

Planning Sub Committee

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Application: HGY/2016/3932

Ward: Tottenham Hale

Address: 1 Station Square, Station Road, N17 9JZ

Proposal: Demolition of existing buildings and erection of a building providing 434 sq.m. (GEA) of commercial floorspace (Class A1/A3), 128 residential units (117 shared ownership units) (Class C3), landscaped amenity space, cycle parking and all structural and associated works.

Applicant: Micuber Estates Limited

Ownership: Private

Case Officer Contact: James Hughes

Site Visit Date: 7th December 2016

Date received: 28th November 2016 **Last Amended:** 27th March 2017

Plans and Drawing Number: Site Location Plan 1711-G100-XP-AL-001; Site Plan – Existing 1711-G100-XP-AL-002; Site Plan - Proposed 1711-G100-P-AL-001; Proposed Ground Floor Plan 1711-G200-P-00-001; Proposed Mezzanine Floor Plan 1711-G200-P-M1-001; Proposed First Floor Plan 1711-G200-P-01-001; Proposed Second Floor Plan (Typical 02-06) 1711-G200-P-02-001; Proposed Seventh Floor Plan 1711-G200-P-07-001; Proposed Eighth Floor Plan 1711-G200-P-08-001; Proposed Ninth Floor Plan (Typical 09-19) 1711-G200-P-09-001; Proposed Twentieth Floor Plan (Typical 20-21) 1711-G200-P-20-001; Proposed Roof Floor Plan 1711-G200-P-RF-001; Proposed Section AA 1711-G200-S-AA-001; Proposed Section BB 1711-G200-S-BB-001; Proposed Section CC 1711-G200-S-CC-001; Proposed Section DD 1711-G200-S-DD-001; Proposed Section EE 1711-G200-S-EE-001; Proposed Section FF 1711-G200-S-FF-001; Existing North East Elevation 1711-G200-XE-NE-001; Existing East Elevation 1711-G200-XE-E-001; Existing South-East Elevation 1711-G200-XE-SE-001; Proposed North East Elevation 1711-G200-E-NE-001; Proposed East Elevation 1711-G200-E-E-001; Proposed South East Elevation 1711-G200-E-SE-001; Proposed South West Elevation 1711-G200-E-SW-001; Proposed South Elevation 1711-G200-E-S-001; Details of North East Elevation 1711-G251-D-TY-001 P8/9 12351979v1; Details of South East Elevation 1711-G251-D-TY-002 Bridging Foundation Over Tunnels 143292-RDG-XX-FN-PL-S-2005 Bridging Foundation Sections 143292-RDG-

XX-XX-SE-S-2006, 1711-G200-001 – Updated Waste Plan, 1711-G200-P-M1-001 – Updated Waste Plan.

Documents: Planning Statement; prepared by NLP; Design and Access Statement, prepared by John McAslan + Partners; Flood Risk Assessment and Outline Drainage Strategy, prepared by Ramboll; Preliminary Risk Assessment, prepared by Ramboll Environ; Noise Impact Assessment, prepared by Ramboll Environ; Air Quality Assessment, prepared by Ramboll Environ; Environmental Wind Assessment, prepared by Ramboll Environ; Historic Environment Assessment, prepared by Ramboll Environ; Statement of Community Involvement, prepared by Belgrave Communications; Transport Assessment, prepared by WSP Parsons Brinckerhoff; Residential Travel Plan, prepared by WSP Parsons Brinckerhoff; Construction Logistics Plan, prepared by WSP Parsons Brinckerhoff; Delivery and Servicing Plan, prepared by WSP Parsons Brinckerhoff; Daylight Sunlight Assessment, prepared by NLP; Heritage, Townscape and Visual Impact Assessment, prepared by NLP; and Sustainable Design, Energy and Construction Statement, prepared by WSP Parsons, Consultation Response prepared by NLP (Parts 1 and 2), Wind and Microclimate report prepared by RWDI.

- 1.1 This application is before Planning Sub-Committee because it is major development and is required to be reported to the Sub-Committee under the Council's constitution.
- 1.2 The application has been referred to the Mayor of London as it is development which comprises or includes the erection of a building that is more than 30 metres high and is outside the City of London.
- 1.3 **SUMMARY OF KEY REASONS FOR RECOMMENDATION**
 - The scale of development will provide a significant number of new homes that will help to meet the Borough and London's wider housing needs in the future. The scheme will be an early catalyst adding to the regeneration of Tottenham Hale.
 - The applicant proposes 117 shared ownership units which represents 91% provision of affordable housing by habitable room. This overall percentage significantly exceeds local and London Plan policy targets and will allow for increased local home ownership.
 - An affordable housing tenure split of 100% shared ownership units meets with the portfolio approach to the management of affordable housing within the Tottenham Hale Housing Zone, and is in the context of the historically high rates of social renting that predominate in Tottenham.
 - The loss of existing B Class employment floorspace is offset by the delivery of a commensurate quantum of A Class employment floorspace. The site's

contribution of Town Centre floorspace is consistent with the site size and overall site capacity.

- The density proposed is approximately 1,454 units per hectare. While this exceeds the density range in the London Plan, it is recognised that this is a reflection of the very small and constrained site.
- The site is highly accessible, being located immediately next to Tottenham Hale Station. The site is also in close proximity to a significant open space in the form of Down Lane Park with Lee Valley Regional Park in close proximity. The site is suitable for smaller units and the quality of the scheme supports the proposed density.
- There is considerable policy support for a tall building in this location. The form, scale and massing of the proposed building is appropriate to the site context, and the height of the tower element of the building at 22 stories, will sit comfortably with taller development that is envisaged within the emerging Tottenham Hale District Centre.
- The quality of the scheme is considered to be high given the numerous site constraints, including the site shape, the “island” nature of the parcel bounded by three roads, and the position of the site above a London Underground tunnel.
- The layout and design of the ground floor has maximised the amount of active commercial frontage. The proposed building materials are considered to be high quality and the fenestration arrangement is legible. The delivery of winter garden style space within subject units together with a landscaped communal amenity space at 7th storey level adds to the residential quality of the scheme. The scheme incorporates single aspect units, however these units are generally one and two bedroom units and are minimised within the scheme, given the site constraints.
- The proposal will deliver a compliant quantum of wheelchair housing and all of the units will receive an acceptable amount of daylight and sunlight when assessed against relevant BRE criteria. Subject to mitigation at the condition stage, the noise, vibration and air quality impacts to future occupiers of the units are acceptable.
- The scheme is not anticipated to give rise to privacy or overlooking impacts. The scheme’s design mitigates inter-looking impacts between the proposed residential units and existing hotel rooms. The impacts of construction noise are temporary and will be controlled by condition.
- The wind and microclimate impacts in the vicinity of building footprint will be subject to further study as surrounding development parcels come forward

in Tottenham Hale. Further study of wind conditions will allow for mitigation and a possible modification of the scheme. The applicant has committed to modification of the scheme if required by way of a S106 obligation.

- The scheme is sufficiently separated from relevant heritage assets. The proposed building would appear above the roofscape in the Bruce Grove Conservation Area due to its height, but the development would appear as a distant feature. The impact to heritage assets is less than substantial, and this harm is outweighed by the public benefits of the scheme.
- The transportation impacts to the scheme are acceptable. The scheme will not generate a significant increase in traffic or parking demand and a car free scheme is acceptable. The provision of cycle storage is policy compliant.
- Subject to a S106 obligation to provide an updated energy strategy and agree a carbon offset payment if required, the design of the scheme is considered to be sustainable. The applicant has committed to a future district energy connection. The issues of flood risk, drainage, land contamination and waste storage are able to be addressed by the imposition of conditions.

2. RECOMMENDATION

- 2.1 That the Committee resolve to GRANT planning permission and that the Head of Development Management is authorised to issue the planning permission and impose conditions and informatives subject to the signing of a section 106 and Legal Agreement providing for the obligations set out in the Heads of Terms below.
- 2.2 That the section 106 legal agreement referred to in resolution (2.1) above is to be completed no later than 10th July 2017 or within such extended time as the Head of Development Management or the Assistant Director Planning shall in her/his sole discretion allow; and
- 2.3 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.2) above, planning permission is granted in accordance with the Planning Application subject to the attachment of the conditions.

Conditions – Summary (The full text of recommended conditions is contained in Section 8 of this report)

- 1) Three Year Expiry (HGY Development Management)

- 2) Development in Accordance with Approved Drawings and Documents (LBH Development Management)
- 3) Materials Samples (LBH Development Management)
- 4) Hard and Soft Landscaping (LBH Development Management)
- 5) Confirmation of Site Levels (HGY Development Management)
- 6) Landscaping – Replacement of Trees and Plants (LBH Development Management)
- 7) Drainage Strategy (Thames Water)
- 8) Impact Piling Method Statement (Thames Water)
- 9) Bridging Structure Supplementary Statement - (LBH Development Management)
- 10) Land Contamination – Part A and B (LBH Environmental Services and Community Safety)
- 11) Land Contamination – Part C (LBH Environmental Services and Community Safety)
- 12) Details of Flood Risk Attenuation Measures – (LBH Development Management)
- 13) Drainage (LBH Senior Drainage Engineer)
- 14) Ultra Low NOx Boilers - Product Specification and Dry NOx Emissions Details (LBH Environmental Services and Community Safety)
- 15) CHP and Associated Infrastructure Detail (LBH Carbon Management)
- 16) CHP Emissions Level Details – (LBH Environmental Services and Community Safety)
- 17) Development in Conformity with Energy Statement (LBH Development Management)
- 18) Details Roof Top PV Panels (LBH Development Management)
- 19) External Solar Shading and Passive Ventilation Study (LBH Development Management)
- 20) Details of AQDMP – (LBH Environmental Services and Community Safety)
- 21) Plant and Machinery - EU Directives (LBH Environmental Services and Community Safety)
- 22) Registration of NRMM - (LBH Environmental Services and Community Safety)
- 23) Revised Air Quality Assessment (LBH Environmental Health)
- 24) NRMM Inventory and Documentation Availability (LBH Environmental Services and Community Safety)
- 25) Details of Noise Mitigation Measures (LBH Development Management)
- 26) Wheelchair Dwellings (LBH Development Management)
- 27) Accessible and Adaptable Dwellings (LBH Development Management)
- 28) Updated Waste Management Scheme (LBH Environmental Services and Community Safety)
- 29) Cycle Parking Details (Transport for London + LBH Transportation)
- 30) Construction Traffic in accordance with Construction Management Plan (LBH Transportation)
- 31) Updated Servicing and Delivery Plan (SDP) (LBH Transportation)

- 32) Disabled Parking Study (LBH Transportation)
- 33) Details of Central Dish/Receiving System (LBH Development Management)
- 34) Individual Satellite dishes or television antennas precluded (LBH Development Management)

Informatives – Summary (The full text of recommended informatives is contained in Section 8 of this report)

- 1) Working with the Applicant (LBH Development Management)
- 2) Community Infrastructure Levy (LBH Development Management)
- 3) Hours of Construction Work (LBH Development Management)
- 4) Party Wall Act (LBH Development Management)
- 5) Requirement for Groundwater Risk Management Permit (Thames Water)
- 6) Attenuation of Storm Flows. Combined Sewer drain to nearest manhole. Connection for removal of ground water precluded. Approval required for discharge to public sewer. (Thames Water)
- 7) Public Sewer Crossing – Approval required for building, extension or underpinning within 3 metres. (Thames Water).
- 8) Water Main Crossing Diversion (Thames Water)
- 9) Minimum Pressure and Flow Rate from Pipes (Thames Water)
- 10) Responsibility to Dispose of Commercial Waste (LBH Neighbourhood Action Team)
- 11) Asbestos Survey (LBH Environmental Services and Community Safety)
- 12) New Development Naming (LBH Transportation)
- 13) Environment Agency – Additional Advice (Environment Agency)

Section 106 Heads of Terms:

Affordable Housing

- 1) 117 shared ownership units to remain affordable until and unless affordable occupiers staircase to 100% outright ownership
- 2) Time Limited marketing the scheme, for a period of six months, to persons who live or are employed in Haringey with gross household incomes below £60,000 pa.
- 3) Occupation restriction (market housing) until affordable units transferred to a Registered Provider.
- 4) Recycling of the GLA grant funding of £28k/unit within the Haringey Local Authority area

Local Skills and Training

- 5) Local Labour and Training During Construction (Obligation to seek targeted approach to on-site labour by way of an employment skills plan to ensure not less than 20% of those employed are local residents.
- 6) End User Skills Training (**£29,000 Contribution**) Haringey Employment and Recruitment Partnership's activities to offer employability and vocational skills training targeted at Haringey residents for the purpose of facilitating their access to end use employment opportunities. Payable upon implementation of the development.

Transportation

- 7) Car Free Development – Future Occupiers not eligible for parking permits in any future CPZ.
- 8) Cycle Parking contribution - 4 spaces in the vicinity of the site. (**£500 Contribution**). Payable upon implementation of the development.
- 9) Updated Residential and Commercial Travel Plan
 - a) Travel Plan Coordinator
 - b) Provision of Transport Welcome Packs
 - c) 1 Year Free Car Club Membership and £50 credit voucher to each approved unit in a car club in the vicinity of the site.
 - d) **£3000 Contribution per travel plan** toward Travel Plan monitoring

Public Realm

- 10) Station Road Public Realm Enhancements (**£94,000 Contribution**) – In line with Tottenham Hale District Centre Framework Streets and Spaces strategy. Payable upon implementation of the development.
- 11) Leisure facilities and soft landscaping improvements as part of the third package of installations to facilitate residential access to Down Lane Park (**£225,000 Contribution**). Payable upon implementation of the development.

Binding Interest

- 12) Obligation to bind the applicant's equitable interest in the land with an obligation to bind the legal interest simultaneously upon acquisition of the development site.

Wind Mitigation

- 13) Obligations to incorporate further wind mitigation measures in response to an updated wind assessment as required by condition and modify the scheme if required. The wind assessment to be completed prior to works commencing on site as per relevant planning condition.

Energy Plan

- 14) Obligation to provide an energy plan addressing whether a carbon offset payment is required when details around energy provision are discharged.

Considerate Constructor

- 15) Obligation to register with the scheme during the construction and demolition phase of the development

16) Off Site Highway Improvement Works

- 1) Lengthen the exiting lay-by on Hale Road
- 2) Site Clearance
- 3) Drainage
- 4) Earthworks
- 5) Pavements
- 6) Traffic Signs and Street Furniture
- 7) Kerb and Footway
- 8) Street Furniture
- 9) Uplift for works on traffic sensitive street
- 10) TMO / CPZ changes
- 11) Contingency and Fees

Total off site highway contribution of **£49,002** payable upon implementation of the development.

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

2.5 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:

- i. In the absence of a legal agreement securing 1) the provision of on-site affordable housing 2) a viability review mechanism 3) marketing of the scheme to local residents on targeted incomes, and 4) the recycling of grant funding, the scheme would fail to foster mixed and balanced*

neighbourhoods where people choose to live, and which meet the housing aspirations of Haringey's residents. The scheme would not make full use of Haringey's capacity for housing to meet targeted delivery of required homes. As such, the proposal is contrary to London Plan Policies 3.9, 3.11 and 3.12, Strategic Policy SP2, and emerging DPD Policies DM 11 and DM 13, and emerging Policies AAP3 and TH4.

- ii. In the absence of a legal agreement securing local employment, the proposal would fail to facilitate training and employment opportunities for the local population. The scheme would fail to contribute to the social regeneration of the area. As such the proposal is contrary to Local Plan Policies SP8 and SP9, emerging Policy DM48 and emerging Policy AAP4.*
- iii. In the absence of legal agreement securing 1) residential and commercial Travel Plans, and Traffic Management Order (TMO) amendments to preclude the issue of parking permits, and 2) financial contributions toward off site cycle parking, travel plan monitoring, and car club provision, the proposal would have an unacceptable impact on the safe operation of the highway network, and give rise to overspill parking impacts and unsustainable modes of travel. As such, the proposal would be contrary to London Plan policies 6.9, 6.11 and 6.13. Spatial Policy SP7, Saved UDP Policy UD3 and emerging Policy DM31 and emerging Policy AAP7.*
- iv. In the absence of a legal agreement securing 1) public realm enhancements 2) leisure facilities and soft landscaping improvements to local green spaces, the proposal would give rise to an illegible public realm, poorly detailed building elevations and poor quality residential access to local green spaces. As such, the proposal would be contrary to London Plan policies 7.1, 7.4, 7.6, 7.18, Strategic Policies SP11 and SP13 and emerging Policies DM1, DM3, DM19 and DM20, and emerging Policies AAP6, AAP9, TH1 and TH4.*
- v. In the absence of a legal agreement securing an obligation to modify the scheme in the event additional wind modelling demonstrates planning harm, the development will give rise to a structure that will impact the amenity of surrounding land and buildings contrary to London Plan Policies 7.6 and 7.7, Strategic Policy SP11, and emerging DPD Policies DM1 and DM6.*
- vi. In the absence of a legal agreement securing an Energy Plan to address a carbon offset payment requirement and demonstrate a connection to a future district energy network, the proposal would fail to mitigate the impacts of climate change. As such, the proposal would be unsustainable and therefore contrary to London Plan Policy 5.2 and Strategic Policy SP4, and emerging DPD Policies DM 21, DM22 and emerging Policy TH4.*

2.6 In the event that the Planning Application is refused for the reasons set out in resolution (2.5) above, the Head of Development Management (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.

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3. PROPOSED DEVELOPMENT AND LOCATION DETAILS

3.1. Proposed development

- 3.1.1. This is an application for the demolition of the existing structures on the land, and construction of a mixed used residential and commercial development. The development would consist of a part 7 storey / part 22 storey building incorporating 128 residential units and 420 m² of A1/A3 retail/commercial floor space at ground floor level.
- 3.1.2. The building is proposed to comprise two elements. The first element is an approximately triangular seven storey podium section oriented toward the junction of Station Road and Hale Road. The ground floor commercial element will wrap around and face what is programmed to be a pedestrian area leading from a continuation of Ashley Road southbound. The frontage is double height and the A1/A3 unit incorporates a mezzanine.
- 3.1.3. The second element is a narrower tower that rises above the eastern side of the podium to 22 stories. The taller element of the building will rise to a height of 82.250 metres Above Ordnance Datum (AOD). The podium projection of the building will have height of seven storeys above ground level (34.7 metres AOD). The tower element is set back at the eastern apex above seven stories.
- 3.1.4. Two landscaped spaces are proposed to be incorporated into the scheme. One communal area is proposed on top of the western side of the podium at 7th storey level, and a planted space is also proposed at 1st floor level (above proposed roof plant) however this space is not an accessible amenity area.
- 3.1.5. The building is proposed to be faced with brown brick, bronze anodised aluminium window frames and panels, and extruded brick panels. Fenestration and projecting balconies are aligned in vertical bands, with variations at upper levels.
- 3.1.6. The double height ground floor is proposed to be faced with reconstituted stone panels and a full-height glazed retail frontage at the apex. The applicant proposes screens to the remaining bays constructed of translucent glass or brown facing brick. (Images of the proposed development are attached at Appendix 3 for reference.)
- 3.1.7. Of the 128 residential units, the applicant proposes 71 one-bedroom units (55%) 48 two-bedroom units (38%) and 9 three-bedroom units (7%). 13% of the units will be wheelchair accessible. The provision of affordable housing is proposed to be 117 units, equating to 91% affordable housing by habitable room. Of the 117 affordable units proposed, 100% are proposed to shared ownership.

- 3.1.8. No on-site car parking spaces are proposed, and car free development is to be secured through a S106 obligation. The public realm surrounding the application site outside the redline area is proposed to be improved in a comprehensive manner by way of improvements secured through the Tottenham Hale Housing Zone, and S106 contributions provided by the applicant.
- 3.1.9. The site sits partly above a London Underground (LU) tunnel serving the Victoria Line. The applicant proposes to construct a bridging structure that will straddle the tunnel and allow for piling operations to support the building. The redline area therefore includes parts of the public highway that will require excavation during the construction phase of the development.

3.2. **Site and Surroundings**

- 3.2.1. The application site is the eastern side of a triangular “island” bounded by Hale Road, Station Road and The Hale and abuts a recently constructed hotel to the west. The plot is irregular shaped and 0.22 ha in area. The redline site area also encompasses a portion of the public highway on the eastern side of Station Road to facilitate construction around a LU tunnel.
- 3.2.2. The site currently contains a car park, a small area of scrub land and two single storey buildings/structures. The first building is currently vacant and is 122 m² in area. The other building and its associated yard is occupied by a car repair firm and is 108.5 m² in area.
- 3.2.3. There is a small stand of immature shrubs at the eastern edge of the site and there are several large format advertisements positioned around the perimeter of the site. The site does not contain any locally or statutorily listed buildings and the site does not lie within a conservation area. The Tottenham Green and Bruce Grove Conservation Areas lie 0.5km to the west.
- 3.2.4. The surrounding area is of a mixed use character that is in transition. The application site will lie at the heart of the proposed Tottenham Hale District Centre. The Ashley Road area to the north is predominately of an industrial character, although proposals are coming forward for residential-led mixed uses.
- 3.2.5. A row of 11 terraced dwellinghouses lies to the northwest of the site. A petrol station (incorporating large forecourt and a car wash) lies to north. To the south of Station Road are large shed-type retail units and associated car parking, with Tottenham Hale Retail Park further to the south. To the east are Tottenham Hale Bus and Railway Station, with Tottenham Hale Village further to the east. Further to the west is a predominately residential area consisting of terraced housing.

3.2.6. The site lies within an emerging strategic site (TH4: Station Square West) as per the emerging Tottenham Area Action Plan (AAP). The AAP was subject to Examination in Public (EiP) in September 2016 and no changes to the allocated site are expected at this juncture in the plan making process. The site lies within the emerging Tottenham Hale Distinct Centre Framework (DCF) and within the Lea Valley Opportunity Area Planning Framework (OAPF). The site is located within the boundaries of the Tottenham Hale Housing Zone.

3.2.7. The site is located in Flood Risk Zone 2 and within the Tottenham Hale Growth Area. The site is designated as a Local Employment Area (LEA). The site is also adjacent to but does not lie within an Archaeological Priority Area. The site does not lie within a Controlled Parking Zone (CPZ) but the Tottenham Hale CPZ lies to the northwest. The site attracts a Public Transport Accessibility Level (PTAL) of 6a which indicates excellent access to sustainable transportation.

3.3. **Relevant Planning and Enforcement history**

3.3.1. There is no planning and enforcement history specific to the application site that is relevant, however there is considerable development programmed in the vicinity of the site, at various stages in the planning process.

3.3.2. The Applicant and their development partners are also undertaking the redevelopment of three parcels of land in the area known as Ashley Road South, north of the application site. Three parallel proposals for this strategic site are under consideration by the Council or are pending submission.

- The first application seeks to deliver a new campus building (of up to six storeys and 6,000 m²) for the National College for Digital Skills (NCDS), the redevelopment of Berol House to provide 15 residential units and 185 new build residential units.
- The second application seeks to deliver a mixed use building between eight and 16 storeys, small pavilion building of four storeys and another mixed use building up to seven storeys. An accompanying outline application seeks to provide up to 3,600sqm of commercial floorspace and 265 new units.
- The third application seeks to provide a mixed use building with up to 1,000 m² of uses within Classes A1, A3 and B1 and 400 new units.

3.3.3. The Ashley Road South scheme will strategically link with the application site by way of Ashley Road.

3.3.4. There are additionally a number of development sites in the vicinity of the application site (Monument Way, Welbourne Centre, Transport for London "Over Station" Development site, and a further site on the fringe of the bus station) which have been the subject of recent land disposal by the Council.

3.3.5. On 21st March 2016, the Council entered into the Tottenham Hale Strategic Development Partnership (SDP) with Argent Related Related to progress the above sites within Tottenham Hale. The SDP will secure the comprehensive delivery of a new District Centre at the heart of Tottenham Hale and a significant part of the first phase of the Tottenham Housing Zone.

3.3.6. The Mayor of London resolved to grant the Hale Wharf Development hybrid planning permission subject to the signing of a Section 106 legal agreement on 10th March 2017, and the remaining plot in the Hale Village development (Plot SW) is currently the subject of pre-application discussions with the Council.

Applicant's Consultation

3.3.7. The applicant has undertaken pre-application public consultation prior to the submission of the application, and has sought pre-application guidance from the Council and the Greater London Authority (GLA). The applicant has submitted a Statement of Community Involvement prepared by Belgrave dated November 2016 with the application. The scheme has also previously been considered by Haringey's Quality Review Panel (QRP). A chronology of engagement with Haringey and GLA officers, QRP and Transport for London (TfL) is below:

- 22 June 2016, meeting with Haringey Quality Review Panel (QRP);
- 26 July 2016 pre-application presentation to Planning Sub-Committee
- 4 August 2016, formal pre-application meeting with LB Haringey
- 18 August 2016, design meeting with LB Haringey;
- 30 August 2016, design meeting with LB Haringey;
- 7 September 2016, meeting with LB Haringey, GLA and TfL;
- 7 September 2016, presentation to Haringey QRP;
- 5 October 2016, design meeting with LB Haringey;
- 18 February 2016 presentation to Haringey QRP (Chair's Review)

3.3.8. The applicant has also undertaken three pre-application public consultation events prior to the deposit of the application. These occurred at Berol House, in the vicinity of the application site on 20 July 2016, 13 September 2016 and 10 November 2016. As the applicant sets out, exhibitions were publicised by the delivery of 6,000 leaflets to the surrounding area and the attendees at each event were:

- 20 July 2016 - 53 people
- 13 September 2016 - 15 people
- 10 November 2016 - 20 people

The response to the Council's statutory consultation is tabulated in the section below.

Quality Review Panel

- 3.3.9. The scheme has been presented to Haringey's Quality Review Panel on two occasions, at the pre-application stage and the application stage (Chair's review). The application has also been presented to Planning Sub-committee at the pre-application stage. The application has been presented to DM Forum. The application has been amended during the pre-application process in response to officer and QRP concerns.
- 3.3.10. A summary of the most recent QRP Chair's Review (on 18th January 2017) is contained in the design section of this report.

4. CONSULTATION RESPONSE

- 4.1. The following were consulted regarding the application:

Internal:

- LBH Design Officer
- LBH Head Of Carbon Management
- LBH Regeneration Tottenham Team
- LBH Housing Design & Major Projects
- LBH Flood and Surface Water Drainage
- LBH Economic Regeneration
- LBH Cleansing Team - East
- LBH Parks
- LBH EHS – Pollution, Air Quality, Contaminated Land
- LBH EHS - Noise
- LBH Conservation Officer Conservation Officer
- LBH Emergency Planning and Business Continuity
- LBH Building Control Building Control
- LBH Transportation Group

External:

- Network Rail
- London Fire Brigade
- Lee Valley Regional Park Authority
- Metropolitan Police - Designing Out Crime Officer
- Transport For London – Borough Planning
- Ferry Lane Action Group
- Environment Agency
- London Underground
- Natural England

- Greater London
- Thames Water Utilities
- Historic England - Greater London Archaeology Advisory Service
- London Wildlife Trust
- Tottenham Conservation Area Advisory Committee

4.2. The full text of comments from internal and external consultees that responded to consultation is contained in Appendix 1. A summary of the consultation responses received is below:

Internal:

1) LBH Transportation

No objection to the scheme. Subject to the additional details being submitted and approved (i.e. blue badge parking demand study), the Highway Authority is likely to conclude that the development will not generate a significant increase in traffic or parking demand or result in a detrimental impact on the highway and transportation network, subject to S.106 obligations and conditions.

2) LBH Environmental Services and Community Safety.

No objection to scheme. Standard Conditions and Informatives Recommended. No residential parking is proposed but on a development of this scale delivery and service vehicles can make a significant contribution. This has been estimated to be 12 HGV trips and 48 LGV trips daily. However no assessment of the transport emissions has been undertaken in either the dispersion modeling exercise or AQ neutral assessment. A servicing and delivery plan has however been submitted. This should focus on reducing the number of trips and promoting low emission vehicle delivery to reduce NOX emissions. In addition a condition requiring the development to be permit free should be included.

3) LBH Environmental Health Officer – Noise

No objection to scheme. Noise and Vibration Impact Assessment reviewed and considered acceptable. Once more detail about the exact plant and equipment is known a further refreshed assessment should be made. Standard conditions recommended.

4) LBH Carbon Management

At this stage the scheme delivers a 40.1% improvement beyond Building Regulations 2013. The policy requirement is to deliver zero carbon for residential units and 35% improvement beyond Building Regulations 2013 for

the commercial floorspace. However, the overall approach is not policy compliant because the London Plan energy hierarchy has not been followed. (The applicant and the Carbon Management Team have both responded further in the course of the application process, and a full assessment of sustainability issues is below.)

5) LBH Regeneration

No objection to scheme. Based on the vision developed in the DCF, Tottenham Regeneration welcomes the introduction of active frontages on Station Square as they will become a significant component to the establishment of an attractive local hub. Through the development of this scheme, the council has emphasised better treatment to the ground floor units, while recognising the highly constrained nature of the site. S106 obligations included in consultation response.

6) LBH Senior Drainage Engineer

Requirement for the consultant to re-submit a drainage strategy for this site that follows Haringey's guidance and completed pro-formas. Concept drainage strategy has not yet been submitted, and officers would request this, if this information. Outstanding drainage issues to be addressed by condition.

7) LBH Waste Management

Objection to the scheme. Twice weekly collection (given reduced bin store size) is technically feasible however twice weekly collection will have service charge and infrastructure implications. This proposed application will require adequate provision for refuse and recycling off street at the front of the property. Confirmation required that space must be provided for this property.

Arrangements will need to be made to ensure waste is contained at all times. Provision will need to be made for storage of receptacles within the property boundary not on the public highway. The above planning application has been given a RAG traffic light status of RED for waste storage and collection.

External:

8) Thames Water

No objection to scheme in terms of waste water and surface water drainage subject to standard conditions and informatives. These are recommended for imposition as per Section 8.

9) Transport for London

TfL finds the overall scheme to be agreeable, however, a number of revisions are requested to ensure the proposal is London Plan compliant:

- *TfL require further clarification regarding the provision and management of Blue badge spaces*
- *Full details of cycle parking should be secured by condition in consultation with TfL.*
- *Undertake a PERS audit.*
- *Justify the walking mode split in the TA.*
- *Continue to work with TfL regarding the Bridging structure*
- *Produce a CLP and DSP by condition.*
- *Submit a full Travel Plan secured through Section 106 agreement.*

10) Environment Agency

No objection to scheme. Environment Agency is not providing specific advice on the risks to controlled waters for this site to concentrate local resources on the highest risk proposals. Referral to standing flood risk advice.

11) Great London Authority – Greater London Archaeological Advisory Service

While the application is generally acceptable and supported in strategic planning terms, it does not yet comply with the London Plan. However GLA officers note there is no in principle objection and notes several areas where further information is required to ensure compliance with London Plan Policy. GLA officers note that the section 106 agreement for the scheme should specify the affordable housing percentage both with and without grant funding, as well as eligible household income limits for each shared ownership unit size. GLA officers further note the Council should secure M4(2) and M4(3) requirements by condition. Further information is required regarding climate change and transport matters.

12) London Underground

The planning applicant is in communication with London Underground engineers with regard to the development. Therefore, London Underground have no comment to make on the application except that the developer should continue to work with LU engineers.

13) Historic England

No objection to scheme. Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.

14) Network Rail

After reviewing the information provided in relation to the above planning application, Network Rail has no objection or further observations to make.

15) Natural England

No objection to the scheme. The location, being over 500m from the Lee Valley Special Protection Area (SPA) and Ramsar site as well as Walthamstow Reservoirs Site of Special Scientific Interest (SSSI) is unlikely to have any impact either directly or indirectly upon the designated sites nearby.

5. LOCAL REPRESENTATIONS

5.1 The following were consulted:

- 938 Neighbouring properties consulted by letter
- 1 Resident's Association consulted by letter
- 6 Planning site notices were erected in the vicinity of the site.

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

- No of individual responses: 5
- Objecting: 5
- Supporting: 0
- Others: 0

5.3 The full text of representations from adjoining occupiers (and the officer response) is set out at Appendix 1 for reference.

5.4 The issues raised in representations from adjoining occupiers are summarised below:

- The development will give rise to parking pressure in the area.
- The development will alter the character and appearance of the area due to its height and density, and will set a precedent for the area.

5.5 The following issues raised are not material planning considerations (the officer comment is noted in brackets following):

- Community has no inclination to be consulted by the developer. (Officer response: the applicant has undertaken community consultation prior to the deposit of the application. The Council has undertaken formal statutory consultation. The objections contained in responses addressing planning issues are the material consideration for members.)
- Development may impact view from an adjoining balcony. (Officer comment: views outside protected strategic and local views are not a material planning consideration.)

6 MATERIAL PLANNING CONSIDERATIONS

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

- 1) Principle of the development – Policy Background
- 2) Principle of Development – Assessment
- 3) Affordable Housing
- 4) Development Design
- 5) Quality of Residential Accommodation
- 6) Development Impact to adjoining occupiers
- 7) Heritage Assets
- 8) Transportation and Parking
- 9) Flood Risk and Drainage
- 10) Energy and Sustainability
- 11) Waste and Recycling
- 12) Land Contamination

6.2 Principle of the Development

6.2.1 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.”

The Development Plan

6.1.1 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). The Examination in Public (EiP) into the Council’s suite of forthcoming strategic policy documents, including the

Tottenham Area Action Plan (AAP) and Development Management Policies Development Plan Document (DPD) concluded in September 2016. The Council undertook an 8-weeks public consultation on the Inspector's Main Modifications arising from the Local Plan examination hearings. The consultation concluded January 13th 2017. There were no modifications proposed to the relevant site allocation TH4. The AAP and DPD are track to be adopted by Cabinet later in 2017.

The London Plan

- 6.1.2 The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. The consolidated London Plan (2016) sets a number of objectives for development through various policies. The policies in the London Plan are accompanied by a suite of Supplementary Planning Guidance (SPGs) that provide further guidance.

Upper Lea Valley Opportunity Area Planning Framework

- 6.1.3 The Upper Lea Valley Opportunity Area Planning Framework (OAPF) (2013) is supplementary guidance to the London. The OAPF sets out the overarching framework for the area, which includes the application site. The objectives for the Upper Lee Valley. The OAPF identifies the wider Station Square West site as suitable for a new landmark building as a focal point of the new district centre.

Housing Zone

- 6.1.4 Key to the delivery of regeneration at Tottenham Hale is the Council's participation in the Mayor of London's Housing Zone program. Tottenham Hale's designation as a Housing Zone provides funding for new infrastructure and allows policy interventions such as tax incentives, simpler planning regulations and the use of compulsory purchase powers. The program seeks to deliver a total of 5,500 new homes – 1,700 more than would otherwise be viable – through the unlocking of brownfield sites. The Housing Zone approach also seeks a portfolio approach to housing delivery to better align public sector resources. This approach also balances housing tenures and dwelling mixtures across Housing Zone areas.

Haringey Local Plan Strategic Policies (2013)

- 6.1.5 Haringey's Local Plan Strategic Policies document highlights the importance of growth areas within the Borough and notes that Tottenham Hale will be the key locations for the largest amount of Haringey's future growth.

- 6.1.6 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.
- 6.1.7 The pre-submission draft of proposed changes to Haringey's Strategic Policies were considered alongside the Tottenham AAP and Development Management DPD at an Examination in Public (EiP) that concluded in September 2016. Post Hearing Modification Consultation on the alterations concluded on 13 January 2017 and if found sound, the modifications to the Strategic Policies are programmed to be adopted later this year.
- 6.1.8 The most significant to the Strategic Policies arise as a result of 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. Given the progression of the alterations to the Strategic Policies in the plan making progress, they may be given significant weight by the decision maker.
- 6.1.9 The alterations to the Strategic Policies also make clear the need for affordable housing outstrips supply in Haringey. The most recent Strategic Housing Market (SHMA) informing the alterations indicates that with a shortfall in provision of 11,757 homes over the plan period. As a proportion of the total net housing requirement for all tenures (20,172), this equates to 59%. At an annual rate, this is 784 affordable homes out of 1,345.

Emerging Tottenham Area Action Plan (AAP)

- 6.1.10 The Tottenham AAP is considered to be a material planning consideration that can be accorded significant weight given its progression in the plan making process, although not full weight as may be accorded 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 Policies DPD and the suite of DPDs emerging alongside the Tottenham AAP to articulate the spatial vision for growth.

AAP Site Allocation

- 6.1.11 The site does not fall within any designated 'site specific proposal' allocation pursuant to the Haringey proposals map (Unitary Development Plan 2006), however the site falls within a wider allocated site within the Tottenham AAP (TH4: Station Square West). The Site Requirement for the wider site are:

- Development will be required to be accompanied by a District Centre-wide masterplan showing how it will complement:
 - Existing/retained parts of the site;
 - Existing extant permissions;
 - The requirements of this, and other District Centre policies; and
 - The recommendations of the District Centre Framework, or other adopted masterplans for the District Centre.
- A new active use facing the bus station will be created.
- A new, legible, north-south connection linking the Ashley Road area to the north, through the heart of the District Centre, and to the Tottenham Hale Retail Park site to the south will be created.
- Developments must contribute to the creation of a new urban square serving as the key bus interchange with Tottenham Hale Station. This will incorporate active frontages facing into the new square.
- Tall buildings marking the key transport node at Tottenham Hale Station and the emerging District Centre may be acceptable on this site.
- Ground floor uses on this site must be town centre uses, with residential and office uses permissible above and must avoid presenting blank facades to the streets.

The Design Guidelines for the wider site allocation are:

- The Victoria Line runs in a shallow tunnel beneath part of this site.
- Development must result in comfortable, attractive and safe/overlooked street environments.
- Station Road, and potentially the extended Ashley Road will provide service access for the buildings on this site.
- Care will be required on south facing frontages to limit heights to avoid overshadowing of block courtyards.
- This site is in an area of flood risk, and a Flood Risk Assessment should accompany any planning permission.
- Each development will be expected to contribute to the aims of a comprehensive public realm strategy.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- Parking should be minimised on this site due to the excellent local public transport connections.
- This site is identified as being in an area with potential for being part of a decentralized 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.

Tottenham Hale District Centre Framework

- 6.1.12 The Tottenham Hale District Centre Framework (DCF) sets out that Tottenham Hale has been identified as having the capacity for a significant number of new homes, with numerous sites that are suitable for new residential or residential-led mixed-use development. In the next 10-15 years, it is expected that 5,000 homes will come forward on these sites. A mix of housing tenures will be delivered, with emphasis on the affordable end of the market, to provide choice.
- 6.1.13 The DCF is not a Development Plan Document (DPD) but acted as a key part of the evidence base informing the Tottenham APP. The Tottenham AAP will allow for the implementation of proposals for the Tottenham Hale District Centre. The DCF has also been informed through engagement with the community, stakeholders and key landowners / developers in the Tottenham Hale area. The DCF provides design guidance and parameters for the wider allocated site.
- 6.1.14 The Station Island site is envisaged be a new focal point of the new Tottenham Hale District Centre. The station square will be a new high quality point of arrival, departure and interchange flanked by new development on both its east and west side.

Tottenham Hale Streets and Spaces Strategy

- 6.1.15 The Streets and Spaces Strategy sets out how to improve streets and public spaces around the area to make them safer, more user-friendly and inviting. The Strategy speaks to linking Ashley Road and the retail park with a new street, calming traffic by creating a pedestrian friendly environment with new controlled crossings, narrowed roads, wider less cluttered footways and more street activity. The document sits below the DCF and is not a development plan document.

Tottenham Hale Green and Open Spaces Strategy

- 6.1.16 The Green and Open Spaces Strategy suggests way to improve and protect existing green spaces. The strategy suggests making it easier to get to the Lea Valley with new and improved connections. The Strategy speaks to the need to invest in Down Lane Park to boost sports provision and enhance the park's wildlife. The document sits below the DCF and is not a development plan document.

Tottenham Strategic Regeneration Framework

6.1.17 The Framework outlines the key strategies that will be used to revitalise Tottenham. It sets seven strategic and overarching priorities for achieving the vision and the aspirations for Tottenham. While inter-related, several of the priorities are less related to the built form of Tottenham and address issues such as educational provision and services. The Framework sets out what the community thinks Tottenham will be and feel like when these strategies have been delivered and what it may mean for Tottenham's different character areas.

Tottenham Physical Development Framework

6.1.18 The Tottenham Physical Development Framework (PDF) was produced by Arup in 2012 for Haringey Council and highlights the scale of the opportunities within the Borough. The document was not consulted upon or adopted by the Council as planning policy and as such has no weight in planning terms. It notes that the area is becoming known for a high-quality, well-connected public realm providing a welcoming place to do business and socialise throughout the day and evening.

Urban Characterisation Study

6.1.19 Published in February 2015 as part of the 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 identifies the components of local character and distinctiveness and highlights those aspects which make Haringey unique. It also provides guidance on the location, type and form of new development, including the location of tall buildings.

6.1.20 The study notes areas in the borough that could be intensified and benefit from an increase in building height. These include areas along main streets, within centres, and areas of regeneration including Tottenham Hale.

Potential Tall Buildings Locations Validations Study

6.1.21 The main purpose of the study is to assess the locations for tall buildings already established by the Council and determine what may be appropriate in terms of place-making, townscape and landscape, and views. The Study undertakes an assessment of Tottenham Hale as an area that is suitable for tall buildings. It forms part of the evidence base for the Local Plan.

6.1.22 The study confirms the potential for tall buildings in Tottenham Hale to provide a land-marking role for the emerging district centre, as well as identifying the locations of the Tottenham Hale bus and railway station. The study notes the visual relationship between individual locations (as well as

the existing and unimplemented built forms) will need careful consideration to ensure a cohesive building group. Tall buildings must also respond to and maintain the individual neighbourhoods identified in the UCS.

6.2 Principle of Development – Assessment

Principle of Demolition

- 6.2.1 The scheme proposes the full redevelopment of the site, including the demolition of two existing buildings on the land. The existing buildings on the land are of no architectural merit and detract from the character of the area. The principle of the demolition of the existing buildings on the land is considered to be acceptable in principle and will optimise its reuse.

Re-provision of existing employment floor space.

- 6.2.2 The National Planning Policy Framework (NPPF) states at Paragraph 51 that Local Planning Authorities should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate.
- 6.2.3 Local Plan Policy SP8 indicates there is a presumption to support local employment and small sized businesses that require employment land and space. Emerging Development Plan Document (DPD) Policy DM40 (B) states that the Council will only consider the loss of employment land or floorspace acceptable subject to new development proposals providing the maximum amount of replacement employment floorspace possible, as determined having regard to viability.
- 6.2.4 The site lies within a Local Employment Area. An auto repair firm (trading as ABC Motors) operates on the site. There will be a loss of 108 m² of existing employment floorspace with re-development.
- 6.2.5 The emerging Tottenham AAP indicates an indicative site capacity for TH4 of 5200 m² of Town Centre space. The wider allocated site is 2.7 Ha in area. The application site is 0.22 Ha and comprises 8.1% of the total allocated site area (the wider site consists of two “island” parcels).
- 6.2.6 The application proposes 434 m² GIA of retail/commercial floorspace (A1/A3). This represents 8.3% of the total site capacity of Town Centre uses by area. While an assessment of provision by site area is indicative, the percentage provision of Town Centre floorspace, given the site area and the available frontage, is considered to be broadly acceptable.

- 6.2.7 The employment generating function of the A1/A3 floorspace is considered to be commensurate with the loss of B1 floorspace on the site, and that provision is in line with Local Plan Policy SP8, which indicates that Local Employment Areas will be treated more flexibly and uses that generate employment not included in the B use class will be considered. It is noted that the A Class floorspace proposed will be a source of employment and contribute to the local economy. The A Class floorspace will be of a higher quality than the B Class floorspace lost and retail or restaurant provision will likely have a higher job density.
- 6.2.8 The 108m² of existing B Class employment floorspace that will be lost with redevelopment is offset by the delivery of new A Class employment floor space, in line with the flexible approach to Local Employment Areas (LEA) articulated in Policy SP8. The site's contribution of Town Centre floorspace to the wider allocated TH4 site is consistent with the parcel size and overall site capacity for main town centre uses. The level of employment generated by the new floorspace considered to be at least commensurate with the existing planning position and will generate local employment. The loss of 108 m² of existing B Class employment floorspace within an LEA is therefore acceptable and no offset financial contribution is required from the applicant.

Density

- 6.2.9 London Plan Policy 3.4 (Optimising Housing Potential) indicates that a rigorous appreciation of housing density is crucial to realising the optimum potential of sites, but it is only the start of planning housing development, not the end. The reasoned justification to policy states that it is not appropriate to apply the London Plan Density Matrix mechanistically - its density ranges for particular types of locations are broad, enabling account to be taken of other factors relevant to optimising potential – local context, design and transport capacity are particularly important, as well as social infrastructure. The Mayor's SPG Housing encourages higher density mixed use development in Opportunity Areas. This approach to density is reflected in the Tottenham AAP and other adopted and emerging local policy documents.
- 6.2.10 In calculating density in vertically mixed schemes (i.e. where housing is on top of non-residential uses), it may be appropriate for the size of the site to be reduced by an amount that is equivalent to the proportion of total floorspace allocated to non-residential uses (both below and above ground, measured as GIA) before calculating residential density in the normal way. Given the site size and the quantum of A Class floor space to be delivered, a standard residential density calculation is employed.
- 6.2.11 The applicant proposes the provision of 128 residential units and the site a PTAL rating of 6a. The density of the proposed scheme is 1,454 habitable rooms per hectare (hr/ha), which exceeds the 200-700 hr/ha range set out in

the London Plan Density Matrix (Table 3.2) within the London Plan. The proposal will yield 581 units per hectare (u/ha) which also exceeds the London Plan Density Matrix Range of 70-260 u/ha for an urban site. The scheme yields 331 habitable residential rooms, yielding an average of 2.5 habitable rooms per unit (hr/u). While the number of habitable rooms per unit is comparatively low, this is reflective of a larger number of 1 and 2 bedroom units within the scheme.

6.2.12 The acceptability of any development density is dependent on the particulars of the proposal and other site constraints. The site is in a highly accessible location with excellent access to public transport next to the Tottenham Hale Underground Station. London Plan Policy 3.4 states while there is usually scope to provide a mix of dwelling types in different locations, higher density provision for smaller households should be focused on areas with good public transport accessibility. The Mayor's draft Affordable Housing and Viability SPG also states that on a case-by-case basis, it may be appropriate to explore the potential to increase densities to make the delivery of more affordable homes viable.

6.2.13 In this case, the development is targeted to provide a comparatively high quantum of affordable housing as per the assessment below. The Tottenham AAP also notes flexibility with respect to density. The AAP states that higher densities and capacities may be acceptable in appropriate locations, close to town centres, in areas with good local facilities and amenities and in areas well served by public transport, providing the other policies of the AAP are met.

6.2.14 While the density is considerably above the density range, it is recognised that this is a reflection of the very small and constrained site. The site is also highly accessible, being located immediately next to Tottenham Hale Station. The site is also in close proximity to a significant open space in the form of Down Lane Park, which lies across Hale Road, immediately to the north of the site, with Lee Valley Regional Park in close proximity. Quality considerations are particularly important for high density schemes the quality of the scheme supports the proposed density as is discussed below.

6.3 ***Affordable Housing***

6.3.1 The NPPF states that where it is identified that affordable housing is needed, planning policies should be set for meeting this need on site. London Plan Policy 3.11 indicates that Boroughs should set an overall target in LDFs for the amount of affordable housing provision needed over the plan period. The London Plan (2011), Policy 3.12 states that Boroughs should seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes.

- 6.3.2 Amended Strategic Policy SP2 requires developments of more than 10 units to provide a proportion of affordable housing to meet an overall borough target of 40%. This approach is reflected in and emerging Policy DM 13, which also sets out the preferred affordable housing size mix as set out in the Council's Housing Strategy (2017-2022) which was adopted by Cabinet in late 2016. Policy AAP3 Part B relates to the provision of affordable housing within Tottenham in line with Policies SP2 and DM13.
- 6.3.3 The Mayor is currently consulting on an Affordable Housing and Viability Supplementary Planning Guidance (SPG). This consultation draft provides guidance to ensure that existing affordable housing policy is as effective as possible. The SPG focuses on affordable housing and viability and includes guidance on the threshold approach to viability appraisals and on viability assessments.

Affordable Housing Offer

- 6.3.4 The applicant has partnered with a Registered Provider (RP) of affordable housing, Newlon Housing, and proposes 117 shared ownership units which represents 91% provision of affordable housing by habitable room, to be delivered on site. This overall percentage of affordable housing is welcomed by officers and is policy compliant in relation to the London Plan and local policy, subject to an assessment of tenure split dwelling mix. The overall percentage proposed also significantly exceeds the 40% target in the Local Plan and this weighs significantly in favour of the proposal. As per the applicant's Affordable Housing Statement, the 11 units of market housing proposed will be located on the top three floors of the development, with the remaining floors comprising affordable housing.
- 6.3.5 The applicant's delivery of 91% affordable housing by habitable room is dependent on public subsidy of £28,000 per unit above 35% to be secured by grant funding from the Greater London Authority. The affordable units below 35% are delivered by planning gain. The applicant has committed in writing to the delivery of the scheme as applied for at 91% affordable housing by habitable room however a scenario in which grant funding is not secured is discussed below.
- 6.3.6 The applicant has submitted an Affordable Housing Statement prepared by Nathaniel Litchfield and Partners dated January 2017. An assessment of the tenure split of the affordable housing offer, the affordable and overall dwelling unit mix and shared ownership obligations are considered in the sections below.

Affordable Housing Tenure Split

- 6.3.7 The applicant proposes that 100% of the 117 affordable units are offered as intermediate shared ownership units. No affordable rented or social rented units are therefore offered.
- 6.3.8 The affordable housing tenure split in Haringey is typically required to be 40% intermediate accommodation and 60% affordable rented accommodation, in accordance with Policy SP2 and emerging Policy DM13. However emerging Policy AAP3 and DM13A(c) provide that this split should be reversed in Tottenham to rebalance the historically high levels of social rented accommodation. Policy therefore requires 60% intermediate accommodation and 40% affordable rented accommodation in this area.
- 6.3.9 Policy DM13 also states the Council may seek to alter the tenure of affordable provision to be secured on a case-by-case basis, to avoid affordable housing of a certain tenure being over or under represented in an area. This approach is in line with London Plan Policy 3.9 (Mixed and Balanced Communities) which states that a more balanced mix of tenures should be sought in neighbourhoods where social renting predominates and there are concentrations of deprivation.
- 6.3.10 The Haringey Housing Strategy (2017-2022) seeks to encourage mixed tenures to improve access to home ownership for those able to consider alternatives to social housing, or who do not qualify for it. The Strategy also provides that homes for lower cost shared ownership offer the most realistic chance for people unable to purchase on the open market to get on the housing ladder. The Mayor's draft Affordable Housing and Viability SPG indicates that Tottenham Hale is a suitable location for shared ownership products given prevailing market values for housing would not result in unrestricted values in excess of £600,000 per unit.
- 6.3.11 The Strategy also specifically notes that in Tottenham, the level of social rented homes is already high. The Haringey Strategic Housing Market Assessment (SMHA) indicates that 52.9% of households in the Tottenham and Seven Sisters Local Housing Market Area (LHMA) own their property on a mortgage or outright. This is comparatively lower than the borough average of 68% and an indication the provision of a higher proportion of affordable shared ownership properties would be appropriate in this location in Haringey.
- 6.3.12 The site is also located within the boundaries of a Housing Zone. The Housing Zone programme is explicitly designed to encourage developers, boroughs and other key partners to consider innovative and flexible approaches to accelerate sustainable development and increase housing delivery.

- 6.3.13 The affordable housing tenure split proposed by the applicant is consistent with the Housing Zone approach in which various sites may each contribute a higher or lower proportion of a particular affordable housing tenure, in line with an overall Zone-wide target. The contribution will depend on individual site characteristics and viability. The affordable housing tenure mix was agreed with the applicant at the pre-application stage.
- 6.3.14 The provision of a scheme offering an affordable housing tenure split of 100% shared ownership units is considered to be acceptable given the location of the site within a Housing Zone, and the historically high rates of social renting that predominate in Tottenham. Shared ownership is a suitable product for Tottenham Hale given prevailing land values, and will offer opportunities for lower cost home ownership in the area.
- 6.3.15 The proposed affordable housing tenure split is therefore considered to deliver a balanced and diverse housing sector that reflects local strategic priorities, in line with London Plan Policy 3.11. The variation to the Council targeted affordable housing tenure split in Tottenham also accords with the 'case-by-case' flexibility noted in emerging Policy DM 13 and the negotiated approach to affordable housing articulated in Strategic Policy SP2.

Dwelling Unit Mix

- 6.3.16 London Plan Policy 3.8 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. Amended Strategic Policy SP2 (Housing) and Policy DM11 of the Council's emerging Development Management DPD continue this approach.
- 6.3.17 Haringey's Housing Strategy (2017-2022) does not set out a target dwelling mix for market housing, however emerging Policy DM11 states that Council will not support proposals which result in an overconcentration of 1 or 2 bed units overall unless they are part of larger developments or located within neighbourhoods where such provision would deliver a better mix of unit sizes.
- 6.3.18 The scheme proposes the following mix, which is set out by tenure type.

Housing Mix: Intermediate Housing (100% Shared Ownership)

No. of bedrooms	No. of units	% of affordable units
1 bed units	68	58%
2 bed units	42	36%
3 bed units	7	6%
Total	117	100%

Housing Mix: Market Housing

No. of bedrooms	No. of units	% of market units
1 bed units	3	27%
2 bed units	6	55%
3 bed units	2	18%
Total	11	100%

6.3.19 Haringey's Housing Strategy (2017-2022) sets out the following target dwelling mix for Intermediate Housing:

- 30 % one bedroom units
- 60 % two bedroom units
- 10 % three bedroom (or more) units

6.3.20 The proposed dwelling mix is mostly of 1 and 2 bedroom units for both the affordable and market components of the scheme, however the proposal is not considered to represent an unacceptable over-concentration of 1 and 2 bedroom units given the site location, which is not considered suitable for a larger proportion of family housing, and the portfolio approach being taken to unit mix within the housing zone.

6.3.21 The dwelling mix is consistent with Housing Zone portfolio approach as it delivers a high density of smaller units on a site within the island site close to Tottenham Hale Station. A greater proportion of family-sized units will be offered in smaller buildings within the Tottenham Hale Housing Zone as other development comes forward, with each site making a Zone-wide contribution based on its characteristics.

6.3.22 The Council will also work, through the Tottenham Area Action Plan, to safeguard family homes within the existing stock in Tottenham. This will include supporting the re-conversion of existing larger units from Houses in Multiple Occupation (HMOs) into family homes in the residential core, in order to promote a mixed and balanced community.

6.3.23 The approaches described above allow for the provision of more units targeted to smaller households in an accessible setting. This approach is also consistent with London Plan Policy 3.4 which speaks to prioritising higher density provision for smaller households in areas with good public transport accessibility.

6.3.24 The dwelling mix of both the affordable and market components of scheme is therefore considered to offer a suitable range of housing choice in line with London Plan Policy 3.8 and is consistent with emerging Policy DM11 seeking

to preclude an overconcentration of 1 and 2 bedroom units within schemes. This is in consideration of AAP objectives to revert HMOs to family homes elsewhere in Tottenham and the targeted management of the housing stock in the Tottenham Hale Housing Zone to allow different sites to contribute varied dwelling mixes.

Shared Ownership Eligibility and Affordability

6.3.25 London Plan Policy 3.12 (Negotiating Affordable Housing) states that criteria for intermediate housing may be set locally to recognise the individual characteristics of local housing markets. London Plan Policy 3.10 also notes that affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

6.3.26 The Haringey Housing Strategy outlines three “cost elements” of shared ownership products (mortgage costs on the percentage share purchased, rent charged on the unsold equity and service charges) should not exceed 45% of net income received by a household.

6.3.27 The applicant notes in the Affordable Housing Statement that effective management will in part allow for affordability and the RP partner, Newlon Housing, has experience in the management of affordable housing in the locality to ensure cost elements are proportionate. The affordability of the units will also be secured by a S106 obligation to set eligible household income limits for buyers.

6.3.28 While the final income limits will be determined by negotiation in the S106 process, the London Plan draft Affordable Housing and Viability SPG notes the income cap for all intermediate products is £90,000 per household per annum. To ensure the units are effectively targeted to Haringey residents and workers the applicant’s have agreed to a S106 obligation to market the scheme, for a time-limited period of six months, to persons who live or are employed in Haringey with gross household incomes below £60,000 per annum. The applicant will also be required to recycle the grant subsidy as part of GLA grant funding requirements within Haringey.

6.3.29 The affordability and eligibility for the shared ownership units, subject to S106 negotiations, are considered to respond to the characteristics of the local housing market and will be comparatively affordable for eligible purchasers and allow for the recycling of grant subsidy.

Affordable Housing Viability

6.3.30 The applicant has submitted a viability assessment prepared by Resolution Property Surveyors dated February 2017. This assessment is submitted in

order for the development costs to be assessed and as a benchmark should the developer seek to renegotiate the level of affordable housing at a later date. Should this be the case a new planning application would need to be submitted.

- 6.3.31 The current scheme proposing 91% affordable housing is in line with draft GLA guidance and considered suitable for a 'Route B' approach (where detailed viability information is not required as the scheme provides more than 35% affordable housing). 35% of the scheme is funded by development value and the remainder by grant.

Benchmark Summary - Principle of Development

- 6.3.32 The proposed development will make an overall contribution to targeted housing delivery in the locality and the regeneration of Tottenham Hale. There is no in principle why the site requirements and development guidelines of the emerging site allocation and the general parameters of the District Centre Framework are unable to be met by the proposal. The demolition of the existing buildings on the application site is acceptable and a commensurate quantum of commercial floorspace is proposed to be delivered by the scheme.
- 6.3.33 The scheme significantly exceeds the quantum of affordable housing required by local planning policy. 91% affordable housing by habitable room delivered by way of shared ownership units is welcomed by officers and weighs in favour of the scheme.
- 6.3.34 The scheme is considered to optimise the site potential with respect to development density and the tenure and mix of affordable housing offered is judged to be acceptable given the spatial location of the application site and the prevailing pattern of affordable housing in the area. The site lies within a Housing Zone and the affordable housing tenure of the scheme will be balanced by other development coming forward in the area. This is inline with draft GLA guidance seeking a tailored approach to affordable housing for Housing Zones.
- 6.3.35 The developer has agreed to local marketing of the shared ownership units. The development is acceptable in principle in this regard and the level of affordable housing is particularly welcomed.

6.4 Development Design

- 6.4.1 The NPPF should be considered alongside London Plan Policies 3.5, 7.4 and 7.6, Local Plan Policy SP11, and emerging Policy DM1. Policy DM1 states that all development must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. Further, developments should respect their surroundings by being sympathetic to the

prevailing form, scale, materials and architectural detailing. Local Plan policy SP11 states 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.

Site Constraints

- 6.4.2 Policy 3.5 and the Mayor's SPG Housing speak to the flexibility necessary to respond to the constraints and opportunities presented by individual sites. As with all development proposals, implementation of planning policy should take account of the range of policy concerns and physical characteristics bearing on a particular site. The Mayor's SPG Housing states a consideration of site constraints is particularly relevant in and around town centres.
- 6.4.3 The site is constrained by number factors including its corner location and unusual shape and the existence of adjoining development and associated party wall matters. The site is the corner of an "island" bounded by three roads with an elongated northern edge. The site sits partly above a London Underground Tunnel and has a history that suggests contamination issues. The assessment of development design and quality takes account of the factors that may constrain site delivery in line with the London Plan.

Tall Building Location and Design

- 6.4.4 London Plan Policy 7.7 (Location and Design of Tall and Large Buildings) is the key London-wide policy for determining tall building applications. The policy requires that tall buildings 'should generally be limited to sites in opportunity areas, areas of intensification or town centres that have good access to public transport'.
- 6.4.5 Strategic Policy SP11 (Design) requires all new development to 'enhance and enrich Haringey's built environment and create places and buildings of high quality'. The Council's emerging Development Plan Document (DPD) Policy DM6 (Building Heights) allocates the site (as per Figure 2.2 'Potential Locations Appropriate for Tall Buildings) as suitable for a tall building and set criteria that tall buildings should achieve. When the Quality Review Panel reviewed the District Centre Framework it concluded that the area was suitable for tall buildings.
- 6.4.6 Haringey Council's Urban Characterisation Study, February 2015 (UCS), includes a map indicating the general locations with the potential suitability for tall building(s). This is supplemented by Potential Tall Buildings Locations Validations Study (November 2015) and the Local Plan identifies this as an area for tall buildings.

- 6.4.7 The Study notes that there is potential for tall buildings in Tottenham Hale to provide a land-marking role for the district centre, as well as identifying the locations of the bus and railway station. The visual relationship between individual tall building locations (as well as the existing and unimplemented built form) will need careful consideration to ensure a cohesive building group.
- 6.4.8 The Station Island site within the DCF envisages a tall building at the apex of the “island” parcel, which the proposal delivers. The DCF notes a building of 11+ stories is suitable for the location. The site allocation in the AAP (Policy TH4) states tall buildings marking the key transport node at Tottenham Hale Station and the emerging District Centre may be acceptable on this site.
- 6.4.9 Historic England Advice Note 4 supersedes the document ‘Guidance on Tall Buildings’ produced by English Heritage and CABI in 2007 (as referenced in emerging Policy DM6). While not part of the Development Plan, this Note provides a list of design criteria that should be satisfied when considering the merit of tall buildings. This criteria includes:
- Architectural quality
 - Sustainable design and construction
 - Credibility of the design
 - Contribution to public space and facilities
 - Consideration of the impact on the local environment
 - Provision of a well-designed inclusive environment
- 6.4.10 An assessment of the development against this criteria is undertaken in the context of emerging Policy DM6 which seek to ensure that the development represents a landmark building in addition to being of community benefit.
- 6.4.11 The proposed development is in the Tottenham Hale Opportunity Area as designated in the London Plan. The site is also in close proximity to a major transport interchange and has a PTAL rating of 6a. Given the policy context, the location is judged to be suitable for a tall building. The applicant has submitted a Tall Building Statement included with the Design and Access Statement.
- 6.4.12 Overall there is policy support for a tall building in this location at the local and regional level. The DCF has also identified this site a suitable for a tall building and notes the potential to act as a way finding structure to Tottenham Hale. Subject to a high quality design, which this development delivers as set out below, a tall building is considered acceptable at this location.

Building Scale, Form and Massing

- 6.4.13 The proposed building has been designed to address the corner of a city block with a 22 storey element adjacent to existing Premier Inn creating a corner feature to the block and 7 storey element to abut a future development to the west which will complete the block. It would have a 7 storey element onto Station Road to address the future Argent Relation development across Station Road. The 22 storey element would be a prominent feature which would mark the centre of the District Centre particularly when looking south along Ashley Road where it would be coupled with other tall buildings on the adjacent site.
- 6.4.14 The design of the building has evolved in response to officer feedback and various assessments by the Quality Review Panel. As the applicant notes in the Planning Statement, the overall height of the tower element has been reduced and the applicant has generally responded positively to other officer and QRP comments around the design of the building.
- 6.4.15 The applicant presented further revisions to the proposal in September 2016. These revisions concerned the relationship of the scheme to adjoining Argent Related proposals evolving adjoining the scheme to the east of the site. Key concerns were that the apex of the building may sit in close proximity to the 25-29 storey building that is now intended to be sited adjoining the Tottenham Hale Bus station. There is also development programmed to the south of the site opposite Station Road that will rise to approximately 10 stories. In response to the evolving DCF position, the applicant's design response was a set back to the apex of the building above the 8th storey. This revision added visual interest and will allow for a greater separation distance for future occupiers. The applicant confirms they continue to liaise with Argent Related around the adjoining schemes.
- 6.4.16 The form, scale and massing of the building is considered to be appropriate to the site context, and will sit comfortably with taller development that is envisaged in the Tottenham Hale District Centre. The podium and tower elements of the scheme are a positive response to the constraints of the site that deliver an efficient floor place and continuous frontage, while also creating a visual landmark within Tottenham Hale and optimise the site potential. GLA Officers note that massing and architecture of the building is supported and they consider the design of the building to be of a high quality. The scale, massing and layout of the development is considered to achieve a high standard of design and contribute to the distinctive character and amenity of the local area inline with the aforementioned London Plan and local policy noted above.

6.4.17 As noted above, the proposal has been assessed by Haringey's QRP at the application and pre-application stage. A summary of the most recent Chair's review is below, in addition to the applicant's response and officer comments.

Quality Review Panel Chair's Comment	Applicant Response	Officer Response
<i>Massing and Development Density</i>		
<p>Whilst an argument may be made for the creation of a cluster of taller buildings to the north of Tottenham Hale Station, the panel feels that the site is too constrained to adequately support development of this scale.</p>	<p>The principle of a tall building in this location is firmly supported by policy.</p> <p>The QRP Chair's feedback on this matter does not reflect relevant and guidance which supports the principle of a taller building in this location.</p>	<p>Haringey and GLA Officers note there is considerable policy support for a tall building in this location</p> <p>The site is located within a Housing Zone, and the quantum of development facilitated by the height of the building is considered to optimise the site potential, as required by the London Plan without significant negative impacts.</p>
<p>The Chair notes that the design team have worked hard to address some of the issues arising from the previous review, resulting in an adjustment of the massing of the tower and of the attached wing of accommodation.</p>	<p>The applicant appreciated QRP's acknowledgment that the enhancement to the form and massing of the tower, and its improved relationship with emerging adjacent developments have improved the quality of the scheme.</p>	<p>Haringey Officers note the scheme has been amended significantly from the pre-application position. The applicant has sought to engage with the Panel's concerns during the development process.</p>
<p>The Chair welcomes</p>	<p>QRP comments do not</p>	<p>Haringey and GLA</p>

<p>additional information about the emerging schemes on adjacent sites, and understands that the development aspirations for the area to the north of Tottenham Hale station are moving beyond that envisaged in the DCF.</p>	<p>fully reflect the scale of development activity emerging in the area, nor do they acknowledge the proposed development's response to this emerging character and scale.</p>	<p>Officers note the context of the DCF is emerging, and the scale of the building is generally responsive to the context of the Argent Related master plan for the area.</p>
<p>The Chair's view is that the site constraints and lack of public space immediately adjacent, mean this particular site is not a suitable location for a tall building.</p>	<p>The proposed development is supported by policy and guidance and represents a contextually appropriate response to the existing and emerging townscape.</p>	<p>A generous public realm is to be provided on neighbouring sites and delivered in part by Housing Zone funding, and the developer has agreed to a S106 contribution to address the wider public realm surrounding the site. This is not considered to constrain a high quality tall building.</p>
<p>The resulting scheme would be significantly compromised in terms of the quality of accommodation.</p>	<p>It is not clear which aspects of the proposed units' residential quality the QRP feels would be compromised, but a review of the application drawings and supporting assessments clearly demonstrates that the scheme is in accordance with relevant policy and guidelines in terms of floorspace, amenity space, play provision, daylight/sunlight, privacy and outlook.</p>	<p>Haringey and GLA Officers are supportive of the quality of accommodation. The scheme presents a very efficient floor plate that responds well to the site constraints.</p>
<p>Whilst the GLA offers support for the scheme, the content of the GLA</p>	<p>The GLA Stage 1 report is consistently and resolutely supportive of the</p>	<p>The GLA Stage 1 report is contained in Appendix 2 for</p>

<p>letter of 09/01/17 also repeatedly acknowledges that the scale and constrained nature of the site is compromising the design.</p>	<p>development's scale, height and design.</p>	<p>member's reference. GLA officers support the scheme, subject to the provision of additional details set out Paragraph 47 of the GLA Stage 1 report.</p>
<p><i>Public Realm</i></p>		
<p>The panel would encourage the design team to think beyond the red line boundary, in order to ensure that the scheme makes a positive contribution to the wider area.</p> <p>The panel welcomes the design team's dialogue and collaboration with Argent Related; however, they still have some reservations about the public realm.</p>	<p>The applicant's landscape architect has prepared a suggested landscape strategy for Station Road, which is based on the emerging proposals from both the Local Authority and Argent Related, to demonstrate how the public realm could be enhanced as part of the 1 station Square development and adjacent developments being progressed by Argent Related.</p>	<p>As per the comments above, the policy context regarding the public realm delivery in Tottenham Hale is informed by Housing Zone funding. The applicant's S106 contribution is also noted by Haringey Officers.</p> <p>Haringey Officers considers the indicative landscape plan to be high quality, subject to the provision of details, but the indicative plan is not material to the planning decision before members.</p>
<p>Further thought is needed to ensure the scheme contributes to improvement of the public realm, especially on Station Road.</p>	<p>The development's Station Road frontage will contain the development's primary residential entrance and two active bays serving the commercial space.</p>	<p>Haringey Officers consider the active frontage to Station Road has been maximised and oriented toward the area where pedestrian activity is proposed to be concentrated .</p>
<p>In contrast with the busy nature of the Tottenham</p>	<p>The applicant's landscape architect has</p>	<p>GLA and Haringey Officers notes the</p>

<p>Hale gyratory, there is scope for Station Road to become a haven for pedestrians. This should be addressed as part of this scheme, in collaboration with Argent Related.</p>	<p>prepared a suggested landscape strategy for Station Road, which is based on the emerging proposals from both the Local Authority and Argent Related.</p>	<p>applicant has sought to engage Argent Related in respect of the public realm and generous areas of public realm will be provide on neighbouring sites.</p>
<p>Current proposals for the edge of the development at Station Road promise a rather more 'back of house' environment.</p>	<p>The proposal would not create a 'back of house' environment. The development has a generous double height ground floor and its interface with Station Road will be an active and high quality frontage which will relate appropriately to the adjacent hotel development.</p>	<p>The site cannot incorporate a basement and the servicing areas are therefore required to be at ground floor level. As per the above, officers consider the frontage has been maximised. The frontage would be continuous with the hotel.</p>
<p><i>Environmental Design: Wind Mitigation</i></p>		
<p>The wind analysis in relation to the public realm shows that the downdraught winds resulting from the tall building will be at their worst on Station Road, at the southern edge of the site.</p> <p>This section of Station Road will have the most sunlight, and will potentially be the place where people will want to sit; however, this is unlikely given the currently predicted wind conditions.</p>	<p>By way of clarification, wind conditions on the majority of Station Road with the development in place will be appropriate for standing to strolling conditions around most thoroughfare locations of the proposed development during the windiest season under both the proposed and cumulative assessment scenarios.</p> <p>This is consistent with the use anticipated during these periods.</p>	<p>The assessment of microclimate impacts do not show significant adverse wind conditions.</p> <p>The final wind conditions in the vicinity of the site will be subject to detailed assessment when the built form of adjoining development is known.</p>

<p>The panel think that the microclimate that the development creates should be a factor informing decisions about an appropriate scale and massing.</p>	<p>The applicant is of the view that sufficient assurance has been provided that an acceptable wind environment can be achieved with the development in place.</p>	<p>As noted above, the tall building does not result in significant adverse wind impacts.</p>
<p>If Argent Related create a high quality new public space immediately to the south of the site, wind mitigation measures at Station Square West will help to ensure that it has a pleasant microclimate.</p>	<p>Taking into account these uncertainties in terms of neighbouring developments, there is little merit undertaking further wind analyses at this stage and wind mitigation/enhancement strategies should be considered and defined as necessary when neighbouring proposals are at a more advanced stage.</p>	<p>Haringey Officers consider the issue of further wind modelling may be progressed at the condition stage, subject to the applicant agreeing to a planning obligation to bring forward any necessary modifications to the scheme if final modelling reveals wind impacts that are unable to be moderated by mitigation.</p>
<p><i>Architectural Expression and Scheme Layout</i></p>		
<p>The panel notes that robust, high quality architecture will be needed in this prominent location.</p>	<p>The development will be constructed of a robust palette of suitably high quality materials as illustrated in submitted CGIs.</p>	<p>GLA and Haringey Officers consider the design to be of a high quality, subject to additional details, as per the Stage 1 Report and the assessment below.</p>
<p>The Panel would encourage the design team to reconsider the choice of dark materials. They note that whilst dark grey brick can be an attractive material, it may not be appropriate</p>	<p>While the QRP has questioned the use of grey brick in this location, JMP and the design team disagree and consider the robustness and materiality of the brick are acceptable.</p>	<p>The applicant has supplied higher quality renders of the scheme in the which more fully illustrate the high quality of materials proposed. Material samples will</p>

<p>for a tall north-facing façade, which will not receive any sunlight. This will be a particular issue on north-facing elevations, where windows open into narrow slots.</p>		<p>be assessed by the details stage of the development.</p>
<p>The alignment of the winter gardens is organised in a vertical strip, which tends to emphasise the verticality of the building. Exploration of whether a more relaxed approach to the configuration of the facades would give the building more personality would be welcomed by the panel.</p>	<p>The applicant considers the pronounced glazed projecting bays and the ground floor treatment provide an appropriate mix of robustness, glazing and articulation.</p>	<p>Haringey Officers consider the expression of the verticality of the building to be a positive design feature.</p>
<p>In terms of layout, the Panel accept the requirement to locate the substation, bicycle and bin stores on Hale Road.</p>	<p>Comment noted.</p>	<p>Comment noted.</p>
<p><i>Next Steps</i></p>		
<p>The Quality Review Panel is not able to offer support for the current proposals for Station Square West, and recommends a reduction in scale, and further consideration of the quality of accommodation,</p>	<p>The applicant considers the scheme to be acceptable, and should be granted planning permission inline with the GLA Stage 1 report which was supportive of the development.</p>	<p>Officers note the concerns however the constraints of the site mean a building of any scale will encounter the issues of quality of accommodation and streetscape. Officers consider the</p>

architectural expression and streetscape delivered by the proposals.		architectural expression of the building to be well considered in relation to the location of the site and emerging context.
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As per the above, the applicant has sought to engage with the QRP at various stages in the pre-application and application stages, and the final development seeks to progress a scheme that accords with policy but also takes account of the constraints and the Housing Zone location to optimise the site potential. The result is considered to be a high quality design that will deliver a significant quantum of high quality affordable housing despite the challenging factors that confine delivery.

Townscape and View Management

- 6.4.18 At the Local Level, both the Urban Characterisation Study and emerging Policy DM6 identify Locally Important Views and Vistas as set out in Figure 2.3 of the document. These designated views have been evaluated according to their interest as panoramas, vistas, landmarks and townscapes.
- 6.4.19 A local linear view from Burgoyne Road (near to Queenmore Road and Stapleton Hall Road) crosses Tottenham Hale looking eastbound to a narrow, framed, long distant view of the horizontal skyline (View #15 in Figure 2.3). The development site is within the view cone of the this locally protected view.
- 6.4.20 While the applicant’s HTVIA or Tall Building Statement make no reference to this local view, officers consider the proposal will have a limited impact in the linear corridor given the narrow proportions of the 22 storey element of the tower. It is also noted the tower is programmed to form a cluster of taller buildings within the Tottenham Hale Growth Area and the configuration of tall buildings within the cluster was considered in the formulation of the Tottenham Hale District Centre Framework.
- 6.4.21 The preferred approach to the cluster as per the DCF is a ‘strip’ formation within the centre (as opposed to a ‘node’ or ‘ring’ layout) which will minimise the impact of the cluster to this local view given building orientations. The location of the subject building is consistent with a strip formation in terms of location, and the emerging Argent Related proposals are considered to

compliment this arrangement. The impact of the development on the designated local view from Burgoyne Road is therefore acceptable.

- 6.4.22 The applicant has also presented various AVRs (Accurate Visual Representations) of the scheme from non-designated locations in the vicinity of the site. These AVRs consider the scheme from Jarrow Road, Wakefield Road, the Tottenham Marshes and Wakefield Road, amongst other locations. The above locations are noted in the UTC as sensitive viewpoints from which potential visual effects of development should be considered.
- 6.4.23 The submitted AVR's in the HTVIA indicate the development will sit comfortably within the massing that is envisaged to be created within the wider Tottenham Hale District Centre, and while initially the building will sit in isolation given the trajectory of other development in Tottenham Hale, the building will soon form part of a new urban realm as Tottenham Hale is regenerated and additional development is brought forward within this cluster.
- 6.4.24 With regards to London strategic views, GLA officers confirm via the Stage 1 Planning Report of 9th January 2017 that the proposal will not impact on any view that is subject to the London View Management Framework. The Validations Study confirms that Tottenham Hale is located at over 4.5km away from Alexandra Palace, and the Growth Area at Tottenham Hale would form a new cluster, which would be offset to the east and viewed separately to the two key focal points of Central London and Canary Wharf. The proposed development therefore would not obscure these focal view points.
- 6.4.25 The impacts of the development are therefore acceptable in townscape and view management terms. Officers consider any obstruction to the locally significant view from Burgoyne Road has been minimised in line with DPD Policy DM5(B) and the approach articulated in the Tottenham Hale District Centre Framework, and the cluster approach to building locations in the Tottenham Hale District Centre will mitigate the impacts of the development.

Victoria Line Tunnel

- 6.4.26 The site sits above a London Underground tunnel serving the Victoria Line. This presents several design constraints and the developer is not able to undertake sub-surface works within a linear 'exclusion zone' that radiates outward from the tunnel walls to protect rail infrastructure. A Thames Water sewer also runs beneath the site and incorporates an exclusion zone.
- 6.4.27 The applicant's design response to the presence of the tunnel is the construction of a load bearing 'bridge' that effectively straddles the exclusion zone to allow the creation of suitable structural foundations to support high

rise development. Images of the proposed table structure are contained in Appendix 3.

- 6.4.28 Transport for London notes in its consultation response to the proposal that the applicant's consultants should continue to work with TfL and London Underground (LU) regarding the bridging structure. TfL and LU do not raise an objection to the scheme.
- 6.4.29 Officers are however also concerned the construction of the table, which will mitigate the issue of piling in the vicinity of the exclusion zone, may itself give rise to issues for the provision of utilities along Station Road for other development sites in the area in particular the forthcoming Tottenham Hale District Energy Network (DEN). Emerging Policy DM22 requires all major development located within 500 metres of a DEN 'connection zone' be designed for connection to a DE network. Whilst a DEN may not be in place at the time of a development's construction, it is important that the development is readily able to connect to such a network if or when it becomes available.
- 6.4.30 The Tottenham Hale DEN requires extensive circulation piping throughout the area, and officers consider the applicant should demonstrate by way of a technical feasibility study that prior to the commencement of the development, the subsurface bridge infrastructure will not preclude district energy provision to any development or impact on provision of other utilities. The proposed condition requiring supplementary details of the bridging structure is contained in Section 8 of this report. Officers may seek third party technical assessment of this submission if required, the cost of which will be borne by the applicant.
- 6.4.31 The requirement for the bridge structure has also bound the applicant to include a portion of Station Road within the red line area. Officers do not consider this to be a concern in planning terms. From a design perspective, the table structure will be wholly subsurface and will have no planning impacts to the road or wider area in visual terms.

Access

- 6.4.32 The Mayor's SPG Housing states that all main entrances to communal entrance lobbies should be visible, clearly identifiable, and directly accessible from the public realm. The main residential access to the building is via Station Road, with a secondary access via Hale Road. The accesses to the residential elements of the building area considered to be legible in line with London Plan guidance. The Station Road access is separated from the commercial element and incorporates a distinct design. The recessed reconstituted stone feature above the main access is considered to be a positive design feature separating the access from the commercial realm.

6.4.33 The Hale Road access is narrower but acceptable as a more subservient element of the frontage. The permeability created by the dual access to the central residential lift core is also a welcome design feature that was requested at the pre-application stage. The commercial access to the ground floor A1/A3 unit is proposed to be located at the apex to the building. This is considered to be a reasonable approach in line with the site design guidelines that locates the commercial element toward where future pedestrian activity is programmed and away from high volume vehicular traffic. The access to the site is acceptable in design terms.

Public Realm

- 6.5 A key objective of the Tottenham Area Action Plan is well designed public spaces that will be at the heart of district centres which focus on creating a pleasant and functional pedestrian urban realm. This objective is reflected in London Plan Policies 7.1 and 7.4, Strategic Policy SP11 and emerging Policies DM1 and DM3.
- 6.5.1 The applicant has submitted an indicative landscaping plan prepared by Churchman Landscape Architects. This plan details wider proposals for public realm beyond the redline area based on a liaison with other developers progressing schemes in Tottenham Hale. The illustrative proposal shows the new alignment for Station Road and the proposed new public square to the south of the development site.
- 6.5.2 The relationship of the application site to the wider public realm in this instance is somewhat unique, as the emerging Tottenham Hale DCF (together with the Tottenham Streets and Spaces Strategy and the Tottenham Green and Open Spaces Strategy) will largely articulate the direction and impression of the public realm in Tottenham Hale. This is envisaged to be delivered in a comprehensive way (including landscaping, paving and street furniture) and respond to the Strategic Development Partnership's plans for the wider area. This delivery is partly underpinned by Housing Zone funding.
- 6.5.3 In general, the building is considered to provide a contextually appropriate built form that will not preclude the introduction of a high quality public realm, brought forward on a comprehensive basis. The Tottenham Streets and Spaces Strategy seeks to incorporate the landscape quality of the Lea Valley and its environs into Tottenham Hale. Comprehensive delivery of public realm infrastructure will allow visual consistency and enhanced place making within Tottenham Hale.
- 6.5.4 The Tottenham AAP states that developers and the Council should utilise Housing Zone funding to optimise housing delivery and more effectively meet the objectives of the Haringey Local Plan. Comprehensive delivery of the

public realm is considered to optimise such delivery and would allow the current applicant to defer design and delivery of the public realm to strategic partners.

- 6.5.5 The applicant has agreed to make a proportionate S106 contribution (as per the S106 Heads of Terms above) to ensure the responsibility for a high quality public realm is shared between various interests seeking to develop Tottenham Hale. This approach is in line with Policy TH4 which states that each development in the allocated site will be expected to contribute to the aims of a comprehensive public realm strategy. Basic interim public realm works prior to any comprehensive delivery will be captured by the S106 agreement.
- 6.5.6 Officers consider that despite QRP's comments, the wider strategic approach to place marking as delivered by the Housing Zone and the applicant's financial contribution will deliver a pleasant and functional pedestrian urban realm in accordance with the policy above. This accords with the views of GLA officers.
- 6.5.7 Notwithstanding the delivery of the wider public realm on a comprehensive basis, a detailed landscaping plan is required by condition to ensure appropriate landscaping to the communal amenity areas. A landscaping condition is therefore contained in Section 8.

Building Frontage

- 6.5.8 The Mayor's SPG Housing states that in mixed use development, non-residential ground floor land uses should provide active frontages when facing publically accessible space. Where inactive frontages have to be located on the ground floor these should be interspersed with active frontages and/or carefully located to minimise their overall impact on the public realm. Long contiguous stretches of inactive frontage facing the public realm reduce perceptions of pedestrian safety and can attract anti-social behaviour, and should therefore be avoided. This approach is reflected in the design guidelines for the wider allocated site in the AAP.
- 6.5.9 The proposed total frontage along station road is approximately 16 metres. The run of frontage at the apex of the building (facing the bus station) is approximately 4 metres. The frontage along Hale Road is approximately 29 metres. The total street facing frontage delivered by the scheme is therefore approximately 49 metres. The continuous and active A1/A3 frontage that wraps around the buildings runs approximately 28 metres. The active residential accesses on each side of the building are 2 metres (Station Road) and 1 metre (Hale Road) in width. The remaining inactive frontage (including the glazed area serving the bike store) comprises 18 metres. The

percentage of active frontage in relation to the total run of frontage is approximately 63%.

- 6.5.10 The proposal seeks to maximise the amount of A1/A3 active frontage by wrapping the commercial element around the apex of the building oriented toward Station Road in line with the design guidelines in the emerging site allocation. However it is acknowledged that the current design will give rise to 37% inactive frontage by linear length, primarily comprised of the substation frontage along Hale Road, and the residential and retail waste service accesses along Station Road and Hale Road.
- 6.5.11 The translucent cast glass panels proposed for the bike storage area at ground and mezzanine levels are considered to be a strong design feature that somewhat mitigates the blank frontage on Hale Road. Brown facing brick is proposed to surround the service accesses to the I service areas facing Hale Road and Station Road which will also give some relief to these facades.
- 6.5.12 The total amount of active frontage has been a point of considerable discussion between the applicant and officers given the aspirations of local planning policy to continue Ashley Road in a southward direction to create a high quality pedestrian environment that integrates active town centre uses. It is noted by officers that the site's shape and orientation make the issues of servicing and access complex, and a fully active frontage along all street-facing elevations is not possible. The comments of Haringey's Quality Review Panel have also been taken into consideration in forming an assessment of the frontage design.
- 6.5.13 Officers consider the available ground floor frontage has been maximised at the point where the most pedestrian activity is programmed to occur. The applicant has also interspersed active and non-active elements of the frontage inline with London Plan guidance (i.e. the residential access and the A1/A3 frontage is separated by the residential service area and the glazed bike store).
- 6.5.14 It is also acknowledged that Hale Road would not be suitable for a doors-to-street residential insertion due to vehicular traffic volumes. Hale Road is considered to be the most appropriate location for the substation frontage given the total footprint of the substation within the site. Given the site constraints the layout and design of the frontage to the building is acceptable, and the amount of active frontage is considered to have been maximised.
- 6.5.15 The scheme design will therefore give rise to a safe and overlooked street environment in line with Tottenham AAP design guidelines and provide an active edge to the east side of the station island site, in line with the approach articulated in the Tottenham Hale DCF.

Party Wall

- 6.5.16 The site is constrained by party wall issues that require the facade adjoining the Premier Inn to remain unencumbered. The applicant therefore undertook further design work to the façade through the introduction of slots of windows set back from the party wall to add visual interest.
- 6.5.17 Officers have invited the applicant to provide public art to be displayed on this elevation that will mitigate the appearance of the facade and allow for a distinctive place making feature associated with the Tottenham Hale District Centre, and improve the ill defined character of area of this part of Tottenham Hale. This element of the scheme is proposed to be secured by condition as per Section 8 of this report.

Building Materials and Fenestration

- 6.5.18 The building facades are proposed to be centrally articulated by bands of expressed brickwork, in which alternate courses project by approximately 50mm, and by areas of hit-and-miss extruded brickwork, where alternate bricks in each course are omitted to allow ventilation. The upper floors are accentuated with termination of projecting windows and contrasting brickwork.
- 6.5.19 The applicant has also sought to clearly differentiate the ground floor from the residential floors above through the use of reconstituted stone and double height commercial windows. This is in direct response to officer feedback that the previous scheme did not demonstrate a clearly defined base. The projecting canopies that will mitigate potential wind impacts will be secured by the imposition of a planning condition (together with other wind mitigation measures as required by modelling undertaken). The applicant also proposes a band of black engineering base brick course where the building meets the pavement. Above the retail level, the scheme will be constructed in facing brown brick. The windows are proposed to be bronze anodized/bronze metallic.
- 6.5.20 Officers acknowledge that QRP is of the view the submitted materials pallet is too dark, especially for the northern elevation of the building, which may receive less direct sunlight and appear muted in the winter months. Officers consider that the quality of materials appears generally high subject to specific product details and samples. In response to officer feedback, the applicants produced larger and more detailed vistas to allow the scheme to be viewed in more detail. These renders are a better approximation of the visual appearance of the building and the materials are judged to be high quality

6.5.21 Officers also consider that the specific materials and their relationship to the urban realm may be more successfully addressed by the imposition of a planning condition to allow the submission of samples with specific product specifications. This will allow officers and members to consider the materials in more details once the principle of planning permission has been established. Notwithstanding this, on the details submitted, the materials are considered to be of a high quality and the fenestration arrangement to be legible and in keeping with the building's mixed use and proportions. Subject to condition, the materials and fenestration are acceptable.

Development Design – Summary

6.5.22 The scheme accords with the site requirements and design guidelines of the emerging site allocation. There is considerable policy support for a tall building in this location. The form, scale and massing of the proposed building is appropriate to the site context, and the height of the building at 22 stories, will sit comfortably with taller development that is envisaged within the emerging Tottenham Hale District Centre. The podium and tower elements of the scheme are considered to be a positive response to the constraints of the site, which deliver an efficient floor plate and continuous frontage, while also creating a visual landmark within Tottenham Hale. The applicant has fulfilled the advisory design criteria for tall buildings provided by Historic England.

6.5.23 The layout and design of the ground floor frontage is acceptable, and the amount of active frontage is considered to have been maximised. Subject to condition, the proposed building materials are considered to be of a high quality and the fenestration arrangement is legible and in keeping with the building's mixed use and proportions.

6.5.24 Impacts to the locally protected view from Burgoyne Road arising from the development have been minimised and the proposal will not impact any London Plan strategic view. The design of the development is acceptable.

6.5.25 Subject to additional technical details, the provision of a sub-surface bridging structure to allow construction around the Victoria Line is acceptable. The public realm proposed by the applicant, subject to a S106 contribution, is satisfactory on this basis that a comprehensive approach to public realm delivery will optimise the potential of the Housing Zone.

6.6 Quality of Residential Accommodation

6.6.1 London Plan policy 3.5 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. Strategic Policy SP2 and Policy DM12 of the Council's emerging Development Management DPD reinforce this approach.

The Mayor's Housing SPG sets out the space standards for new residential developments to ensure an acceptable level of living accommodation is offered.

- 6.6.2 All of the units in the scheme meet the space standards in the Mayor's SPG Housing and the scheme is considered to provide a high standard of residential accommodation. The internal layout on residential levels achieves an efficient floorplan that provides separation from the northern elevation of the hotel, and deck access to provide a degree of dual aspect to residential units that are close to north-facing. There are 26 single aspect units that are north-east-facing; however it is recognised that this is the result of the spatially constrained site, and is alleviated to a certain degree by projecting bays that will increase light and ventilation to the units. Internal corridors benefit from natural ventilation and lighting, which is strongly supported.
- 6.6.3 Deck access, residential layouts, as well as a planted visual amenity space on level 1 will provide a degree of separation and privacy between the neighbouring hotel and the residential units to the west of the site. The level 7 external residential amenity space has direct access from the core. External amenity space is not provided for units overlooking Hale Road in recognition of traffic impacts; however sufficient additional interior living space is provided in line with Housing SPG requirements.

Unit Privacy

- 6.6.4 The Mayor's SPG Housing seeks to encourage the kind of housing that provides comfortable and enjoyable places of retreat and privacy. The scheme will be in close proximity to an existing hotel development with the deck access units on the lower levels of the proposed development facing the rear aspect hotel rooms. With the exception of the end (western most) deck access units on levels 02-07, the habitable rooms are generally set away from the hotel – any inter-looking would exist between proposed kitchens and the rear of the hotel. At the narrowest point, the distance is less than 10 metres, but this separation distance does widen out westwards.
- 6.6.5 The room layout would mitigate inter-looking (with habitable rooms oriented toward Hale Road on levels 02-07), and the Mayor's Housing SPG speaks to flexibility on separation issues in high density urban settings. It is considered that with the setback to the apex of the buildings above the 8th floor there is sufficient separation distance between the emerging Argent Related scheme and the eastern units within the subject building. The privacy impacts are considered to be acceptable. The privacy impacts to adjoining occupiers are assessed in the section following. Overall, residential quality is of a good standard. This is also the view of GLA Officers.

Inclusive Access

- 6.6.6 Local Plan Policy SP2 and Policy 3.8 of the London Plan require that all housing units are built to Lifetime Homes Standards with a minimum of 10% wheelchair accessible housing or easily adaptable for wheelchair users.
- 6.6.7 The proposed development provides 13 wheelchair units which meet the 10% requirement in planning policy and the layouts are considered acceptable. As per the Design and Access Statement (DAS) the identified wheelchair units are units 02 located on floors 8-21. The DAS notes that all wheelchair units in the scheme are fully compliant with Building Regulations Approved Document M4(3) and all other units are fully compliant with Approved Document M4(2). This issue of disabled parking is addressed in the transportation section of this report.
- 6.6.8 The applicant further states that level pedestrian access to the scheme will be provided to the commercial/retail unit in accordance with the Equality Act (2010) and the other requirements of Part M of the building regulations. A condition seeking details around the accessibility of the commercial units is included in Section 8. The accessibility of the scheme is judged to be acceptable and in line with the Mayor's Housing SPG and the Mayor's Accessible London SPG.

Daylight/Sunlight Provision to Proposed Units

- 6.6.9 The Mayor's SPG Housing states that in relation to daylight and sunlight provision to new development an appropriate degree of flexibility needs to be applied when using Building Research Establishment (BRE) guidelines. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity. The applicant has submitted a Daylight/Sunlight Assessment prepared by Nathaniel Lichfield & Partners dated November 2016.
- 6.6.10 The assessment concludes the scheme will deliver very high levels of compliance with the guide levels for interior daylighting for an urban development project of this scale and character. This includes all of the main habitable rooms within the developments (living rooms/kitchens) which comply with the guide levels.
- 6.6.11 Likewise, officers are in agreement with the applicant's consultant's conclusion that the levels of annual sunlight availability within the proposed units are considered acceptable for an urban development project having regard to the suburban basis of the BRE guidance, the orientation and

configuration of the site. This is also the view of GLA officers. The scheme is acceptable from a daylight/sunlight perspective.

Wind Impacts to Private and Communal Amenity Areas

6.6.12 The applicant has submitted a Wind and Micro-climate Assessment prepared by RWDI dated 17th January 2017. While the Assessment primarily assesses the wind impacts on the public realm surrounding the site, an assessment of the usability of amenity spaces created by the development is also undertaken. The Assessment concludes that higher wind speeds, usually suitable for standing and strolling uses (as per the Lawson Scale) are expected across most of the large communal terrace located at 7th storey level. This is likely due to the prevailing and secondary winds accelerating around these amenity areas of the site. While the smaller south-facing amenity private areas are not assessed, these spaces are inset within the building fabric, and less exposed than the deck access amenity area.

6.6.13 The Assessment concludes that wind conditions created on the 7th storey amenity area are up to two categories windier than desired for the intended amenity space usage during the summer and would require mitigation to achieve an appropriate comfort level. It is considered that this issue may be addressed by the imposition of a planning condition, to provide a good quality and useable amenity area.

6.6.14 In terms of specific mitigation, the wind report recommends landscaping (of a minimum of 1.5 metres in height) be introduced to create a beneficial effect to conditions around the terrace edges by providing further shelter than the balustrade alone. A condition requiring wind mitigation in broad conformity with the report is included in Section 8 of this report. Subject to the provision of mitigation details, the wind and microclimate conditions to the communal and private amenity areas are acceptable. The wind and microclimate impacts to adjoining occupiers and the public realm are assessed in the section below.

Noise and Vibration Impacts to Future Occupiers

6.6.15 London Plan Policy 7.15 (Reducing and Managing Noise) states that development proposals should seek to manage noise by avoiding significant adverse noise impacts on health and quality of life as a result of new development. This policy also indicates that where it is not possible to achieve separation of noise sensitive development and noise sources, then any potential adverse effects should be controlled and mitigated through the application of good acoustic design principles. This approach is reflected in the NPPF, Saved UDP Policy UD3 and emerging Policy DM1 and DM23.

- 6.6.16 The applicant has submitted a Noise and Vibration Impact Assessment prepared by Ramboll Environ dated November 2016. The applicant's consultant has undertaken a baseline noise and vibration survey in the vicinity of the application site. Attended and unattended noise level measurements were recorded on Thursday 1st September and Friday 2nd September 2016. Vibration levels were also measured at a strategic location to determine the possible vibration impacts arising from the railway lines located 65 metres to the south-east of the application and the Victoria Line running under the site.
- 6.6.17 The Assessment concludes that potential impacts on the proposed occupiers of the development are primarily noise break-in from traffic on the surrounding roads, which may be controlled by providing adequate façade and ventilation design to achieve suitable indoor ambient noise level criteria. The Assessment also concludes the vibration impacts to the proposal may be addressed by mitigation.
- 6.6.18 The Assessment outlines the minimum sound insulation requirements for glazing and ventilation to the façade required to achieve the BS8233:2014 indoor ambient noise level criteria. These results are based on the output of the 3D acoustic modelling predictions of the sound pressure level. Compliance with the rating noise levels would mean that no significant adverse impacts occur.
- 6.6.19 Vibration levels from the proposed operation of the Victoria Line during the night time periods could result in a significant adverse impact upon the residents within the proposed development, however, with the adoption of appropriate mitigation measures, no residual significant adverse effects are predicted. These mitigation measures are proposed to be secured by condition and an updated noise impact assessment once further design details are progressed.
- 6.6.20 The Council's Environmental Health Officer (Noise) has reviewed the noise impacts to the residential units created, and does not raise an objection subject to the imposition of suitable planning conditions including an updated noise assessment proposing mitigation to be progressed when full design details are known. On this basis the noise impacts to the future residential units are considered acceptable and in accordance with London Plan and local policy seeking to control and mitigate noise through the application of good acoustic design principles.

Noise Impacts to External Amenity Area

- 6.6.21 The applicant's noise assessment undertakes a consideration of the noise impacts to the 7th storey external amenity area. The assessment notes that the noise generated at 7th storey level to the amenity space is predicted to be between 55 to 61 dB. The Assessment also recognises that it is not

always possible to meet an upper noise limit of 55 dBA in all amenity spaces as per British Standards, and this must be weighed against other planning considerations. Officers are in general agreement with this assessment, and it is also noted that the wind mitigation is required to be installed may also serve to address the impacts of noise external.

6.6.22 It is also recognised the site is constrained by the parcel shape and the noise exposure of the amenity space is inevitable with high volume traffic on Hale Road, a source that is unable to be separated from the receptor. On balance, given the comparatively high number of units that benefit from a private amenity space within the scheme, and the other mitigation that will be brought forward to address wind impacts, the noise levels on the rooftop amenity area are considered to be acceptable. This approach is considered to be inline with London Plan Policy 7.15 which seeks to address noise by way of mitigation where separation is not possible through design. This conclusion also takes into consideration the other positive benefits of the scheme, including the delivery of a high quantum of affordable housing.

Child Play Space

6.6.23 Policy 3.6 of the London Plan seeks to ensure that development proposals include suitable provision for play and recreation. Local Plan Policy SP2 requires residential development proposals to adopt the GLA Child Play Space Standards 2009, where London Plan Policy 3.6 and Local Plan Policy SP13 underline the need to make provision for children's informal or formal play space.

6.6.24 Based on the Mayor's Playspace SPG and playspace calculator, 8 children are predicted to live in the development, of which 5 would be under the age of 5. Implementation Point 1 of the 'Shaping Neighbourhood: Play and Informal Recreation SPG (2012)' indicates that only new housing developments that will accommodate 10 children or more are expected to make provision for play and informal recreation on site.

6.6.25 Notwithstanding this, the proposal includes 54 m² of play space targeted to under-fives within the level 7 external amenity area, which is welcomed, and it is noted that the play facilities of Down Lane Park are in close proximity. Landscaping and wind mitigation details for this space are proposed to be secured by condition. GLA officers support the play space provision within the scheme.

6.6.26 The applicant has agreed to make a S106 contribution to address the provision of leisure facilities and soft landscaping improvements as part of the third package of installations to facilitate residential access to Down Lane

Park. This weighs in favour of the scheme. The site has good access to the wider amenities of the Lea Valley. Given the child yield, the applicant's proposed S106 contribution and the site location, the development is considered to provide suitable for play and recreation for young people, in accordance with the London Plan and local policy above.

Air Quality

- 6.6.27 The NPPF states that planning decisions should ensure that any new development in Air Quality Management Areas (AQMAs) is consistent with the local air quality action plan. London Plan Policy 7.14 sets out the Mayor's commitment to improving air quality and public health and states that development proposals should minimise increased exposure to poor air quality. At the Local level, Policy SP7 states that in order to control air pollution developers must 'carry out relevant assessments and set out mitigating measures in line with national guidance. This approach is reflected by emerging Policy DM23 which states that air quality assessments will be required for all major development and other development proposals, where appropriate. Policy indicates that where adequate mitigation is not provided, planning permission will be refused.
- 6.6.28 The applicant has provided an Air Quality Assessment prepared by Ramboll Environ dated November 2016. The site falls within the LBH Air Quality Management Area (AQMA) which is a borough-wide designation due to measured exceedances of the air quality objectives for nitrogen dioxide (NO₂) and particulate matter (as PM₁₀). The primary source of emissions of these pollutants in the Borough is road traffic.
- 6.6.29 The Council's Environmental Officer has assessed the application. The construction phase impacts are considered to be addressed by the imposition of a planning condition, around the provision of a detailed Air Quality and Dust Management Plan (AQDMP). Such a condition is recommended for imposition in Section 8.
- 6.6.30 The Assessment concludes that the proposed development would introduce new residential receptors into a location which is expected to currently exceed the annual mean NO₂ objective. A proposed development and ventilation strategy has been developed to limit potential exposure to poor air quality and to provide residents with a clean source of make up air. As such, it is considered that existing air quality is considered to have a Slight Adverse Effect on the proposed development.
- 6.6.31 The mitigation noted in the assessment indicates each unit would be provided with mechanical ventilation with heat recovery system. Make up air would either be pulled from the roof of the building or where air intakes cannot be provided at roof level, these would be fitted with suitable filters to

remove oxides of nitrogen and particulates from the incoming air. These details are proposed to be secured by condition and updates to the air quality assessment. With respect to building emission benchmarks, the assessment concludes that the proposed development can be considered to be air quality neutral.

- 6.6.32 Subject to the provision of an AQDMP to address air quality construction impacts, and details of an updated Air Quality to ensure appropriate mitigation to future occupiers is incorporated into the operational phase of the development, the air quality impacts of the scheme are considered to be acceptable and in accordance with the policy above.

Summary – Quality of Residential Development

- 6.6.33 The scheme is considered to deliver dwellings of sufficient size and quality. On balance and given the site constraints, including the site shape with an elongated northern edge, the incorporation of single aspect units into the scheme is considered to be acceptable.
- 6.6.34 The delivery of winter garden style space within subject units together with a landscaped communal amenity space at 7th storey level adds to the residential quality of the scheme. The proposal will deliver a compliant quantum of wheelchair housing and all of the units will receive an acceptable amount of daylight and sunlight when assessed against relevant BRE criteria. The scheme does not require provision for child play space on site based on the child yield, however the communal amenity area will include 54m² of space targeted to under-fives. Subject to mitigation at the condition stage, the noise, vibration and air quality impacts to future occupiers of the units are acceptable. The wind and noise impacts to the communal amenity area are also able to be satisfactorily mitigated. Overall the residential quality of the development is considered to be high and responds well to the constrained nature of the site.

6.7 Development Impact to Adjoining Occupiers

- 6.7.1 Saved UDP Policy UD3 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. Similarly London Plan Policy 7.6 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 states that tall buildings should not affect their surroundings adversely in terms of overshadowing, noise and/or glare and should not impact on local or strategic views.

Daylight/Sunlight BRE Assessment Methodology

- 6.6.3 The Mayor's SPG Housing indicates that BRE guidelines on assessing daylight and sunlight should be applied sensitively to higher density development in London, particularly in central and urban settings, recognising the London Plan's strategic approach to optimise housing output (Policy 3.4) and the need to accommodate additional housing supply in locations with good accessibility suitable for higher density development (Policy 3.3). Quantitative standards on daylight and sunlight should not be applied rigidly, without carefully considering the location and context and standards experienced in broadly comparable housing typologies in London.
- 6.6.4 The impacts of daylight provision to adjoining properties arising from proposed development is considered in the planning process using advisory Building Research Establishment (BRE) criteria. A key measure of the impacts is the Vertical Sky Component (VSC) test. BRE criteria suggest a VSC of 27% or more should be achieved if a room is to be adequately day lit.
- 6.6.5 In conjunction with the VSC tests, the BRE guidelines and British Standard 8206-Part 2:2008 indicate that the distribution of daylight should be assessed using the No Sky Line (NSL) test. This test separates those areas of a 'working plane' that can receive direct skylight and those that cannot.
- 6.6.6 If following construction of a new development, the no sky line moves so that the area of the existing room, which does receive direct skylight, is reduced to less than 0.8 times its former value, this will be noticeable to the occupants and more of the room will appear poorly lit.
- 6.6.7 The acceptable level of sunlight to adjoining properties is calculated using the Annual Probable Sunlight Hours (APSH) test. In terms of sunlight, the acceptability criteria are greater than 25% for the whole year or more than 5% between 21st September and 21st March.

Assessment of Daylight/Sunlight Impacts to Adjoining Occupiers

- 6.6.8 The applicant has submitted a Daylight/Sunlight Assessment prepared by Daylight/Sunlight Assessment prepared by Nathaniel Lichfield and Partners dated November 2016.
- 6.6.9 The assessment has considered the effects of the development on the levels of daylight received by neighbouring residential accommodation within Nos.1-29 Hale Road (odd), the upper floor of Nos 29-31 The Hale, Nos. 32-86 Hale Gardens and the lower floors of Emily Bowes Court. Other buildings in the vicinity of the site are non-residential in use or are situated a sufficient distance from the site to be unaffected in daylight terms. The applicant has considered two scenarios with respect daylight, one with the proposed

development and current conditions, and one with the development in the context of DCF massing.

Daylight – Scenario 1 (Development in Isolation)

- 6.6.10 The applicant has tested adjoining windows surrounding the development for daylight impacts using the Vertical Sky Component (VSC) test. The assessment incorporates 543 windows to 322 rooms in the vicinity of the proposed development.
- 6.6.11 The results of the daylight analysis under Scenario 1 demonstrate that the majority of the neighbouring windows requiring assessment will achieve the BRE guide levels for VSC with the development in place. Overall, 222 of the 233 neighbouring windows assessed will comply with the guide levels (95.3%). This is a high level of compliance for a high density development in London given that the BRE guide is predicated on a suburban scale of development.
- 6.6.12 The 11 non-compliant windows serve Nos. 13-21 Hale Road in the terrace of dwellinghouses north of the application site. These windows will experience only marginal effects; retaining VSC levels between 64% and 78% of the baseline VSC levels. The applicant concludes the retained levels of VSC remain acceptable for a development of this character in London. Officers are in agreement with this perspective.
- 6.6.13 The applicant concludes the effects of the development on the daylight levels experienced by neighbouring properties in Scenario 1 are acceptable in the context of the BRE guidance and relevant policy.

Daylight - Scenario 2 (Development with DFC Massing)

- 6.6.14 The results of the daylight analysis under Scenario 2 again demonstrate that the majority of the neighbouring windows requiring assessment will achieve the BRE guide levels for VSC with the proposed development in place alongside the massing of development envisaged elsewhere in Tottenham Hale under the DCF. Overall, 214 of the 230 neighbouring windows assessed under this scenario will comply with the guide levels (93%). The remaining windows will again experience only marginal effects.
- 6.6.15 The level of compliance with the guide levels under this alternative scenario (93%) is again high for a development of this character in London given that the BRE guide is based on a suburban scale of development. The applicant concludes the cumulative daylight effects of the development in isolation and with the DCF massing are, therefore, considered acceptable. Officers are in agreement with this assessment.

Sunlight – Scenarios 1 and 2

6.6.16 The results of the applicant's cumulative analysis under both Scenarios 1 (in isolation of proposed DCF massing) and 2 (with the DCF massing in place) demonstrate that all of the neighbouring windows requiring assessment will achieve the BRE guide levels for annual sun lighting.

Daylight/Sunlight - Summary

6.6.17 The majority of tested windows in the vicinity of the site will receive compliant levels of daylight and sunlight. Where breaches of the BRE guidance are experienced by neighbouring properties in respect of daylight provision, they are marginal and above reductions that might be experienced in an urban setting in London. There have been no objections to the scheme on the basis of daylight or sunlight impacts from any adjoining occupier.

6.6.18 It is, therefore, concluded that the development will not result in any materially unacceptable impacts on the daylight and sunlight levels to neighbouring residential properties. Officers have reached this conclusion in consideration of the Mayor's guidance around the flexible application of BRE criteria and the need to accommodate additional housing supply in locations with good accessibility suitable for higher density development.

Privacy of Existing Adjoining Occupiers

6.6.19 The Mayor's SPG Housing notes that designers should consider the position and aspect of habitable rooms, gardens and balconies, and avoid windows facing each other where privacy distances are tight.

6.6.20 The development site is currently somewhat isolated in Tottenham Hale, and would not be expected to give rise to privacy concerns to adjoining residential occupiers to the west of the site within Hale Gardens, or to the terraced dwellings on Hale Road as the north facade of the scheme does not incorporate private external amenity areas.

6.6.21 However, the layout of scheme will result in the units in the projecting wing of the development facing the existing hotel rooms to the southwest of the development site. As noted above the habitable rooms are generally set away from the hotel and any inter-looking would exist between the proposed deck access dwellings and the rear of the hotel. At the narrowest point, the separation distance is less than 10 meters, but this distance does widen out westwards.

6.6.22 The applicant has followed the approach to privacy articulated in the Mayor's SPG Housing in that the affected units are oriented with habitable rooms to the rear and the inter-looking will generally occur between the hotel rooms

and residential kitchens. The units are also buffered by the deck width and balustrades in line with the approach noted in London Plan guidance. The Housing SPG also notes that a rigid adherence to typical separation distances can limit the variety of urban spaces and housing types in the city. In light of this flexibility and high quality design, the privacy impacts to adjoining occupiers are considered acceptable.

6.6.23 Officers also note the applicant has amended the design of the scheme to set back the upper floors of the tower portion of the scheme at the apex to ensure the sufficient separation distance to potential future occupiers of the forthcoming Argent Related scheme. This alteration is welcomed by officers.

Noise and Disturbance

6.6.24 Saved UDP Policy UD3 seeks to resist developments involving an unacceptable level of noise beyond the boundary of the site. This stance aligns to the NPPF and with London Plan Policy 7.15 and Policy SP14 of Haringey's Local Plan. Emerging Policy DM23 also reflects this approach.

6.6.25 While the introduction of mixed use development will give rise to additional noise and comings and goings generated from future occupiers, the potential noise emanating from the scheme would not create a level of noise and disturbance over and above that of typical dwellings/flats or small scale commercial uses in an urban location. As noted above, the site is generally isolated from existing residential uses.

6.6.26 Given that a noise intensive use in the form of auto repair currently operates from the site, the conversion of the site to predominantly residential use is considered to be an improvement in planning terms. The noise and disturbance impacts generated by future occupiers of the land are acceptable in planning terms.

6.6.27 The impacts of construction noise are temporary and are proposed to be controlled by condition. The applicant has submitted a Construction Logistics Plan prepared by WSP Parsons Brinckerhoff dated November 2016. The applicant will also be required to join the Considerate Contractors scheme, with proof of registration provided to the Local Authority.

6.6.28 The temporary noise impacts during the construction are, subject to condition, judged acceptable. The long term noise impacts introduced by the development are acceptable given the existing planning position and the nature of the scheme.

Wind and Microclimate Impacts

- 6.6.29 London Plan Policy 7.6 and 7.7 state that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to wind and microclimate. This is particularly important for tall buildings. Emerging Policy DM6 states that proposals for tall buildings should consider the impact on microclimate. Policy DM3 more broadly requires improvements to the public realm for pedestrians and cyclists in Haringey, and this approach is reflected in emerging Tottenham Area Action Plan Policy AAP6.
- 6.6.30 The Lawson Criteria (Bristol Method) may be used to determine the acceptability of wind conditions for pedestrian safety and comfort in baseline and proposed scenarios. The Lawson Criteria provide it is not only the velocity of wind that is considered but also the frequency of occurrence of these velocities. The frequency of occurrences is used as an indicator of the likely duration of certain wind speeds.
- 6.6.31 The applicant has submitted a Wind and Microclimate Assessment prepared by RWDI dated 17th January 2017. The assessment is informed by a Computational Fluid Dynamics (CFD) simulation considering prevailing winds from various directions. The methodology adopted for the assessment combines the use of CFD to predict air flow patterns and wind velocities around the site, and incorporates the use of wind data from the nearest suitable meteorological station.
- 6.6.32 Following discussions with Officers, the applicant has submitted a supplementary letter dated 17th February 2016 authored by RWDI further discussing the impact of future development in the vicinity of the site and the consequent limits of wind modelling for the scheme at this juncture in the planning process.
- 6.6.33 The submitted assessment considers three scenarios, the existing site with existing surrounding buildings, the proposed development with the existing surrounding buildings and the proposed development in the context of future development as generally envisaged by the Tottenham Hale DCF.
- 6.6.34 The report concludes that predominantly “standing” to “strolling” conditions (as characterised by the Lawson scale) are expected around most thoroughfare locations around the proposed development without DCF massing during the windiest season, which would generally correlate to conditions suitable for the intended thoroughfare usage.
- 6.6.35 However, two large areas to the south-east and north-west corners of the proposed development (without DCF massing) that are likely to have walking conditions during the windiest season which are one category windier than desired for the intended thoroughfare use and would require mitigation to suitable.

6.6.36 The Tottenham Hale DCF envisages a high quality pedestrian area leading from Ashley Road southbound. It is noted however the most severe impacts would occur during the winter months, when an outdoor seating area for a cafe would not be in use, and that conditions appear to improve with DCF massing in place (i.e. Configuration 3 in the applicant's assessment).

6.6.37 A key factor that will influence final wind conditions in the vicinity of the site will be the form and location of surrounding development that may exceed the parameters of the DCF and result in wind conditions that will further enclose a future pedestrian area. It is not possible to come to a definitive view on wind conditions until we know the form of the surrounding development.

6.6.38 On this basis, the applicant has agreed to undertake updated wind modelling to a milestone agreed in the S106 agreement, and the applicant has further agreed to a S106 obligation that will compel the developer to progress an amendment to the scheme by way of a non-material amendment application or a variation application, if required. This will ensure the scheme is revised in the event that updated wind modelling indicates that conditions in the future pedestrian realm would continue to be of concern. It is clear that mitigation for thoroughfare use will be required in any event.

6.6.39 A condition around mitigation is contained in Section 8 of this report. The scheme is therefore not considered to unacceptably harm the amenity of surrounding land and buildings in line with the aforementioned London Plan and local policy.

Summary - Development Impact to Adjoining Occupiers

6.6.40 The scheme is not anticipated to give rise to privacy or overlooking impacts given its separation distance from existing residential development. The scheme's design mitigates inter-looking impacts between the proposed residential units and existing hotel rooms adjoining the site. Given the existing commercial use of the land, the change of use to residential-led mixed use is considered reduce the noise impacts to any adjoining occupier. The impacts of construction noise are temporary and will be controlled by condition.

6.6.41 The daylight/sunlight impacts to adjoining occupiers are acceptable for an urban site in London. There have been no objections to the scheme on the basis of daylight or sunlight impacts from any adjoining occupier. The wind and microclimate impacts in the vicinity of building footprint prior other development parcels coming forward in Tottenham Hale are not ideal, however further study of the future wind conditions will allow for mitigation and a possible modification of the scheme. The applicant has committed to

modification of the scheme if required by way of a S106 obligation. On this basis, the wind impacts of the scheme are considered acceptable. No wind conditions that would be classified as dangerous would be created by the proposal.

6.7 *Development Impacts to Heritage Assets*

- 6.7.1 The legal position with respect to heritage assets is pursuant to Section 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and as per relevant planning case law, which is set out below.

Legal Position and Policy – Heritage Assets

- 6.7.2 The Barnwell Manor Wind Farm Energy Limited v East Northamptonshire District Council case indicates that "Parliament in enacting section 66(1) did intend that the desirability of preserving the settings of 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." The Forge Field Society v Sevenoaks District Council case indicates 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 the settings of 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.
- 6.7.3 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, 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 emphasized 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.
- 6.7.4 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 statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering.

- 6.7.5 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 to each element 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.
- 6.7.6 Policy 7.8 of the London Plan requires that development affecting heritage assets and their settings to conserve their significance by being sympathetic to their form, scale and architectural detail. Policy SP12 requires the conservation of the historic significance of Haringey's heritage assets. Saved policy CSV5 of the Haringey Unitary Development Plan (UDP) (2006) requires that alterations or extensions preserve or enhance the character of the Conservation Area. Policy DM9 of the Council's Development Management DPD pre-submission version 2016 continues this approach.

Impacts to Heritage Assets

- 6.7.7 The applicant has submitted a Heritage, Townscape and Visual Impact Assessment dated November 2016 prepared by Nathaniel Lichfield and Partners. The assessment has identified the heritage assets which would be likely to be affected by the proposed development. The potential effects on significance have been established, including impacts arising through effects on setting.
- 6.7.8 Locally listed Berol House lies approximately 50m to the north, whilst the Markfield Pumping Station Building and Engine (Grade II); Ferry Boat Inn (Grade II) and 62 High Cross Road (Grade II), Tottenham High Cross (Grade II) and The Green School (at rear of former Grammar School) and No. 2 Cooperative Workshops (former Tottenham Grammar School) (Locally Listed) lie between 500 to 750m away.
- 6.7.9 Approximately 500m to the west is The Tottenham High Road Historic Corridor which includes several conservation areas - Seven Sisters/Page Green, Tottenham Green, Bruce Grove, Bruce Castle, and Clyde Circus. The assessment has found that the proposed development would preserve the settings of the heritage assets identified. 1 Station Square would be only partially visible in views from the identified listed buildings, screened by intervening development and seen within the context of existing new and taller development.
- 6.7.10 GLA officers have assessed the impact to heritage assets in issuing the Stage 1 Report. GLA officers conclude there would be limited visibility to the scheme from Tottenham High Road due to the enclosed nature as a

transport corridor with frontages either side. There would, however, be a more open view to the application site from Bruce Grove which enables a vista to the application site. The proposed development would appear above the roofscape, but the development would appear as a distant feature in the setting of the Conservation Area and due to the distance the proposed design would not detract from the Conservation Area's historic detailing and sense of domestic scale. Haringey Officers are in agreement with this assessment.

6.7.11 As set out in the NPPF paragraph 134 where a development proposal would lead to less than substantial harm the public benefits of the proposal should be weighed against this harm. The overall effect of balancing both the harm caused and heritage and benefit derived, leads to an overall heritage assessment of less than substantial harm which is outweighed by other planning and regeneration benefits of the proposal, including the provision of a high level of affordable housing. In making this assessment great weight has been given to the preservation or enhancement of the heritage assets as per the Council's statutory requirement.

6.8 Transportation and Parking

6.8.1 Strategic Policy SP7 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. This approach is continued in emerging DM Policies DM31 and DM32.

6.8.2 London Plan Policy 6.13 sets out that the Mayor wishes to see an appropriate balance being struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use. In locations with high public transport accessibility, car-free developments should be promoted (while still providing for disabled people).

6.8.3 The site has an excellent public transport accessibility level (PTAL) of 6a and is located close to Tottenham Hale bus station with a number of nearby bus stops providing access to some 6 bus routes with a combined frequency of 83 buses per hour (two way). The site is also within 230 metre walking distance of Tottenham Hale railway and tube stations. The nearest car club bay is located on Antill Road approximately 400m away.

Trip Generation

6.8.4 In order to assess the potential multimodal trips likely to be generated by the proposed development, the industry standard TRICS database has been

interrogated. Trip rates for the typical morning (0800-0900) and evening (1700-1800) peak traffic hours have been extracted from comparable sites.

- 6.8.5 These trip rates have then been applied to the proposed development and demonstrate that peak hour multi modal trip generation (excluding servicing and vehicle trips) for the proposals would be up to approximately 10 arrivals and 51 departures for the am peak period and up to 37 arrivals and 17 departures in the pm peak period. It is to be noted that as this development will not be providing off-street car parking spaces, it is expected that the majority of the proposed trips will be by sustainable modes of transport.
- 6.8.6 The multi modal trip rate assessment contained in the accompanying Transport Assessment is considered to be relatively modest and unlikely to give rise to any significant impact on local transport network.

Parking

- 6.8.7 Owing to the 'car free nature' of the scheme, the multimodal trip rate assessment assumed that the vehicular trip generation/parking demand is likely to be negligible.
- 6.8.8 Whilst it is considered reasonable to assume that a 'car free development' in such a location (i.e. high PTAL) is likely to generate fewer car trips, there is still potential for the proposal to generate some parking demand, which in the absence of on-site parking, has the potential to be displaced on street.
- 6.8.9 The majority of roads in close proximity of the site are controlled by yellow line 'at any time restrictions' including Station Road, Hale Road, Watermead Way and sections of Ashley Road. Additionally, 'no loading at anytime' restrictions are in force on Station road and Hale Road immediately adjacent to the site.
- 6.8.10 A number of Controlled Parking Zones (permit only parking) are located in close proximity of the site including, 'Seven Sisters CPZ' to the south of the site with controls in operation Monday to Saturday 8:30am – 6:30pm, and 'Tottenham Hale CPZ' to the north of the site with controls in operation Monday to Friday 8am to 6.30pm for zone.
- 6.8.11 Taking the above parking constraints into consideration, the only opportunity for legal parking is on Ashley Road (in parts), Mill Mead Road and Jarrow Road (in parts), it is however unlikely that Mill Mead Road and Jarrow Road will be impacted by the development given the separation (indirect access) and distance from the development.
- 6.8.12 It is also noted that as part of the consent for the neighbouring hotel development, the council required a financial contribution by way of a S.106

agreement towards the implementation of a parking control scheme on Ashley Road. Any residual parking demand as a result of the development proposal being considered will be minimised by the above mentioned controls.

6.8.13 Based on the above parking constraints and excellent transport accessibility level of the site and, a 'Car Free' proposal would be supported in this location. A car free development in this location is considered consistent with policy SP7 of the Council's Local Plan. In coming to this conclusion, officers have had regard for the objections of adjoining occupiers around parking.

Disabled Parking

6.8.14 Disabled parking is shown to be accommodated on street within 3 no. spaces on Station Road approved as part of the neighbouring hotel development. As with all on-street provision, this provision cannot be dedicated to the proposed development.

6.8.15 With regard to disabled parking provision the London Plan states that the appropriate number of disabled parking bays will vary with the size, nature and location of the development, the levels of on and off street parking and the accessibility of the local area. It seeks to ensure adequate parking spaces for disabled people are provided and recommends at least one accessible on or off street car parking bay designated for Blue Badge holders, even if no general parking is provided.

6.8.16 The Policy therefore allows flexibility on disabled parking provision if a parking space for each accessible unit (as recommended by the Housing SPD) can be demonstrated to excessive for a site.

6.8.17 The applicant has cited the existing underground tunnel below the site which prohibits the ability to create any basement structure for parking, as one of the reasons why it has been difficult to provide dedicated off-street parking provision.

6.8.18 .The accompanying Transport Assessment provides evidence of disabled parking occupancy at a number of recently constructed and fully occupied residential developments in Greater London. The study suggests that in areas of high public transport accessibility, the demand for disabled parking provision is likely to be relatively low (0%). In addition it is noted that Tottenham Hale Station has step-free access.

- 6.8.19 In light of the local context and the specific site constraints detailed above, flexibility of London Plan and the council's Blue Badge parking standards may be justified in this location.
- 6.8.20 The provision of shared on-street provision on Station Road can only be considered if it is clear that the level of provision (3no.of spaces on Station Road) will be sufficient to meet the demand generated by the adjacent hotel and the development being considered. A parking demand study should be submitted confirming the above requirement. The applicant should refer to the Blue Badge study/discussion as part of the wider Ashley Road sites in carrying out the above assessment. Officers are seeking to address disabled parking requirements through the development of the wider area. A condition requiring this study is contained in Section 8 below.

Access and Servicing Arrangements

- 6.8.21 The applicant has proposed providing residential refuse storage and waste collection on the ground floor along the station road frontage. It is proposed that residential refuse stores can be accessed from the loading bay secured as part of the neighbouring hotel development on Station Road. An assessment of the cumulative servicing demand of both the existing hotel and the proposed residential use demonstrates that a single bay on Station Road is likely to be sufficient to meet the servicing needs of both sites.
- 6.8.22 The waste storage for the commercial unit is located along the Hale Road frontage and it is expected that due to the location of the storage area, that the most convenient and likely place for vehicles to stop will be Hale Road, including the closures (footway re-instatement) of 2 no. redundant vehicular crossovers. In the interest of minimising impacts on traffic (servicing) in the adjoining road (Hale Road), it is advised that the applicant is required to pay a sum to cover the highway works necessary to lengthen the exiting lay-by as identified in the Tottenham Hale District Centre Framework Regeneration Plans - Street and Spaces Strategy, Nov 2015. The applicant will be required to enter into an agreement with the Council pursuant to s.278 of HA 1980, to pay the Council for above necessary highway improvement works. The draft Heads of Terms for such an agreement are set out in the section above. An assessment of waste storage is in the section below.

Travel Plan

- 6.8.23 The applicant has provided a draft travel plan which includes interim modal shift targets, a monitoring schedule and measures including free car club membership for three years for each household. It is expected that a full travel plan will be submitted and thereafter re-submitted in accordance with a

S106 Travel Plan obligation. The travel plan must promote the development as a 'Car Free' scheme and support sustainable travel choice and modal shift. The council will seek a Section 106 travel plan fee totalling £3000 to cover the cost of reviewing the TP at each reporting stage. It will be necessary to secure its delivery via a S106 agreement.

Conclusion

- 6.8.24 Subject to the additional details being submitted and approved (i.e. Blue Badge parking demand study), the Highway Authority is likely to conclude that the development will not generate a significant increase in traffic or parking demand or result in a detrimental impact on the highway and transportation network, subject to the S106 obligations at the head of this report.
- 6.8.25 Transport for London and the Greater London Authority have commented on the scheme and have raised no objection. The scheme is not considered to give rise to cumulative transportation impacts in relation to the operation of the highway network and highway safety that may be considered to be severe in relation to Paragraph 34 of the National Planning Policy Framework.

6.9 Flood Risk and Drainage

- 6.9.1 The site is located within Flood Zone 2 and is therefore considered to have a low probability of flooding from rivers and sea. As the development site is less than 1 hectare, a Flood Risk Assessment (FRA) is not required to support the application.
- 6.9.2 London Plan (2011) Policy 5.13 (Sustainable drainage) and Local Plan (2013) Policy SP5 (Water Management and Flooding) require developments to utilise Sustainable Urban Drainage Systems (SUDS) unless there are practical reasons for not doing so, and aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the drainage hierarchy.
- 6.9.3 Policy also requires drainage to be designed and implemented in ways that deliver other policy objectives, including water use efficiency and quality, biodiversity, amenity and recreation. Further guidance on implementing Policy 5.13 is provided in the Mayor's Sustainable Design and Construction SPG (2014) including the design of a suitable SUDS scheme.
- 6.9.4 The applicant has submitted a Flood Risk Assessment and Outline Drainage Strategy prepared Ramboll dated November 2016. The assessment concludes that Environment Agency (EA) hydraulic modelling demonstrates that, after consideration of catchment-wide flood defences, no flooding of the

site is predicted during events with up to a 1 in 1,000 (0.1%) annual probability. Therefore, the actual risk of flooding at the Site is considered to be equivalent to land within Flood Zone 1 (Low Probability). Flood risks from sewer surcharging, overland pluvial flow and groundwater emergence are also demonstrated to be low.

- 6.9.5 The Assessment notes that detailed drainage design has not yet been completed for the proposed development and would be prepared post-determination of the application following further consultations with the EA and Thames Water.
- 6.9.6 It is concluded in the Assessment that the potential volume of a living roof system cannot be relied upon as a storm water attenuation system and the only feasible option for storm water attenuation is, therefore, considered to be a tank system at or below ground floor level. The final location of such a tank would be confirmed at detailed design stage.
- 6.9.7 The Council's Senior Drainage Engineer has assessed the scheme and requires the imposition of planning conditions to secure drainage details. Thames Water and the Environment Agency do not raise an objection to the scheme subject to condition. Subject to the imposition of the condition noted above, the development is acceptable in Flood Risk Terms.

6.10 Energy and Sustainably

- 6.10.1 The NPPF and London Plan Policies 5.1, 5.2, 5.3, 5.7, 5.8, 5.9, 5.10 and 5.11, and Local Plan Policy SP4 sets 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. The London Plan requires all new homes to achieve a 35 per cent carbon reduction target beyond Part L 2013 of the Building Regulations (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).
- 6.10.2 The London Plan sets a target of 25% of the heat and power used in London to be generated through the use of localised decentralised energy systems by 2025. Where an identified future decentralised energy network exists proximate to a site it will be expected that the site is designed so that it can easily be connected to the future network when it is delivered. The Council's Planning Obligations SPD (October 2014) indicates that a non-financial obligation may be secured with respect to demonstration of connection to the district energy network by way of a planning obligations agreement pursuant to S106 of the TCPA 1990.

6.10.3 The applicant has submitted a Sustainable Design Energy and Construction Statement prepared by WSP by dated November 2016. The applicant has also provided supplementary comments in response to internal consultee comments from LBH Carbon Management. The Statement indicates that the proposed development will exceed the energy targets set out by Haringey Council and the Greater London Authority (GLA) and development is expected to achieve the necessary energy and CO2 requirements within the London Plan and Haringey Council's Local Plan. A consideration of the applicant's proposed energy strategy pursuant to the Mayor's Energy Hierarchy is below.

Energy – Lean

6.10.4 The Carbon Management Team note that the applicant has proposed an improvement of beyond Building Regulations by 8.9% through improved energy efficiency standards in key elements of the build. The Carbon Management Team considers this to be acceptable, subject to condition these improvements are secured on the site. Such a condition is contained in Section 8.

Energy – Clean

6.10.5 A community CHP system with Low Temperature Hot Water Heating (LTHW) system is proposed to serve the heating and hot water loads. This will meet 75% of annual space and hot water loads. The remaining 25% of space heating will be supplied by condensing boilers with a minimum seasonal efficiency of 92%. This is considered to be acceptable by the LBH Carbon Management.

6.10.6 The Carbon Management Team note that Tottenham Hale has been identified as an area where a District Energy Network will be delivered. Therefore, connectivity is expected, and an energy centre capable of connecting to the future DE network must be designed into the development.

6.10.7 The applicant's statement notes that due to the presence of proposed heat networks in close proximity to the proposed development, it has been identified that there is potential for a connection when it is implemented. Given the current specification of the heating systems, the LTHW flow and return temperatures will be consistent with that of typical decentralised heat network, meaning that connection to the proposed network can be facilitated in the building services design proposal. A condition around a DEN connection is contained in Section 8.

Energy – Green

- 6.10.8 The Council's Carbon Management Team notes that in line with Haringey's Local Plan the development must deliver 20% on site renewables, after it has delivered the other elements of the energy hierarchy – Be lean, Be Clean. Officers seek that maximum opportunities are delivered on the PV panels.
- 6.10.9 The applicant has proposed approximately 100m² PV panels that would produce regulated CO₂ savings of approximately 5.3%. These are fitted on to the roof space of the building. Not all roof space has been used for energy generation. The Carbon Management Team has sought clarification on this issue from the developer to ensure that all roof space is used for PV panels in an efficient manner.
- 6.10.10 The applicant has responded noting that the uppermost 'overrun' part of the roof cannot be used to mount a PV array, and so this presents an overshadowing issue for the PV, as does the proposed parapet wall to run around the edge of the roof. For this reason, the PV cannot be placed to the north of the overrun, or too close to the edge of the roof as it will be over-shaded, rendering it much less effective. Officers consider that the issue may be addressed by the imposition of a planning condition. Such a condition is contained in Section 8 to bring forward full PV details.

Overheating Risk

- 6.10.11 Haringey's Carbon Management Team notes that the results of the applicant's submitted overheating analysis shows that living areas within dwellings pass the TM52 overheating criteria using the current London DSY file, on the condition that blinds are closed when irradiance reaches a level of 500 W/m² and that windows can be opened for prolonged periods based on the modelling assumptions above. Similarly, using a percentage hours exceed measure, it was found that bedrooms pass the assessment in the case of the current London DSY. In addition, there are a number of single aspect units.
- 6.10.12 The applicant has responded to the Carbon Management Team's consideration of the over heating analysis and the assessment criteria for overheating. It is considered the issue of overheating risk may be addressed by the imposition of a planning condition. Such a condition is contained in Section 8.
- 6.10.13 Subject to the conditions noted above, the proposal is considered to meet standards of sustainable design as set out in the London Plan and local policy and the development will conserving and enhancing the natural environment and make the required carbon saving identified in policy.

6.11 Waste and Recycling

- 6.11.1 London Plan Policy 5.16 indicates the Mayor is committed to reducing waste and facilitating a step change in the way in which waste is managed. 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. The approach is reflected in emerging DPD Policy DM4. The applicant has submitted a Delivery and Servicing Plan prepared by WSP Parsons Brinckerhoff dated November 2016.
- 6.11.2 The proposed bin store is provided at ground floor level with an entrance from Station Road on the southern elevation. Management staff will move full bins to the doorway for collection by LBH refuse operatives. An on street collection space is identified on plans on Station Road.
- 6.11.3 The commercial bin stores are separately located to the northern boundary with direct access on street to Hale Road. Servicing for both elements will primarily be via Station Road, however the exact serving arrangements will be the subject of a planning condition, as discussed below.
- 6.11.4 The applicant’s have amended the bin storage arrangement in the course of the application process to ensure there is sufficient on site storage in line with Haringey local policy. There will be management issues associated with the storage of waste given the tandem arrangement; however it is considered this can be addressed by the imposition of a planning condition.

6.12 Land Contamination

- 6.12.1 Saved Policy ENV1 and emerging Policy DM32 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. The applicant has submitted a Preliminary Risk Assessment prepared by Ramboll dated November 2016.
- 6.12.2 This Assessment comments on a previous investigation undertaken at the site which identified contamination of the soil with metals, hydrocarbons and moderately elevated land gases. It is acknowledged that the investigation was limited as it related to the commercial use of the site. The report also describes potentially contaminative historic uses of the application site including buildings of an unknown use, small garages which have been present since the mid-1980s and the electricity sub-station since the 1990s.
- 6.12.3 In addition the application site has been surrounded by mixed residential, industrial and commercial use with potential historic contaminative uses

including an electricity sub-station, works, printing and stationary works, depot, and a Petrol Filling Station north of the application site.

- 6.12.4 The Council's Environmental Health Officer (Pollution) has assessed the proposal and raises no objections subject to the imposition of standard conditions around land remediation on any grant of planning permission. These standard conditions are recommended for imposition and are contained in Section 8.

6.13 Summary – Material Planning Considerations

- 6.13.1 The development is acceptable in principle and the quantum of affordable housing exceeds the targets in the Development Plan. The development is considered to be well designed and the height of the building is acceptable given the site context and planning policy position. The scheme will deliver high quality residential units and a high quality commercial space. Any harm to heritage assets is less than substantial and outweighed by the public benefits of the scheme. The scheme is not anticipated to give rise to any planning harm in transportation terms and a car free scheme is acceptable given the site location. The scheme's impacts to adjoining occupiers are negligible and the scheme is considered to be sustainable subject to the provision of additional details and S106 negotiations. Issues of waste, land contamination, and drainage are able to be addressed by the imposition of standard planning conditions.

- 6.13.2 The Greater London Authority supports the proposal subject to the provision of additional information

7 COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 7.1.1 Based on the information given on the plans, the Mayoral CIL charge will be **£493,080.95** (11,463 sqm x £35 x 1.229) and the Haringey CIL charge will be **£181,230** (11,463 sqm x £15 x 1.054). 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. The applicant may apply for relief as a Registered Provider of social housing following on from the grant of planning permission.

8 RECOMMENDATIONS

8.1 GRANT PERMISSION subject to conditions and subject to sec. 106 Legal Agreement.

Subject to the following condition(s) and informatives:

1) Three Year Expiry (HGY Development Management)

The development hereby authorised must be begun not later than the expiration of 3 years from the date of this permission, failing which the permission shall be of no effect.

Reason: This condition is imposed by virtue of the provisions of the Planning & Compulsory Purchase Act 2004 and to prevent the accumulation of unimplemented planning permissions.

2) Development in Accordance with Approved Drawings and Documents (LBH Development Management)

The approved plans comprise drawing nos: Site Location Plan 1711-G100-XP-AL-001; Site Plan – Existing 1711-G100-XP-AL-002; Site Plan - Proposed 1711-G100-P-AL-001; Proposed Ground Floor Plan 1711-G200-P-00-001; Proposed Mezzanine Floor Plan 1711-G200-P-M1-001; Proposed First Floor Plan 1711-G200-P-01-001; Proposed Second Floor Plan (Typical 02-06) 1711-G200-P-02-001; Proposed Seventh Floor Plan 1711-G200-P-07-001; Proposed Eighth Floor Plan 1711-G200-P-08-001; Proposed Ninth Floor Plan (Typical 09-19) 1711-G200-P-09-001; Proposed Twentieth Floor Plan (Typical 20-21) 1711-G200-P-20-001; Proposed Roof Floor Plan 1711-G200-P-RF-001; Proposed Section AA 1711-G200-S-AA-001; Proposed Section BB 1711-G200-S-BB-001; Proposed Section CC 1711-G200-S-CC-001; Proposed Section DD 1711-G200-S-DD-001; Proposed Section EE 1711-G200-S-EE-001; Proposed Section FF 1711-G200-S-FF-001; Existing North East Elevation 1711-G200-XE-NE-001; Existing East Elevation 1711-G200-XE-E-001; Existing South-East Elevation 1711-G200-XE-SE-001; Proposed North East Elevation 1711-G200-E-NE-001; Proposed East Elevation 1711-G200-E-E-001; Proposed South East Elevation 1711-G200-E-SE-001; Proposed South West Elevation 1711-G200-E-SW-001; Proposed South Elevation 1711-G200-E-S-001; Details of North East Elevation 1711-G251-D-TY-001 P8/9 12351979v1; Details of South East Elevation 1711-G251-D-TY-002 Bridging Foundation Over Tunnels 143292-RDG-XX-FN-PL-S-2005 Bridging Foundation Sections 143292-RDG-XX-XX-SE-S-2006

The approved documents comprise:

Planning Statement; prepared by NLP; Design and Access Statement, prepared by John McAslan + Partners; Flood Risk Assessment and

Outline Drainage Strategy, prepared by Ramboll; Preliminary Risk Assessment, prepared by Ramboll Environ; Noise Impact Assessment, prepared by Ramboll Environ; Air Quality Assessment, prepared by Ramboll Environ; Environmental Wind Assessment, prepared by Ramboll Environ; Historic Environment Assessment, prepared by Ramboll Environ; Statement of Community Involvement, prepared by Belgrave Communications; Transport Assessment, prepared by WSP Parsons Brinckerhoff; Residential Travel Plan, prepared by WSP Parsons Brinckerhoff; Construction Logistics Plan, prepared by WSP Parsons Brinckerhoff; Delivery and Servicing Plan, prepared by WSP Parsons Brinckerhoff; Daylight Sunlight Assessment, prepared by NLP; Heritage, Townscape and Visual Impact Assessment, prepared by NLP; and Sustainable Design, Energy and Construction Statement, prepared by WSP Parsons, Consultation Response prepared by NLP (Parts 1 and 2), Wind and Microclimate report prepared by RWDI.

The development shall be completed in accordance with the approved plans and documents except where conditions attached to this planning permission indicate otherwise or where alternative details have been subsequently approved following an application for a non-material amendment.

Reason: In order to ensure the development is carried out in accordance with the Approved details and in the interests of amenity.

3) Materials Samples (LBH Development Management)

Prior to the commencement of the development (excepting demolition works) and notwithstanding the information submitted with this application, precise details of the external materials to be used in connection with the development hereby permitted shall be submitted to, approved in writing by and implemented in accordance with the requirements of the Local Planning Authority and retained as such in perpetuity. The details shall include samples of the type and shade of cladding, window frames and balcony frames, sample panels and brick types and a roofing material sample combined with a schedule of the exact product references.

Reason: In order to retain control over the external appearance of the development in the interest of the visual amenity of the area

4) Confirmation of Site Levels (HGY Development Management)

Prior to the commencement of the development (excepting demolition works) details of all existing and proposed levels on the site in relation to the adjoining properties be submitted to and approved by the Local Planning Authority.

The development shall be built in accordance with the approved details.

Reason: In order to ensure that any works in conjunction with the permission hereby granted respects the height of adjacent properties through suitable levels on the site.

5) Hard and Soft Landscaping (LBH Development Management)

Prior to the commencement of the development (accepting demolition works), full details of both hard and soft landscape works shall be submitted to and approved by the Local Planning Authority.

Details of hard landscaping works shall include:

- hard surfacing materials
- minor artefacts and structures (eg. furniture, refuse or other storage units, signs, lighting etc.)
- bat/bird boxes
- proposed and existing functional services above and below ground (eg. drainage power, communications cables, pipelines etc. indicating lines, manholes, supports etc) including details of the re-located sub-station on the site.

Details of soft landscape works shall include:

- planting plans (for both amenity areas)
- a full schedule of species of new trees and shrubs proposed to be planted
- written specifications (including cultivation and other operations) associated with plant and grass establishment;
- schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate; and
- an implementation programme.

The hard and soft landscaping shall be constructed in accordance with the approved details. The approved soft landscaping details shall be implemented in the first planting and seeding season following the occupation of the approved development. The approved hard landscaping details shall be implemented within 3 months of the residential occupation of the development.

Reason: to protect the amenity of the locality.

The Local Planning Authority is satisfied that the pre-commencement requirements of the condition is so fundamental to the development permitted that it would have been otherwise necessary to refuse the whole permission.

6) Landscaping – Replacement of Trees and Plants (LBH Development Management)

Any tree or plant on the development (including roof top and first floor amenity areas) which, within a period of five years of occupation of the approved development 1) dies 2) is removed 3) becomes damaged or 4) becomes diseased, shall be replaced in the next planting season with a similar size and species of tree or plant.

Reason: to protect the amenity of the locality.

7) Drainage Strategy (Thames Water)

Development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted in writing 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.

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.

The local planning authority is satisfied that the pre-commencement requirement of the condition is so fundamental to the development permitted that it would have been otherwise necessary to refuse the whole permission.

8) Impact Piling Method Statement (Thames Water)

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water, London Underground Limited and Transport for London. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

The Local Planning Authority is satisfied that the pre-commencement requirements of the condition is so fundamental to the development permitted that it would have been otherwise necessary to refuse the whole permission.

9) Bridging Structure Supplementary Statement - (LBH Development Management)

Prior to the commencement of the development (excluding demolition) a statement detailing the technical feasibility of the bridging structure over the Victoria Line Underground tunnel in relation to any future District Energy Network (DEN) and utility infrastructure to and from and in the vicinity of the application site shall be submitted to and approved by the Local Planning Authority. The statement shall be authored by a suitably qualified person. The cost of third party assessment of any supplementary statement shall be borne by the applicant.

Reason: to ensure the development proposal contributes to the provision and use of Decentralised Energy network infrastructure and utility provision in the locality.

The Local Planning Authority is satisfied that the pre-commencement requirements of the condition are so fundamental to the development permitted that it would have been otherwise necessary to refuse the whole permission.

10) Land Contamination – Part A and B (LBH Environmental Services and Community Safety)

A) Before development commences other than for investigative work: Using the information from the Preliminary Risk Assessment (UK18-23523) submitted with the planning application by Ramboll Environ, a site investigation shall be designed for the site. This shall be submitted to, and approved in writing by the Local Planning Authority prior to that investigation being carried out on site. The investigation must be comprehensive enough to enable:-

- a risk assessment to be undertaken,
- refinement of the Conceptual Model, and
- the development of a Method Statement detailing the remediation requirements.

The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority.

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.

Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.

The Local Planning Authority is satisfied that the pre-commencement requirements of the condition is so fundamental to the development permitted that it would have been otherwise necessary to refuse the whole permission.

11) Land Contamination – Part C (LBH Environmental Services and Community Safety)

C) 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 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.

12) Details of Flood Risk Attenuation Measures – (LBH Development Management)

Prior to the commencement of the development full details of attenuation infrastructure shall be submitted in writing to and for approved by the Local Planning Authority. The attenuation measures shall demonstrate compliance with relevant London Plan standards in relation to greenfield run off rates. The approved details shall be implemented as approved and maintained thereafter.

Reason: To mitigate flood risk. The Local Planning Authority is satisfied that the pre-commencement requirements of the condition are so fundamental to the development permitted that it would have been otherwise necessary to refuse the whole permission.

13) Drainage (LBH Senior Drainage Engineer)

The development hereby permitted shall not be begun until details of the design, implementation, maintenance and management of the sustainable drainage scheme have been submitted to and approved in writing by the local planning authority. Those details shall include:

- a) Information about the design storm period and intensity, discharge rates and volumes (both pre and post development), temporary storage facilities, means of access for maintenance, the methods employed to delay and control the surface water discharged from the site and the

- measures taken to prevent flooding and pollution of the receiving groundwater and/or surface waters;
- b) Any works required off-site to ensure adequate discharge of surface water without causing flooding or pollution (which should include refurbishment of existing culverts and headwalls or removal of unused culverts where relevant);
 - c) Flood water exceedance routes, both on and off site;
 - d) A timetable for its implementation, and
 - e) A management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by an appropriate public body or statutory undertaker, management and maintenance by a Residents' Management Company or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime.

Once approved, the scheme shall be implemented, retained, managed and maintained in accordance with the approved details.

Reason: To prevent the increased risk of flooding, to improve and protect water quality, improve habitat and amenity, and ensure future maintenance of the surface water drainage system.

The Local Planning Authority is satisfied that the pre-commencement requirements of the condition are so fundamental to the development permitted that it would have been otherwise necessary to refuse the whole permission.

14) Ultra Low NOx Boilers - Product Specification and Dry NOx Emissions Details (LBH Environmental Services and Community Safety)

Prior to the installation of any Ultra Low NOx boilers for space heating and domestic hot water on the application site, details of the relevant boiler's product specification and dry NOx emissions shall be submitted in writing to and for approval by the Local Planning Authority. The details shall demonstrate dry NOx emissions not exceeding 31 mg/kWh @0% O₂ in conformity with the approved document Air Quality Assessment (Ramboll Environ UK18-23523). The boilers shall be installed in accordance with approved details and maintained thereafter.

Reason: To protect local air quality

15) CHP and Associated Infrastructure Detail (LBH Carbon Management)

Prior to the commencement of the development, details of the Combined Heat and Power (CHP) facility and associated infrastructure shall be submitted in writing to and for approval by the Local Planning Authority.

The details shall include:

- a) location of the energy centre;
- b) specification of equipment;
- c) flue arrangement;
- d) operation/management strategy; and
- e) the method of how the facility and infrastructure shall be designed to allow for the future connection to any neighbouring heating network (including the proposed connectivity location, punch points through structure and route of the link)

The Combined Heat and Power facility and infrastructure shall be constructed in accordance with the details approved, installed and operational prior to the first occupation of the development and shall be maintained as such thereafter.

Reason: To ensure the facility and associated infrastructure are provided and so that it is designed in a manner which allows for the future connection to a district system.

The Local Planning Authority is satisfied that the pre-commencement requirements of the condition are so fundamental to the development permitted that it would have been otherwise necessary to refuse the whole permission.

16) CHP Emissions Level Details – (LBH Environmental Services and Community Safety)

Prior to commencement of the development (excluding demolition), details of the Combined Heat and Power (CHP) unit shall be submitted in writing to and for approval by the Local Planning Authority. The details shall 1) demonstrate the installed unit will have dry NO_x emissions not exceeding 10mg/m³ @5% O₂ in conformity with the emissions levels set out in the approved document Air Quality Assessment (Ramboll Environ UK18-23523) and 2) include the submission of a CHP Information Form. The relevant unit shall be installed in conformity with the approved details and maintained thereafter.

Reason: To protect local air quality.

The Local Planning Authority is satisfied that the pre-commencement requirements of the condition are so fundamental to the development permitted that it would have been otherwise necessary to refuse the whole permission.

17) Development in Conformity with Energy Statement (LBH Development Management)

The development hereby approved shall be constructed and delivered to the U-values set out in the approved document Sustainable Design, Energy and Construction Statement prepared by WSP Parsons Brinckerhoff dated November 2016 and the development shall achieve the agreed carbon reduction of 8.9% beyond Building Regulations 2013

Reason: to mitigate the impacts of climate change.

18) Details Roof Top PV Panels (LBH Development Management)

Prior to the occupation of the development for residential purposes, details of the layout and specification of the PV solar panel installation hereby approved shall be submitted in writing to and approved by the Local Planning Authority. The installation shall be constructed in accordance with the approved details and maintained thereafter.

Reason: To address climate change.

19) External Solar Shading and Passive Ventilation Study (LBH Development Management)

Prior to the commencement of any superstructure work on the building hereby approved, an external solar shading and passive ventilation study shall be submitted in writing to and for approval by the Local Planning Authority. The study shall include design measures to ensure the risk of overheating is low and adaptation to higher temperatures is included. The details shall be implemented as approved and shall be maintained there after.

To ensure sustainable development and mitigate the impacts of climate change.

20) Details of AQDMP – (LBH Environmental Services and Community Safety)

Prior to the commencement of the development (excepting demolition), an Air Quality and Dust Management Plan (AQDMP) shall be submitted in writing to and for approval by the Local Planning Authority. The (AQDMP) shall be in accordance with the GLA SPG Dust and Emissions Control and include a Dust Risk Assessment. The plan shall be implemented as approved and maintained for the duration of the construction phase of the development.

Reason: to protect local amenity.

The Local Planning Authority is satisfied that the pre-commencement requirements of the condition are so fundamental to the development permitted that it would have been otherwise necessary to refuse the whole permission.

21) Plant and Machinery - EU Directives (LBH Environmental Services and Community Safety)

All plant and machinery to be used during the demolition and construction phases shall meet Stage IIIA of EU Directive 97/68/ EC for both NOx and PM.

Reason: to protect local air quality

22) Registration of NRMM - (LBH Environmental Services and Community Safety)

Prior to the commencement of development (excepting demolition), all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW shall have been registered at <http://nrmm.london/> and proof of registration shall be submitted to the Local Planning Authority.

Reason: to protect local air quality.

The Local Planning Authority is satisfied that the pre-commencement requirements of the condition are so fundamental to the development permitted that it would have been otherwise necessary to refuse the whole permission.

23) Revised Air Quality Assessment (LBH Environmental Health)

Prior to the commencement of the development, a revised air quality assessment shall be submitted in writing to and for approval by the Local Planning Authority. The revised assessment shall propose details of a mechanical ventilation and/or filtration system for the development to mitigate air quality impacts. The development shall be constructed in accordance with the approved details, and maintained thereafter.

Reason: To mitigate air quality impacts

The Local Planning Authority is satisfied that the pre-commencement requirements of the condition are so fundamental to the development permitted that it would have been otherwise necessary to refuse the whole permission.

24) NRMM Inventory and Documentation Availability (LBH Environmental Services and Community Safety)

An inventory of all NRMM shall be kept on site during the course of the demolitions, site preparation and construction phases of the development. All machinery should be regularly serviced and service logs kept on site for inspection. Records shall be kept on site which detail 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

25) Details of Noise Mitigation Measures (LBH Development Management)

Prior to the commencement of the development (excepting demolition), an updated Noise and Vibration Assessment proposing details of mitigation measures to demonstrate compliance with relevant British Standards and in general conformity with the approved document Noise and Vibration Assessment (Prepared by Ramboll Environ dated November 2016) shall be submitted in writing to and approved by the Local Planning Authority. The mitigation measures shall be installed in accordance with approved details prior to the occupation of the development for residential purposes and maintained thereafter.

Reason: To mitigate the impact of external noise on the residential units hereby approved.

The Local Planning Authority is satisfied that the pre-commencement requirements of the condition are so fundamental to the development permitted that it would have been otherwise necessary to refuse the whole permission.

26) Wheelchair Dwellings (LBH Development Management)

At least 10% of all dwellings hereby approved shall be wheelchair accessible or easily adaptable for wheelchair use (Part M4 (3) 'wheelchair user dwellings' of the Building Regulations 2015) in conformity with Design and Access Statement, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure inclusive and accessible development

27) Accessible & Adaptable Dwellings

All residential units within the proposed development shall be designed to Part M4 (2) 'accessible and adaptable dwellings' of the Building Regulations 2015 (formerly Lifetime Homes Standard) unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure inclusive and accessible development

28) Updated Waste Management Scheme (LBH Environmental Services and Community Safety)

Prior to the commencement of any superstructure works on the approved building, and notwithstanding the approved Delivery and Servicing Plan (Prepared by WSP Parsons Brinckerhoff dated November 2016) details of an updated scheme setting out the collection and storage of waste and recycled materials shall be submitted in writing to and for approval by the Local Planning Authority.

The updated scheme shall address:

- 1) Waste and recycling collection frequency, following liaison with Haringey's Waste Management Team and Veolia (Haringey's waste service provider)
- 2) The cost implications of collection frequency to future occupiers
- 3) The management of waste on site, including bin rotation and storage layout
- 4) The collection storage area on Station Road

The details shall be implemented as approved prior to the occupation of the development for residential purposes, and maintained thereafter.

Reason: to protect the amenity of the locality.

29) Cycle Parking Details (Transport for London + LBH Transportation)

Prior to any superstructure works on the approved building, details of arrangements for cycle storage (including means of enclosure for the storage area and the bicycle stairway and trough system) shall be submitted to, and approved in writing by, the Local Planning Authority and the approved arrangements shall be completed to the satisfaction of the Authority before any part of the development is first occupied, and permanently maintained thereafter to the Authority's satisfaction.

Reason: To ensure that adequate cycle storage facilities are provided and promote sustainable travel.

30) Construction Traffic in accordance with Construction Management Plan (LBH Transportation)

All construction traffic (including HGV movement) shall be managed in accordance with the approved document Construction Logistics Plan prepared by WSP Parsons Brinckerhoff dated November 2016 unless otherwise agreed in writing with the local planning authority.

Reason: To reduce congestion and mitigate any obstruction to the flow of traffic on the transportation and highways network.

31) Updated Servicing and Delivery Plan (SDP) (LBH Transportation)

Prior to any superstructure works on the approved building and notwithstanding the approved document Delivery and Servicing Plan Prepared by WSP Parsons Brinckerhoff dated November 2016, an updated Servicing and Delivery Plan (SDP) shall be submitted in writing to and for approval by the Local Planning Authority.

The updated SDP shall demonstrate, following liaison with Transport for London:

- 1) The feasibility of the long term use of the existing Hale Road layby for commercial and residential servicing for the development AND proposed full details of servicing and deliveries via the relevant laybys OR
- 2) Full details of all commercial and residential servicing by way of the layby on Station Road.

The scheme shall also demonstrate that delivery vehicle movements are planned and coordinated to avoid the AM and PM peak travel periods. The updated SDP shall be implemented as approved and maintained thereafter.

Reason: To ensure servicing and reduce traffic and congestion on the transportation and highways network.

32) Disabled Parking Study (LBH Transportation)

Prior to any superstructure works on the approved building, A disabled parking demand study shall be submitted in writing to and approved by the Local Planning Authority. The study shall demonstrate that level of provision of 3 disabled parking spaces on Station Road is sufficient to meet the demand generated by both the adjacent hotel and the development hereby approved. The study shall propose alternative offsite provision in the event of provision is insufficient.

Reason: to ensure the delivery accessible parking

33) Details of Central Dish/Receiving System (LBH Development Management)

Prior to the occupation of the development, details of a Central Satellite Dish/Receiving System for the residential units hereby approved shall be submitted in writing to and for approval by the Local Planning Authority. The

System shall be implemented in accordance with approved details and maintained thereafter.

Reason: to protect the amenity of the locality.

34) Individual Satellite dishes or television antennas precluded (LBH Development Management)

The placement of any satellite dish or television antenna on any external surface of the development is precluded, excepting the approved central dish/receiving system noted in the condition above.

Reason: to protect the amenity of the locality.

35) Facade Improvement Scheme (LBH Development Management)

Prior to the residential occupation of the development, details of a facade scheme to improve the building elevation above the Premier Inn shall be submitted in writing to and for approval by the Local Planning Authority. The details shall include provision for improvements to this facade that incorporate way finding to Tottenham Hale. The scheme shall be implemented as approved prior to the residential occupation of the development and maintained thereafter.

Reason: to ensure a high quality public realm.

36) Retention of Architects

The existing architects or other such architects as approved in writing by the Local Authority acting reasonably shall undertake the detailed design of the project.

Reason: In order to retain the design quality of the development in the interest of the visual amenity of the area and consistent with Policy SP11 of the Haringey Local Plan 2013 and Saved Policy UD3 of The Haringey Unitary Development Plan 2006.

INFORMATIVES

1) Working with the Applicant (LBH Development Management)

INFORMATIVE: In dealing with this application, the London Borough of Haringey has implemented the requirements of the National Planning Policy Framework and of the Town and Country Planning (Development Management

Procedure) (England) Order 2015 to foster the delivery of sustainable development in a positive and proactive manner.

2) Community Infrastructure Levy (LBH Development Management)

INFORMATIVE: The Community Infrastructure Levy 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.

3) Hours of Construction Work (LBH Development Management)

INFORMATIVE: The applicant is advised that under the Control of Pollution Act 1974, construction work which will be audible at the site boundary will be restricted to the following hours:

- 8.00am - 6.00pm Monday to Friday
- 8.00am - 1.00pm Saturday
- and not at all on Sundays and Bank Holidays.

4) Party Wall Act (LBH Development Management)

INFORMATIVE: The applicant's attention is drawn to the Party Wall Act 1996 which sets out requirements for notice to be given to relevant adjoining owners of intended works on a shared wall, on a boundary or if excavations are to be carried out near a neighbouring building.

5) Requirement for Groundwater Risk Management Permit (Thames Water)

INFORMATIVE: A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality."

- 6) Attenuation of Storm Flows. Combined Sewer drain to nearest manhole. Connection for removal of ground water precluded. Approval required for discharge to public sewer. (Thames Water)

INFORMATIVE: 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. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. The contact number is 0800 009 3921.

- 7) Public Sewer Crossing – Approval required for building, extension or underpinning within 3 metres. (Thames Water).

INFORMATIVE: There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted for extensions to existing buildings. The applicant is advised to visit thameswater.co.uk/buildover.

- 8) Water Main Crossing Diversion (Thames Water)

INFORMATIVE: There is a Thames Water main crossing the development site which may/will 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.

- 9) Minimum Pressure and Flow Rate from Pipes (Thames Water)

INFORMATIVE: Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

- 10) Responsibility to Dispose of Commercial Waste (LBH Neighbourhood Action Team)

INFORMATIVE: 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.

11) Asbestos Survey (LBH Environmental Services and Community Safety)

INFORMATIVE: The applicant is advised that 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.

12) New Development Naming (LBH Transportation)

INFORMATIVE: The new development will require naming. The applicant should contact LBH Local Land Charges at least six weeks before the development is occupied on 020 8489 5573 to arrange for the allocation of a suitable address.

13) Environment Agency – Additional Advice (Environment Agency)

INFORMATIVE: The Environment Agency has provided advice to the applicant in respect of Ground Water Protection and Land Affected by Contamination. This advice is available on the Council's website using the application reference number