purposes represents appropriate development in the Green Belt;
- The proposed net loss of business space and displacement of jobs is considered acceptable within the context of a high quality mixed-use that continues to provide job opportunities, with opportunities for local unemployed people and maximum regeneration benefits being secured by way of planning obligation;
- The scale of development would provide a significant number of new homes that would deliver Tottenham Housing Zone objectives and help to meet the Borough and London's wider future housing needs. The PRS element would provide greater high quality purpose designed new homes with stable management and security for occupants complementing the existing housing offer in the area;
- There would be at least 30% affordable housing based on habitable rooms, which an independent viability assessment has shown to be the maximum amount of affordable housing that the site can currently support and remain viable.
- The proposed mix of residential units is considered appropriate for a high density scheme at an accessible location with a larger number of smaller units but also some larger family units. The proposed residential accommodation would be high quality and meet all the required London Plan Standards and provide on-site the required amount of play space for 0-5 year olds. All the proposed dwellings would meet Building Regulation standard M

- (4) (2), accessible and adaptable dwellings, which is broadly equivalent to the former 'Lifetime Homes' standard and 10% would meet Regulation 4 (4) (3), wheelchair user dwellings;
- The principle of tall buildings is supported by existing and draft policy, subject to detailed consideration, in particular the impact on the natural environment, sufficiently high design quality, the need to safeguard residential amenity and the need to preserve or enhance the setting of heritage assets. The detailed proposals for Phase 1 achieve this and the proposed buildings are acceptable;
 - The visual and townscape assessments accompanying the application demonstrate that the scale of proposed development would not have a significant impact on the appearance of the area locally. The proposed design is considered to be high quality which justifies a higher density than recommended in the London Plan guidance. There would be no harm caused to nearby heritage assets;
 - The development is in a highly accessible area where restricted car parking provision is acceptable in principle. Subject to the recommended conditions and obligations the proposed car and cycle parking facilities are acceptable and should not lead to additional parking stress in nearby streets and the proposed servicing and delivery arrangements are acceptable. The proposed pedestrian bridges would improve connectivity and access to public transport and would relieve pressure on Ferry Lane at peak times. Works to Ferry Lane public highway would be controlled by way of a S278 agreement;
 - Subject to a number of mitigation measures being secured by condition, the proposed development would not have a significant adverse effect on the Blue Ribbon Network or on the Lee Valley SINC, the Lee Valley Special Protection Area or the Walthamstow SSSI. In the longer terms, the proposals would enhance the biodiversity value of the site;
 - Having regard to the environmental information (the Environmental Statement and representations made by consultation bodies and others about the environmental effects of the proposed development), the likely significant environmental effects of the proposed, including impact upon local amenity in terms of daylight/sunlight, wind, noise, air quality and traffic impacts have been assessed and subject to the recommended conditions and obligations are considered to be acceptable;
 - The level proposed carbon dioxide reductions meet policy requirements and provision is made to connect to an existing Hale Village heat network or provide an on-site communal heating network. The proposal would incorporate SUDs and would not increase flood risk and is considered to be a sustainable design;

- The proposed waste management arrangements are considered acceptable and would be controlled through a planning obligation; and
- The proposals are not considered to give rise to any adverse equalities impact upon the protected characteristics of any individual or group.

6.17 Community Infrastructure Levy

6.17.1 Based on the application material, the Mayoral CIL charge would be £770,790 (18,352 sqm x £35 as upgraded for inflation) and the Haringey CIL charge would be £286,231 (18,352 sqm x 15 as upgraded for inflation). This will be collected by Haringey after/should the scheme is/be implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the construction costs index. An informative will be attached advising the applicant of this charge.

7.0 RECOMMENDATIONS

GRANT PERMISSION subject to conditions, section 106 Agreement and subject to referral to the Mayor for London.

Appendix 1 Consultation Responses from internal and external agencies

Stakeholder	Question/Comment	Response
INTERNAL		
Transportation	<p>Comments on the outline element of the application</p> <p><u>Car and Cycle Parking.</u> The application is presenting the proposal as a very low car parking site, with 58 spaces in total, of which 6 will be allocated to the Business Barges, 2 will be for car club provision, and the remaining 50 for blue badge holders (derived from the 10% of all units being fully accessible and requiring a parking space). These spaces aside there are no parking spaces proposed for the development. The requirement to provide 6 spaces for the Business Barges has been queried; the applicant's explanation is that these are attached to the ongoing leases for the Business Barges. Whilst this is accepted, given the very low parking for the remainder of the development it seems counter intuitive for this provision to remain. It is suggested that use of these be monitored as part of the Car Parking Management Plan process and further information provided as to the remaining length of lease on these car parking spaces to enable consideration of appropriate use of these spaces in the longer term.</p> <p>Whilst it is accepted that the site does have very good accessibility to public transport services, and will enable more direct access to Tottenham Hale Station upon completion of the proposed footbridges, there are concerns about the potential for creation of a parking nuisance in the locality. It is acknowledged that opportunities for overspill parking are limited however it is possible and probable.</p> <p>Census figures from 2011 for the Tottenham Hale Ward recorded car ownership as 0.49 cars per household ward wide.</p> <p>As proposed, it is accepted and acknowledged that a considerably lower</p>	<p>Recommended Planning Conditions A10, A17, A18, A37, A38, B7, B21 and B29 and s106 Heads of terms would secure the mitigation referred to in these comments.</p>

Stakeholder	Question/Comment	Response
	<p>ratio of provision is entirely appropriate, when coupled with the very good access to public transport services, high quality cycle parking to London Plan standards, car club membership and provision, and local goods and services being within walking distance.</p> <p>However, this is still a large development and included in the residential element are 53 no. 3 bedroom units, (of which 7 are included in Phase 1 of the development) which can be considered family units. It is likely that there will be some demand for parking from these units (and some of the smaller units) especially from tradespersons that have vans with equipment, and families or individuals where a vehicle is needed for mobility issues (whilst not being blue badge holders) or for family or work reasons. It is possible that not all of the blue badge bays will be taken up but this is not certain.</p> <p>Homes for Haringey have reported issues with overspill parking following build out of the Hale Village development, and have extended enforcement hours but still report issues and pressures outside of enforcement hours. A different housing association/trust manages Jarrow Road. Given the potential for further additional pressures, a further piece of work for the Transport Assessment is required to detail what opportunities there are for overspill parking generated by this development, and the appropriate mitigation. This will require looking further than the 200m standard parking stress survey walk distance. Parking stress surveys will be required particularly for the Ferry Lane estate roads to the south side of Ferry Lane.</p> <p>Subsequent to these concerns being raised, the applicant has responded and commented that the Travel Plan will make it clear to future occupants that no on street parking available within the Homes for Haringey Estate. However, Transportation is still of the opinion that the further work referred to above must be undertaken to review what parking opportunities exist, the levels of parking stress at present and what mitigation will be</p>	

Stakeholder	Question/Comment	Response
	<p>appropriate. Without this information a potential impact of this large development will not have been fully considered and could worsen parking pressure issues for existing residents.</p> <p>Overall, a Parking Management Plan will be required for both Phase 1, and the later Phases (for the completed development) to manage the residential parking and potential overspill issues. This should be provided for review prior to the planning decision. In addition to this, if the site does become located in or adjacent to a formal Controlled Parking Zone, it will be appropriate for the site to be designated a car free/permit free site.</p> <p>Considering cycle parking, table 4.2 in the TA details the required provision in terms of absolute numbers site wide for both the residential and non residential land uses. It is also noted that semi vertical racks are proposed for cycle parking. Horizontal cycle parking is required and Sheffield Stands are referred to in Borough Policies. semi vertical cycle parking can be awkward for some cyclists. Ideally all the cycle parking should be horizontal, and given the high numbers to be provided double stacking could be utilised. The applicant has revisited the proposed arrangements for Blocks A and B that will be built out in Phase 1 and comments on their latest proposals are included later in this response.</p> <p>The same exercise to review provision so that horizontal cycle parking is provided will need to be carried out for Phases 2 and 3. The applicant has made reference to difficulties in physically accommodating the required quantum if semi vertical cycle parking is not utilised, however it is essential that the cycle parking provided is of the highest quality, and easy to use to encourage the uptake of cycling at the site. This will assist in meeting the Travel Plan mode share targets and of course mitigate the very low parking provision. The revised cycle parking details should be provided with the forthcoming detail applications for phases 2 and 3.</p> <p><u>Highway Access.</u> The site access off Ferry Lane is intended to be slightly</p>	

Stakeholder	Question/Comment	Response
	<p>to the west of the existing access to suit the building lines proposed for the site. The progression of the detailed design and highway works to create this will need to be covered by a Section 278 Agreement between the applicant and the Highway Authority. An estimate of the costs for the highway works will be worked up to advise of the costs for this. A more detailed drawing for the revisions to the access proposed is required to enable this estimate to be produced, the drawing needs to show the existing and proposed arrangements on the same drawing.</p> <p>Swept paths have been provided for the proposed access showing HGV's, refuse vehicles and cars passing through into the site and leaving the site onto Ferry Lane and these appear acceptable, however the S278 process will undertake all formal design checks that will be necessary.</p> <p><u>Pedestrian and cycle access.</u> Pedestrian and cycle access will be retained from Ferry Lane. Internal footways to the site appear to vary in width, between 2.7m and 1.2m. There is reference to 3 lengths of footway north of block C (64 metres long in total) that are 1.2 metres wide, where they pass between gardens and adjacent landscaping areas. This does seem counter intuitive as although 1.2m is detailed as adequate in terms of being able to accommodate wheelchairs/pushchairs and parents, for a new development of this size and stature it should be possible to provide sufficiently wide footways, say 2.0m in width. Only a small point but perhaps something to be addressed with the future detailed application. The applicant has commented that this will be revisited at the detail design stage and ideally this should be remedied.</p> <p>Included in this proposal are two footbridges – the Hale Village Green Link Bridge (HVGLB) and an additional footbridge that crosses Pymmes Brook, to provide step free access to the towpath, from which lift access will be provided to the HVGLB.</p>	

Stakeholder	Question/Comment	Response
	<p>The HVGLB in particular will enable more direct access to both Hale Village and Tottenham Hale station, as part of the station improvements Network Rail will be implementing a footbridge to connect to Hale Village. This is programmed for completion by early 2018 so should be in advance of the Hale Wharf site build out. It is understood that the developer is not delivering these footbridges, that these will be funded and delivered by the GLA/Haringey. Ideally they would be in place for the occupation of the first phases of Hale Wharf by 2019 to provide the alternative more direct route to Tottenham Hale Station. It is noted that cyclists will be permitted onto the footbridges (dismounted) and lift access will be available.</p> <p>Cycle access is as per pedestrian access to the development, via Ferry Lane and the footbridge link. The applicant does not propose any formal cycle facilities within the development based on the relatively low numbers of vehicle movements expected with the low parking provision. This is appropriate.</p> <p>Mandatory Cycle Lanes are marked on Ferry Lane, and there are formal cycle route facilities in both directions from the site including Toucan Crossings.</p> <p><u>Trip generation</u>. The trip generation has been derived as agreed at the scoping stage, partly by adopting separate trip rates for the residential units that will be allocated car parking spaces and those that will not that are to be 'car free'. Iterations were carried out using both the TRICS and TRAVEL databases, there were some slight differences between the two, however nothing materially different. For robustness the higher car trip results were used, however, the absolute numbers of peak car trips are predicted to be low (8 in the AM peak and 6 in the PM). The Trip Generation predictions are based on the 2011 census 'journey to work' mode shares in the Tottenham Hale Ward and are adjusted to reflect the parking provision for the proposed development. Overall the residential</p>	

Stakeholder	Question/Comment	Response
	<p>element of the development is predicted to generate 338 all mode trips in the AM peak and 258 all mode in the PM peak. Public transport mode shares for the units with parking are predicted to be 65% and for those without parking 83%. The cycle mode is around the Borough average of 3%. The additional trips from the commercial floor area in the development bring the total trip generation to 402 (two way) in the AM peak and 326 (two way) in the PM peak, with the majority utilising public transport.</p> <p>Summarising, the AM Peak hour two way trips (inbound and outbound) are predicted to be as follows – from table 5.12 in the TA; This is for both the residential and commercial elements of the development, (note that the AM peak and PM peak figures are largely similar but that the AM peak trips are slightly higher)</p> <p>Underground 150 Train 52 Bus 125 Car 8 Car passenger 10 Cycle 13 Foot 38 Taxi/Other 5</p> <p>Delivery and servicing vehicle trips have been derived using data from similar sites and are predicted to number around 26 a day for the residential component of the development and 19 to 25 a day for the commercial.</p> <p><u>Vehicle trip impacts.</u> Taking into account the residential, commercial and servicing trips into account, it is proposed that the overall numbers of car/vehicle trips will be lower than the surveyed existing. Based on the low parking proposed this is accepted.</p>	

Stakeholder	Question/Comment	Response
	<p><u>Public transport impacts.</u> The TA has derived the additional bus and tube/train trips, and predicted that the uplift in demand for bus trips in the peaks will be 125 (am) and 101 (pm). The TA includes a predicted breakdown of how many trips will allocate to the different bus services available for residents and employees from the site. This is detailed in Table 6.10 in the TA which predicts the highest numbers of new journeys in the AM peak hours will be made on the 76 (48 trips), 192 (26 trips) and the 123 (14 trips). TfL have assessed this uplift against their own records for capacity of the services that will be used by residents and visitors to the development, and have detailed that mitigation in the form of capacity uplifts will be required for the 123 and 192 services, and a contribution of £50,000 has been agreed between TfL and the applicant to provide the necessary capacity uplifts over the next 5 years (from development opening it is assumed).</p> <p>With regards to the London Underground, the TA predicts 150 trips in the am peak and 120 in the pm. TfL agree with the applicant's derivation and have commented that they do not consider any mitigation necessary for this level of uplift in demand. Future capacity improvements are already earmarked for the Victoria Line and the accompanying interchange improvements forthcoming with the Tottenham Hale station works will also accommodate the development underground trips.</p> <p>For national rail services from Tottenham Hale, 52 trips are predicted in the AM peak and 43 in the PM peak. This sounds negligible however I am not aware if Network Rail or the franchisee have comments on this.</p> <p><u>Pedestrian Impacts/PERS Audit.</u> The development will generate 365 walk trips in the AM peak, which of course includes the walk trips to bus, tube and rail services at Tottenham Hale.</p>	

Stakeholder	Question/Comment	Response
	<p>At scoping stage it was identified and agreed that; a PERS audit would be undertaken for the routes connecting Hale Wharf (Site) with Tottenham Hale station, Tottenham Hale Retail Park and Harris Academy, as well as routes to key facilities and recreation grounds. The audit was carried out and accompanies this application. The survey generally found that links, crossings and public transport waiting areas rated 'green' apart from The pedestrian crossing of Ferry Lane east of the site, the public transport waiting area at Watermead Way (east) and the pedestrian route to Harris Academy. All of these rated 'yellow'. The Audit Report and the TA did not make suggestions to carry out improvements, given the size of the development it would be appropriate for improvements to be carried out by/funded by the applicant. Although the Ferry Lane pedestrian crossing is to the eastern side of the development, it may still be used by residents of the site as will the route to Harris Academy. Given the development is presented as sustainable and with very low car parking provision routes to and from the site for cyclists and pedestrians should be of a high quality to encourage and facilitate walking.</p> <p>Since initial Transportation feedback has been given, the applicant has proposed implementation of a Toucan or Tiger Crossing at the site of the existing Zebra crossing on Ferry Lane immediately east of the site. As well as improving the pedestrian facility at this crossing it will of course improve conditions for cyclists, in particular those making right turn manoeuvres into and out of the site. These works can be included in the S278 works for the changes to the site access.</p> <p>Pedestrian comfort levels have also been assessed to and from the site, carried out in accordance with TfL's guidance on Pedestrian Comfort Assessments. Overall this did find that in general comfort levels of 'B+' are achieved on the northern footway, however it also details that lower levels of 'C-' and 'D' occur during the peak periods. the assessment for the southern footway details the comfort level as 'A'.</p>	

Stakeholder	Question/Comment	Response
	<p>This PCL assessment has identified that by 2021 and with the development in place, the north footway of Ferry Lane will experience a decline in comfort level to level 'E'. The commentary in the Transport Assessment is that the footway is likely to be 'extremely uncomfortable' during the PM peak, and recommends an increase in width or measures to keep the footway as clear as possible. The application makes no proposals for mitigation here; additionally it is not certain what mitigation is provided by the HVGLB footbridge. The applicant has commented that this new footbridge connection to Hale Village should result in redistribution of the pedestrian flows towards Tottenham Hale Station, but hasn't provided a prediction or estimate of what that will be and how it may result in improved Pedestrian Comfort Levels along the north side Ferry Lane footway. This should be provided to facilitate an understanding of future conditions along this link and accordingly detail what mitigation may be appropriate to the northern footway of Ferry Lane.</p> <p><u>Servicing, refuse /recycling arrangements.</u> The site access and internal roads have been designed to accommodate vehicles expected to visit the development, including construction vehicles such as 16.5 metre articulated lorries. Swept paths have been provided for refuse vehicles. It is intended for all servicing to take place from the street. It is envisaged that smaller vehicles will used spaces in the public parking courts, and locally widened carriageway in a number of locations to enable stopped larger vehicles to be passed by another car or delivery vehicles. Detailed plans showing the widths and layout will be required for the detailed application. It is noted that in the Delivery and Servicing plan reference is made to some redesign of the carriageway and public realm layout to provide an improved layout that can better accommodate service vehicle manoeuvres and stopping. The revised designs can be submitted as appropriate for Phase 1 and Phases 2 and 3 for the detailed applications.</p>	

Stakeholder	Question/Comment	Response
	<p>It is noted that over run areas are proposed within the development, to facilitate refuse collection vehicle manoeuvres, and allow other vehicles to pass. This does appear to work in terms of the swept paths provided, however a more detailed Delivery and Servicing Plan should be provided with clearer drawings.</p> <p>At this outline stage for the main development indicative areas are proposed for refuse and recycling collections. Detailed proposals are provided for Phase 1 and these are covered later on in this response.</p> <p>Travel Plan and sustainable travel initiatives. A £3,000 monitoring fee should be provided by the applicant to fund the resource required to monitor the development's Travel Plan.</p> <p>The Framework Travel Plan as proposed is overall acceptable in terms of its proposed format and Structure. There are some observations and comments to points of detail that can be taken on board for the production of the final Travel Plan. These are as follows;</p> <ul style="list-style-type: none"> • Lifespan of the Travel Plan - to clarify, given Phases 2 and 3 are not going to be occupied until two years after occupation of Phase 1, the initial 5 year period should run from occupation of Phases 2 and 3 i.e. the whole development. Baseline surveys can be carried out as proposed upon 75% occupancy of Phase 1, so that the Travel planning process can begin, and an end of year 1 survey can also be carried out for Phase 1 prior to the occupation of Phases 2 and 3. The 5 year period may be extended should Haringey consider further scope/potential for mode change still exists beyond year 5 after full occupation of the development. • Targets – splitting them between units with and without car parking is acceptable. However a target to reduce public transport usage does feel counter intuitive and this should not reduce by 5%. It is understood 	

Stakeholder	Question/Comment	Response
	<p>that the other targets to increase cycling and walking may take mode share from public transport however it is not considered appropriate to have a target to reduce public transport usage.</p> <ul style="list-style-type: none"> • The Travel Plan wording needs to be updated for the revised car club provision (longer membership and driving credit package) and to have reference to the provision of Electric Vehicle Charging Points. <p>A final draft based on the changes referred to above can be provided by condition prior to occupancy of the site.</p> <p>Car club arrangements for the development – it is noted that there has been dialogue and correspondence between the applicant and Zipcar, and the applicant’s proposal is for a year’s membership to be provided for each residence in the development plus £50 driving credit, provided 50% by the applicant and 50% by the car club operator. The car club operator has proposed it will be appropriate for two cars to operate from the development. It is ‘custom and practice’ at Haringey for three years membership to be funded by a developer, to ensure there is a greater uptake over time of the car club, along with a £50 driving credit for each residence. Given the size of the development, and the very low parking proposed, it is entirely appropriate that a longer period is provided for each residential unit. TfL are of the same opinion and support a longer period of free membership. The applicant has subsequently revised their offer, to fund two year’s membership for each residence. The driving credit of £50 for each residence should also be provided.</p> <p>The car club bays will be located close to the Highway Access off Ferry Lane (as they will be accessible to other car club members not living at the development). A bay will need to be in place for the opening of Phase 1 as well.</p> <p><u>Electric Vehicle Charging Points</u>. The development must accord with</p>	

Stakeholder	Question/Comment	Response
	<p>London Plan requirements for the proportions of parking spaces that are enabled for electric vehicle charging, 20% of them to be available and operational at day 1, and a further 20% to be passively provided so able to be brought into use as demand requires. The applicant has acknowledged this and will be providing EVCP as required.</p> <p><u>Construction Logistics Plan.</u> There is some information relating to the construction phase in Volume 1 of the Environmental Statement. There is also detail included in the Construction Buildability and Logistics Consideration Report which provide details of construction vehicle numbers predicted during the Construction Phase.</p> <p>It is understood that construction of Phase 1 of the project is planned for a January 2017 commencement and is planned to take 30 months with Blocks A and B opening in June 2019. Phases 2 and 3 are then planned for October 2019 commencement with completion by December 2021.</p> <p>Access needs to be maintained to the completed phase 1 development whilst 2nd and 3rd phases are being built out.</p> <p>The Construction Buildability and Logistics Consideration Report details that during the earlier stages of the project build out, (the first eleven months) there would be up to 40 movements a day (it is not clear in the ES text but it is assumed these are one way movements) with no more than 15 in the busiest hours. The busiest phase of the project build out is during month 19 of the project, with around 100 movements per day and 30 per hour at the busiest times. As with the earlier stages the numbers of movements does tail off towards the end of the build out period.</p> <p>A full detailed draft of the Construction Logistics Plan should be provided prior for approval prior to commencement of the works, to enable a full assessment and consideration of the construction phase impacts and to</p>	

Stakeholder	Question/Comment	Response
	<p>detail how the construction development will be carried out without adversely impacting on the highway. This will need to provide commentary on how the works will be phased and how Phase 1 will operate once built out and occupied as Phases 2 and 3 are being constructed post June 2019.</p> <p>Transportation comments on the detailed element of the application</p> <p><u>Car Parking.</u> There is a temporary car parking arrangement proposed for Phase 1, which is proposed to provide 10 spaces to the north of Block B, and an additional 15 to the western side of Block B. Overall, given Phase 1 will include approximately half of the residential units for the whole development, this will be acceptable. It will be necessary to include a car club bay during these interim arrangements and also provide the required amount of EVCP bays. The detail of the parking provision and allocation for the interim/Phase 1 period can be covered in the Parking Management Plan.</p> <p><u>Cycle parking.</u> It is proposed for internal secure cycle stores within each of Blocks A and B, and 8 external visitor parking for each Block. Further to earlier concerns raised regarding the applicant's proposal to provide only semi vertical cycle parking, the applicant has now revised their proposed cycle parking arrangements for phase 1 of the development. It is now proposed to provide 2 tier horizontal parking and a small number of Sheffield Stands in Block A (62 in total) and retain the semi vertical parking for the remainder in Block A (197). Overall is it proposed to provide 265 spaces, 44 more than FALP standards require. For Block B it is proposed to provide all of the cycle parking as two tier horizontal, with no semi vertical cycle parking proposed. However, the applicant is now proposing 124 cycle parking spaces only as opposed to the FALP required 166 (a shortfall of 42 spaces). The applicant is proposing that some residents in Block B utilise cycle parking in Block A.</p>	

Stakeholder	Question/Comment	Response
	<p>Whilst this would numerically meet the demands of the two blocks, it is a clumsy arrangement. This does need to be looked at further, it is counter intuitive to have cycle parking in a separate building, especially when the overall development is being proposed as highly sustainable in Transport Terms and essentially car free. Cycle Parking needs to be practical, accessible and go towards encouraging residents to use their cycles. Obviously security will not be compromised, however it should be the aim to have the appropriate provision in each of the blocks with a new development.</p> <p>It is suggested that this is revisited and that the detailed arrangements for cycle parking for Blocks A and B be covered by condition prior to commencement of the works to ensure the appropriate arrangements to meet demand for each block are met in situ.</p> <p><u>Servicing Arrangements.</u> The draft Delivery and Servicing Plan has been drafted for the whole development, so by pro rata roughly half the number of trips derived for the whole site can be expected for Phase 1. As for the overall development it is proposed that there will be some set down areas for servicing vehicles to use. These need to be clarified for phase 1.</p> <p><u>Highway Access.</u> As referred to earlier in this response a drawing of greater detail showing the proposed changes in kerblines/highway arrangement is needed to enable Highways to produce an estimate for the S278 works.</p> <p><u>Travel Plan.</u> A £3000 monitoring fee should be provided by the applicant to fund the resource required to monitor the development's Travel Plan.</p> <p>The Framework Travel Plan as proposed is overall acceptable in terms of its proposed format and Structure. There are some observations and</p>	

Stakeholder	Question/Comment	Response
	<p>comments to points of detail that can be taken on board for the production of the final Travel Plan. These are as follows;</p> <ul style="list-style-type: none"> • Lifespan of the Travel Plan - to clarify, given Phases 2 and 3 are not going to be occupied until two years after occupation of Phase 1, the initial 5 year period should run from occupation of Phases 2 and 3 i.e. the whole development. Baseline surveys can be carried out as proposed upon 75% occupancy of Phase 1, so that the Travel planning process can begin, and an end of year 1 survey can also be carried out for Phase 1 prior to the occupation of Phases 2 and 3. The 5 year period may be extended should Haringey consider further scope/potential for mode change still exists beyond year 5 after full occupation of the development. • Targets – splitting them between units with and without car parking is acceptable. However a target to reduce public transport usage does feel counter intuitive. It is understood that the other targets to increase cycling and walking may take mode share from public transport. • The Travel Plan wording needs to be updated for the revised car club provision (longer membership and driving credit package) • A final draft based on the changes referred to above can be provided by condition prior to occupancy of the site. <p><u>Conclusion.</u> This application is for the provision of 505 residential units plus associated flexible retail or business uses and accompanying infrastructure including pedestrian/cycle footbridges, modification works to the existing vehicular highway access, landscaping and public realm works, car/cycle parking; and associated and facilitating works. The footbridges associated with this application include the Hale Village Green Link Bridge (HVGLB) which will connect the site to Hale Village across the River Lee Navigation and Pymmes Brook, a pedestrian footbridge across to the Paddock. It is proposed to build the scheme out in two periods, initially comprising Phase 1 (with approximately half of the residential</p>	

Stakeholder	Question/Comment	Response
	<p>units) and then Phases 2 and 3 two years later to provide the remainder of the development.</p> <p>The site is proposed as essentially a car free site, it has a High PTAL and this will improve upon opening of the HVGLB footbridge connecting to the Hale Village development. Cycle parking is to be provided to accord with London Plan requirements however there are still outstanding details required for this as discussed earlier in this response.</p> <p>Sustainable transport provision for this development will include cycle parking, car club provision, the new footbridge connections and a Travel Plan.</p> <p>In principle this application should be acceptable in Transportation terms; however there are a number of issues that require further work and resolution prior to Transportation being able to fully endorse the application. These include;</p> <ul style="list-style-type: none"> • Car Parking – further work is needed to ascertain the opportunities for parking migration and any appropriate mitigation • Cycle Parking – the proposed provision needs to be revisited to increase the provision of Horizontal cycle parking and to ensure appropriate provision is made for each block. • Delivery and Servicing arrangements – iterations to the public realm/road/footway layouts are referred to in the application to provide a more appropriate arrangement for service vehicle parking on the site. <p>And the following S106 obligations are appropriate;</p> <ul style="list-style-type: none"> • Car Club provision (three years membership per residential unit and driving credit, and provision of two bays/cars within the development including one for Phase 1) • TfL Bus Services contribution – A sum of £50,000 has been agreed between the applicant and TfL to contribute towards the capacity uplift 	

Stakeholder	Question/Comment	Response
	<p>required.</p> <ul style="list-style-type: none"> • Travel Plan (revised as required in this response and structured for the staggered occupation of the development) • Future permit free status in the event of a formal CPZ being implemented in the locality • Parking mitigation measures – following the Applicants Technical Note reporting on a car parking survey of the Ferry lane Estate and comments from the Parking Schemes Manager. • Car Parking Management Plan <p>Finally the following can be covered by condition;</p> <ul style="list-style-type: none"> • Delivery and Servicing Plan • S278 for Highway changes for new site access and implementation of Toucan/Tiger crossing of Ferry Lane to replace the existing Zebra crossing east of the site access • Cycle Parking arrangements (to include scaled layout drawings and manufacturer’s details/specifications) • Detailed Highway design for site access • Provision of Electric Vehicle Charging Points • Construction Logistics Plan (phased for build out in the stages) 	
<p>Parking Schemes Manager</p>	<p>Planned introduction of Controlled Parking Zones in Bruce Grove and St. Ann’s in 2016/17 would be likely to increase parking pressure in Jarrow Road and other nearby uncontrolled roads. Need funding to introduce parking controls in this area – seeking financial contribution of £42,000.</p>	<p>Recommended s106 Heads of Terms would secure a financial contribution towards introducing a CPZ on Jarrow Road.</p>
<p>Economic Development</p>	<p>The Council places great importance on creation of:</p> <ul style="list-style-type: none"> • Workspace provision. • Number and range of job and training opportunities that can be made available to local people. <p>We note that this site is currently designated as a Local Employment Area</p>	<p>Noted</p>

Stakeholder	Question/Comment	Response
	<p>(for regeneration) and recognise that it is not in intensive use and the geographical and physical constraints do not readily mitigate the situation.</p> <p>Although there is minimal workspace creation in the first phase of the development, the proposed total development is likely to lead to retaining the same level of employment, from a reduced employment footprint with a significant higher proportion in office-related jobs. We are therefore broadly supportive of the proposed development; though stress the importance of workspace coming forward as part of subsequent phases.</p> <p>We further note that the construction period will total 54 months commencing in January 2017, during which approximately 143 construction jobs will be required. However, a deficit of construction workers in the Borough relative to the national average has been identified in the submitted ES (Volume 1, section 15-37).</p> <p>The Haringey Employment & Recruitment Partnership (HERP) – which incorporates partners such as Haringey Council, Jobcentre Plus, Tottenham Hotspur Foundation and the College of Haringey, Enfield and North East London - was set up to help address these issues by providing committed, trained and qualified local candidates for jobs in a range of sectors, including construction. Request for a £30,000 contribution towards HERP.</p> <p>The HERP will be delighted to support the applicant and its contractors to address these.</p>	
<p>LBH Carbon Management Team</p>	<p>Energy Strategy</p> <p>The energy strategy submitted addresses the needs for the full application for Phase 1 (249 dwellings), and an outline application for the remaining phases. It sometimes mixes the two, but mostly focuses on the calculated emission savings for Phase 1 of the development. It is set out as per the</p>	<p>It is recommended that the majority of these matters are secured by way of the proposed planning obligations, rather than</p>

Stakeholder	Question/Comment	Response
	<p data-bbox="516 237 1381 267">London Plan guidance under Lean, Clean and Green Energy.</p> <p data-bbox="516 310 709 341">Lean Energy</p> <p data-bbox="516 345 1566 448">The phase one development will deliver a 7.62% improvement beyond Building Regulations (2013). This is across the dwellings and retail units to be constructed.</p> <p data-bbox="516 490 863 521">Suggested Condition 1</p> <p data-bbox="516 526 1541 628">You must deliver the energy efficiency standards (the Lean) as set out in “Hale Wharf Energy Strategy”, dated 13th May 2016, by Hilson Moran, version 2.</p> <p data-bbox="516 670 1566 1036">The development shall then be constructed and deliver the U-values set out in this document. Achieving the agreed carbon reduction of 7.87% reduction beyond BR 2013 with a carbon saving of 48 tonnes. Addressing the dwellings, communal areas and retail area. Confirmation that these energy efficiency standards and carbon reduction targets have been achieved must be submitted to the local authority at least 6 months of completion on site for approval. This report will show emissions figures at design stage to demonstrate building regulations compliance, and then report against the constructed building. The applicant must allow for site access if required to verify measures have been installed.</p> <p data-bbox="516 1078 1541 1219">Should the agreed target not be able to be achieved on site through energy measures as set out in the afore mentioned strategy, then any shortfall should be offset at the cost of £2,700 per tonne of carbon plus a 10% management fee.</p> <p data-bbox="516 1261 1528 1364">Clean Energy. The application gives two options to deliver carbon reduction in Phase One: 1 - Connect to Hale Village's energy centre; 2 - Develop a phase one only CHP network.</p>	<p data-bbox="1598 237 2039 631">planning conditions. The recommended s106 Heads of Terms address most of these issues (although based on current evidence, the cost of carbon is set at £1,800 per tonne). Recommended planning condition B10 also addresses overheating for the Outline element of the proposed scheme.</p>

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	<p>With both options there is no evidenced based carbon factors of heat are provided, and assumptions have been made. This means that the carbon reduction targets (82 tonnes or a saving of 29.77%) proposed cannot be demonstrated.</p> <p>It is also noted that the carbon savings are not Phase One specific. They are shared out across all 3 phases of development. This means that as the scheme grows, greater carbon savings are made, but at initial phases carbon performance will not be as high as the later phases. If the later phases are not built as currently planned, the carbon savings promoted may not be realised.</p> <p><u>Option 1: Connection to Hale Village's energy centre.</u> By connecting to the Hale Village Heat Network with its current Biomass Boiler system a 24.77% reduction could be achieved on site (section 6.2.2). If it connects to Hale Village Heat Network with a new CHP system in operation at Hale Village no carbon reduction figures are provided.</p> <p>Option one is the preferred option for the Council. And at this stage there is no justifiable reason presented as to why this cannot be delivered.</p> <p>But with option 1 the Council requires more information on the following:</p> <ul style="list-style-type: none"> - Details on the CO₂ reduction that would be delivered by connecting to the Hale Village Network (with two proposals - a biomass boiler and a CHP engine) - Details of how the route of pipe work to connect to Hale Village will be delivered (this seems to be based on an outline application for a bridge). How the Hale Wharf Site will connect to Hale Village if no bridge is delivered; - If the connection between the energy centre at Hale Village and the site is unable to be made the start of phase one, (due to the lack of bridge) details are needed on the interim energy supply to the 	

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	<p>development in phase one before the bridge is constructed;</p> <ul style="list-style-type: none"> - The route of the pipe work across the site and how the future pipe work into the outline development will be delivered; - Location and details of any plant room requirements on Hale Wharf (including thermal storage, pumping equipment, back up equipment etc); - Confirmation that all units (dwelling and commercial) are served by this heat source for all their hot water and heating needs (this is not clear in the submitted energy Strategy). <p>If the applicant proposes that option one cannot be delivered then the Council will need to be provided with evidence of this, and the Council will make a judgment. If the Council agrees then the applicant should proceed to work up proposals based on option 2. But this should be undertaken once the Council has made a judgment.</p> <p><u>Option 2: Develop a phase one only CHP network.</u> With option 2, the applicant is proposing to install three 60 kWe/120kWth gas fired CHP units as the lead heat source for the site heat, supported by back up boilers. It is unclear as to whether this number of CHPs and Boilers are needed only on phase one, or phases one, two, and three.</p> <p>In option 2, a reduction in regulated CO2 emissions of 175 tonnes per annum (28%) is proposed to be achieved through this “clean” part of the energy hierarchy. This carbon reduction seems not to be guaranteed for phase one, and can only be delivered when the energy centre is completed for phases 2 and 3.</p> <p>If the Council was to consider option two more details will be needed to be provided, this includes:</p> <ul style="list-style-type: none"> - Details and location of the Energy Centre for phase one; - Details of how this energy centre will be expanded to ensure that 	

Stakeholder	Question/Comment	Response
	<p>there is enough space for equipment to provide all the space hot water and heating loads for the later phases of development;</p> <ul style="list-style-type: none"> - A schematic of the plant room with all its requirements (thermal store, engines, pumps, heat exchangers etc); - Details of how this energy centre will be designed to enable future strategic connections to be made; - Details of the operating - Consideration should be given to incorporating renewable technologies into that site only heating and hot water network (for example Water Source Heat Pumps); - Details of the carbon factors in the following scenarios: <ul style="list-style-type: none"> o Phase one o Phase one, two and three <p>Suggested Condition 2 A Community Energy Strategy will be submitted giving details of the community heating network and associated infrastructure shall be submitted to for approval in writing by the Local Planning Authority 6 months prior to any works commencing on site. This will demonstrate how all the space heating and hot water loads requirements for the whole site and phases will be provided by a single hot water network.</p> <p>This new Community Energy Strategy will build on and give greater detail on the submitted Energy Strategy (Hilson Moran, May 2016) where two options are proposed in a hierarchy. With option one being the preferred option to be delivered.</p> <p><u>Option one.</u> The site is expected to demonstrate how it will connect to the wider community heating network at the Hale Village Energy Centre. This will deliver a 28%.</p> <p>This option 1 strategy will include details on:</p> <ul style="list-style-type: none"> • The CO₂ reduction to be delivered by connecting to the Hale Village 	

Stakeholder	Question/Comment	Response
	<p>Network (with two proposals - a biomass boiler and a CHP engine) plant room;</p> <ul style="list-style-type: none"> • The confirmed route of pipe work to connect to Hale Wharf from Hale Village; • Confirmation of the route of the pipe work to enable neighbouring and future development sites (including the Lock Keepers Cottages and the Paddock site) are able to link into the Energy Centre at Hale Wharf; • The route of the pipe work across the Hale Wharf linking into future phases; • The location the plant room on phase one; • The plant room requirements on Hale Wharf (including thermal storage, pumping equipment, back up equipment etc) which will be sized to the requirements of phases one, two and three; • The agreed operational practises across the Hale Wharf site ensuring that residents are protected and the system is designed to be efficient; • The carbon factor of the heat across the heat network. <p><u>Option two.</u> In the event that the Council agrees that a connection to Hale Village cannot be delivered. Then the option two must be set out to the Council to approve. Under option two the site is expected to deliver a single energy centre, that will serve all the development on the site and be able to grow to accommodate the equipment needed to provide heat and hot water in future phases.</p> <p>This option 2 strategy will include:</p> <ul style="list-style-type: none"> • Details and location of the Energy Centre for phase one; • Details of how this energy centre will be able to be expanded and ensure that there is enough space for equipment to provide all the space hot water and heating loads for the later phases of development; 	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • Confirmation that the energy system will be CHP lead, with boiler back up; • A schematic of the plant room with all its requirements (thermal store, engines, pumps, heat exchangers, flue location etc); • Details of how this energy centre will be designed to enable future strategic connections to be made; • Details of the operating systems and • The agreed operational practises across the Hale Wharf site ensuring that residents are protected and the system is designed to be efficient. • Consideration of incorporating renewable technologies into that site only heating and hot water network (for example Water Source Heat Pumps); • Details of the carbon factors of heat in the following scenarios: Phase one, Phase one, two and three (predicted) <p>Should the agreed carbon reduction target not be able to be achieved on site through energy by the preferred option set out in the afore mentioned strategy, then any shortfall should be offset at the cost of £2,700 per tonne of carbon plus a 10% management fee.</p> <p>Once approved the site wide network and facilities shall be installed and operated in strict accordance with the details so approved. It will be operational prior to the first occupation of the development and shall be maintained as such thereafter ensuring that the same carbon factor of heat is delivered. This condition must be discharged prior to any planning submission of later phases on the site.</p> <p>Green Energy. The Council has a policy (SP:04) that requires a minimum of 20% reduction in carbon emissions through the use of renewable energy. The London Plan policy 5.7 states “major development proposals should provide a reduction in expected carbon dioxide emissions through</p>	

Stakeholder	Question/Comment	Response
	<p>the use of on-site renewable energy generation, where feasible.”</p> <p>The scheme has demonstrated that an 8% reduction of energy demand is feasible and can be delivered through the use of renewable energy (Solar PV) but they have chosen not to undertake this. The reason given is that it is “unfeasible due to the additional cost of installing PV panels on top of the infrastructure costs of connecting into a district heating system.”</p> <p>The scheme has not committed to connecting to the area wide district heating network at Hale Village. If the scheme does connect to the Hale Village development, and if the Hale Village is operating its Biomass boilers on site, then this will. Therefore the renewable energy policies, local and regional have not been delivered. This scheme therefore is not policy compliant.</p> <p>Suggested Condition 3. 3 months prior to commencement on site a renewable energy strategy will be submitted to the council for approval. This strategy will set out how the development will maximise opportunities for renewable energy generation and work towards a minimum of 20% carbon reduction through the use of renewable technologies on site.</p> <p>Should the target related to this condition not be able to be achieved on site, and no acceptable justification given, then any shortfall should be offset at the cost of £2,700 per tonne of carbon plus a 10% management fee.</p> <p>Once approved the renewable technologies will be installed on site in accordance with the details so approved. It will then be operational prior to the first occupation of the development and shall be maintained as such thereafter.</p> <p>Overheating. It was noted that there is an inconsistency between the g-</p>	

Stakeholder	Question/Comment	Response
	<p>values proposed in the overheating (0.40) and energy strategies (0.48).</p> <p>This has been clarified in a note to the GLA stating that the figure used in the calculations is 0.48. But there are no background calculations to demonstrate this. The text references Appendix A, but this is not attached to the Energy Strategy. The online version has a title of “Overheating Risk Analysis” in Appendix B, but there are no calculations (or anything) included in this appendix.</p> <p>The statement used by the applicant following the overheating analysis is “The analysis indicated that for the moderately warm summer 1989 the apartments are not overheating. When spaces are analysed using 1976 and 2003 weather files the TM49 results indicate that a number of the apartment’s living spaces are not meeting the criteria set.” This is continues “overall it is considered that the development meets the overheating criteria for the current weather files, and minor changes to the interior design in the future could allow the development to meet criteria set for future climate change.” These design alterations have not been included into the final design submission.</p> <p>Therefore based on the design and statements submitted, this development will overheat in future weather patterns without the inclusion of mechanical ventilation or cooling.</p> <p>Action: There are two options: 1) To condition that design elements recommended by the Energy Team are delivered and demonstrated before they start on site. These include: - Installation of enhanced mechanical ventilation to encourage air movement such as ceiling fans; - Installation of external blinds to balcony openings for SW and NE facing living rooms.</p>	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> - Relocating bedrooms on the south and west facing side and living rooms on the east facing side of top floor apartments; - Installation of high level or roof vents to release accumulated hotter air. - Increase the level of exposed thermal mass to surfaces in living rooms and bedrooms to reduce peak temperatures - Installing glass with a lower g-value or fritting the glass to reduce levels of solar gain to the spaces (currently proposed at 0.48). <p>2) Require that a new design approach is delivered and that this is thermally modelled and demonstrated that no units overheat in future climate scenarios. This may result in air conditioning being installed, and this in turn will require a new energy Strategy as more power would be needed on site.</p> <p>For reserve matters: At phase 2 and 3 of submission (detailed) the following information will be required:</p> <ul style="list-style-type: none"> - An Energy Strategy demonstrating how the detailed application will deliver the required energy policy standard at the time of submission. If the full application for phases 2 and 3, are submitted before the Energy Condition for phase one has been discharged the Energy Strategy for later phases will need to be determined at a later date; - An Overheating Assessment, demonstrating that the later phases of the scheme do not over heat in future climate scenarios; - A sustainability assessment demonstrating how the new buildings will deliver wider environmental sustainability outcomes. 	
LBH Housing Commissioning, Investment and Sites team	No comments received.	
LBH Tottenham	No comments received.	

Stakeholder	Question/Comment	Response
Team		
LBH Arboriculturalist	<p>The vast majority of existing trees within and adjacent to the Hale Wharf site are of low quality and value and are mainly Category C trees, in accordance with BS 5837: 2012 Trees in relation to design, demolition and construction. Category C trees should not be an impediment to development. There are no existing trees of high quality and value (Category A). Two trees (1 x Category B and 1 x Category C) are proposed for removal to facilitate the development.</p> <p>Tree cover on the site has been constrained by the existing built environment. Trees are located on the extremities of the site on the eastern and western boundaries and consist of mostly self-seeded natural regeneration, including; Sycamore, Hawthorn, and Willow.</p> <p>Groups of trees outside the site do provide screening and are of conservation value by providing a habitat for wildlife using the river corridor. Pruning works will be required to provide clearance to facilitate the proposed construction works. Selective removal of some of these trees would improve the structure of the groups and may provide opportunities for new planting.</p> <p>Re-development of the site would have minimal impact on the existing tree cover, if protective measures are installed in accordance with the recommendations of BS 5837: 2012 Trees in relation to design, demolition and construction.</p> <p>Substantial new tree planting is specified in the landscape proposals. They include the planting of semi-mature and mature trees of suitable species, including London plane, Oak, Alder and Hornbeam. It is also proposed to plant an extensive native hedging, wildflowers and grasses. New planting would significantly increase the local tree cover and biodiversity within the</p>	<p>Recommended planning conditions A39 and B30 would secure the mitigation referred to in these comments.</p>

Stakeholder	Question/Comment	Response
	<p>site.</p> <p>When drafting planning conditions, they must include reference to the following;</p> <p>A pre-commencement site meeting must be specified and attended by all interested parties, (e.g. Site manager, Consultant Arboriculturist, Council Arboriculturist and Contractors) to confirm all the protection measures to be installed for trees and discuss any construction works that may impact on the trees.</p> <p>Robust protective fencing / ground protection must be installed under the supervision of the Consultant Arboriculturist, prior to commencement of construction activities on site and retained until completion. It must be designed and installed as recommended in BS 5837: 2012 Trees in relation to design, demolition and construction.</p> <p>The tree protective measures must be approved by the Council Arboriculturist, prior to any works commencing on site and remain in place until works are complete.</p> <p>The tree protective measures must be periodically checked the Consultant Arboriculturist.</p> <p>All construction works within root protection areas (RPA) or that may impact on them, must be carried out under the supervision of the Consultant Arboriculturist.</p>	
<p>LBH Flood and Surface Water</p>	<p>Having reviewed the supplied information to date, I can confirm we are happy with the concept design and associated calculations for flow and volume. I do not see any reason this should not now be taken to detailed design stage. The following two factors, others aside, will need to be taken into account and addressed during the detailed design stage, as</p>	<p>Recommended planning conditions A28 and B19 secure the approval and implementation of a detailed drainage strategy.</p>

Stakeholder	Question/Comment	Response
	<p>previously noted:</p> <ul style="list-style-type: none"> • The critical element in all of this is the design of the tanks. It looks like it will be below ground water table. Therefore we still need to see full calculations including buoyancy. • We also need to know if it is proposed to discharge against a potentially surcharged system – It is noted as pending but needs to be confirmed. 	
LBH Waste management	<ul style="list-style-type: none"> • Bulk store collection as required with direct access for collection crew. • There must be a management plan in place to ensure regularly cleansing arrangements and storage and rotation of waste facilities. • Commercial waste must be stored separately away from residential waste. • Arrangements for a scheduled waste collection with a Commercial Waste Contractor will be required. • The business owner will need to ensure that they have a cleansing schedule in place and that all waste is contained at all times. • Commercial Business must ensure all waste produced on site are disposed of responsibly under their duty of care within Environmental Protection Act 1990. It is for the business to arrange a properly documented process for waste collection from a licensed contractor of their choice. Documentation must be kept by the business and be produced on request of an authorised Council Official under section 34 of the Act. Failure to do so may result in a fixed penalty fine or prosecution through the criminal Court system. • Please also ensure that waste facilities and arrangements are discussed at least six weeks prior to occupation with the waste contractor to ensure service is delivered correctly. • The above planning application has been given a RAG traffic light status of GREEN for waste storage and collection. 	<p>It is recommended that a planning obligation secures the implementation of an approved Waste Plan.</p>
LBH Nature Conservation	<p>The Nature Conservation Ranger Team of LB Redbridge was commissioned to provide advice on the application. Proposed development is acceptable, subject to the following conditions:</p>	<p>Recommended planning conditions A9, A11, A21, A29, A32 to A35, A39, B9, B15,</p>

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li data-bbox="516 272 1577 1365"> <p>We recommend a condition for the provision of a detailed process and monitoring package as a follow up to the supplied Construction Management Plan, which will be known as the outline construction environmental management plan (OCEMP), to be supplied and approved by the LPA before demolition and construction takes place. This will include the provision of an ecological clerk of works who will oversee and monitor the identified impacts during construction, such as pollution incidents, management of invasive plant species, noise, light spill and air quality (dust). The OCEMP will also need to include a plan of action to mitigate impacts and non-compliance as they occur on site. We request temporary air quality/dust and noise monitoring points are extended to the North, East and South of the development site to monitor and protect the SPA, Ramsar and SSSI habitats, to ensure compliance of mitigation measures promised. We would like to see the OCEMP using data from the Walthamstow Wetlands Project and other regular bird counts, as part of the ongoing monitoring programme, to enhance the monitoring provided under section 4 of the HRA screening report. These are vital areas of the adjacent SPA, Ramsar and SSSI and should not be forgotten. The OCEMP will also need to show a paper trail of evidence that tool box training to staff and biodiversity champions are assigned within the various construction teams and sub-contractors, and they are liaising with the ecological clerk of works, discussing any issues during construction and. This will be ongoing, as turnover of staff and crews will change during the construction process. There will also be an ongoing requirement (under the OCEMP) that an independent post construction ecological brief is made at the end of each phase to summarise any notable events during construction, to summarise the monitoring programme of bird species, dust and noise, as well to confirm compliance of mitigation requirements required under section 4 of the HRA screening report.</p> 	<p>B20, B24 to B27 and B30 incorporate recommendations for protecting existing wildlife and providing enhanced opportunities within a new development.</p>

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li data-bbox="520 235 1570 560">• Within the HRA screening report particular mention is made of the potential noise impacts during demolition on the south side and initial sheet piling of Block A, with noise hoardings unable to be installed. We recommend a condition for an ongoing requirement that the LPA is made aware of these works being carried out, without noise hording, in advance to ensure it falls within the agreed June – August time frame. A follow up brief produced by the site ecologist/clerk of works to inform the LPA of the outcome of the works to the surrounding SSSI and SPA, will be required. <li data-bbox="520 602 1570 889">• We recommend a condition for the detailed design of the lighting scheme that will be installed across all three phases of the development, to be supplied and approved before demolition and construction takes place. This needs to contain exactly where white light will be used with the aim of no impact or spill onto the water either side of the new development. We would also like to see on this plan, where amber/orange led lighting will be put in place to reduce light pollution within sensitive areas. <li data-bbox="520 932 1570 1399">• We recommend a condition for the detailed design and inclusion of multiple integrated bat and bird boxes within the development, as well as the mentioned invertebrate hotels. We expect the design team to take into account constraints of the site and make suitable adjustments to incorporate them in. To be supplied and approved before demolition and construction takes place. The waterways and reservoirs are ideal habitat and commuting zones for bats that we know use the waterways locally. We would like to see the provision of significant roosting habitat as part of this proposal through integrated bat boxes http://www.bats.org.uk/pages/bat_boxes.html#Integrated%20bat%20boxes and bird boxes http://www.nhbs.com/browse/subject/910/integrated-bird-boxes to support these important species. House sparrows, starlings and swifts 	

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	<p>are of particular interest for bird life. The invertebrate hotels can be built at a large scale and can add value to the landscape, this example shows how it can be integrated into the façade of the building http://blog.bolandbol.com/wp-content/uploads/2012/03/arup-hotel1.jpg and can be made of robust materials for a permanent feature. We will require the timescale and phase these works will take place.</p> <ul style="list-style-type: none"> <li data-bbox="520 493 1566 743">• We recommend a condition for the provision of detailed designs for the floating habitat rafts to be installed on the river, with full size, scale, number of rafts and planting specifications, as well as the inclusion of fencing on the rafts to prevent vegetation being eaten by wildfowl during establishment. We will require the timescale and phase these works will take place. To be supplied and approved before demolition and construction takes place. <li data-bbox="520 789 1566 1256">• We recommend a condition for the provision of a detailed grounds maintenance specification and management plan of the proposed landscaping. The landscape areas are to be compartmentalised and marked on a map according to their type and management required, the total of these areas will be measured in square metres or linear metres (whichever is appropriate) and will be accompanied by descriptive text. Management must be timed (i.e. avoid cutting of hedges during bird breeding season) and be specifically of benefit to biodiversity. Specifications for any chemical applications on hard surfacing, weeding, strimming around play equipment/park furniture/obstacles must also be added. Tree maintenance programme must also be in place with the required number of visits for maintenance of tree pits and watering as required. <li data-bbox="520 1302 1566 1404">• We strongly recommend a condition that all data collected related to environmental variables being monitored, such as dust/air quality, noise, light and wildlife records are made available to the LPA and its 	

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	partners in both the raw and summarised forms.	
LBH EHS - Pollution Air Quality Contaminated Land	<p>Air Quality:</p> <p>The adjacent main road of air pollution concern, Ferry Lane is one of the 3 main routes across the Lea Valley. The whole of the borough of Haringey is a designated Air Quality Management Area (AQMQ), as is the neighbouring borough of Waltham Forest and both boroughs are committed to being 'Cleaner Air Boroughs', working towards improving air quality and to minimise the risk of poor air quality to human health and quality of life for all residents. Whilst the proposed development will introduce new receptors adjacent this main road, the majority of the proposed residential units are located away from Ferry Lane, adjacent the 'Lea Valley'.</p> <p>An air quality assessment (Ramboll, Environmental Statement, May 2016) and an Air Quality Neutral Assessment (AQNA) has been submitted along with the planning application to assess the air pollution impact of the proposed developments and determine the change in pollutant concentrations of NO2 and PM10. The main polluting operations associated with the entire site include and associated traffic movements, 5No. natural gas powered CHP units and 3 gas powered boilers.</p> <p>Information used to model the air pollution impacts include:</p> <ul style="list-style-type: none"> • 4No. SAV-XRGI 20 CHP units (of 77m stack height, internal flue diameter of 105.7mm and external diameter of 500mm, emission temperature 47oC and emission velocity 8.1m/s); • 3No. MHS Ultramax R3602SB gas boilers • 58 parking spaces - equating to 106 vehicle trips per day and • No vehicle movements attributed to the commercial aspect of the development. • The Energy Centre is to be located in Block A, with the flue terminating 	<p>Recommended planning conditions A6, A26, A27, A30 to A36 and B22 to B28 would secure these measures.</p>

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	<p>1.5m above the roof line of central gable (Fig. 5.19 of the EIA).</p> <p>The air quality assessment does give some concern: The planning application references 5No. CHP units (Energy Strategy, Hilson Moran, ref: 18335/S/RT01/02), no detail is provided in this strategy with respect to the CHP and boiler units.</p> <p>The energy centre modelling</p> <ul style="list-style-type: none"> • Many of the assumptions used for the model inputs (Appendix 6.D) have no units and the internal diameter of the flues for CHP and boilers are given as 105.7mm and 500mm respectively. The elevation drawings showing block A does not show flues of these dimensions. • No emissions data (as mg/m³ or mg/kWh at reference conditions for the CHP and boilers respectively) are provided. It is unclear if the data provided is based on the operation of all CHP units and boilers. • The CHP units used for the assessment are approximately 60kW units and manufacturer's data indicates very low emission levels. Therefore the emissions from the energy centre to be applicable only CHP units with comparable levels of emissions would be acceptable. • The emission velocity of the CHP would not comply with the Mayor's Sustainable Design and Construction SPG. • The ridge level of Block A, as currently proposed is 84.1m AOD and approximately 74m above ground level. Any changes in the height of the building or other inputs would need to be re-modelled. <p>The 2014 background level for NO₂ has been determined to be 30.43µg/m³ with baseline predictions ranging between 31.3 to 40.8µg/m³. However modelled data based on the LAEI shows that levels within 40 to 50 µg/m³ are predicted along the Ferry Lane within 10m of the</p> <p>The 2021 scenario (with the development) for NO₂ has predicted levels ranging from 30.53 - 40.76 µg/m³ at the selected receptors. However this</p>	

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	<p>is based on transport emissions only and potentially underestimated trip generation figures. The assessment does not incorporate the energy centre emissions to show the combined impact on the sensitive receptors but is included separately in Appendix 6.D. and only shown at one height only.</p> <p>In any case despite the limitations of the inputs the predictions indicate some areas remain above the annual mean objective level and the borough is an Air Quality Management Area therefore the Band B emission standards must apply to the CHP units proposed.</p> <p>AQ neutral assessment The London plan requires all development to be AQ neutral. The AQ neutral assessment is included in E.S. Appendix 5</p> <p>However there are concerns:</p> <ul style="list-style-type: none"> • the assessment is based on the assumption that the borough is an outer London borough however the GLA classes Haringey as an inner borough and therefore the benchmarking comparison may not appropriate and the assessment should take this into account. For example as an inner London borough the TEB for NOX and PM10 would be 784.27 and 134.84 respectively; • the residential Transport Emission Benchmarks (TEB) for NOx and PM10 have been calculated incorrectly using the emission factors provided as 'g/dwelling/year' but using the floor area (m2) of the residential development rather than number of units to calculate the TEB figure; • the traffic data used in the assessment is underestimated for the reasons stated in the section above; • the floor space used in the assessment is inconsistent with the proposed floor space provided in Schedule 4. 	

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	<p>Contaminated Land: A summary of Ground Conditions and Contamination is included in the Environmental Statement: Chapter 9 and Volume 3 Technical appendices section 9 (including Ramboll Geotechnical and Geoenvironmental Desk Study (2014), Interpretive report (2014), Hale Wharf Remediation Strategy (2015). These reports have identified the following issues:</p> <ul style="list-style-type: none"> • Ground gas: Concentrations of carbon dioxide in excess of the 5%v/v guidance threshold for CS2 (29) were recorded on numerous occasions. • Elevated concentrations of contaminants were found in made ground including exceedences of site-wide Lead and benzo(a)pyrene. Bbenzo(a)anthracene and TPH asbestos were also identified. • Asbestos containing material was encountered within half of the exploratory locations completed within the made ground in the northern half of the application site. • Leachable contaminants: the results of the ground investigation identified several soil leachate exceedences including heavy metals, ammonium, polyaromatic hydrocarbons (PAHs) and TPH (C10-C40) within the made ground. There were two exceedences of lead and ammonium as NH4 and one exceedence of C10-C40 within the Alluvium • Perched Water: (nickel and TPH (C10-C40)) <p>The summary recognises that much of the site was inaccessible at the time of the ground investigation due to the continued occupation of the industrial and commercial units and recommends further plot by plot intrusive investigation to refine the conceptual model.</p>	

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	<p>The following conditions are recommended for the detailed component of the application – Phase 1:</p> <ul style="list-style-type: none"> • Contaminated land: (CON1 & CON2) <p>CON1:</p> <ul style="list-style-type: none"> • Before development commences other than for investigative work: <ul style="list-style-type: none"> (a) Using information obtained from the ES Technical Appendices 9 (including Geotechnical and Geoenvironmental Desk Study, Interpretive report, Remediation strategy) additional site investigation, sampling and analysis shall be undertaken. The investigation must be comprehensive enough to enable:- <ul style="list-style-type: none"> ○ a risk assessment to be undertaken, ○ refinement of the Conceptual Model, and ○ the development of a Method Statement detailing the remediation requirements. <p>The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority.</p> <ul style="list-style-type: none"> (b) If the risk assessment and refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements, using the information obtained from the site investigation, and also detailing any post remedial monitoring shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site. <p>And CON2 :</p> <ul style="list-style-type: none"> • Where remediation of contamination on the site is required completion of the remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have 	

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	<p>been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied. Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p>Method of Piling</p> <ul style="list-style-type: none"> No phase of the development hereby approved (including the Site Preparation Works) shall commence until a Piling Impact Study has been undertaken including the method of piling foundations for that phase of development has been submitted to and approved in writing by the Local Planning Authority prior to any development commencing. Piling or any other foundation designs using penetrative methods shall not be permitted except for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details. Reason: To prevent the contamination of the underlying groundwater / aquifer. <p>Air Quality</p> <ul style="list-style-type: none"> Prior to development a revised air quality assessment (including the air quality neutral assessment) taking into account the comments raised above shall be submitted, to the Local Planning Authority for approval. Reason: To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction. <p>Combustion and Energy Plant:</p> <ul style="list-style-type: none"> Prior to installation, details of the Ultra Low NOx boilers for space heating and domestic hot water should be forwarded to the Local Planning Authority. The boilers to be provided for space heating and domestic hot water shall have dry NOx emissions not exceeding 40 mg/kWh. Reason: To protect local air quality. 	

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	<ul style="list-style-type: none"> • Prior to installation details of all the chimney heights calculations, diameters and locations (5No. CHP units and 3No. boilers) will be required to be submitted for approval by the LPA prior to construction. Reason: To protect local air quality and ensure effective dispersal of emissions. • Prior to commencement of the development, details of the CHP must be submitted to evidence that the unit to be installed complies with the emissions standards as set out in the GLA SPG Sustainable Design and Construction for Band B. A CHP Information form must be submitted to and approved by the LPA. Reason: To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction. <p>Management and Control of Dust:</p> <ul style="list-style-type: none"> • No works shall be carried out on the site until a detailed Air Quality and Dust Management Plan (AQDMP), detailing the management of demolition and construction dust, has been submitted and approved by the LPA. The plan shall be in accordance with the GLA SPG Dust and Emissions Control and shall also include a Dust Risk Assessment. Reason: To Comply with Policy 7.14 of the London Plan • Prior to the commencement of any works the site or Contractor Company is to register with the Considerate Constructors Scheme. Proof of registration must be sent to the LPA. Reason: To Comply with Policy 7.14 of the London Plan • 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 IIIA of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non- 	

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	<p>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. Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ.</p> <ul style="list-style-type: none"> 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. <p>As an informative: Prior to demolition of 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>	
<p>LBH Conservation Officer</p>	<p>The development would have a low impact on the setting (distant views) of various listed and unlisted heritage assets along Tottenham High Road (particularly Tottenham Green, Seven Sisters and South Tottenham) as well as the listed Markfield Beam Engine. This impact would be mainly on the distant views and not on the fabric of the heritage assets themselves. Given the distance of the development from potential heritage sites, the impact is considered to be low. As per statutory duty, this low harm should be given great weight. It is considered that the design of the proposed buildings is of high quality that would enhance the setting of the heritage assets and as such would outweigh the low harm caused by its height and the visual impact thereof. The greatest impact would be on the listed Ferry</p>	<p>Noted</p>

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	Boat Inn within LB Waltham Forest.	
LBH Emergency Planning and Business Continuity	Satisfied that the Applicant has taken sufficient account of flood risk and provided assurances about the resilience of the development.	Noted.
LBH EHS - Noise	No comments received.	
LBH Head of Direct Services (Parks)	<p>We face a real challenge of additional pressures on the green space network due to the increase in the number of new homes being proposed in the borough. This application is no different and therefore this development will lead to increased demand on the local open space network in the Tottenham Hale Area. Access to high quality open space is a priority and that access should be to a variety of types of open space from the natural habitat offered immediately adjacent to this development (The Paddock) to the more formal landscape of Down Lane Park and Markfield Recreation ground which are all within easy access of this development site. All these sites will receive more visits and sustain more usage as a result of this development and therefore it is imperative that investment is secured to improve one or more of these spaces.</p> <p>The Council has identified within its adopted Biodiversity Action Plan (BAP) the target of establishing The Paddock as a Local Nature Reserve (LNR) it is therefore important that a contribution towards the improvement of the fabric of The Paddock to reflect the increase in the pressures on the local open space network. The councils estimated cost of improving the paddock is in the region of £2-£2.5m to bring it up to a standard where it can sustain the level of usage as a key piece of the local open space network under the increased demand from this new development. Such an investment should also be supported to ensure that easy access to high quality open space promotes active travel patterns and an active lifestyle to ensure people remain fit and healthy and ensure that they do not suffer</p>	The recommended s106 Heads of Terms seek a financial contribution of £500,000 towards the costs of improving The Paddock.

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	<p>illness later in life as a result of inactivity. The council has identified some funding to improve the open space in the Tottenham Hale area but the added pressures are a direct result of proposed development and therefore a significant contribution should come from this development to shoulder part of the additional cost on the council. I would therefore recommend that given the scale of this development and the proximity to the Paddock a section 106 contribution in the region of 25% of the improvement cost of the Paddock should be secured prior to any permission for this development going ahead. Such a contribution would be in lieu of direct provision of the required amount of new open space required under current planning policy.</p>	
EXTERNAL		
Canal & River Trust	<p>Surface Water Discharge We note that the intended discharge of surface water during the demolition and construction phase is to the River Lee Flood Relief Channel. The Environmental Statement identifies leachable contamination within the Made Ground. Contamination has also been identified within the perched water on-site and the groundwater. Contaminants include lead, benzo(a)pyrene, asbestos, PAHs and speciated TPHs. The discharge of contaminated water into the River Lee Flood Relief Channel would not be accepted. We therefore request a condition to seek submission of details of a temporary surface water discharge scheme during the demolition and construction phases so the issue of the disposal and/or treatment of contaminated water can be addressed appropriately.</p> <p>Lighting Light spill should be avoided on water spaces, which are used by bats as feeding corridors. We would therefore recommend that ‘bat friendly’ lighting be used throughout the external spaces of the development, to encourage local populations. We suggest that the Council should require, through condition, further details of lighting for the part of the scheme which is subject to the full application and that this should also be</p>	<p>Recommended planning conditions A21, A34, A35, A38, B15, B26, B27 and B29 require the implementation of an approved Construction Logistics Plan, Surface Water Drainage details during the construction phase and adherence to the approved Lighting Strategy.</p> <p>Recommended planning condition A38 also require a study in to the feasibility of using the adjoining waterways for freight movement during the construction phase.</p>

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	<p>addressed when agreeing reserved matters for the later phases.</p> <p>Pedestrian Bridge The Trust is in discussions with LB Haringey and the applicant regarding the detail of the proposed footbridge. We accept the principle of a pedestrian bridge here.</p> <p>Waterborne Freight The Trust's policy on use of the River Lea Navigation for freight is to respond to market or policy driven demand. The Trust notes that neither the Major of London's Safeguarded Wharves: London Plan Implementation Report (2005) nor the Safeguarded Wharves Review: Final Recommendation (2013) identify Hale Wharf as a wharf to be safeguarded, with the latter noting that "the only realistic demand on the canal network (for freight movements) will be for small niche markets". Policy 7.26 of the London Plan sets out the policy protection given to safeguarded wharves.</p> <p>The Mayor of London's 2013 report does, however, note the following (at paragraph 4.5.3): "specific development projects that are occurring alongside the canal network have the opportunity to be supplied with construction materials and have demolition waste removed"</p> <p>"These new canal side developments could also be encouraged through local planning decisions to allow domestic waste produced by the developments to be transported by barge to waste transfer and processing centres elsewhere on the canal network".</p> <p>This is consistent with policy 7.26 of the London Plan which specifies that development proposals close to navigable waterways should maximise water transport for bulk materials, particularly during the demolition and</p>	

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	<p>construction phases.</p> <p>In this context we request a condition, set out below, in relation to investigating the use of the waterway for the movement of construction materials and/or demolition waste from this site.</p> <p>Requested Conditions</p> <p><u>Surface Water Drainage</u> “Notwithstanding any submitted details, prior to the commencement of development details of measures for disposing of contaminated rainwater, rainwater run-off or extracted ground water/perched water from de-watering works etc. during the demolition and construction phase (i.e. a temporary surface water drainage scheme) and an implementation plan shall be submitted to and approved by the local planning authority. The scheme shall include the details of any associated mitigation measures required as part of the temporary drainage arrangements e.g. for the treatment of water or to prevent contaminated water entering the adjacent watercourses. The approved temporary surface water drainage scheme shall be implemented in accordance with the implementation plan.</p> <p>Reason: To ensure that the water quality of the River Lee Flood Relief Channel is protected, in accordance with Policy SP5 of the Haringey Local Plan Strategic Policies and Policy 5.14 of the London Plan. The condition must be discharged prior to commencement of the development to ensure that no demolition and construction activities take place before the necessary drainage protections relating to these phases are in place.</p> <p><u>Waterborne Freight</u> “Prior to the commencement of the development hereby approved a feasibility study into the use of waterborne freight shall be carried out and submitted to and approved in writing by the Local Planning Authority.</p>	

Stakeholder	Question/Comment	Response
	<p>Where practicable, the use of waterborne freight shall be maximised for the movement of demolition waste and construction materials”.</p> <p>Reason: To encourage such use of the waterway in accordance with policy 7.26 of the London Plan. The condition must be discharged prior to commencement of the development to ensure that the opportunities that exist to utilise waterborne freight during the demolition and construction phases are properly investigated and taken, where appropriate.”</p> <p><u>Informatives</u></p> <p>“The applicant/developer should refer to the current “Code of Practice for Works affecting the Canal & River Trust” to ensure that any necessary consents are obtained (https://canalrivertrust.org.uk/business-and-trade/undertaking-works-on-our-property-and-our-code-of-practice).”</p> <p>“The applicant/developer is advised that any encroachment or access over the River Lee Navigation requires written consent from the Canal & River Trust, and they should contact the Canal & River Trust’s Estates Surveyor, Jonathan Young (jonathan.young@canalrivertrust.org.uk) regarding this.”</p> <p>“The applicant/developer is advised that any surface water discharge into Canal & River Trust waterways requires written consent from the Trust, and they should contact the Canal & River Trust’s Head of Utilities, Nick Pogson (nick.pogson@canalrivertrust.org.uk) regarding this.”</p>	
<p>Designing out Crime Officer</p>	<p>Earlier concerns over the adequacy of proposed boundary treatment at the rear of homes and proposed lighting of bridges have been satisfactorily addressed at this stage. Will want to comment further at the detailed design stage.</p>	<p>Noted. Recommended planning condition A25 requires proposals to be designed in accordance with Secured by Design principles.</p>
<p>Environment Agency</p>	<p>These comments constitute a partial response to this planning application. Our comments regarding the impact of the development on the flood defences in the area are to follow</p> <p>Condition 1</p>	<p>Noted. Recommended planning conditions A12 to A15 and B11 to B14 would secure these measures.</p>

Stakeholder	Question/Comment	Response
	<p>Prior to commencement the applicant must reach a legal agreement with The Environment Agency to ensure the maintenance of access to the Pymmes Brook on site. Reason To maintain the Environment Agency's access to the Pymmes Brook.</p> <p><u>Advice to Applicant.</u> The Environment Agency is the designated land owner of the Pymmes Brook adjacent to the proposed development. We require the maintenance of access to the river in this location. It must be demonstrated that the proposed development will not limit or prevent access by the Environment Agency to the channel. As part of the permitting process for this proposal the applicant should contact our Estates Team at phillip.alliston@environment-agency.gov.uk to discuss creating a legal agreement to maintaining access rights to the Pymmes Brook.</p> <p><u>Flood Risk</u> The submitted flood risk assessment (FRA) found within 'Hale Wharf ES Vol 3 Part 3 of 3 Part 1' and associated plans demonstrate that finished floor levels shall be set no lower than 9.0m AOD to protect the development from flooding. The development should be carried out in accordance with this FRA.</p> <p>Climate Change An analysis has been carried out by a third party to determine the sensitivity of the river levels to climate change and to support this application. We have applied a risk based approach to the assessment of this analysis and finds it appropriate for its purpose. In this instance a basic review has been carried out. We have not undertaken a full assessment of the fitness for purpose of the analysis and can accept no liability for any errors or inadequacies in the sensitivity analysis report.</p> <p>Emergency Access and Egress You are the competent authority on matters of evacuation / rescue, and therefore should assess the safety of</p>	

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	<p>the route of access / egress from the site in a flood event. You should consult your emergency planners as you make this assessment.</p> <p><u>Flood Risk Activity Permitting</u> This development may require a permit under the Environmental Permitting (England and Wales) Regulations 2010 from the Environment Agency for any proposed works or structures, in, under, over or within eight metres of the top of the bank of the Pymmes Brook, Lee Navigation and Lee New Cut, designated 'main rivers'. This was formerly called a Flood Defence Consent. Some activities are also now excluded or exempt. A permit is separate to and in addition to any planning permission granted. Further details and guidance are available on the GOV.UK website: https://www.gov.uk/guidance/flood-risk-activities-environmental-permits.</p> <p>Based on the Asset Performance Team's comment we recommend the following additional planning conditions in addition to Condition 1 from our 8 July letter.</p> <p>Condition 2 No development shall take place until details have been submitted and agreed by the Local Planning Authority, that demonstrate how unrestricted access to Environment Agency access ramps will be maintained throughout construction and for the lifetime of the development. Reason: To ensure continued access to the river channel for maintenance or other reasons.</p> <p>Condition 3 No development shall take place until details have been submitted and agreed by the Local Planning Authority, that demonstrate that the development will not put the structural integrity of the river walls at risk by placing undue loading on the walls. Reason: To ensure that river walls will remain at a standard that will allow</p>	

Stakeholder	Question/Comment	Response
	<p>them to serve their intended purpose for the lifetime of the development. Without the above conditions, we would consider the development to be unacceptable and would recommend refusal of planning permission</p>	
<p>Greater London Archaeology Advisory Service</p>	<p>The proposal is unlikely to have a significant effect on heritage assets of archaeological interest. No further assessment or conditions are therefore necessary.</p>	<p>Noted.</p>
<p>Greater London Authority</p>	<p>Employment floorspace: The loss of the existing poor quality employment floorspace is acceptable, and the re-provision of an element of employment floorspace is supported.</p> <p>Housing: The principle of residential use is supported. Private rented sector (PRS) tenure is supported; however these units should be subject to a covenant, a Section 106 agreement or other legal agreement typically for 15 years or more, retained in single ownership, and be subject to a 'clawback'. A large proportion of one and two bed units are considered appropriate in this highly accessible location, and smaller units are particularly suitable for PRS use; however the Council should confirm that this responds appropriately to housing needs in the area. Taking account of the accessibility of the site, its tightly constrained nature surrounded by large areas of public open space, its location within an Opportunity Area, a Council Growth Area, and a Housing Zone, the density is supported. The provision of play space is acceptable.</p> <p>Affordable housing: The level of affordable housing should be increased and a portion of these affordable homes should be delivered in phase 1. Discussions to examine a more varied mix of tenures and units sizes to achieve an increased level of affordable housing should continue. Consideration should also be given to the inclusion of affordable housing in phase 1. The Council should provide GLA officers with their independent assessment of viability prior to the referral of any Stage Two</p>	<p>Noted.</p> <p>Officers consider that a 10-year covenant for PRS is acceptable.</p> <p>The level of affordable housing has been significantly increased since the comments were made.</p> <p>Recommended planning condition B8 requires details of how privacy of future residents living in phases 2 and 3 would be safeguarded to be submitted alongside Reserved Matter applications (so that the LPA can consider this issue at the detailed design stage).</p> <p>Recommended condition B7 secures a Management and</p>

Stakeholder	Question/Comment	Response
	<p>application, in order to confirm that the proposal will provide the maximum reasonable amount of affordable housing, in accordance with London Plan Policy 3.12. GLA officers will update the Mayor on the findings of the assessment, and of further negotiations, at the Stage Two decision making process. Any departure from Policy 3.11 must be fully justified.</p> <p>Natural environment: The proposals are not considered to cause any harm to the Green Belt. Subject to the views of Natural England, no significant impacts are expected on designated nature areas and no significant adverse effects to birds of importance at the national scale are expected. The proposals are considered to be beneficial to Blue Ribbon Network.</p> <p>.</p> <p>Urban design and tall buildings: The site is identified as a suitable location for tall buildings, and the tallest blocks are appropriately located nearer to the existing and forthcoming tall buildings in Hale Village, and the public transport links at Tottenham Hale. The height and massing of the proposals appropriately respond to the sensitivities of the site and are supported. The layout, architecture and materials of the proposals are generally considered to be of a high quality. The use of car parking courts raises some concerns about the security of these areas and the applicant should provide clarification as to how this will be achieved. The applicant should clarify how the design principles for the bridges will be secured. It is suggested that an additional design code secures that the layout of units and windows ensures privacy within the courtyard spaces.</p> <p>Inclusive design: The proposed Lea Navigation bridge is much improved compared to earlier versions; however the applicant should confirm the proposed maintenance arrangements for the access lifts and how this will be secured. The Council should secure M4 (2) and M4 (3) requirements for both the detailed and the outline applications by condition.</p>	<p>Maintenance Plan for the Bridges – which will cover the up-keep of lifts.</p> <p>Recommended conditions A10, A17, A18, A37, A38, B7, B21 and B29 address the transport issues that have been raised.</p> <p>Recommended planning obligations would prioritise a connection to the Hale Village Energy Centre and failing that the provision of an on-site energy centre (with financial contributions towards off-setting as a backup).</p>

Stakeholder	Question/Comment	Response
	<p>Transport: There are a number of issues to be addressed before the application can be considered to comply with the London Plan Policies 6.1 'Strategic approach', 6.3 'Assessing effects of development on transport capacity', 6.9 'Cycling', 6.13 'Parking' and 6.14 'Freight'. Section 106 contributions are requested to mitigate the impact on the bus network in the vicinity of the site as a result of the development. The section 106 agreement should secure the Travel Plan and car club membership. Conditions should be secured for Blue Badge parking and EVCP provision; cycle parking and facilities; Delivery and Servicing Plan; and Construction Logistics Plan.</p> <p>Climate change: Based on the energy assessment submitted, a reduction of 224 tonnes of CO2 per year in regulated emissions is expected, compared to a 2013 Building Regulations compliant development, equivalent to an overall saving of 36%. The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan; however, further information should be provided before compliance with London Plan energy policy can be verified. The proposed development complies with London Plan Policies 5.12 and 5.13; however, the use of green roofs is strongly encouraged.</p>	
Historic England	On the basis of the information provided, we do not consider that it is necessary for this application to be notified to Historic England under the relevant statutory provisions,	Noted
Lee Valley Regional Park Authority	It is recognised that there will be considerable regeneration benefits from the development of this scheme. However, the scale of the proposed Block A is excessive. Its scale will dominate views from across and through the Regional Park to the detriment of visitor amenity. Its design does not reflect the 'sense of place' of this site in the Regional Park or provide visual interest. The proposed ecological measures and bridges whilst welcome are insufficient to overcome an objection.	Noted. The proposed scale and massing is fully considered in the report.

Stakeholder	Question/Comment	Response
<p>London Underground Infrastructure protection</p>	<p>No objection in principle to the above planning application there are a number of potential constraints on the redevelopment of a site situated close to underground tunnels and infrastructure.</p> <p>Therefore we do ask that a condition is included on any planning permission granted Therefore we do ask that a condition is included on any planning permission granted stipulating that:</p> <p>The development hereby permitted shall not be commenced until detailed design and method statements for Phase 1 only (in consultation with London Underground) for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:</p> <ul style="list-style-type: none"> • provide details on all structures • accommodate the location of the existing London Underground structures and tunnels • accommodate ground movement arising from the construction thereof <p>The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied. Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2015 Table 6.1 Industry and Transport 2012</p>	<p>Noted. Recommended planning condition A16 would secure this.</p>
<p>London Borough Waltham Forest</p>	<p>Officer comments – No objection in principle to the development (subject to a high quality of design) – but some concern about the potential impact on the open character of the Wetlands as an important wildlife and ecological area. Seeking an “appropriate financial contribution” by way of</p>	<p>Noted.</p>

Stakeholder	Question/Comment	Response
	mitigation is made towards the Wetlands.	
London Fire Brigade	Fire fighting facilities are acceptable in principle. Full details can wait until the Building Regulations stage.	Noted.
London Wildlife Trust	No comments	
Natural England	<p>A Habitat Regulations Screening Report has been provided for this application, which considers potential impacts in relation to the Lee Valley Special Protection Area (SPA) and Ramsar site. Potential impacts on the interest features of the Walthamstow Reservoirs Site of Special Scientific Interest (SSSI) have also been considered in the separate Ecological Impact Assessment (EclA).</p> <p>Natural England agrees with the conclusion of the Habitat Regulations, that with the mitigation package implemented as described in Section 4, significant effects on the Lee Valley SPA and Ramsar site alone or in-combination with cumulative schemes are unlikely, and no further assessment is necessary. We also advise that with these provisions in place, the proposed operations are not likely to damage any of the interest features of the Walthamstow Reservoirs Site of Special Scientific Interest (SSSI).</p>	Noted
Thames Water	<p>Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary.</p> <p>Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from</p>	Noted. Recommended planning conditions A28, A32, A33, B19, B24 and B25 would safeguard Thames Water assets and secure the implementation of a drainage strategy.

Stakeholder	Question/Comment	Response
	<p>Thames Water Developer Services will be required. They can be contacted on 0800 009 3921. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.</p> <p>With the information provided Thames Water, has been unable to determine the waste water infrastructure needs of this application. Should the Local Planning Authority look to approve the application ahead of further information being provided, we request that the following 'Grampian Style' condition be applied - "Development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed".</p> <p>Reason - The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community. Should the Local Planning Authority consider the above recommendation is inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Control Department (telephone 0203 577 9998) prior to the Planning Application approval.</p> <p>Water Comments The existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development. Thames Water therefore recommend the following condition be imposed: Development should not be commenced until: Impact studies of the existing water supply infrastructure have been submitted to, and approved in writing by,</p>	

Stakeholder	Question/Comment	Response
	<p>the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point. Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand.</p> <p>Thames Water recommend the following informative be attached to any planning permission: There is a Thames Water main crossing the development site which may need to be diverted at the Developer's cost, or necessitate amendments to the proposed development design so that the aforementioned main can be retained. Unrestricted access must be available at all times for maintenance and repair. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.</p> <p><u>Supplementary Comments</u> We have concerns about the potential impact of this development on the public sewerage network. We request that a drainage strategy is submitted, detailing the site's proposed foul water & surface water discharge rates, along with points of connection to the public network.</p>	
<p>Transport For London Road Network Area Manager</p>	<p>The Applicant responded to a number of initial queries and concerns raised by TfL as follows:</p> <ul style="list-style-type: none"> • Provision of contributions towards bus network improvements to mitigate the impact of the development – initial request for £850,000 reduced to £50,000 • Review of footway widths provided internal to the site – accept that this can be undertaken at detailed design stage. • Acceptance of phased delivery of the pedestrian and cycle bridges with later phases of the development – Grampian condition requiring provision of Bridge 1 before Phase 2/3 is occupied. 	<p>Noted. Recommended conditions A10, A17, A18, A37, A38, B7, B21 and B29 and s106 Heads of Terms would secure these matters.</p>

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • Accept the total number, location and details on the type of cycle parking provision • Seek financial contribution towards improving crossing of Ferry Lane • Accept clarification on the size of proposed Blue Badge parking and proposals to monitor the car parking allocated to the business barges • Details on provision of Electric Vehicle Charging Points acceptable. • Increase of offer to 3 years free membership of car club and phasing arrangements acceptable. • Revised cycle parking proposals are acceptable. • Further information on ATTrBuTe assessment means that the submitted Travel Plan is acceptable • Further details on the potential impact of the construction of the development and arrangements and plan in place to construct the development to be included in a Construction Logistics Plan (CLP) before determination, including investigating using 	
NEIGHBOURING PROPERTIES		
Commercial Boat Operators Association	<p>The Commercial Boat Operators Association (CBOA) represents water freight carriage on the UK's inland and estuarial waterways and is accepted by the Government as the representative industry body.</p> <p>The CBOA has an interest in promoting use of the London's rivers, canals and basins for carriage of freight by barge, to relieve road congestion and reduce exhaust emissions. This is particularly relevant where movement of materials is proposed for developments that are adjacent or near to waterways. This is in line with Government proposals for assisting reduction of road congestion in London. (See GPG 2122 Planning for</p>	<p>Noted. The site is allocated for mixed use development. Recommended planning condition A37 requires a feasibility study in to the use of waterways during the construction phase.</p>

Stakeholder	Question/Comment	Response
	<p>Freight on Inland Waterways and also the London Plan; the latter as a good example of use of the 'Blue Ribbon Network' of navigable waterways for freight). Leeds, Tower Hamlets and Greenwich are examples whose local authorities are keen on freight use of waterways in this way.</p> <p>The River Lee which borders this site is classified as a Commercial Waterway and as such is fully capable of carrying significant amounts of freight, so reducing the freight taken by road with the consequent advantages. Freight carriage on the River Lee is supported by the Canal and River Trust, who operate the waterway.</p> <p>The proposed development at Hale wharf would mean that use of the facility of a wharf, i.e. where barges can be loaded and unloaded would be prevented. The River Lee has lost many wharves in recent years, each one lost meaning a reduction in its potential capability of carrying freight.</p> <p>CBOA opposes the proposed development as far as wharf access is concerned. Any development on site should we believe allow continued use of the wharf for freight activities as and when this is required in the future. This means access from the Lane by HGVs, manoeuvring space around the wharf and some hard standing area. Complete development of the site as proposed will exclude this.</p> <p>The following outlines the benefits of transfer of freight from road to water –</p> <ul style="list-style-type: none"> • Significant reduction of road congestion • Lower risk of road accidents/fatalities • Lower noise on highways • Reduced highway wear and tear from HGVs, meaning lower long term highway maintenance costs • Lower fuel consumption meaning reduction of the carbon footprint • Lower exhaust emissions, meaning less air pollution in the district. 	

Stakeholder	Question/Comment	Response
Inland Waterways Association	<p>Each barge can carry several more lorry loads.</p> <p>The Inland Waterways Association objects to this application on the grounds that no specific consideration has been given to the effect on boat users using Tottenham Lock of the loss of sunlight and the wind turbulence caused particularly by the very tall buildings proposed adjacent to the lock. We point out that entering and leaving a lock, coming alongside to operate, or standing off until a lock is ready, are hazardous manoeuvres in strong and blustery wind conditions. Extensive analysis has been made on the possible effects on pedestrians and cyclists. In the same way, analysis of potential boat handling problems and mitigating measures is needed.</p> <p>The loss of sunlight in the lock operational area is also a safety issue if ground conditions will tend to remain wet, creating slippery conditions for boat users operating the lock. The extent of this needs to be analysed and mitigating measures considered.</p>	<p>The ES reports on an assessment of overshadowing of the Lock Keepers Cottage Amenity Area and finds a likely ‘negligible’ effect (Table 12.16). It also reports on an assessment of the wind microclimate of the River Lee Navigation Lock and finds no significant effects (Table 14.5).</p>
Stonebridge Boaters	<p>Stonebridge Boaters restate our unusual status under CRT and as residents within the boundaries of the Lee Valley regional park, but not in the park itself. We recognise that we have been consulted, but we would also like to point out that our receptivity has not been modelled when it comes to:</p> <ul style="list-style-type: none"> • Air Quality • Noise and Vibration • Dust • Wind • Daylight & Overshadowing <p>For example, in terms of receptor sensitivity, one of the few mentions of our moorings lists the vibration effect as “negligible” despite our close vicinity to pile driving and subsequent construction processes Table 7.20 of ES)</p>	<p>Chapter 3 of the ES recognises that there are a number of leisure moorings located towards the northern end of the application site which are frequently used. It is understood that the Canal and River Trust defines these moorings as being for leisure/ recreational purposes and not as permanent residential accommodation. The ES does not, therefore, identify these moorings as residential receptors. However, it does identify them as an amenity</p>

Stakeholder	Question/Comment	Response
	<p>Air Quality</p> <ul style="list-style-type: none"> • In relation to Air Quality, we note that Air quality objectives are already predicted to exceed the annual mean values in 2014 for Nitrogen Dioxide (NO2) at "an existing property close to Ferry Lane". We have concerns that these predictions underestimate the impact of increased construction traffic during both phases of the proposed development. • As noted above we are not included in Identified Sensitive Receptors, although at demolition phase adverse dust effects are considered to be of moderate significance (in the absence of mitigation) to human health and will be experienced by receptors within 350m of the construction boundary. In Residual Significant Effects, the relevant document states; ...by implementing mitigation adverse effects can be reduced. <p>Wind</p> <ul style="list-style-type: none"> • Stonebridge Boaters are not listed as a Sensitive Receptor. Identified Sensitive Receptors include; Surrounding Area – pedestrian use of the entrance at Ferry Lane, footpath and carriageway of Ferry Lane, the River Lee Navigation Lock and towpath and the adjacent Garage Site to the east • We note that the non-technical summary identifies the river navigation lock as a sensitive receptor, but it is unclear as to whether the analysis modelled the effect of cross winds on the boats using the lock (which any boater will tell you can have significant effect). • Downdrafts affecting the river and towpath seem not to have been modelled, and given the failure to model Hale Village successfully (see below), we are concerned about the impact that increased wind might have. • With regard to the proposed buildings themselves we are aware of anecdotal reports from a resident at Hale Village that it is not comfortable to sit out on the balcony for any extended period. • We are concerned that the effects of wind on our Moorings, and our boats have not been modelled or reported on. 	<p>receptor within the various technical assessments, where this is considered relevant.</p> <p>Issues relating to proposed scale and massing are fully addressed within the report. Officers consider that the proposed development does accord with development plan policies.</p> <p>The likely significant effects on Ecology are addressed in the ES and Natural England raises no objections. The Council has commissioned detailed advice from LB Redbridge Nature and recommended planning conditions A9, A11, A21, A29, A32 to A35, A39, B9, B15, B20, B24 to B27 and B30 incorporate recommendations for protecting existing wildlife and providing enhanced opportunities within a new development.</p> <p>CIL payments are considered appropriate to help fund infrastructure in the borough</p>

Stakeholder	Question/Comment	Response
	<p>Noise and Vibration</p> <ul style="list-style-type: none"> In relation to Noise and Vibration, noting our remarks above, it is stated; there are likely to be major adverse impacts on the nearest sensitive receptors without mitigation. However mitigation using Best Practicable Means will only reduce noise levels depending on the nature of the work. The statement goes on to assess (subject to mitigation of construction noise) that the resultant noise levels are expected to be of moderate significance, and adverse which in our submission, does not bode well for Boaters, for the seven- year duration of the construction phases. Indeed, due to our unusual status we are concerned that the effects on us will not have been mitigated at all. <p>Daylight & Overshadowing</p> <ul style="list-style-type: none"> In relation to Daylight & Overshadowing we refer to Alternative Scales of Development where it is stated: The increased height of the taller blocks towards the more urban southern end of the site at Ferry Lane allows for a lower height and lower density development along the waterways and ecologically sensitive northern tip of the application site. In our submission, the use of the term lower is misleading. The height at the lower end is still 8 storeys. We believe there will be significant negative daylight impact upon the southernmost moorings at Stonebridge South. We also refer to the Operational Phase and Residual Side-Effects which states; Once constructed, the proposed development is anticipated to result in a certain level of overshadowing impact to surrounding receptors; however these are all considered to be negligible or slight in nature, with the exception of one moderate adverse effect upon Lock Keepers Cottage which is anticipated to experience a localised reduction of daylight availability. In our submission this is incorrect. We believe there will be significant 	<p>to address additional pressures from this and other development.</p> <p>The principle of the proposed uses and loss of employment is fully addressed in the report.</p> <p>The affordable housing offer has been significantly increased since these comments were made and is fully addressed in the report.</p> <p>Likely transport effects are fully addressed in the report and recommended Planning Conditions A10, A17, A18, A37, A38, B7, B21 and B29 and s106 Heads of Terms would mitigate any likely adverse effects.</p>

Stakeholder	Question/Comment	Response
	<p>negative daylight impact upon the southernmost moorings at Stonebridge South – this has not been addressed. In addition, overshadowing of Lock Keeper’s Cottage means that the lock, and the temporary moorings along that section of river must also be affected, but there is no data on this at all.</p> <p>Tall Buildings</p> <ul style="list-style-type: none"> • Having seen the diagram of Illustrative Building types (at the end of this document – see Appendix 1) we notice that Blocks A and B are labelled “tall buildings” for reference only. This labelling would tend to suggest that the developers do not generally consider the remainder of the buildings to be tall. Without criticising your labelling, it is our submission that the development has been designed in a way that totally ignores the perspective of current users or inhabitants of the river. From the perspective of a floating home, all of these buildings are very tall. You could say the same from the perspective of a cyclist, or a pedestrian enjoying the view from the bridge. The language employed seems to reflect somewhat distant attitude to the effect that tall buildings will have on the character of the area. We believe the use of this language for technical purposes shows a disregard of perspective for those who inhabit the moorings, and who use the local area. • Further, in the non- technical statement, the Tall Buildings Statement is listed as a component of the bundle, but we could not locate this document. We found only Guidance relating to Tall Buildings. If this has genuinely been omitted, or misnamed, it demonstrates an underestimation of the importance to “sensitive receptors” of the impact of this large scale site, and diminishes or undermines our efforts to find out information about how this permanent change to our neighbourhood will impact us. <p>Environmental</p> <p>We believe there will be considerable detrimental impact on the</p>	

Stakeholder	Question/Comment	Response
	<p>environment, for the following reasons:</p> <ul style="list-style-type: none"> • The development will sit hard on the southern boundary of the Walthamstow Wetlands Project which is scheduled for completion in 2017 and will affect this corner of the wetlands; • There is a significant and diverse bird population in the immediate area of the development, including blackbirds, thrush, robins, tits, warblers, coots, swans and ducks; • There is a significant bat population, including rare species, which feeds along the canal and Lee Diversion. Light impact will significantly affect the feeding patterns and population during development and post-development; • The site of the development is an important 'flyway' for migrating birds; and • The construction and operation of the Hale Wharf Bridge in its present design format will have a significant effect on the wildlife. <p>Wildlife Population - Lighting</p> <ul style="list-style-type: none"> • We refer to Potential Significant Effects, Demolition & Construction Phase; <i>Potential effects are only expected to occur within 500m of the site, with the majority being limited to within 100m, at most, to properties having direct views of the site or wildlife that has nearby habitat or may use the site for foraging.</i> <i>Construction phase impacts are most likely to contribute to more substantial effects, but this will be limited primarily to days with limited daylight hours. These effects are able to be controlled and are expected to be 'Slight / Slight to Moderate Adverse' during winter months, and generally 'Negligible' throughout the year.</i> <i>Operational Phase</i> <i>Operational phase impacts will contain high degrees of in-built mitigation made through both the selection of new lighting and its planned arrangements within the full proposed development. Effects</i> 	

Stakeholder	Question/Comment	Response
	<p><i>are therefore considered to be well managed and are considered to be generally 'Negligible' to Slight Adverse to Negligible'.</i></p> <ul style="list-style-type: none"> • In our submission this is not correct. The impact may well extend significantly further than 500m from the site and should be considered not just in distance but also in time. We believe the lighting damage to wildlife will take several years to repair and recover and some species may never return or recover. • In relation to the Impact on Walthamstow Wetlands, we note; <i>The adjacent waterways, wetland and woodlands to the application site are likely to provide valuable foraging and commuting habitat to bat and wetland bird species, and the surrounding waterways have the potential to support otter and water vole. However, the application site itself was found to have little ecological value</i> • We strongly disagree with this assessment as the boundary of the site shares a common border the Walthamstow Wetlands project. • In relation to the Hale Wharf Bridge, we refer to [HALE WHARF] Design Access Statement May 2016 (DAS). <i>The Hale Village Green Link Bridge landing will involve the removal or modification of approximately 0.03ha of vegetation – this is considered to be a negligible extent and does not alter the character of the SINIC to a significant degree or remove any habitat type completely.</i> • In our view, the wildlife inhabiting this area has not yet been adequately identified as we believe it is an annual nesting site for swans. • In our submission, lighting levels from the bridge, during construction and operation, although low, will significantly affect the bat population which includes rare species. <p>Our concerns about the scale of the project are set out below, and our concerns seem to be broadly in line with national and local guidance. We would ask the local authority to rigorously review the project in terms of the scale, use, and target market, and to make informed decisions about the type of scheme the local and national guidance points to, asking</p>	

Stakeholder	Question/Comment	Response
	<p>themselves whether this development ticks those boxes, and whether it meets the genuine needs of the local area.</p> <p>In support of our statements below, we submit that the proposed development does not meet regional policy.</p> <ul style="list-style-type: none"> • In our submission, the development does nothing to address your own findings that: 15.4.87 Consequently the households in the Borough and, in particular the neighbourhood around the application site suffer from a lack of suitable private and affordable housing, low income levels, poor employment prospects, education challenges and a poor health situation. There are stark inequalities in levels of deprivation found in relatively close proximity across the Borough, with a cycle of poverty difficult to resolve. • Instead, it takes the form trying to resolve these very challenging conditions by pushing the responsibility back to the local authority, and slipping some money over the table: we refer to an extract from the non-technical statement (at page 31). To agree appropriate mitigation for the slight adverse effect that the proposed development may have on educational and primary healthcare facilities capacity, and to further enhance the beneficial effect of open space and play space provision, the Applicant should enter discussions with LB of Haringey. This is likely to include offering financial contributions towards education and healthcare, and may include financial contributions towards local space and youth space provision. <p>We have taken our responsibility as good neighbours seriously, and have looked over as many of the planning applications as we could in the relatively short time available. We have the following general comments:</p> <ul style="list-style-type: none"> • As neighbours for a cumulative period of 500 years, we are naturally apprehensive about the change of use to the vicinity. 	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • If it must change, then we would like to see it change to a new neighbourhood that positively affects the local area. The current proposed development feels like a cash cow that benefits the developers, and current landlords, but does not bring benefit to the local area and population, excepting the HVGBL (the bridge). • The height of the proposed buildings is completely out of scale with the local area. This is not only the tall tower at the front, but the range of heights across the site is excessive. Further, it is in contradiction to Tottenham AAP AAP6, which states that “building heights should then transition down to the surrounding area.” • Haringey and Tottenham specifically have an understandable need for new homes. However, they have met this target with other developments so there should be an opportunity to create a development here which is a community asset, not a dormitory for commuters. The proposed development does not address national guidance to “widen opportunities for home ownership and create sustainable, inclusive and mixed communities”. • Nearby neighbourhoods Blackhorse Road and Walthamstow have increased development in studios, workshops, and other facilities which promote local employment. This kind of use of space is also necessary, as well as housing, and a refresh of this brownfield site would provide a bright outlook for the site and much-needed local employment, continued employment, and promotion of entrepreneurship. • The deletion of a known 116 jobs and speculative proposed creation of 119 jobs will not help local employment. • 7% social housing – 34 units out of 505 is simply not what this area needs. In addition, we are very concerned that this 7% is caveated with the words “subject to viability”; that it is in the last phase of the project; that is not “pepper potted”, but is located at the least desirable part of the development. This is not social inclusion. We refer to your own documents, main text part 3, chapter 15 socioeconomics. 	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • A development with fewer storeys, and mixed- use which retains or promotes local employment, and incorporates more social housing and social responsibility locally would be far more acceptable to us as neighbours. • The work done by your project teams has been of an exceptionally high quality and we would support the reuse of this data for a smaller scale project, with the additional reporting mentioned above. (CRT's input, Tall Buildings Statement and modelling various conditions from the perspective of the nearest neighbours). • Locally, parking, transport, and retail outlets are already over- subscribed. See appendix 2: queuing for a ticket at Tottenham Hale. As local users, we experience the queues at all local amenities, and we do not believe that the cumulative effects of developments across the local area, in particular the removal of the Retail Park, address these concerns. • Our concerns about the proposed development are that it ultimately fails to make a positive contribution to Tottenham Hale, or improve the area, or its quality. Nor does the proposed development relate positively to neighbouring structures, or respond to concerns raised about the heights of certain structures, and their concomitant effects. 	
The Regents Network	<p>OBJECTION The disregard by the applicant of the importance and sensitivities of the waterways is strongly objected to, and it is recommended that the application is rejected.</p> <p>Strategic importance</p> <p>1.1 The site of the proposed development is dominated by waterways and open space. The Lee Navigation and the many other channels are designated as the Blue Ribbon Network, to which special and prominent attention is to be given. The Mayor states that the Blue Ribbon Network is of 'strategic importance' to London (LP Para 7.70) and that the network of waterways is 'of vital importance'.</p>	<p>The effects that the development would have on the blue ribbon network are fully addressed in the report.</p> <p>Recommended planning conditions A21, A34, A35, A38, B15, B26, B27 and B29 require the implementation of an approved Construction Logistics Plan, Surface Water</p>

Stakeholder	Question/Comment	Response
	<p>1.2 It is also required that the uses of the waterspace and land alongside should be prioritized ‘for water related purposes’ (LP BRN Policy, 7.24 Para A). Exploitation and dominance by over-sized tower blocks has a distinct negative effect on the waterways in the vicinity, and for a considerable distance up and down stream, and does not relate to the waterway in any way.</p> <p>1.3 The negative effect is also inflicted on the Lee Navigation by the lower level buildings in the scheme as they are positioned so close and on top of the waterway. Start from the water.</p> <p>2.1 This unwelcome development does nothing for the waterways. It is established that ‘the starting point for consideration of development and use of the Blue Ribbon Network and the land alongside it must be the water. The water is the unique aspect and consideration must initially be given as to how it can be used, maintained and improved’ (LP Para 7.71). In this application little or no consideration is given to the improvement of the waterway, as the objective of the developer is to exploit the presence of a wonderful stretch of water to enhance their own development and provide a financial gain. The development takes from the waterway, but gives nothing back.</p> <p>Promote waterway use</p> <p>3.1 An important and fundamental issue is the increase of the use of the Blue Ribbon Network for passengers and tourists (LP BRN Policy 7.25) that the Mayor and the London Plan, as well as local planning policies encourage and promote – and there is a clue in the name as a navigation. But more important still is the promotion of freight transport (LP BRN Policy 7.26) which has been a core use and activity of the Lee Navigation for hundreds of years. There has been a short period of 20 years when</p>	<p>Drainage details during the construction phase and adherence to the approved Lighting Strategy.</p> <p>Recommended planning condition A38 requires a study in to the feasibility of using the adjoining waterways for freight movement during the construction phase.</p> <p>Recommended planning conditions A13, A14, A15 and B12, B13 and B14 safeguard river walls, access to ramps and access to Pymmes Brook (as requested by the Environment Agency).</p>

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	<p>freight has dwindled, but effort is now being made to regenerate the essential use of the historic waterway. This should be promoted by the applicant, rather than ignored.</p> <p>3.2 Another clue to the importance of freight is the title of the location of the development as Hale Wharf, because that is just what it most successfully has been used for. It could again (or should again) be actively operated as a wharf.</p> <p>3.3 Water transport produces less than 20% of the emissions of road transport, and can take thousands of tonnes of freight off the grid-locked roads in the Lee Valley. Who would not want to promote that? In spite of the gentrification of the essential industrial areas up the Lee Valley, there are still very extensive commercial industries in the area which would welcome water transport.</p> <p>3.4 How many of the tens of thousands of lorries that have been used in the development of the Tottenham Hale area could have been taken off the local roads? For the monstrous development at Hale Wharf, how is all the bulk demolition rubble going to be disposed of, and by what means are the concrete aggregates and building materials going to be supplied – by road or by water?</p> <p>A responsibility</p> <p>4.1 The promotion and development of the Lee Navigation is more important than it seems to be realised. The Lee Navigation is of historic importance as it was constructed in Elizabethan times, for a very early use of water transport before the Canal Age and Industrial Revolution. It is also a section of the 3,000 mile canal network throughout the country which is a national asset. The stretch of waterway at Hale Wharf is not just a local feature, it is of national importance. This means that the local boroughs have a responsibility to care for and develop their stretch of a national</p>	

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	<p>asset. This is a great responsibility, and the authorities should recognise that. And so should the applicant that is exploiting the waterway and not caring for it.</p> <p>4.2 The applicant for this undesirable development is the Canal and River Trust (CRT), the custodians of our nation’s inland waterways. The development partner is Muse Developments which is a partner in Isis Waterside Regeneration, jointly owned by the Canal and River Trust. The home addresses of the partners are at waterway locations provided by the Canal and River Trust.</p> <p>Act of Parliament</p> <p>5.1 In the Transport Act 1968 (Schedule 12) the Lee Navigation is designated as a ‘commercial waterway’ rather than a leisure waterway. It is one of the seven great commercial waterways in the country which include the Trent Navigation, the Aire and Calder Canal, the Upper River Severn, the Weaver Navigation and the Gloucester and Sharpness Canal.</p> <p>5.2 It is national policy that the Lee Navigation at Hale Wharf should be engaged in commercial activities, rather than sitting there looking pretty waiting to be used.</p> <p>Inappropriate development</p> <p>6.1 Hale Wharf should never have had its commercial and business use terminated by their landlords – the Canal and River Trust. There were potentially thriving businesses that were run down, but with the importance to London and the national economy, the commercial opportunities should have been promoted. There was (and still is) a great opportunity to redevelop the site with new and improved commercial premises. It is a prime location and the businesses would thrive and provide a key commercial centre.</p>	

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	<p>6.2 This would entail extensive new buildings, but this need not be to the detriment of the surrounding waterways if the development is of reasonable scale and appearance. The Blue Ribbon Network does not oppose property development, so long as it is appropriate.</p> <p>6.3 There is no planning justification for a Change of Use, with the loss of valuable industrial land. There has been too much overall loss of industrial and business land in London, contrary to the important policies for protection (and enhancement) of industry and business. Ask the Mayor.</p> <p>6.4 With sensible and essential development, the wharf itself could continue to be used as a wharf. This is strongly promoted (LP BRN Policy 7.26; LP Policy 5.17, Para Bg; LP Policy 5.20, Para Fc; LP Policy 6.1, Para Ae and Para 6.8; LP Policy 6.11, Para Bc; LP Policy 6.14, Para A and Bc).</p> <p>Houses v jobs</p> <p>7.1 It is clear that without residential development on Hale Wharf, LB Haringey is still set to achieve its target to provide new homes, especially with the vast and mountainous development around the railway area (sadly titled as a 'village') with over 2,000 new homes. This is most creditable, but where are all these people going to work, and what will be the effect on the transport system to provide services and supplies to this increase in population? Hale Wharf could provide an active local transport hub.*</p> <p>7.2 There is no pressure to build residential blocks, but the applicant Canal and River Trust are just going for the money, unfortunately in a very aggressive and negative manner with a detrimental effect on the waterways that they have responsibility for.</p> <p>7.3 The Canal and River Trust is first and foremost 'manager and</p>	

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	<p>custodian' of our inland waterways with great responsibility for their long term future, and they have charitable status, rather than 'being a charity'.</p> <p>7.4 The applicant should be developing use of the waterway as they are obliged to do through the Acts and Policies, and CRT must overhaul its management.</p> <p>*Also waste removal can be dealt with at Hale Wharf by direct water transport up the Lee Navigation to the canalside Edmonton Waste Management Centre, rather than the waste vehicles daily trundling north.</p> <p>Open space designation</p> <p>8.1 It is very important to note that London's Blue Ribbon Network is categorised as 'public open space' which is the same designation as a park (LP Table 7.2). It is also interesting that London's largest open space (although it is linear) is the River Thames which is about 4½ times bigger than Richmond Park. The Blue Ribbon Network should not be underestimated, as the above map shows.</p> <p>8.2 According to established planning policy, as 'open space' the Blue Ribbon Network such as the Lee Navigation has the same consideration and protection as a park (LP Policy 2.18, Para 2.86).</p> <p>8.3 This is a 'clincher' as far as large scale waterside developments are concerned. The key question.</p> <p>9.1 The question that should be asked about the gross Hale Wharf development proposal is "would this development be acceptable beside a park?"</p> <p>9.2 The straight answer would undoubtedly be that such a large and dominant development as proposed would not be allowed beside a park.</p>	

Stakeholder	Question/Comment	Response
	<p>In that case, this refusal also applies to the dumping of the suggested bulky tower and blocks on the 'open space' waterside of the Lee Navigation.</p> <p>9.3 The rejection would in this case also apply to the lower 4-storey blocks because they are pushed close to the waters edge, rather than set back a reasonable distance (cf a park). Also their positioning would preclude the use of the long established and very practical wharf.</p> <p>9.4 It has to be accepted that Hale Wharf is not available for this scale, appearance and type of development. It is a worry that the applicant, an apparent responsible waterway agent, intends to sideline the waterway policies and renege on the responsibilities that it is charged with upholding.</p> <p>Unreliable proposal</p> <p>10.1 Basically, this planning application is most unsatisfactory and unsustainable. There is no sound justification for the change of use of the site as there is no target to fulfil. The misguided motive for a national body such as Canal and River Trust as applicant to be driven solely by financial considerations is unacceptable. Money is not a planning matter, and a national and community organisation such as the applicant should know better, and operate more reliably.</p> <p>10.2 The applicant has also been unreliable by deliberately managing the unfortunate loss of industry and business, which over the years they have been intentionally running down.</p> <p>10.3 There is no getting away from the fact that this unwelcome application is ill-conceived and will cause damage to the environment as well as the heritage of an important asset to the nation. The applicant has ignored and run roughshod over long established policy, especially the</p>	

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	<p>waterway ones that in particular it should be upholding and promoting. Not only is this proposal unreliable, but it could be said to be irresponsible.</p> <p>Appearance and design</p> <p>11.1 Apart from the unsuitable scale and bulk of the development, the appearance of the buildings is not agreeable. They have a grim expression which is compounded by the relentless repetition.</p> <p>11.2 One serious (and all too common) shortcoming that is visually uncomfortable is the proliferation of obtrusive balconies, which are a disagreeable addition. They give the buildings an aggressive appearance, spouting outwards from all over the elevations. The most satisfactory balconies are constructed internally, and they have the added advantage of being an integral and more useful part of the flats.</p> <p>11.3 It seems perverse that the tallest element of the development is in the most visible and prominent location, and to make it worse, the bulky tower looms over and dominates the historic Tottenham Locks. What a travesty. To add to the overbearance, there are the aggressive balconies digging into the copious open vista around the locks.</p> <p>Heritage and features</p> <p>12.1 It would be useful and informative for the applicant (and their partners), planners and authorities to appreciate the heritage and attributes of our nation's canal network. This should inform them of how to go about assessing waterside developments. These attributes include:</p> <ul style="list-style-type: none"> • National importance for hundreds of years; • Great economic value to the nation for centuries; • A National Asset – held for the nation in perpetuity (Transfer of Functions Order 2012); • Protected open space – with the same care and protection as given to a park (GLA); 	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • Conservation area(s); • Environmental importance from their ecological and natural attributes, and open space character; • Area of natural beauty, and Area of Metropolitan Importance for Nature Conservation; • Recreational features, and a focal point for the local community (Parliamentary Debate July 2010); • A navigation – for industry and trade, as well as leisure; • An extensive transport route, and the reason for the canal network construction and development. [Note: The canal navigation is designated as the waterway and the towpath]. <p>Waterway maintenance</p> <p>13.1 As well as reinstating and developing the commercial use of the application site, the applicant should be concentrating on maintenance and improvement of the waterway itself and its infrastructure, such as the historic Tottenham Locks. The Canal and River Trust are neglecting their responsibilities to maintain the waterways, not only on the Lee Navigation but throughout the national canal network. They need to be more focussed and businesslike. Coming up with money-making schemes such as the unsuitable Hale Wharf development are not going to rescue the nation’s canals from serious neglect and weak management.</p> <p>13.2 ‘To secure the availability of the commercial waterway for public use, it shall be the duty of Canal and River Trust to maintain the commercial waterways in a suitable condition for use by commercial freight-carrying vessels’ (Transport Act 1968, Para 105 – a direct quote).</p> <p>13.3 It is a big responsibility that our waterways, which have thrived over centuries, are cared for and maintained to progress actively into the next 100 years or so. The prospects of this at present are not hopeful. Developments such as the negative one at Hale Wharf are not the way</p>	

Stakeholder	Question/Comment	Response
	<p>forward.</p> <p>Ownership</p> <p>14.1 For information: The canals are held in perpetuity for the nation – they are our waterways (Transfer of Functions Order 2012). The overall responsibility for the canal network is Parliament through the Waterways Infrastructure Trust. The Canal and River Trust is only the management, although they are charged with great responsibility.</p> <p>14.2 The canals are regulated by the Acts of Parliament. For instance, for a bridge to be built over the Lee Navigation at Hale Wharf, it has to have Parliamentary consent.</p> <p>Other policies</p> <p>15.1 This response to the application has concentrated on the waterways, but the rest of the valuable open space in the locality is also at serious risk of being degraded. There are many other sources of policy and advice, particularly from the Haringey Local Plan, and this has to be ‘in conformity’ with the London Plan so many of the local issues may have been covered.</p> <p>15.2 It should be noted that Hale Wharf is the only waterway asset in LB Haringey, and it must be pointed out that the application site is on the fringe of the borough and may not get the same attention as the central areas. Perhaps the Blue Ribbon Network may not be a top priority.</p> <p>15.3 A few years ago LB Haringey were legally challenged concerning an application at Hale Wharf on the grounds that the BRN Policies were ignored. As they lost and were stung with costs, it may be that the borough planners are better informed about Blue Ribbon Policies these days.</p> <p>Summary</p> <ul style="list-style-type: none"> • There is a lot of waterway policy that should be considered; 	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • There should be no change of use, nor revisions to ‘tweak’ the proposal as a compromise; • It really irkes that the applicant for such a negative waterway application is Canal and River Trust; • It is straightforward to reject it – it simply does not conform to the BRN Policies and London Plan; • The development takes from the waterway but gives nothing back. 	
<p>Tottenham Civic Society</p>	<p>Failure to respect the context and environment The Design and Access Statement makes contradictory comments and ignores the environmental context. The two tall buildings (21 and 15-storey) would stand out like giant sore thumbs from their surroundings; visually intrusive, overscale, shadow-casting objects which would just loom menacingly over the Paddock. They would also be visible from the Reservoirs to the northeast and southeast of the site and from Stonebridge Lock.</p> <p>The Height and Massing of the Proposed Tower Very little account has been taken of the objections previously made to the height of the tower; a token reduction from the 25 storeys proposed in the original draft of the site plan has been made, but other concerns about the height and massing of the development appear to have been waved away.</p> <p>Proposal does not comply with Policy DM1, Policy DM 6 (Local Views) or Policy AAP6 and would also be contrary to London Plan Policy 7.24.</p> <p>Although there are tall buildings close to the Tottenham Hale transport interchange further to the west, the heights of the other buildings in the Hale Village development decrease towards the east, to 9 storeys for the riverside pavilions alongside the Lea Navigation. The buildings on the far side of the Hale Wharf site, and in the Ferry Lane Estate to the south of Ferry Lane, are much lower rise. It should therefore</p>	<p>Noted. Issues relating to proposed scale and massing are fully addressed within the report. Officers consider that the proposed development does accord with development plan policies.</p> <p>The affordable housing offer has been significantly increased since these comments were made and is fully addressed in the report.</p> <p>The proposal is effectively ‘car free’, with 10% car parking for disabled residents. This is fully addressed in the report.</p>

Stakeholder	Question/Comment	Response
	<p>be expected that to be consistent with the grain of these buildings and to meet the requirements of the council's policy AAP6 and the Mayor's policy 7.7 any (and all) building(s) on the Hale Wharf site should be intermediate between those of Hale Village and the Ferry Lane Estate: in other words, not only much lower than 21 storeys, but even lower than 9 storeys.</p> <p>Buildings would fail to make a positive contribution to the Hale area because they would run counter to policy 7.24 of the Mayor of London's London Plan, concerning the Blue Ribbon Network, which includes the Lea Navigation.</p> <p>The Design and Materials of tallest buildings Incorrect reference to precedents. The precedents referred to are quite alien to and have never been present in the Hale area, and to introduce such buildings would therefore be a significant departure from the site's history and previous character.</p> <p>visitors to or travellers through the area would effectively be presented with two giant brick walls, one of 21 storeys in height and the other of 15 storeys, little mediated by the addition of other features. Such walls, howsoever decorated, would be both intimidating in appearance and entirely out of keeping with the extensively glazed riverside pavilions of the Hale Village development on the other side of the Lea Navigation.</p> <p>The Design and Access Statement is silent on the question of why pitched roofs should be of metal rather than tile, and indeed the use of metal conflicts with the historical industrial and wharf side buildings cited as precedents by the applicants as the influence for the proposed tallest buildings all such buildings have tiled roofs.</p> <p>Other Issues</p>	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • Lack of affordable housing – none being proposed in the two tallest buildings • There is a strong case for, other than parking spaces for disabled residents, the development should be car-free. 	
Ferry Lane Action Group	<p>For our residents the river and the open vistas around it are an important amenity - one of the reasons that people choose to move here, and to stay, helping to make it a strong and resilient community.</p> <p>The proposed development at Hale Wharf would seriously damage that amenity. The tall towers, up to 21 storeys, will dominate the view for many of our residents in their homes, and for all of our residents when enjoying the river and marshes, the Paddock and the Walthamstow Wetlands.</p> <p>We believe that the proposal is contrary to Haringey’s own policies in the Tottenham Area Action Plan which says that building heights should taper down from town centres. We know and accept that we will have tall buildings around Tottenham Hale station. But the existing buildings facing the river at Hale Village are 12 storeys the proposed development would not taper down from this but would be twice the height.</p> <p>We also consider that the design of the towers is poor. It does not reflect any local style and is featureless and bleak.</p> <p>The population of Tottenham is rising fast, and will rise even faster with the many developments in the pipeline. So it is all the more important to retain the positive amenities of openness and contact with nature that the river corridor offers for the rising population of what will be very dense developments.</p> <p>Some years ago FLAG was involved in consultations with what was then British Waterways and its development arm about the site. This was a</p>	<p>Noted.</p> <p>Noted. Issues relating to proposed scale and massing are fully addressed within the report. Officers consider that the proposed development does accord with development plan policies.</p> <p>The proposal has benefitted from input from the Quality Design panel and officers consider that it is of high quality.</p> <p>Noted. The proposals would significantly improve pedestrian/cycle connectivity with the Regional park and make a financial contribution to the improvement of The Paddock.</p>

Stakeholder	Question/Comment	Response
	<p>good consultation process and we arrived at some consensus about what development would be welcomed by the local community. We are disappointed that the developers have ditched the good work done then and come forward with a proposal that ignores community views.</p> <p>We hope that Haringey Council will make it clear to the developers that this proposal is not acceptable, and that they should come back with a proposal that is significantly lower than the Hale Village pavilions in order to comply with planning policy and to reduce the impact on local amenity.</p>	Noted.
Local representations	<p>Excessive Building height:</p> <ul style="list-style-type: none"> • Contravenes Policy AAP6 • Adverse impact on views to and from the Lee Valley Park • Buildings should taper down from Tottenham Hale Station • Tall buildings would diminish the openness of the area • Tall buildings would dominate the landscape • Concern about wind/down draughts • Insufficient design quality • Buildings would be “eye sores” • Excessive density <p>Overshadowing/loss of daylight/loss of sunlight:</p> <ul style="list-style-type: none"> • Loss of daylight and sunlight to neighbouring properties • Overshadowing terraces/balconies in nearby homes • Overshadowing river bank areas • Proposed open spaces on the site would be in shadow for much of the day. <p>Adverse impact on natural environment:</p> <ul style="list-style-type: none"> • Adverse effect of tall buildings on birds – light pollution/flying obstructions • Light pollution generally 	<p>Noted. Issues relating to proposed scale and massing are fully addressed within the report. Officers consider that the proposed development does accord with development plan policies.</p> <p>The ES adequately addresses likely significant effects and the issues are fully addressed within the report.</p> <p>The likely significant effects on Ecology are addressed in the ES and Natural England raises no objections. The Council has commissioned</p>

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • Noise during construction and once built (traffic, works, future residents) • Concern about impacts on foraging animals (foxes, hedgehogs etc.) and bats and water voles • Adverse impact on the Green Belt <p>Adverse impact on services:</p> <ul style="list-style-type: none"> • Pressure on school places • Health services already over subscribed • Need for further community facilities • Impacts are not adequately assessed in the ES <p>Insufficient Affordable Housing:</p> <ul style="list-style-type: none"> • Proposed amount is far too little • Proposed dwelling mix for affordable housing is not acceptable • No guarantee that wheelchair accessible homes would be provided • Proposed rent levels not clear • Affordable housing would be in later phases – risk it would not happen • Lack of access to viability information in order to check. <p>Poor Design/character</p> <ul style="list-style-type: none"> • Industrial/mill aesthetic is out of keeping • Design is uniform/uninteresting • Proposed buildings would be inward looking • Development would create a canyon effect • Brick would not be an authentic material and would be overly dark/heavy • “Bart Simpson hair style” roof design would be inappropriate • Out of keeping with the surrounding green spaces, natural environment • Out of keeping with the character established by Hale Village 	<p>detailed advice from LB Redbridge Nature and recommended planning conditions A9, A11, A21, A29, A32 to A35, A39, B9, B15, B20, B24 to B27 and B30 incorporate recommendations for protecting existing wildlife and providing enhanced opportunities within a new development.</p> <p>CIL payments are considered appropriate to help fund infrastructure in the borough to address additional pressures from this and other development.</p> <p>The affordable housing offer has been significantly increased since these comments were made and is fully addressed in the report.</p> <p>The proposal has benefitted from input from the Quality Design panel and officers consider that it is of high quality.</p>

Stakeholder	Question/Comment	Response
	<p>Traffic and Car Parking</p> <ul style="list-style-type: none"> • The area is already a bottle neck between east and north London – extra traffic would make this worse • Increase number of accidents • Increase in air pollution • Insufficient car parking • Likely adverse impact on surrounding area – increase parking pressure – particularly Bream Close • Increased congestion on Ferry Lane pavement s(particularly north side) <p>Contravention of policy</p> <ul style="list-style-type: none"> • Proposals would contravene planning policy • Proposals would be counter to Policy DM1 on tall buildings • Proposals would be counter to Policy AAP6 • Contrary to Urban Centre Masterplan • Contrary to London Plan • Contrary to the NPPF <p>No Need for so much housing</p> <ul style="list-style-type: none"> • Sites in the AAP area are capable of meeting the Council’s required target for 5,000 homes <p>Loss of Privacy</p> <ul style="list-style-type: none"> • Unacceptable loss of privacy to flats/balconies/terraces in Hale Village • Unacceptable loss of privacy to occupiers of the existing boats <p>Impacts on boats moored on the wharf</p> <ul style="list-style-type: none"> • Significant adverse impacts during construction and operation. • Loss of privacy/overshadowing 	<p>Likely transport effects are fully addressed in the report and recommended Planning Conditions A10, A17, A18, A37, A38, B7, B21 and B29 and s106 Heads of Terms would mitigate any likely adverse effects.</p> <p>Officers consider that the proposals accord with development plan policies and the NPPF.</p> <p>Emerging Alterations to Strategic Polices make clear that Growth Areas in the Borough are expected to deliver approx. 13,500 new homes up to 2026, with Tottenham Hale having the potential to provide more than 5,000 new homes.</p> <p>The likely effects on occupiers of neighbouring properties are</p>

Stakeholder	Question/Comment	Response
	<p>Employment floorspace/opportunities</p> <ul style="list-style-type: none"> • Displacement of existing businesses/jobs • Only two commercial units proposed – fear that these may not be viable and remain vacant for a long time (as at Hale Village) <p>Public Transport Capacity</p> <ul style="list-style-type: none"> • Tottenham Hale Station already at capacity • Train services that use Tottenham Hale are already over-stretched. <p>Adverse impacts during construction</p> <ul style="list-style-type: none"> • Noise, traffic, air quality • Impacts on wildlife • Proposed phasing will spread out these adverse impacts over a longer period <p>Other</p> <ul style="list-style-type: none"> • Adverse noise when built – • General dwelling mix is inappropriate – too many 2-bed homes – not what Tottenham needs • Concern at the nature of the planning application and fear that developers will come back for more • Insufficient assessment of views • Lack of community benefit • Conflict of interest – the architects are also advising the Council on the District Centre Framework • Impact on users of the towpath – walkers/joggers etc. • Increase in littering. • Part of the site should be used to provide improved facilities for boaters in the area. 	<p>fully addressed within the report – proposed separation distances are considered acceptable.</p> <p>The ES adequately assesses the likely significant effects on boats moored on the wharf.</p> <p>The principle of the proposed uses and loss of employment is fully addressed in the report.</p> <p>Recommended planning conditions A32 to A40 and B23 to B30 and the recommended s106 Heads of Terms would secure measures to mitigate likely adverse effects during the construction phase.</p>

