CONSULTEE	COMMENT	OFFICER RESPONSE
Environment Agency	Thank you for your consultation on the above. We have not reviewed the Flood Risk Assessment for this site as this site being within Flood one 2 falls within our Flood Risk Standing Advice: https://www.gov.uk/guidance/flood-risk-assessment-local-planning-authorities  We are currently operating with a significantly reduced resource in our Groundwater and Contaminated Land Team in Hertfordshire and North London Area. This has regrettably affected our ability to respond to Local Planning Authorities for some planning consultations. We are not providing specific advice on the risks to controlled waters for this site as we need to concentrate our local resources on the highest risk proposals. We recommend however that the requirements of the National Planning Policy Framework and National Planning Policy Guidance (NPPG) are still followed. This means that all risks to groundwater and surface waters from contamination need to be identified so that appropriate remedial action can be taken. This should be additional to the risk to human health that your Environmental Health Department will be looking at.  We expect reports and Risk Assessments to be prepared in line with our 'Groundwater protection: Principles and practice' document (commonly referred to as GP3) and CLR11 (Model Procedures for the Management of Land Contamination).	Response noted. Application has bee circulated to LBH LLFA. The applicant has submitted a risk assessment.
	- No infiltration based sustainable drainage systems should be constructed on land affected by contamination as contaminants can remobilise and cause groundwater pollution.	
	- Piling or any other foundation designs using penetrative methods should not cause preferential pathways for contaminants to migrate to groundwater and cause pollution. End:\Documents\2016 Admin and Progression Plan\DPS Letter Template.docx 2	
	The applicant should refer to the following sources of information and advice in dealing with land affected by contamination, especially with respect to protection of the	

	groundwater beneath the site:	
	<ul> <li>- From www.gov.uk: Groundwater Protection: Principles and Practice (August 2013)</li> <li>Our Technical Guidance Pages, which includes links to CLR11 (Model Procedures for the Management of Land Contamination) and GPLC (Environment Agency's Guiding Principles for Land Contamination) in the 'overarching documents' section Use MCERTS accredited methods for testing contaminated soils at the site</li> <li>- From the National Planning Practice Guidance: Land affected by contamination</li> </ul>	
	- British Standards when investigating potentially contaminated sites and groundwater: BS 5930: 1999+A2:2010 Code of practice for site investigations BS 10175:2011 Code of practice for investigation of potentially contaminated sites BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points BS ISO 5667-11:2009 Water quality. Sampling. Guidance on sampling of groundwaters	
	All investigations of land potentially affected by contamination should be carried out by or under the direction of a suitably qualified competent person. The competent person would normally be expected to be a chartered member of an appropriate body (such as the Institution of Civil Engineers, Geological Society of London, Royal Institution of Chartered Surveyors, Institution of Environmental Management) and also have relevant experience of investigating contaminated sites.	
LBH Head of Organisational Resilience	No comments on this application	Response noted.
Historic England Greater London Archeological	Thank you for your consultation dated 30 November 2016.  The Greater London Archaeological Advisory Service (GLAAS) provides	Response noted.

Advisory Service (GLAAS)	archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter.  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, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.  No further assessment or conditions are therefore necessary.  Please note that this response relates solely to archaeological considerations. If necessary my Historic Buildings and Areas colleagues should be consulted Separately regarding statutory matters.	
Lead Officer – Pollution. Environmental Services and Community Safety	Air Quality  The London Plan, Policy 7.14 states that new development should:  • minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans  • promote sustainable design and construction to reduce emissions from the demolition and construction of buildings;  • be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).  • Ensure that where provision needs to be made to reduce emissions from a development, this is usually made onsite.  A CHP unit and boilers are proposed but no detailed information on these is provided within the energy and sustainability statement. The transport assessment concludes that due to the	Response noted. Condition around the preclusion of issue of car parking permits to future occupiers is recommended for imposition.

highly accessible nature of the proposed development it is proposed to be car free and therefore no parking is proposed with the expectation that existing disabled parking and servicing bays already provided on street will be sufficient. A Travel Plan and Delivery and Servicing plan has also been submitted.

An Air Quality Assessment by Ramboll Environ dated November 2016 has been submitted. This assumes a 50 kWe micro CHP unit with NOx emissions of 10mg/Nm3 and 3 x 60 kWh boilers with NOx emissions of 31 mg/kWh will be employed. These emissions have been used as the basis for both the dispersion modelling exercise and the air quality neutral assessment. It is therefore important that the combustion plant that is installed meet these emission standards.

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.

#### Contaminated Land

A Preliminary Risk Assessment (UK18-23523 by Ramboll Environ dated November 2016) has been submitted. This report 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. 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. Recommended conditions

Combustion and Energy Plant:

Prior to installation, details of the Ultra Low NOx boilers for space heating and domestic hot water should be forwarded to the Local Planning Authority. The boilers to be provided for space heating and domestic hot water shall have dry NOx emissions not exceeding 31 mg/kWh @0% O2 as set out in the Air Quality Assessment (Ramboll Environ UK18-23523).

Reason: To protect local air quality

Prior to commencement of the development, details of the CHP must be submitted to evidence that the unit to be installed complies with the emissions levels set out in the Air Quality Assessment (Ramboll Environ UK18-23523), that is, shall have dry NOx emissions not exceeding 10mg/m3 @5% O2. A CHP Information form must be submitted to and approved by the LPA.

Reason: To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction.

Contaminated land: (CON1 & CON2)

#### CON1:

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.

#### And CON2:

• 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.

Management and Control of Dust:

• No works shall be carried out on the site until a detailed Air Quality and Dust Management Plan (AQDMP), detailing the management of demolition and construction dust, has been submitted and approved by the LPA. The plan shall be in accordance with the GLA SPG Dust and Emissions Control and shall also include a Dust Risk Assessment.

Reason: To Comply with Policy 7.14 of the London Plan

• Prior to the commencement of any works the site or Contractor Company is to register with the Considerate Constructors Scheme. Proof of registration must be sent to the LPA.

Reason: To Comply with Policy 7.14 of the London Plan

• No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIA of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at http://nrmm.london/. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on

	site.	
	Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ.	
	• An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.	
	Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ.	
	As an informative: Prior to demolition of existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.	
London Underground	Thank you for your communication of 30th November 2016.	Response noted.
Infrastructure Protection	I can confirm that the planning applicant is in communication with London Underground engineers with regard to the development above. Therefore, we have no comment to make on the application except that the developer should continue to work with LU engineers.	
	These comments relate only to the London Underground infrastructure protection issues raised by the application. They should not be taken to be representative of the position which may be taken by the Mayor and/or another part of TfL. You are advised to consider whether it is also necessary or appropriate to consult other parts of TfL and whether the application should be referred to the Mayor as an application of potential strategic importance pursuant to the provisions of the Town and Country Planning (Mayor of London) Order 2008. All other consultations with TfL should be made by emailing boroughplanning@tfl.gov.uk.	

# Appendix 1 -Consultee and Neighbour Responses

Natural England	Many thanks for consulting Natural England regarding the above planning application at Station Square in Haringey. Having taken a look at the documentation and given the location Natural England would have no specific comment to make regarding the proposals. 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.  As such the only comments to make would be in relation to ensuring as much is gained from green infrastructure implementation as possible in the development, with the known benefits of this for both biodiversity and for human health and wellbeing. The use of green or brown walls or roofs and rain gardens within the development would greatly help to mitigate for future climate change impacts through better resilience to heavy rainfall events as well as being a great resource for local wildlife.	Response noted. Green communal areas are programmed into the development.
Network Rail	Thank you for consulting Network Rail with regards to the reference HGY/2016/3932.  After reviewing the information provided in relation to the above planning application, Network Rail has no objection or further observations to make.	Response noted.
Transport for London – Borough Planning	Station Square West – TfL's initial comments  The following comments represent the views of Transport for London officers and are made on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. These comments also do not necessarily represent the views of the Greater London Authority.  Proposal  Site Description	Response noted. Conditions around a PERS audit, cycle parking, Blue Badge Parking, CLP and DSP are recommended for imposition.  A travel plan obligation is included in the Heads of Terms.
	The site is bounded to the north by Hale Road and Station Road to the east and south. The nearest section of the Transport for London Road Network is The Hale 80m to the west. Tottenham Hale bus station is located to the south east of the site which serves 6 routes. Tottenham Hale Station provides access to the Victoria Line which operates a 24 hour service on Friday and Saturday in addition to national rail services. A taxi rank is also available at the station.	

As such the site records a Public Transport Accessibility Level (PTAL) of 6a on a scale of 1 to 6b, which indicates an excellent level of accessibility. Cycle Superhighway 1 can also be accessed on High Road 750m to the west.

#### Access

Access to the site for pedestrians and cyclists can be achieved from Station Road and Hale Road which TfL have no objection however the applicant should ensure that all doors are wide enough to allow cycles to pass.

## Car Parking

The applicant proposes a car free development with Blue Badge parking provided at three bays at the hotel next to the site and on Ashley Road to the north. As this is below London Plan standards, TfL require the applicant to clarify; how it will be controlled and whether it will be sufficient for the adjacent hotel and this development. All prospective residents should also be prevented from accessing on street permits for any existing or future controlled parking zone (CPZ) secured through Section 106 agreement.

## Cycle Parking

The applicant proposes 185 long stay and 4 short cycle spaces for the residential element and 3 long stay spaces for the commercial use which complies with London plan standards. The applicant should nonetheless clarify design matters and the provision of end of journey facilities for the commercial use. Full details of cycle parking with reference to the London Plan and London Cycling Design Standards (LCDS) should be secured by condition.

#### Pedestrian Environment

The site is identified as a key location within an emerging district centre and should therefore contribute to a high quality pedestrian environment required. It should also contribute to the delivery of the 'Healthy Streets' agenda. As such TfL requests that a

Pedestrian Environment Review System (PERS) audit be undertaken to identify any deficiencies in the public realm. The applicant should liaise with Haringey Council to ensure there is an appropriate overarching wayfinding strategy; a contribution towards Legible London wayfinding signage may be required accordingly. Impact Assessment

The applicant has submitted a multi modal impact assessment using a combination of TRICs sites and Census data. The applicant should justify the high mode split of 44% By comparing to 2011 Census data.

## Servicing

The applicant has provided an outline Delivery and Servicing Plan (DSP) which states that Servicing take place from Station Road or Hale Road. TfL would prefer Station Road as it is less busy. The applicant forecasts 29 servicing movements per day and should provide details of how servicing movements will be regulated in a full Delivery and Servicing Plan, secured by condition.

Further guidance on producing a DSP can be found at:

https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessmentguide/guidance-by-transport-type/freight

### Bridging structure

Part of the site lies above Victoria Line tunnels. The applicant has proposed a Bridging structure to support the tunnels and should continue to work with TfL.

#### Construction

The applicant has provided an outline Construction Logistics Plan (CLP) which TfL finds acceptable. Given the proximity to the Lea navigation, TfL requests that serious consideration is given to water freight for demolition and construction related trips. A full Construction Logistics Plan should be secured by condition.

Further guidance on producing a CLP can be found at: https://tfl.gov.uk/infofor/

	urban-planning-and-construction/transport-assessment-guide/guidance-bytransport-type/freight  Travel Plan  The applicant has submitted a residential travel plan which TfL find broadly acceptable. A full Travel Plan should be secured through Section 106 agreement. Community Infrastructure Levy  In accordance with London Plan policy 8.3, Community Infrastructure Levy, the Mayor agreed to commence CIL charging for developments permitted on or after 1 April 2012. It is noted that the proposed development is within LB Haringey, where the Mayoral charge is £35 per square metre Gross Internal Area (GIA). <a href="http://www.london.gov.uk/publication/mayoral-community-infrastructure-levy">http://www.london.gov.uk/publication/mayoral-community-infrastructure-levy</a> .  Summary	
	In summary 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.	
Thames Water	Waste Comments  Following initial investigation, Thames Water has identified an inability of the existing waste water infrastructure to accommodate the needs of this application. Should the Local Planning	Response Noted. All conditions and informative received recommended for imposition on the decision notice.

Authority look to approve the application, Thames Water would like the following 'Grampian Style' condition imposed.

"Development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed". Reason - The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community.

Should the Local Planning Authority consider the above recommendation is inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Control Department (telephone 0203 577 9998) prior to the Planning Application approval.

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

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.

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.

<u>Surface Water Drainage</u> - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer.

In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage.

When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. 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.

Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

'We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission:

"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."

	Water Comments	
	No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.	
	Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.	
	Thames Water recommend the following informative be attached to any planning permission:	
	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.	
	Thames Water recommend the following informative be attached to any planning permission:	
	There are large water mains crossing the proposed development site. Thames Water will not allow any building within 5 metres of them and will require 24 hours access for maintenance purposes. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.	
Neighbourhood Action Team Leader. Waste	Further to your request concerning the above planning application I have the following comments to make:	Comments noted. Condition around a waste management plan is

### Management Comments

- Street-based households receiving kerbside collection services require space for the 'Standard kerbside collection full set' to be left for collection within the area of the property as close as possible to the access point to the property for collection teams. Details of the 'Standard kerbside collection full set' are given below.
- Wheelie bins or bulk waste containers must be provided for household collections.
- Wheelie bins must be located no further than 25 metres from the point of collection.
   Bulk waste containers must be located no further than 10 metres from the point of collection.
- If waste containers are housed, housings must be big enough to fit as many containers
  as are necessary to facilitate once per week collection and be high enough for lids to
  be open and closed where lidded containers are installed. Internal housing layouts
  must allow all containers to be accessed by users. Applicants can seek further advice
  about housings from Waste Management if required.
- All doors and pathways need to be 200mm wider than any bins that are required to pass through or over them.
- If access through security gates/doors is required for household waste collection, codes, keys, transponders or any other type of access equipment must be provided to the council. No charges will be accepted by the council for equipment required to gain access.
- Adequate waste storage arrangements must be made so that waste does not need to be placed on the public highway other than immediately before it is due to be collected. Further detailed advice can be given on this where required.

This proposed application will require adequate provision for refuse and recycling off street at the front of the property. I would like to confirm that space must be provided for this property. The information indicated above and below provides some detail about accessibility, design and space requirements.

- 21 x 1100L bin for refuse
- 13 x 1100L bin for recycling
- 128 x food waste kitchen caddy

recommended for implementation.

# Appendix 1 -Consultee and Neighbour Responses

	9 x 140L food waste exterior box	
	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 application provided seems to suggest there is not enough Storage Area provision for the requirements.	
	The above planning application has been given a RAG traffic light status of RED for waste storage and collection.	
Greater London Authority	(The full text of the Greater London Authority Stage 1 report for the proposal is attached at Appendix 2)	Response noted. The officer response to the GLA's comments around \$106 provisions for affordable housing area addressed in the main body of the report in Section 6.  The conditions around Part M4(2) and M4(3) of the building regulations are recommended to be imposed as per Section 8 of this report.  The additional information around carbon savings has been provided by the applicant as per Section 6 of this report.

# LBH Ref: HGY/2017/3932 Comment Noted. A full Transportation **Transport Context** transport assessment is contained in Section 6 of The application site is bounded by Hale Road along its northern boundary and this report. Station Road along its southern boundary. 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 in located on Antill Road approx. 400m away. **Description of Development** The proposals are for the redevelopment of the site to provide a 22 storey building comprising 128 residential units and 420 sqm (GIA) retail floor space (A1/A3). Pedestrian access to the residential units is proposed from Station Road and access to the commercial units is likely to be from Hale Road. A total of 203 cycle parking spaces (long stay) will be provided in accordance with London Plan Standards. **Trip Generation** 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. 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 approx. 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.

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

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. 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.

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.

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.

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.

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.

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 Councils Local Plan.

## Disabled Parking

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. 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. 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%). The study presented in the TA is not by itself sufficient to justify the absence of dedicate off street peaking, particularity in light of similar studies that suggest that blue badge take up can, on occasion, be higher. In light of the local context and the specific site constraints detailed above, flexibility of London Plan and the councils Blue Badge parking standards may be justified in this location.

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. Access and Servicing Arrangements

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.

The waste storage for the commercial unit is located along the Hale Road frontage and it is expected that due 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 totally (x) 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.

#### Travel Plan

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 it's delivery via a S106 schedule.

#### Conclusion

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 following S.106 obligations and conditions:

Section 106 Obligations/Undertaking

1. The applicant will be required to enter into a Section 278 Agreement to secure

a sum of £TBC for works related to the extension of the existing inset bay, creation of 1no. 12m loading bay on Hale Road including any associated traffic order amendments and removal of 2 no. redundant vehicular crossovers (re-instalment of footways). Unavoidable works required to be undertaken by Statutory Services will not be included in LBH Haringey Estimate or Payment.

Reason: To improve pedestrian/cycle conditions in the immediate vicinity of this development

- 2. The applicant enters into a S.106 agreement including provision that no residents within the proposed development will be entitled to apply for a resident's parking permit under the terms of any current or subsequent Traffic Management Order (TMO) controlling on-street parking in the vicinity of the development. Reason: To mitigate the parking demand generated by this development proposal on the local highways network by constraining car ownership and subsequent trips generated by car, resulting in increase travel by sustainable modes of transport hence reducing the congestion on the local highways network.
- 3. (£TBC) Cycle parking contribution for 4no, cycle parking spaces within proximity of the site
- 4. A residential and commercial travel plan must be secured by the S.106 agreement. As part of the detailed travel plan the flowing measures must be included in order to maximise the use of public transport:
- a) The developer must appoint a travel plan co-ordinator to monitor the travel plan initiatives annually.
- b) Provision of welcome induction packs containing public transport and cycling/walking information like available bus/rail/tube services, map and time-tables to all new residents.
- c) The developer must offer one years free membership and £50 credit to each new residential unit.
- d) The applicant's are required to pay a sum of, £3,000 (three thousand pounds) per travel plan for monitoring of the travel plan initiatives.

	Conditions:	
	1. All construction traffic (including HGV movement) shall be managed in accordance with the Construction Logistics Plan unless otherwise agreed in writing with the local planning authority.	
	2. Details of arrangements for cycle storage (including means of enclosure for the area concerned and the bicycle stairway and trough system) shall be submitted to, and approved in writing by, the Local Planning Authority before any part of the development hereby permitted is commenced 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. Informative	
	The new development will require naming. The applicant should contact the Local Land Charges at least six weeks before the development is occupied (tel. 020 8489 5573) to arrange for the allocation of a suitable address.	
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.	Comment Noted.
LBH Carbon Management	Energy – Overall 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.	
	Energy – Lean  The applicant has proposed an improvement of beyond Building Regulations by 8.9% through	
ı	improved energy efficiency standards in key elements of the build.	

This should be conditioned to be delivered on site: Suggested Condition:

You must deliver the energy efficiency standards (the Lean) as set out in the Energy Strategy, by WSP Parsons Brinckerhoff, Revision 2, dated November 2016. This Building Element Proposed specification for the development (u-values)

External walls 0.15

Roof 0.1

Ground floor 0.1

Windows 1.2

Glazing g-value 0.3

Air tightness 3 m3/hr/m2

The development shall then be constructed and delivered to the U-values set out in the Energy Strategy document. Achieving the agreed carbon reduction of 8.9% beyond BR 2013. Confirmation that these energy efficiency standards and carbon reduction targets have been achieved must be submitted to the local authority at least 6 months of completion on site for approval. This report will show emissions figures at design stage to demonstrate building regulations compliance, and then report against the constructed building. The applicant must allow for site access if required to verify measures have been installed.

The Council should be notified if the applicant alters any of the measures and standards set out in the submitted strategy (as referenced above). Any alterations should be presented with justification and new standards for approval by the Council.

Should the agreed target not be achieved on site through energy measures as set out in the afore mentioned strategy, then any shortfall should be offset at the cost of £1,800 per tonne of carbon plus a 10% management fee.

Reason: To comply with London Plan Policy 5.2. and local plan policy SP:04 Energy – Clean A community CHP system with Low Temperature Hot Water Heating 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%. 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.

Action: Applicant must submit details of location and size [m2] of energy centre for connection to future DE network.

We recommend that these are addressed through the following condition: Suggested Condition:

Details of the Combined Heat and Power facility and associated infrastructure, which will serve heat and hot water loads for all the units on the site.

This shall provide for no less than 26.9% total C02 reduction shall be submitted to and approved in writing by the Local Planning Authority 3 months prior to any works commencing on site. 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)

Once these details are approved the Council should be notified if the applicant alters any of the measures and standards set out in the submitted strategy (as referenced above). Any alterations should be presented with justification and new standards for approval by the Council.

The Combined Heat and Power facility and infrastructure shall be carried out strictly in accordance with the details so 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 in line with London Plan policy 5.7 and local plan SP:04 and DM 22.

Suggested condition for condensing boilers:

That all condesing gas boilers that are to be installed across the development are to have a

minimum SEDBUK rating of 92%.

The applicant will demonstrate compliance by supplying installation specification at least 3 months

post construction. Once installed they shall be operated and maintained as such thereafter. Reason: To comply with London Plan Policy 5.2. and local plan policy SP:04 Energy – Green

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. We seek that maximum opportunities are delivered on the PV panels. This is not policy compliant. PV Panels - They have concluded that approximately 100m2 PV panels 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.

Action: For the applicant to review number of PV panels and maximise area of panels on roof. A revised schematic, with the increased coverage is to be submitted prior to determination. This should include area [m2] and output [kWp] of panels. A condition will be worded to ensure delivery of this once the schematics have been submitted and approved. Should the target not be able to be achieved on site through renewable energy technologies, then any shortfall should be offset at the cost of £2,700 per tonne of carbon plus a 10% management fee.

Reason: To comply with London Plan Policy 5.2. and local plan policy SP:04 Sustainability Assessment

The applicant is expected to submit a Sustainability Assessment with their Energy Strategy. For the commercial spaces the applicant is expected to undertake BREEAM and achieve 'Very Good. Action: The applicant must confirm how the sustainability assessment will be undertaken for the

domestic dwelling

Suggested condition for BREEAM:

You must submit for our written approval a design stage accreditation certificate confirming that the development will achieve a BREEAM "Very Good" outcome (or equivalent) a minimum of 6 months prior to commencement on site.

The development shall then be constructed in strict accordance of the details so approved, and shall achieve the agreed rating and shall be maintained as such thereafter. A post construction certificate shall then be issued by the Building Research Establishment or other

independent certification body, confirming this standard has been achieved. This must be submitted to the local authority at least 6 months of completion on site. Suggested condition:

3 months prior to commencement on site a renewable energy strategy will be submitted to the council for approval (including a map with the area, capacity and location of renewable, solar PV).

This strategy will set out how the development will maximise opportunities for renewable energy generation and work towards the delivery of the policy requirement of a minimum of 20% carbon reduction through the use of renewable technologies on site. Should the target not be able to be achieved on site through renewable energy technologies, then any shortfall should be offset at the cost of  $\mathfrak{L}1,800$  per tonne of carbon plus a 10% management fee.

Reason: To comply with London Plan Policy 5.2. and local plan policy SP:04 In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the local authorities approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.

Reasons: In the interest of addressing climate change and to secure sustainable development in accordance with London Plan (2011) polices 5.1, 5.2,5.3 and 5.9 and policy SP:04 of the Local Plan.

Suggested condition for Home Quality Mark sustainability assessment:

The development shall then be constructed in strict accordance of the details so approved, and shall achieve the rating of Home Quality mark level 4 for all units on the site, and shall be maintained as such thereafter. A post construction certificate shall then be issued by an independent certification body, confirming this standard has been achieved. This must be submitted to the local authority at least 6 months of completion on site for approval. In the event that the development fails to achieve the agreed rating for the whole development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on

site within 3 months of the local authorities approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.

Reasons: In the interest of addressing climate change and to secure sustainable development in accordance with London Plan (2011) polices 5.1, 5.2,5.3 and 5.9 and policy SP:04 of the Local Plan.

## Overheating Risk

The results of the analysis show 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 exceedance 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.

The mitigation strategy proposed is not acceptable – having open-able windows and blinds to prevent overheating. Blinds are not a planning issue. These are occupant and behavioural solutions and are not acceptable. Furthermore, the location of the site adjacent to the junctions of several A roads means it will have a high concentration of air pollution and noise. Opening windows are not a sensible solution.

As the site is allocated for approximately 90% 'affordable' housing (shared ownership) – on going running costs for heating and electricity should be considered within the affordability of the units, and the risk of overheating should be designed out.

This is therefore not policy compliant.

Action: Applicants to clarify what design measures will be implemented to reduce the overheating risk (such as Brise soleil) or energy loads (such as air conditioning) are incorporated to the design of the development and its Energy Strategy.

Suggested Condition The applicant must submit report to include details of the design measures incorporated within the

scheme (including details of the feasibility of using external solar shading and of maximising passive ventilation) to ensure the risk of overheating is low and adaptation to higher temperatures are included. Air Conditioning will not be supported unless exceptional justification is given.

	Once approved the development shall be carried out strictly in accordance with the details so approved, shall be maintained as such thereafter and no change there from shall take place without the prior written consent of the Local Planning Authority.  Reason: London Plan Policy 5.9 and local policy SP:04 and in the interest of adapting to climate change and to secure sustainable development.  Drafted by: Sadhbh Ní Hógáin, Housing Retrofit Project Manager, Carbon Management Team	
LBH Regeneration	The Tottenham Hale District Centre Framework (DCF) adopted by the council in March 2016 sets the regeneration and delivery framework for Tottenham Hale. 1 Station Square lies at the heart of the new district centre, along the axis of the key north-south connection that runs past the site. This route is critical to establishing a new network of Streets and Spaces at the heart of Tottenham Hale.  This site is at the heart of the Strategic Development Partnership with Argent Related which the Council agreed to enter into July 2016. The sites around 1 Station Square are set to be delivered by the Council's strategic partner, Argent Related.  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.  The public realm in and around 1 Station Square is currently being developed and refined through the finalisation of the Streets and Spaces Strategy. This document sets out the movement framework and public realm strategy for Tottenham Hale. The developer is continuing to engage with the Council and neighbouring landowners through this process. The Council's Green and Open Spaces Strategy sets out the council's approach to enhancing and protecting green spaces, and the links between them, within Tottenham Hale.  Coordinated approach to the delivery of the Tottenham Hale District Centre With the future redevelopment of Tottenham Hale, the council has set up a Landowner and Developer Forum. There are three main areas of work – coordination (infrastructure, utilities, logistics etc), communications and skills/employment initiatives.  As part of this forum, the council will expect all the landowners to collaborate to agree	Comments Noted

## Appendix 1 –Consultee and Neighbour Responses

coordinated construction logistics plan and programme for the delivery of the many sites of Tottenham Hale and to contribute to the position of a new project manager employed by the council, who will be in charge of coordinating and leading on this important piece of work.

S106 Contributions

The council has been working with developers and major landowners to develop an approach to the delivery of key infrastructure to support the delivery of the required infrastructure necessary to support the development coming forward. S106 contributions are requested for:

- Leisure facilities and soft landscaping eisure improvements as part of the third package of improvements to Down Lane Park (£225,000). Reference: Green and Open Spaces Strategy.
- Station Road public realm enhancements (£94,000). Station Road will be an important urban feature and connection to a vibrant Station Square. Concept and detailed designs for the road and public realm have been developed and will be refined through the current phase of the Streets & Spaces strategy. Station Road's upgrade will be funded through contributions from two sites on the Station Square West site allocation.
- End user skills training (£29,000). The contribution will be supported the 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.

Peter Timmer	The 'Statement of Community Involvement' comprises 6 documents, only 1 of which	Objection noted. The
49 Clonmell Road	seems to show 'data'. It seems to suggest just 21 people's views (via a survey) have been	Council has undertaken
N176JY	assembled by the planning applicant.	statutory consultation in
		conformity with relevant
Objects to the	I'd say the way the Council has handled Wards Corner and Apex House (amongst others)	legislation and guidance.

proposal.	means the community has ceased to take such processes seriously, through 'breach of trust' in fake consultation. 4,600 invitations to see an 'exhibition' of the building, 0.45% views presented in the application. Yeah gods!  I'd just like to point out that you have no community involvement from what I can read on this application, and I can't see many people having any 'growing faith' in our Council's ability to listen to the people who live in spaces like Tottenham Hale and Seven Sisters, and will live under the shadows of such buildings - 22 storeys, it's Apex House all over again.  It seems all community appetite for active participation has gone, and I will not be expressing a view beyond leaving this comment. You have no community data.	The consultation in respect of the application is considered to be acceptable.
J Skuse High Cross Road London N17 9PE Objects to the proposal.	I have two primary concerns arising from my reading of the submitted planning documents:  1) Car parking. It has been suggested that the development will be 100% car free (aside from the blue-badge spaces). I feel that this is an obtuse statement. Look at the surrounding areas to the proposed site and it is clear to see the large number of cars parked - showing demand from residents, with minimal space for any more.  To say that public transport satisfies the needs of people movement is inaccurate, as evidenced by the large modal share of transport by road. It is a noble ambition, but does not seem to be evidenced (or reasonable).  This demand for car-parking will only increase from this specific proposal (as well as when time goes on with proposed further developments increasing the housing density around the Tottenham Hale area), this has knock-on effects on parking on local roads.  This leads on to my second point.  2) Character and appearance of the area. Tottenham Hale is a primarily low-to-medium rise developed area on the outskirts of inner London (or the inner parts of outer London,	Objection Noted. The transportation impacts of the scheme (including parking) are considered in Section 6 of this report.  The impacts to the character and appearance of the area are also assessed in Section 6 of this report.

# Appendix 1 - Consultee and Neighbour Responses

	depending on your criteria used). The creation of a 22 storey building very much changes both the character and appearance of the area. Other areas in similar parts of London such as around Stratford's East Village and Nine Elms have resulted in areas with vast quantities of generic & dense tall residential buildings, oppressive skylines and channelled wind at ground level. These can be considered unattractive and unacceptable.  Individually this planning application does not take into account of local needs and the area's character. Additionally, if this sets the template for further developments then the area will	
Connie Meade Flat 3 79 High Cross Road	significantly change - and not in my view for the better.  Hello, I am concerned that the proposed development will impact on the view from our balconies (as the Premier Inn) did. Also we have a huge problem with parking on High Cross Road, it does not sound like there are any plans to create car parking spaces for these new residents. They will inevitably try to park on our road as it is within closest walking distance to the proposed new properties.	Objection noted. The transportation impacts of the scheme (including parking) are considered in Section 6 of this report.
proposal.		
Sacha Wooldridge Flat 2 79 High Cross Road Tottenham Hale London	I don't object with the development in principle. However I think it is imperative that the the development makes better consideration and provision to address the parking congestion that is an existing problem - High Cross Road N17 9NR is already horrifically congested, with residents double parking and blocking in other residents. It is inconceivable that such a large development won't worsen an already un-livable situation for existing tenants. The parking concerns are something that we are in the process of undergoing a parking consultation application in request to get Haringey council to address this - there is a live petition on Change.org for this and photo evidence had been provided to the Haringey Front Line Parking Consultations team. Further, the one way system there is already very heavily congested with drivers regularly undertaking illegal u-turns on the road. Adding 128 residential units will no doubt only worsen this position. It is unsafe and poses a significant and real danger to pedestrians as it is.	Objection noted. The transportation impacts of the scheme (including parking) are considered in Section 6 of this report.