

Planning Sub Committee

## REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

### 1. APPLICATION DETAILS

**Application:** HGY/2016/4165

**Ward:** Tottenham Hale

**Address:** Cannon Factory and Ashley House

**Proposal:** Demolition of the existing buildings at Cannon Factory and Ashley House and erection of three buildings to provide up to 3,600sqm of commercial floorspace (GEA) (Class A1/A3/B1/D1), up to 265 residential units (Class C3), new public realm, landscaped amenity space, car and cycle parking and all associated works.

**Applicant:** Notting Hill Housing Trust

**Ownership:** Private

**Case Officer Contact:** James Farrar/Robbie McNaugher

**Site Visit Date:** 19/04/17

**Date received:** 20 December 2017 **Last Amended:** 21 April 2017

**Plans and Drawing Number:** Site Location 1824-JMP-02-XX-DR-A-0001 Rev A; Planning Application Boundary 1824-JMP-02-00-DR-A-0002 Rev C; Site Location (proposed buildings shown) 1824-JMP-02-XX-DR-A-0003 Rev C; Demolition Plan 1824-JMP-02-XX-DR-A-1001; Existing Ground Levels 1824-JMP-02-XX-DR-A-1002 Rev A; Building Footprints – Maximum Parameters (existing context) 1824-JMP-02-XX-DR-A-0004 Rev E; Building Heights – Maximum Parameters (existing context) 1824-JMP-02-XX-DR-A-0005 Rev G; Access Parameters (existing context) 1824-JMP-02-XX-DR-A-0006 Rev E; Land Use Parameters – Ground Floor (existing context) 1824-JMP-02-00-DR-A-0007 Rev E; Land Use Parameters – First Floor (existing context) 1824-JMP-02-01-DR-A-0008 Rev D; Land Use Parameters – Typical Upper Floor (existing context) 1824-JMP-02-02-DR-A-0009 Rev E; Proposed Ground and Floor Levels (existing context) 1824-JMP-02-00-DR-A-0017 Rev C; Use Frontage Ground Floor (existing context) 1824-JMP-02-00-DR-A-0018 Rev A; Landscape Parameters Ground Level (showing existing context across the Ashley Road South Masterplan) 449-101 Rev 02; Landscape Parameters Upper/Roof Level (showing existing context across the Ashley Road South Masterplan) 449-103 Rev 02.

**Documents:** Planning Statement; prepared by Lichfields; Design and Access Statement incorporating Landscape Strategy (Amended April 2017), Design Guidelines (Amended April 2017) & Introduction to the Ashley Road South Masterplan prepared

by John McAslan + Partners; Equalities Impact Assessment prepared by Lichfields; Health Impact Assessment prepared by Lichfields; Arboricultural Impact Assessment and Method Statement (Amended April 2017) prepared by WSP Parsons Brinckerhoff; Statement of Community Involvement, prepared by Belgrave Communications; Framework Travel Plan prepared by WSP Parsons Brinckerhoff; Development Specification (Amended April 2017); Sustainable Design and Energy Statement prepared by WSP Parsons Brinckerhoff (Amended April 2017); Affordable Housing & Viability Statement prepared by Jones Lang LaSalle; Construction Logistics Plan prepared by WSP Parsons Brinckerhoff; Delivery and Servicing Plan prepared by WSP Parsons Brinckerhoff; PERS Audit prepared by WSP Parsons Brinckerhoff.

Supplementary Environmental Statement (April 2017) incorporating:

- Townscape and Visual Impact Assessment;
- Transport;
- Daylight, Sunlight and Overshadowing;
- Socio-Economic Effects;
- Built Heritage
- Environmental Wind;
- Air Quality;
- Noise and Vibration;
- Ground Conditions and Contamination Impact;
- Water Resources and Flood Risk;
- Ecology and Nature Conservation;
- Cumulative Assessment.

1.1 This application is before Planning Sub-Committee because it is major development.

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**

- 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-led mixed-use development. The application forms an important first step in the regeneration of Ashley Road South in support of emerging allocation TH6.
- The 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 scale of development is supported by its location within the Upper Lee Valley Opportunity Area; the Tottenham Area Action Plan and the Tottenham Housing Zone all of which envisage transformational change.

- The minimum overall affordable housing proposal of 50% will make a significant contribution to meeting the portfolio approach to the management of affordable housing within the Tottenham Hale Housing Zone, and contributing to a mixed and balanced new residential neighbourhood. The overall tenure balance, which includes a significant number of lower-cost shared ownership units, is acceptable.
- The height of the north eastern tower element of the building at 16 stories, will sit comfortably within the context of a clear block structure, announcing the new District Centre on approach from the north along Watermead Way. This is supported in the context of the step change in the urban context envisaged within the emerging Tottenham Hale District Centre.
- Taking into account the wider approach to employment re-provision across the Ashley Road South Masterplan, the overall balance of employment floorspace is considered to be acceptable. The overall balance of retail, food & drink and commercial floorspace, subject to the controls recommended in this report, is likely to contribute to a genuinely mixed use neighbourhood.
- The masterplan has undergone rigorous testing since 2015 evolving with the potential to form a well considered new neighbourhood. The form, scale and massing of the proposed mansion blocks, of which this application is part, is appropriate to the site's changing urban context. The quality of the scheme is considered to be high.
- The density of the development equates to a maximum of 265 units per hectare if the scheme's maximum parameters are built out. This would be slightly above the density range within the London Plan's indicative range for 'urban' sites with a PTAL of 5-6a but would optimise the site's potential and is considered acceptable given its good quality design.
- The site is highly accessible, being located close to Tottenham Hale Station. The site is also adjacent to a significant open space in the form of Down Lane Park with Lee Valley Regional Park in close proximity. The mansion block structure presents the opportunity for a good housing mix and balance of residential units having regard to local need and site specific characteristics contributing to the creation of a mixed and balanced community.
- The scheme will make a significant new contribution to the quality of the public realm, facilitating the enhancement of Ashley Road as a new central spine and delivering a significant new east-west route from Down Lane Park towards the planned College (Ashley Link) all of which weigh heavily in favour of the scheme.

- Subject to remodelling of entrances and detailed landscaping, the development will relate positively to the adjacent Down Lane Park, providing new and improved pedestrian & cycle links. Building 2 in particular, holds the potential to be a high quality pavilion building at the interface between the park and a new neighbourhood.
- The overall impact on social and community infrastructure is acceptable, taking into account existing provision to support new development. Given the importance of social infrastructure in areas of major new development most play and open space will be provided on-site, which is welcome, but additional mitigation measures are needed to remodel access to Down Lane Park, secured via s.106 agreement.
- 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.
- No additional mitigation measures in relation to environmental wind are considered necessary at this stage. Planning conditions are recommended to take wind conditions into consideration when designing sitting areas and building entrances at the detailed design stage. Further testing is suggested to test the effectiveness of the measures mentioned above and verify that pedestrians are sheltered from prevailing winds, particularly in the north-eastern corner of the site.
- Following a request from officers, the applicant has provided additional information in respect of fire safety in the form of a question and answer sheet. No details are being approved at this outline stage and all details and materials will be the subject of reserved matters in addition to requirements relating to Building Regulations. The commitments that the applicant has made are set out in the body of the report.
- The transportation impacts of the scheme are acceptable. The scheme will not generate a significant increase in traffic and a car free scheme, save for accessible spaces, is acceptable. The overall provision of cycle storage will be revisited at detailed stage as will the re-provision of existing bus stops on Ashley Road but is considered acceptable.
- 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 referral to the Mayor of London and the signing of a section 106 and Legal Agreement providing for the obligations set out in the Heads of Terms below.
- 2.2 That delegated authority be granted to the Head of Development Management or the Assistant Director Planning to make any alterations, additions or deletions to the recommended heads of terms and/or recommended conditions as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chairman (or in their absence the Vice-Chairman) of the Sub-Committee.
- 2.3 That the section 106 legal agreement referred to in resolution (2.1) above is to be completed no later than 18 January 2018 or within such extended time as the Head of Development Management or the Assistant Director Planning shall in her/his sole discretion allow; and
- 2.4 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 9 of this report)

1. Reserved Matter Approval (Scale, Appearance, Layout, Access, Landscaping)
2. PRIOR TO RESERVED MATTERS - Affordable Housing Strategy
3. PRIOR TO RESERVED MATTERS - Phasing strategy & details
4. COMPLIANCE - Time limits for Reserved Matters
5. COMPLIANCE - Reserved Matters Specification (List of documentation to accompany Reserved Matters Applications)
6. COMPLIANCE - Development in Accordance with Approved Drawings and Documents
7. COMPLIANCE - Environmental Statement
8. COMPLIANCE - Environmental Statement: Reserved Matters Applications
9. COMPLIANCE - Quantum of Development
10. COMPLIANCE – LAND USE (Community)
11. COMPLIANCE – LAND USE (Retail)

- 12.COMPLIANCE - Development in Conformity with Energy Statement
- 13.COMPLIANCE - Land Contamination – Part C
- 14.COMPLIANCE - Landscaping – Replacement of Trees and Plants (LBH Development Management)
- 15.COMPLIANCE - NRMM Inventory and Documentation Availability
- 16.COMPLIANCE – Accessibility
- 17.COMPLIANCE - Compliance with London Housing Design Standards
- 18.COMPLIANCE - Individual Satellite dishes or television antennas precluded
- 19.PRE COMMENCEMENT - Confirmation of Site Levels
- 20.PRE COMMENCEMENT Drainage Strategy (Thames Water)
- 21.PRE COMMENCEMENT - Archaeology (Written Scheme of Investigation)
- 22.PRE COMMENCEMENT - Tree protection meeting (pre-commencement)
- 23.PRE-COMMENCEMENT – Water supply (Thames Water)
- 24.PRE- COMMENCEMENT - Construction Environmental Management Plan
- 25.PRE COMMENCEMENT - Land Contamination – Part A and B
- 26.PRE COMMENCEMENT - Details of AQDMP (Dust)
- 27.PRE COMMENCEMENT - Waste Management Scheme
- 28.PRE COMMENCEMENT - Updated Construction Logistics Plan
- 29.PRE COMMENCEMENT - Piling method statement (Thames Water)
- 30.PRIOR TO ABOVE GROUND WORKS - Biodiversity Enhancement Plan
- 31.PRIOR TO ABOVE GROUND WORKS - Sustainable Urban Drainage
- 32.PRIOR TO ABOVE GROUND WORKS - Energy Strategy
- 33.PRIOR TO ABOVE GROUND WORKS Sustainability Standards – Non-residential
- 34.PRIOR TO ABOVE GROUND WORKS - External Solar Shading and Passive Ventilation Study
- 35.PRIOR TO ABOVE GROUND WORKS - Phasing strategy & details
- 36.PRIOR TO ABOVE GROUND WORKS - Green and Brown Roof
- 37.PRIOR TO INSTALLATION - Ultra Low NOx Boilers - Product Specification and Dry NOx Emissions Details (LBH Environmental Services and Community Safety)
- 38.PRIOR TO SUPERSTRUCTURE WORKS - Cycle Parking Details
- 39.PRIOR TO OCCUPATION - Estate Management & Maintenance Plan
- 40.PRIOR TO OCCUPATION - Play Space
- 41.PRIOR TO OCCUPATION - Secured by Design
- 42.PRIOR TO OCCUPATION - Details Roof Top PV Panels
- 43.PRIOR TO OCCUPATION– Lighting strategy
- 44.PRIOR TO OCCUPATION - Car Parking Management Plan
- 45.PRIOR TO OCCUPATION - Details of Central Dish/Receiving System

**Informatives – Summary** (the full text of recommended informatives is contained in Section 9 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)
- 14) Archaeology
- 15) Asbestos Survey (LBH Environmental Services and Community Safety)
- 16) Highways Licenses

### **Section 106 Heads of Terms:**

#### Affordable Housing

- No less than 50% affordable units (71% Intermediate / 29% Affordable Rented Units). All affordable rented units in the development will be nominated units with targeted rents in line with Haringey Housing Strategy.
- Viability review mechanism to be triggered if an agreed level of progress on implementation is not made within two years of permission being granted i.e. if no reserved matter application has been submitted within 2 years
- Occupation restriction (market housing) until affordable units delivered.
- Of the intermediate units, minimum 34% lower-cost shared ownership within Band 2 aimed at those households earning less than £40,000 a year.
- All shared ownership units to remain affordable until and unless affordable occupier's staircase to 100% outright ownership.
- Time Limited marketing of the Low Cost Shared Ownership homes, for a period of up to three months. Time limited marketing of Shared Ownership, for a period of up to three months to persons who live or are employed in Haringey.
- Recycling of the GLA grant funding within the Haringey Local Authority area, unless no developments readily available within the borough.

#### Transport

- To submit Design details of Ashley Road, public realm and pedestrian/cycle improvements, prior to commencement (Area 18 of DCF Drawing Numbers ref: 257 - 01 -170511 Tottenham Hale DCF: Proposed Public Realm with Revised Highways Layout and 257 - 02 -170511 Tottenham Hale DCF: Streets & Spaces and Green and Open Space Project Delivery).
- A residential and site-wide framework commercial travel plan, including:

- Travel plan co-ordinator to monitor the travel plan initiatives
- Provision of welcome induction packs containing public transport and cycling/walking information
- Three years' car club membership for each residential unit including £50 annual credit for those who take up or equivalent assistance in buying a bike
- Contribution to the LPA in the amount of £3,000 (per each travel plan submitted), for reviewing and providing recommendations to the submitted TP, until such time when targets have been achieved.
- Car free development, occupiers of the residential units are not eligible, for on-street car parking permits.
- Residents of the new wheelchair accessible dwellings will be granted parking permits for the new wheelchair accessible parking spaces, which shall be individually allocated per relevant dwelling in accordance with priority criteria. Details to be agreed through the car parking management plan.
- CPZ review of the area in the vicinity, before and after 50%, and 90%, of occupation including a contribution towards costs associated with the revision of the existing CPZ across the impact area arising from the development (to be agreed).

#### Commercial Strategy

- Provision to review and update the commercial strategy to take into account wider regeneration and commercial proposals.

#### Public Realm Delivery and Management

- Public access to footpaths, cycleways and open spaces.
- Maintain development estate public realm areas in accordance with standards to be agreed.
- Meanwhile conditions & landscaping of sites to enhance and integrate new development, during phased development.
- Complete works to Ashley East-West Link, including any interim landscaping proposals, prior to occupation of Buildings 2 and 2A
- Complete works to Burdock Road, including any interim landscaping proposals and wind mitigation measures, prior to occupation of works to Building 3.
- Final design of Ashley Road prior to commencement and phasing plan for implementation.

#### Securing Design Quality

- The existing architects or other such architects as approved in writing by the Local Authority
- Work in partnership to achieve coherent design of Buildings 2a & 1a as one urban block together with Buildings 3 & 4 as another urban block.

#### Skills and training

- 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).



- End User Skills Training (**£96,000 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.

#### Open Space

- Leisure facilities and landscaping measures as a consequence of remodelling residential access to Down Lane Park including contribution of £895,000. Payable upon implementation of the development.

#### Energy

- To use best endeavours to connect to the Tottenham Hale District Energy Network (DEN) including delivery of pipework to highway edge. The Energy Strategy will demonstrate that the development either connects to the DEN upon completion of the building work if the DEN is present, or the development is designed to connect to the DEN once the DEN is constructed. This will be set out through two options. District Energy Option 1 will set out how the scheme is designed and will be delivered to connect to the DEN and ensure heat and how water supply for first occupiers. If it is accepted by the LPA that the development cannot connect to the DEN then the applicant must deliver District Energy Option 2. District Energy Option 2 will demonstrate how the development will be designed to connect to the DEN once access to the heat network is available.
- Provision to work with the Council to facilitate access to the Ashley Link in order for the Council to deliver the DEN.
- If no DEN has been delivered within Tottenham Hale within a 5 years from planning approval, then the applicant will have the freedom to replace the boilers serving the development with CHP or other similar technologies.
- Any shortfall in carbon offsetting required to ensure policy compliance (as set out in London Plan Policy 5.2) will be offset at £1,800 per tonne.

#### Construction

- Obligation to register with the Considerate Constructor scheme during the construction and demolition phase of the development
- The applicant will work with developers in the Tottenham Hale area to directly procure a coordinator to monitor compliance, reporting and review of construction activity, including the provision of timely information and to act as a shared resource or pay a maximum sum each year towards the Council's direct appointment of a shared resource [not agreed with the applicant].

#### Monitoring

- Environmental Monitoring Fee – the applicant will pay a maximum sum each year towards environmental monitoring of the construction of the development as described in the Environmental Statement.

- 2.5 In the event that members choose to make a decision contrary to officers' recommendation members will need to state their reasons.
- 2.6 That, in the absence of the agreement referred to in resolution (2.1) above being completed within the time period provided for in resolution (2.2) above, the planning permission be refused for the following reasons:
- i. *In the absence of a legal agreement securing 1) the provision of on-site affordable housing 2) marketing of the scheme to local residents on targeted incomes, and 3) 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 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) 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 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.*

- 2.7 In the event that the Planning Application is refused for the reasons set out in resolution (2.5) above, the Head of Development Management (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 outline planning application with all matters reserved for the demolition of the existing buildings at Cannon Factory and Ashley House and erection of three buildings to provide up to 3,600sqm of commercial floorspace (GEA) (Class A1/A3/B1/D1), up to 265 residential units (Class C3), new public realm, landscape amenity space, car and cycle parking all associated works.
- 3.1.2. A minimum and maximum quantum of development is being applied for across the Cannon Factory and Ashley Road site. The land use quantum's applied for are specific to each plot and are as follows:

Maximum residential units	Up to 265
Proposed Residential	Building 2/2A – 97 units Building 3 – 168 units
Affordable Housing	50% affordable housing provision with a tenure split of 70% intermediate and 30% affordable rent.
Maximum non-residential floorspace	Up to 3,600sqm (Use Classes A1, A3, B1, D1)
Proposed non-residential floorspace	Scheme Total: Maximum: 3,600sqm (GEA) (3,290 sqm (GIA)) (Class A1/A3/B1/D1)
	Building 2/2A – 725 sqm (minimum 600sqm) Building 3 – 2,565 sqm (minimum 2,000sqm)
Maximum Heights (AOD heights)	Building 2 (the Pavilion) – Up to 25.4m AOD Building 2A (Ashley House) – Up to 34.950m AOD (up to 35.950m AOD with flue)
	Building 3 (Cannon Futon Factory) – up to 63.725m AOD (up to 64.725m AOD with flue)

*Table 1: quantum of development proposed*

- 3.1.3. The application seeks planning permission for a maximum of 3,600sqm of commercial floorspace (Class A1/A3/B1/D1) (GEA) (3,290sqm GIA) and a minimum of 3,000sqm (GEA) (2,750sqm).
- 3.1.4. The application seeks planning permission for a maximum of 265 residential units with a commitment to provide 50% affordable housing including a 70%/30% tenure split (intermediate/affordable rent). The exact mix of units is reserved at this stage although an indicative mix has been provided.

3.1.5. The planning application seeks formal approval for the following documents as part of the submission:

- Planning application form, certificate and notices
- Community Infrastructure Levy (CIL) form
- Site location plan
- Parameter plans (these define the application boundary, disposition of land uses, proposed heights, access and circulation, landscape and open space, phasing, building footprints and roof plans).
- Design guidelines (to guide and control the detailed design of future reserved matters applications)
- Development specification (to describe precisely what is being applied for).

3.1.6. The residential development is proposed to be 'car-free' but will provide 18 accessible car parking spaces. The breakdown per plot is shown below:

<b><i>Building</i></b>	<b><i>Car parking</i></b>
2/2A	6
3	12
Total	18

*Table 2: Car Parking*

## 3.2. **Site and Surroundings**

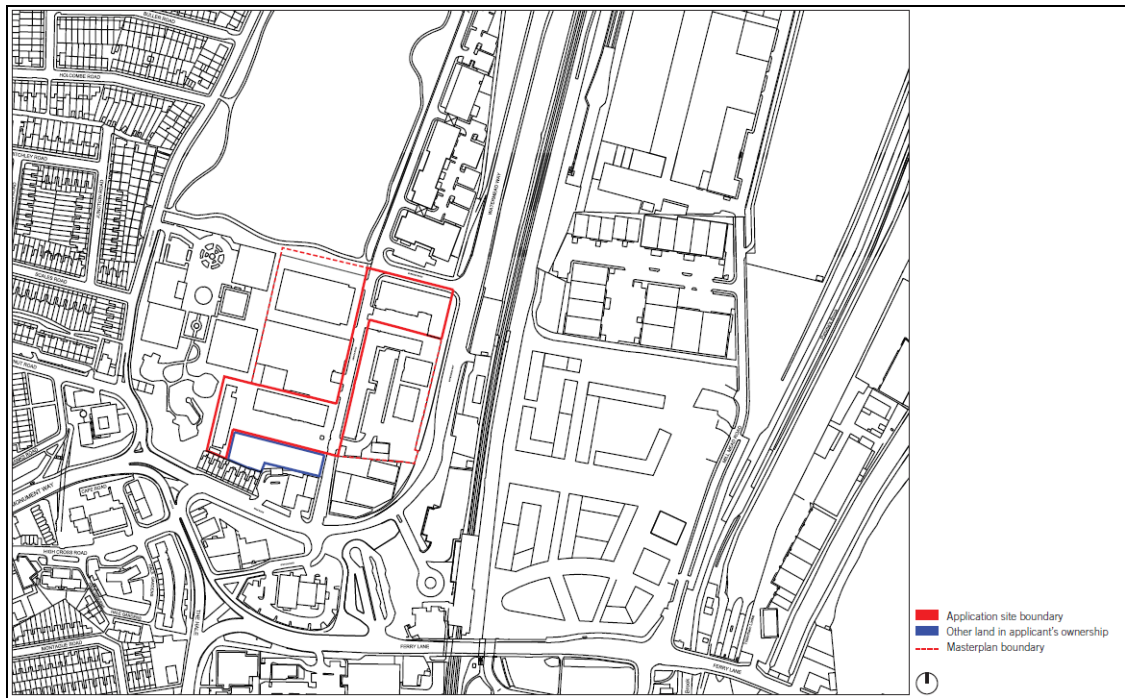
### *Ashley Road South Masterplan*

3.2.1. The Ashley Road South Masterplan comprises this outline application on behalf of Notting Hill Housing and the two Berkeley Square Developments applications. The wider masterplan (see images below) proposes seven new buildings: Buildings 1,1A, 2, 2A, 3, 4; the Ada National College for Digital Skills; and, the redevelopment and extension of Berol House for commercial and residential use.

3.2.2. Whilst not forming all of this outline application the wider Ashley Road Masterplan area shows emerging proposals for the land uses shown below. Planning applications, pursuant to the wider masterplan, have now been submitted for the remainder of the Ashley Road South Masterplan on behalf of Berkeley Square Developments.



*Illustrative masterplan for Ashley Road South*



*Application site boundary and masterplan boundary*

<b>Applications</b>	<b>Building</b>	<b>Residential units</b>
Full (Berkeley Square Developments)	Building 1	377 units
	Building 1A	
Hybrid (Berkeley Square Developments)	Building 4	156 units
	Berol House	Up to 18 units
Outline (Notting Hill Housing)	Building 2	Up to 265 units
	Building 2A	
	Building 3	
Ashley Road South Masterplan	All buildings	816 units (including maximum NHH parameters)

*Table 3: Emerging residential units for Ashley Road South Masterplan*

<b>Application</b>	<b>Building</b>	<b>Proposed commercial floorspace (GIA)</b>
Full (BSD)	Building 1	1,070 sqm (GIA)
	Building 1A	
Hybrid (BSD)	NCDS	6,000 sqm (GIA)
	Building 4	833sqm (GIA)
	Berol House	3,316.5 sqm (GIA)
Outline (NHH)	Building 2	725 sqm (GIA)
	Building 2A	
	Building 3	
ARSM	All buildings (including NHH building along DLP)	14,509.5 sqm (GIA)

*Table 4: Emerging employment floorspace across ARS*

*The Ada National College for Digital Skills (NCDS)*

3.2.3. The hybrid planning application by Berkeley Square Developments includes proposals for a new National College for Digital Skills amounting to 6,000sqm of educational space. This will be designed to be a defining architectural statement with a rotated volume mirroring the design approach adopted for Building 2. The masterplan envisages these two buildings acting as a counterpoint to one another along Ashley Link. This route will form an important new movement route as part of the wider movement network across Ashley Road Site.



3.2.4. Ada, the National College for Digital Skills will be a new Further Education College established as the centre of excellence in the delivery and learning of digital skills. The overall objective is to deliver a learning environment that supports the vision and values of the College and has the technology to deliver the educational offering. This is currently operating from a temporary location.

3.2.5. The application site comprises land to the north-east and south-west of the Ashley Road South Masterplan area. To the north-east, the development will comprise a mixed use building of between eight and sixteen storeys. To the south-west, the development will comprise Building 2, a small pavilion building of four storeys and Building 2A, a mixed use building up to seven storeys.

3.2.6. The Ashley House section of the application site occupies the southwestern part of the masterplan. The site comprises two 2-storey buildings which serve as warehouse and office accommodation. The buildings are laid out on an L shaped configuration and partly enclose a car park and holding area, all of which is owned by Notting Hill Housing. To the south lies a petrol station and a terrace of Victorian houses which front onto Hale Road. On the western boundary the site backs onto a playground/recreational area within Down Lane Park.

3.2.7. The Cannon Factory section of the planning application site occupies the north eastern part of the masterplan. Accessed from Ashley Road, the site also has frontages along Burdock Road and Watermead Way both of which are lined with mature trees. The two-storey brick building is largely factory warehouse space with a small block of office accommodation on Ashley Road. The building has a service yard to the south for the loading/unloading. It is currently occupied in a meanwhile use. This part of the site is located diagonally opposite Down Lane Park with the Harris Academy to the north and Berol House immediately the south.

### **3.3. Relevant Planning and Enforcement history**

3.3.1. There are no planning applications for this site that are of direct relevance to the current proposal. Emerging development activity in and around the site is summarised below.

3.3.2. A planning application was submitted in January 2017 in relation to 18 Ashley Road, to the north of this application site but within the Ashley Road Masterplan area. The application was for a temporary change of use of building from light industrial B1 use to D2 use incorporating a climbing wall facility, yoga studio, ancillary cafe and offices, and B1 light industrial use. The application was granted, subject to a range of planning conditions.

- 3.3.3. On 21 March 2016, the Council entered into the Tottenham Hale Strategic Development Partnership (SDP) with Argent 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.
- 3.3.4. There are 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 10 April 2017 the Council resolved to grant planning permission, subject to s.106 agreement, for 1 Station Square, Station Road. The application included 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. The site, together with Ashley Road South, forms an important part of the proposed north-south spine envisaged in the Tottenham Streets and Spaces.

#### *Applicant’s Consultation*

- 3.3.6. 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).
- 3.3.7. The applicant has submitted a Statement of Community Involvement prepared by Belgrave dated December 2016, in accordance with the Council’s Statement of Community Involvement. The scheme has also previously been considered by Haringey’s Quality Review Panel (QRP). A chronology of pre- application engagement is below:
- A meeting with ward Councillors on 27<sup>th</sup> July 2016
  - 5 September 2016 workshop with LBH officers regarding the wider masterplan
  - 5 October pre-application meeting with LBH
  - 7 October pre-application meeting with GLA
  - 15 September 2016 pre-application meeting with LBH
  - 12 October 2016, meeting with Haringey Quality Review Panel (QRP);
  - 18 October pre-application meeting with LBH
  - 24 October 2016 pre-application meeting with the GLA and LBH officers
  - Development Management Forum (23<sup>rd</sup> November 2016)
- 3.3.8. The following discussions took place following the submission of the application:
- 18 January 2017 presentation to the QRP on the Ashley Road Masterplan

- 24 January 2017 application meeting with LBH
- 14 February 2017 application meeting with GLA regarding energy matters
- 15 February 2017 application meeting with TfL
- 8 March 2017 presentation to QRP (Chair's Review)
- 15 March 2017 meeting with the Secured by Design Officer
- 24 April Development Management Forum

3.3.9. The following public exhibitions were held by the applicant at Berol House, 25 Ashley Road. 4,600 invitations were issued across the distribution area to publicise the exhibitions.

- 20 July 2016 (15:30 – 19:30) 53 people
- 10 November 2016 (15:30 – 19:30) 20 people

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

#### *Quality Review Panel*

3.3.10. The scheme has been presented to Haringey's Quality Review Panel on three occasions, at the pre-application stage and the application stage (Chair's review). This has included a panel review of the wider Ashley Road Masterplan. The application has also been presented to the Development Management Forum. The application has been amended during the pre- and post-application process in response to issues raised by officers and the QRP.

3.3.11. A summary of the most recent QRP Chair's Review (on 8 March 2017) is contained in the design section of this report. A summary of the Development Management Forum and officer response is appended (Appendix 2).

## **4. CONSULTATION RESPONSE**

4.1. The following were consulted regarding the application:

Internal:

- 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 Authority
- 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:

*LBH Transportation*

Subject to suggested planning conditions and planning obligations the proposal is acceptable in transportation terms. See detailed comments within the main body of the report.

*LBH Environmental Health Officer – Noise*

Environmental health officers are satisfied with the findings of the Environmental Statement in respect of noise issues and there are no objections.

*LBH Environmental Health Officer – Air Quality*

A detailed energy, air quality assessment and AQNA have not been provided at this outline stage. Further information used to model the air pollution impacts will be required. Predictions provided with the application indicate some areas remain above annual mean objective level. The borough is an Air Quality Management Area therefore the Band B emission standards must apply to the proposed boilers. A number of pre-commencement planning conditions are proposed to secure further details at the detailed design stage. These should include a revised air quality assessment and details of the combustion and energy plant.

Site investigations revealed a range of contaminants present. A hotspot of asbestos containing material was found to be present in made ground. Further site investigations are recommended as follows: further ground gas/vapour monitoring to fully characterise ground gas regime; post demolition works including sampling and testing within the footprint of the existing buildings and the area of Ashley Road car park to delineate the hydrocarbon and asbestos impacted soils.

### *LBH Carbon Management*

The updated version of the Sustainable Design and Construction Strategy (April 2017) follows a series of meetings between the GLA, LBH and the applicant. The current strategy indicates the scheme will deliver a 10.7% improvement over building regulations (Building Regs 2013). This is a relatively low standard considered against comparable schemes in Haringey. To become policy compliant (LP 5.2) the developer will have to offset the remaining of their emissions at a cost per tonne, secured via s106 agreement.

### *Lean*

The scheme delivers a 9.1% carbon reduction through lean (energy efficiency measures). This is comparatively low, but is within an acceptable range. On average, Haringey Council sees 10-12% improvement through energy efficiency measures.

### *Clean*

The scheme is now proposing a boiler-led heating system following discussions regarding the ability of the scheme to easily connect into a future DEN. This is a change from the CHP which was proposed initially and is welcomed.

The following measures should be secured via a combination of planning conditions and planning agreement:

- That the boilers provide all space heating and hot water across the site;
- That this energy centre has pipework installed which will run from the Energy Centre, under the landscaping to the edge of Ashley Road highway. This will enable this to be connected to the DEN at a later date;
- A commitment to connect this (currently unused) pipework to the larger pipework which will then be serve the DEN;
- That when the DEN is delivered that they commit to decommission their boilers and take heat from the DEN.

The Carbon Management Team accept that this carbon performance is less than the applicants preferred CHP-led ambition, and are willing to discuss the impact of this on the overall carbon emissions in the context of longer-term gains flowing from connections to a future DEN. This will need to be verified by detailed carbon emissions and technology type proposed. The detailed issues relating to these comments have been discussed with the Carbon Management Team and are addressed later in this report. Appropriate planning conditions and planning obligations to overcome these issues are proposed.

The Carbon Management Team note the results of the overheating testing including the conclusion that the majority the bedrooms, and 1/3 of living rooms will potentially overheat. As the scheme is currently illustrative and no details of this assessment have yet been provided further modelling work will be required at Stage 3 and 4 of design. The team recommend that this is undertaken and that the units are designed not to overheat through the use of design measures, but not through the use of blinds. This should be required by condition and required 6 months before commencement for approval in order to arrive at appropriate design mitigation measures.

#### *LBH Senior Drainage Engineer*

LBH Drainage Engineers satisfied with the supplied calculations. LBH Drainage require the applicant to supply detailed drainage design drawings, including SuDS features for review and sign-off for approval. The Drainage Officer also comment that the use of orifice plate flow control is preferred over 'Hydrobrake'.

#### *LBH Waste Management*

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

This proposed application will require adequate storage provision for refuse and recycling storage for a once weekly collection

The 252 dwellings will require the following bin capacity provision across the 3 buildings (Building 2, Building 2A and Building 3):

- 43 x 1100L bin for refuse
- 25 x 1100L bin for recycling
- 19 x 140L food waste exterior bin.

The site will require the managing agents to have a cleansing schedule to remove litter from the external areas of the site and cleansing of the waste storage areas.

Vehicles should never have to reverse into or from a highway to make a collection. Where collection vehicles do have to enter developments there should be sufficient onsite turning circles or hammerheads to allow safe egress.

Commercial Businesses occupying the commercial floor space must ensure all waste produced on site are disposed of responsibly under their duty of care within Environmental Protection Act 1990

#### *LBH Nature & Conservation*

Officers have reviewed the Arboricultural Impact Assessment (AIA) & Method Statement. It is not proposed to remove any of the trees located on council land that are immediately adjacent to this development sites(s). The AIA & MS outline all the necessary measures to be implemented to ensure the trees are protected throughout

the demolition and construction process. No objection subject to conditions to ensure trees to be retained are adequately protected during the demolition/construction phase.

External:

*Thames Water*

No objections subject to the provision of drainage strategy detailing any on and/or off site drainage works by grampian condition, and informatives. Thames Water recommend the imposition of a Grampian Style Planning Condition to require the submission of a drainage strategy detailing any on and/or off site drainage works for approval.

*Transport for London*

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

- The management of the demand responsive accessible parking proposal being clearly set out in the car park management plan; this must clearly demonstrate how accessible spaces will be efficiently made available for Blue Badge holders when the demand exists. The car park management plan should be secured by condition;
- 24-hour access to Ashley Link should be secured through the Section 106 agreement or condition as appropriate;
- The applicant must either deliver a replacement bus stand that is approved by TfL as being fit for purpose, or fully incorporate the existing Ashley Road bus stand into the planning application. The former option would require a Grampian condition. The latter option would require inclusion within the planning application;
- At reserved matters stage TfL expect to see greater detail regarding how the cycle storage in Building 2A is accessed from the street, including how the internal courtyard integrates with the cycle parking access points.
- At reserved matters stage TfL also expect to see greater detail of the internal cycle parking arrangements on plan, including numbers and types of cycle parking stands;
- TfL expect short-stay cycle parking to be clearly set out (including quantity and type) on plan at reserved matters stage;
- Evidence of coordination with London Underground should be included in the construction logistics plan (CLP). The final CLP should be secured by a pre-commencement condition in consultation with TfL.

*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. The Environment Agency refers the Council to standing flood risk advice.

*Natural England*

Natural England notes the potential for recreational pressure from new residents upon the Walthamstow Wetlands site (Walthamstow Reservoirs Site of Special Scientific Interest and Lee Valley Special Protection Area and Ramsar) once this opens for public access later this year. In order to combat this Natural England believes it would be desirable to have high quality Green Infrastructure (GI) on site and to ensure that there are good links with Lane Down Park to the north of the site with the potential to provide funding for improvements at the park should space not be available on the development site itself.

Benefits in the long term and of course in the desirability of the properties would be gained through the inclusion of high quality on site GI such as green roofs and walls as well as Sustainable Drainage Systems on site in order to cope with future changes in climate and the associated weather effects (heavy rainfall for instance). The benefits for wildlife would be mirrored by human health benefits seen from plentiful high quality on site GI which could also help with the air quality issues the area suffers from due to being able to absorb more of the pollutants at the roadside through the use of hedgerows for example. Given the location, Natural England has no other comments to make.

*Greater London Authority [see full report in appendices]*

The GLA considered a Stage 1 report on 30 January 2017. The principle of the proposed residential led mixed-use development is consistent with London Plan policies and is supported. The report indicated broad policy support in terms of London Plan policies but raised a number of issues in relation to the following policies: residential/town centre uses/employment including the number of jobs and possibility of affordable workspace; the housing density and play space proposals are supported; ranges of housing mix should be secured in the section 106 agreement.

The proposed tenure split meets the requirements of the draft SPG, subject to the views of the Council. The applicant's viability assessment confirms that assumed affordable rent levels are at local housing allowance levels or lower. Of the shared ownership units, 25% will be low cost shared ownership; however, there are concerns about the affordability of the remaining 75%. The urban design and tall building proposed are generally supported; however, some amendments and clarifications are required. The proposed development would preserve the settings of heritage assets. The proposals are acceptable in relation to inclusive design, subject to an increase in Blue Badge parking spaces.

The applicant should increase Blue Badge car parking provision; assess development trip generation impact on buses; increase cycle parking provision; and provide detail on location, access and design of all cycle parking. A car park management plan, delivery and servicing plan and travel plan should be secured by condition or section 106 agreement. A construction logistics plan should be secured by pre-commencement condition. Depending on results of bus impact assessment, a contribution towards bus impact mitigation may be required.



A site-wide energy network is required. Further information is required in order to verify the carbon savings. On balance, the application does not yet comply with the London Plan; however, the possible remedies set out in the report could address these deficiencies.

#### *Greater London Archaeological Advisory Service*

Pre-demolition recording of the Cannon Avent factory is proposed in the applicants' ES. GLAAS advise that this aspiration be secured by a planning condition. Historic England guidance is that the appropriate recording for structures to be demolished complies with Level 3 recording as set out in Understanding Historic Buildings, and this approach should be applied here.

Appraisal of this application using the Greater London Historic Environment Record and information submitted with the application indicates that the development is likely to cause some harm to archaeological interest but not sufficient to justify refusal of planning permission provided that a condition is applied to require an investigation to be undertaken to advance understanding. The archaeological interest should be conserved by attaching a planning condition.

#### *London Underground*

London Underground Infrastructure protection has no comment to make on this planning application.

#### *Designing out crime officer*

The applicant has addressed most of the earlier issues raised following a meeting with the architect. The Designing Out Crime Officer is encouraged by the Design Guidelines which makes proper mention of Secured by Design New Homes 2016. The officer is confident with the correct specification of products, that the scheme could achieve at least Secured by Design Silver award. The officer requests a planning condition to detail the measures to be incorporated.

#### *London Fire & Emergency Planning Authority*

The LFPA is satisfied with the proposals. Fire brigade access appears satisfactory although an appropriate turning area will be required adjacent to Building 2. Detailed advisory informatives are provided.

#### *Network Rail*

Network Rail provide a number of advisory comments to ensure the proposal, both during construction and after completion of works does not:

- encroach onto Network Rail land
- affect the safety, operation or integrity of the company's railway and its infrastructure
- undermine its support zone
- damage the company's infrastructure
- place additional load on cuttings
- adversely affect any railway land or structure
- over-sail or encroach upon the air-space of any Network Rail land

- cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future

## **5. LOCAL REPRESENTATIONS**

5.1 The following were consulted:

- Neighbouring properties consulted by letter
- 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: 2
- Objecting: 2
- 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 proposed height, is considered to be out of scale with surrounding buildings;
- The development will cause overlooking;
- Objections on the basis of the level of noise and disruption during and post-construction;
- Objections on the basis of adverse impact on access to Berol House for employees and visitors;
- Reduction in attractiveness of Berol House as employment location.

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

## **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 the development – Assessment
- 3) Employment and land use mix
- 4) Housing (including affordable housing) and density
- 5) Masterplanning, public realm & urban design
- 6) Tall buildings, townscape and view management
- 7) Quality of Residential Accommodation

- 8) Development Impact to Adjoining Occupiers
- 9) Heritage Assets
- 10) Transportation and Parking
- 11) Flood Risk and Drainage
- 12) Energy and Sustainability
- 13) Waste and Recycling
- 14) Land Contamination
- 15) Equalities
- 16) Health Impact Assessment

## 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 includes 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-week public consultation on the Inspector’s Main Modifications arising from the Local Plan examination hearings. The consultation concluded January 13th 2017 and the DPP’s were referred from Cabinet to full Council in June 2016. A number of clarifications in the wording to site allocation TH6 (Ashley Road South Employment Area) were proposed through Modifications to the Tottenham Area Action Plan. To provide greater clarity, these related primarily to site requirements including reference to support for ‘mixed-use employment-led development’.
- 6.1.2 The Inspector’s Report was received on 28 April 2017 and concludes that the Alterations to Strategic Policies (ASP), Site Allocations Development Plan Document (TAAP), Tottenham Area Action Plan (TAAP) and the Development Management Development Plan Document (DMDPD) provide an appropriate basis for the planning of Haringey.
- 6.1.3 The ‘development plan’, including the relevant site allocation (TH6), is therefore at an advanced stage and should be afforded significant planning

weight. The AAP and accompanying suite of Development Plan documents are on track to be adopted by Cabinet later in 2017.

#### *The London Plan*

- 6.1.4 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*

- 6.1.5 The Upper Lea Valley Opportunity Area Planning Framework (OAPF) (2013) is supplementary guidance to the London Plan. 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 Ashley Road South site as suitable for residential, employment and potential new school. A comprehensive mixed masterplan is envisaged with good connections to transport and improved entrance to Down Lane Park.

#### *Housing Zone*

- 6.1.6 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 programme 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)*

- 6.1.7 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.
- 6.1.8 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.

- 6.1.9 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. The Inspector's Report was received on 28 April 2017 and concludes that the Alterations to Strategic Policies (ASP), Site Allocations Development Plan Document (TAAP), Tottenham Area Action Plan (TAAP) and the Development Management Development Plan Document (DMDPD) provide an appropriate basis for the planning of Haringey.
- 6.1.10 The most significant change 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.
- 6.1.11 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)*

- 6.1.12 The Tottenham AAP is at an advanced stage and should be afforded significant planning weight given its progression in the plan making process. 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*

- 6.1.13 The site allocation (TH6) envisages the creation of an employment-led mixed use quarter north of a new District Centre, creation of a new east-west route linking Down Lane Park and Hale Village, and enhanced Ashley Road public realm. Residential use will only be acceptable for the purpose of making viable the re-provision of employment floorspace.

The site requirements for the wider site allocation (incorporating Major Modifications endorsed by the Inspector 2017) are as follows:

- The site is within a Designated Employment Area: Regeneration Area and proposals for mixed use employment-led development will be supported, where appropriate. It is anticipated that the redevelopment of this site will not create a net reduction in employment floorspace.
- The introduction of a tertiary education provider providing education in the technology sector will be supported on this site.
- Residential development will only be acceptable for the purpose of making viable the re-provision of employment floor space.
- The proximity of the new Harris Academy to the north and Down Lane Park to the north and west make the area particularly suitable for larger units along those edges.
- Ashley Road will form the key public and movement spine, with pedestrian access to Tottenham Hale District Centre from enhanced workspaces optimised.
- Active frontages will be expected on both sides of the Ashley Road frontage at ground floor level.
- Good quality buildings, including, but not limited to Berol House and 16 Ashley Rd should be retained and adapted for flexible, and affordable employment use. Residential use will only be acceptable for the purpose of making viable the re-provision of employment floorspace.
- The site has a key role to play in laying out the Green Grid. Along the southern edge of the site and east-west link will be provided to connect into Down Lane Park to the west and to the Lee Valley in the west. Developments should positively benefit this route by providing active frontages along its length.
- The delivery of superfast broadband to the employment area will be supported.

#### *Tottenham Hale District Centre Framework*

- 6.1.14 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.
- 6.1.15 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.

- 6.1.16 The Ashley Road South site is envisaged to be a thriving mixed-use area with a vibrant mix of high density businesses and homes occupying converted and new purpose built accommodation.

*Tottenham Hale Streets and Spaces Strategy*

- 6.1.17 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 seeks to provide a north/south spine 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*

- 6.1.18 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*

- 6.1.19 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*

- 6.1.20 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*

- 6.1.21 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.
- 6.1.22 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*
- 6.1.23 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.
- 6.1.24 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. Whilst many of the existing buildings on the land are of limited architectural merit and detract from the character of the area the Cannon Aven Factory is considered to be of sufficient merit to warrant building recording.
- 6.2.2 Archaeological building recording is an investigation to establish the character, history, dating, form and development of an historic building or structure which normally takes place as a condition of planning permission before any alteration or demolition takes place. The outcome will be an archive and a report which may be published. Pre-demolition recording of the Cannon Aven factory is proposed in the applicants' Environmental Statement and is also supported by Historic England and LBH officers. This will be secured by a planning condition following the Historic England guidance for Level 3 recording for structures to be demolished and as set out in Understanding Historic Buildings.



### *Employment provision*

- 6.2.3 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.
- 6.2.4 Local Plan Policy SP8 indicates there is a presumption to support local employment and small sized businesses that require employment land and space. The site is also located within a Local Employment Area (LEA 15) within the Local Plan Strategic Policies. These policies are now relatively out of date and soon to be replaced by emerging policies, which are at an advanced stage having been tested through examination.
- 6.2.5 Emerging policies restrict mixed-use redevelopment of employment land to Local Employment Area – Regeneration Areas. The Strategic Policies Local Plan provides the basis for a more flexible approach to development in such Regeneration Areas. Furthermore, the London Plan and Haringey's Strategic Policies require that more intensive land uses are directed to highly accessible locations. Emerging Policy DM38 states that the Council will support proposals for mixed-use development within a Local Employment Area – Regeneration Area where this is necessary to facilitate the renewal and regeneration of existing employment land and floorspace. In particular, proposals are expected to demonstrate that for reasons of viability a mixed-use scheme is necessary to facilitate the delivery employment floorspace and maximise the amount of employment floorspace to be provided within the mixed-use scheme, having regard to development viability. Proposals are expected to provide demonstrable improvements in the site's suitability for continued employment and business use, having regard to:
- The quality, type and number of jobs provided, including an increase in employment densities where appropriate;
  - Flexibility of design to enable adaptability to different business uses over the lifetime of development;
  - Environmental quality of the site;
  - Provision for an element of affordable workspace where viable.
- 6.2.6 Specifically, emerging policies relating to site allocation TH6 in the Tottenham Area Action Plan state residential development will only be acceptable for the purpose of making viable the re-provision of employment floorspace. The site is within a Designated Employment Area: Regeneration Area and proposals for mixed use employment-led development will be supported, where appropriate. Subject to the above, the principle of the demolition of the existing buildings on the land is considered to be acceptable in principle and

will optimise its reuse in accordance with a range of development plan policies.

- 6.2.7 The majority of the employment floorspace applied for within the application concerns Building 3, which includes a partial podium and commercial floorspace on the ground floor facing Ashley Road and a future public square behind Berol House (the 'Yard'). The first floor will provide dedicated B class uses with the flexibility to sub-divide to attract a range of employers. Early assessments of demand, provided to the applicant, indicates the location and space could be attractive to a range of occupiers seeking more affordable options than Central London, but within a creative and vibrant environment. The space could be appealing to local creative tenants, small to medium sized companies that might view Tottenham as an alternative to Central London or large-scale occupiers looking to a new affordable fringe location, such as co-working spaces.

#### *Number and type of jobs*

- 6.2.8 The existing buildings and yards are currently occupied by low grade commercial and industrial buildings (Class B1/B2/B8). The site currently provides 3,234sqm (GIA) of commercial floorspace (B1/B2 uses) and this is estimated to provide in the order of 63 FTE jobs. The construction phase could lead to the displacement of various employment on-site activities. The existing occupiers are on short term leases with all having an end date in 2018.
- 6.2.9 The precise number of jobs that will be supported will depend on the end-users that occupy the scheme and the extent to which current occupants of employment space may be re-accommodated in the new scheme. However, it is possible to estimate employment generation by applying average employment densities to the proposed floorspace. In gross terms, it is estimated that the proposed development could support 262 jobs or 217 FTE jobs. In terms of net additional employment and assuming approximately half of these jobs are re-accommodated in the proposed scheme would give rise to a net employment figure of approximately 186 FTE jobs. This represents a significant uplift in the number of jobs. The new commercial space will be of a high quality and more efficient design and will provide predominantly B1(a) office space which can support a greater capacity of workers.

#### *Employment floorspace*

- 6.2.10 The employment provision directly relating to this application is disaggregated below.

<b>Application</b>	<b>Building</b>	<b>Existing commercial floorspace (GEA)</b>	<b>Proposed commercial floorspace (GEA)</b>
Outline (Notting Hill Housing)	Building 2	1,748 sqm (Class B1)	800sqm (A1/A3/B1/D1)
	Building 2A		
	Building 3	1,486 sqm (Class B1)	2,800sqm (A and B Class Uses)
	Totals	3,234sqm (Class B1)	Up to 3,600sqm (GEA) all commercial uses

Table 5: commercial floorspace applied for (NHH)

6.2.11 The application seeks permission for up to 3,600sqm total commercial floorspace with a minimum provision of 2,750sqm. In the event the total amount applied for is built out this represents an overprovision of commercial floorspace. Conversely, in the event the minimum applied for is built out, this represents a like-for-like reduction in commercial provision, within the context of the red line in the application. The proposals, as submitted, allow flexibility for a range of commercial A, B1 & D1 uses.

6.2.12 As part of a wider mixed use allocation in emerging policies the existing and proposed employment provision must also be viewed in the context of the wider proposals for Ashley Road South. The ambition of emerging policies is to secure re-provision of employment floorspace across the whole allocation leading to a genuinely mixed use area. Proposals for the wider masterplan area have now been submitted and this application seeks to play a complementary role. The provision across Ashley Road South is shown below and, if built out in full, shows the potential for 9% additional re-provision in all forms of commercial floorspace. The residual commercial floorspace is the subject of separate planning applications for the remainder of the masterplan area. The specific question of the overall balance of uses, specifically retail use, is considered below.

<b>Policy Document</b>	<b>Building</b>	<b>Existing commercial floorspace (GEA)</b>	<b>Proposed commercial floorspace (GEA)</b>
Policy Requirement (DCF)	All buildings	14,729 sqm (158,549 sqft) (GEA)	16,611.3 sqm (113% re-provision)
Policy Requirement (TAAP)	Totals	15,300 sqm (Assumed GEA)	16,611.3 sqm (109% re-provision)

Table 6: emerging commercial floorspace across ARS

- 6.2.13 Officers have worked with the applicant to maximise the amount of employment-generating floorspace across the masterplan area and the new buildings within this proposal provide a total of up-to 3,600sqm. The parameter plans and Development Specification currently allow for a range of uses across A1/A3/B1/D1 use classes. This level of provision would meet the overall objective of re-provision required, subject to finding the right balance between retail and employment uses to secure policy objectives.
- 6.2.14 The proposals clearly demonstrate a significant improvement in the quality, type and flexibility of employment space provided. Whilst subject to market demand and future detailed design, the proposals offer flexibility of design to enable adaptability to a range of businesses over the lifetime of development consistent with the ambition for the area. In addition, the proposals offer a significant improvement in the environmental quality of the site, in line with the changing function and role of Tottenham Hale, and also consistent with the Council's employment policies.

*Balance of commercial land uses*

- 6.2.15 To maximise and secure the employment re-provision envisaged (Policies TH6 and DM40) and secure an appropriate re-provision of employment floorspace across the masterplan area, controls on the commercial floorspace to restrict retail use within the scope of this application are necessary. A limited amount of A1/A3 use commensurate with the employment-led role of ARS is supported, particularly in and around key public areas of activity & movement. The commercial employment units will of course be subject to market demand but the proposals offer a range of unit sizes capable of adapting to a range of businesses over the lifetime of the development.
- 6.2.16 The existing and emerging policy framework does not envisage retail use in this part of the regeneration area and officers view the introduction of significant new retail provision in this location as potentially detrimental to the strategic role of Ashley Road South as part of the wider town centre offer. In particular, DM38 seeks to maximise the amount of employment floorspace. The introduction of a significant amount of retail provision in this location would lead to an unbalanced mix of land uses in conflict with the employment-led role identified for Ashley Road South. Officers have carefully considered the overall balance of uses including the option of an embargo on retail uses, and consider a limited amount of retail and A3 use as appropriate in the circumstances of this particular site.
- 6.2.17 Taking all these factors into consideration, including the overall policy objective of creating an employment-led mixed use area, officers recommend the retail use is restricted to a maximum of 450sq.m. of Class A1 use and a maximum Class A3 use of 300sqm. In addition, as part of the s.106

agreement, the applicant has agreed to review and update the commercial strategy prior to the occupation of any units, to give due consideration to the wider commercial offer as part of the Ashley Road South masterplan. Officers consider this approach to strike the right balance between maximising employment floorspace and allowing a limited amount of flexibility to deliver a genuinely mixed use and vibrant part new neighbourhood in Tottenham Hale. The proposed retail use restrictions will also bring the proposal into line with emerging policies by securing the maximum viable re-provision of existing employment floorspace. This balance will also ensure Ashley Road South does not compete with the existing and emerging retail role in the new Tottenham Hale District Centre.

6.2.18 Within Building 2a, specific provision is made for D1 community use. It is anticipated this space, located at a key visual interface between a new residential community and the park, could form an important community function. Utilisation of the ground floor to provide a community use would be a benefit to the scheme. The parameter plans currently allow for a range of uses within this ground floor space across A1/A3/B1 and D1 uses. A community use is the preferred use in this important location and will be secured via planning condition.

6.2.19 Considered in the light of wider emerging proposals and subject to the recommended restrictions on retail use, the land use and employment provision is considered to be acceptable. The proposed employment, food and drink and community components would provide a significant number of new jobs, help create safe and attractive places for meeting and socialising consistent with the wider ambition to create a vibrant new creative district. 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. Carefully managed, the balance of land use components could make a positive contribution towards creating a sustainable community creating a genuinely mixed use area.

### **6.3 Tall Buildings, townscape and view management**

6.3.1 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'.

6.3.2 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.

- 6.3.3 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.
- 6.3.4 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.
- 6.3.5 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. These criteria include:
- 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
- 6.3.6 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. Ashley Road South masterplan area sits outside the identified views.
- 6.3.7 The Local Tall Buildings Validation Study states that the areas of industrial and business alongside the railway are considered to be less sensitive to potential tall buildings. There is potential for tall buildings in this area 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 these individual locations requires careful consideration to ensure a cohesive building group.

### *Tall buildings assessment*

- 6.3.8 Within the Tottenham Area Action Plan emerging policy AAP6 (Urban Design and Character including Tall Buildings) outlines the opportunity to ‘establish a new urban character’ for such Growth Areas. One overall objective under TH1 is to create ‘a new urban form – consistent with the area’s status and accessibility’.
- 6.3.9 The AAP also allocates Ashley Road South (TH6) as a key site and states that it will form a transition site between the denser District Centre and the surrounding residential area. Within the emerging Haringey Development Management DPD the proposed site is allocated in Figure 2.2 ‘Potential Locations Appropriate for Tall Buildings’ under emerging Policy DM6 (Building Heights) as an area that continues to be appropriate for tall buildings. The Tottenham Hale District Centre Framework (December 2015) also identifies the Ashley Road South site as suitable for medium rise height buildings.
- 6.3.10 Any new tall building(s) should be a focal point, but should also adhere to the existing hierarchy; the aim is to create discrete, identifiable places, both within the borough and London. Building 3 is predominantly a medium rise courtyard form building with a taller element at its north eastern corner. The taller element, rising to 16 stories, is located on the busy Watermead Way, so it will become a visible element on the approach to Tottenham Hale from the north, demarcating the entrance to the district centre. The planned heights provide an appropriate step down from the taller buildings of around 20 storeys which are proposed within the new centre. The building heights, sitting within a well resolved masterplan, are likely to contribute to a planned and cohesive group of taller buildings as part of a new urban context and are therefore in line with AAP6.
- 6.3.11 As the proposals are currently in outline form it is only possible to form a view on the silhouette, with detailed elevational treatment and materials reserved for future consideration. Illustrative material shows the potential for a high quality outcome through effective articulation of windows, balconies and recessed windows running the vertical length of buildings. A number of planning conditions and planning obligations are recommended to secure further attention to design and details and a high quality outcome.
- 6.3.12 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. Sitting in the context of a well resolved masterplan, the tall building proposed represents an appropriate and positive addition to Tottenham Hale and is supported in this location.

*View management and townscape assessment*

- 6.3.13 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 Station Square proposal and Argent Related proposals are considered to compliment this arrangement. The development sits to the north (and outside) the designated local view from Burgoyne Road.
- 6.3.14 An assessment has been carried out of the effect of the development on existing townscape character and on views towards the site. A total of 11 representative views were selected and agreed with LBH officers. The assessments comprise two separate but interrelated assessments: an assessment of the likely significant effects on the character and quality of the townscape together with an assessment of the effect of development on views (including protected views), viewers and their visual amenity. The cumulative impact of the wider proposals for Ashley Road South was also assessed.
- 6.3.15 Together, the sites identified for cumulative assessment would deliver a considerable change in urban scale around the centre of Tottenham Hale, commensurate with the objectives set out in the District Centre Framework. The proposed introduction of high density mixed use and residential development would also change the area's currently partially industrial land use character. The assessments conclude that the nature of change to the Tottenham Hale East character area would be high, whilst the nature of change to the Park View Road and Jarrow Road character areas would be moderate, the latter experiencing primarily visual changes in scale to their setting.
- 6.3.16 Officers agree with the conclusions of the individual and cumulative assessments. The introduction of a cluster of taller buildings and higher density residential and mixed use development around Tottenham Hale would have a number of benefits for the area, including replacing the existing, often utilitarian, architectural context with attractive contemporary architecture; introducing better definition to the streetscape with new active frontages; the introduction of new uses and activities within Tottenham Hale which would benefit surrounding residents; improved natural surveillance and legibility for those moving through the area; and a stronger district identity for Tottenham Hale within the surrounding town centre hierarchy, expressed through appropriate taller elements.
- 6.3.17 The applicant has also presented various AVRs (Accurate Visual Representations) of the scheme from non-designated locations in the vicinity of the site. The submitted AVR's in the HTVIA indicate the development will sit comfortably within the massing that is envisaged to be created across Ashley Road South Masterplan and within the wider Tottenham Hale District



Centre. Given the trajectory of other development across the Ashley Road South Masterplan and Tottenham Hale, the buildings will soon form part of a new urban structure as Tottenham Hale is regenerated and additional development is brought forward.

- 6.3.18 The proposed buildings, as part of the wider masterplan, will appear prominently above the existing tree plane in Down Lane Park. Overall, and subject to detailed design, the introduction of residential development adjacent to the park will provide a positive new relationship not dissimilar to the way in which residential areas interface with urban parks in other parts of London.
- 6.3.19 Down Lane Park divides the smaller scale industrial areas close to the centre from low rise residential streets forming the hinterland transition to Bruce Grove and Northumberland Park/North Tottenham and the introduction of a well-designed residential neighbourhood will assist in the transition from a new district centre to the residential and industrial hinterland.
- 6.3.20 With regards to London strategic views, GLA officers confirm via the Stage 1 Planning Report of 30 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.
- 6.3.21 Overall, the Cannon Factory and Ashley House scheme will have a positive effect on the townscape and visual amenity of Tottenham Hale. The scale, form and character of the outline development are a direct response to the emerging policy requirement for a high quality mixed use development at Ashley Road Area and Tottenham Hale. The visual and townscape assessments indicate the development will have a beneficial environmental effect.

#### **6.4 Housing and density**

- 6.4.1 London Plan Policy 3.3 provides explicit strategic support for the provision of housing within London, and sets a target for the Council to deliver a minimum of 15,019 homes in the Plan period 2015-2025. London Plan Policy 2.13 (and supporting Table A1.1) recognises the significant potential of the Upper Lee Valley Opportunity Area to accommodate new homes, and identifies a minimum of 20,100 new homes to be accommodated within the area. Haringey Council's Strategic Policy SP1 seeks to focus the majority of housing growth in the designated Growth Areas, including Tottenham Hale. Therefore, given the site's context within the Upper Lee Valley Opportunity

Area and the Tottenham Housing Zone, and in light of the Council's local policy designations, the principle of the redevelopment for of this site for housing, to include up to 265 new homes is supported and in line with both London Plan and local planning policy.

- 6.4.2 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.
- 6.4.3 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.
- 6.4.4 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 and Tenure Split*

- 6.4.5 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.
- 6.4.6 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.

### *Portfolio approach to affordable housing*

- 6.4.7 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.
- 6.4.8 The Housing Zone 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. 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.
- 6.4.9 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 type or 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. The overall provision of a scheme offering 50% affordable housing is a welcome contribution to the portfolio approach given the location of the site within a Housing Zone and the built form of the development which offers opportunities for larger homes. Looking at all the sites across the Ashley Road site allocation the level of affordable housing is likely to be approximately 36%. The illustrative breakdown across the sites is shown in the table below and will be subject to further testing through individual applications.

<b>App</b>	<b>Building</b>	<b>Residential units (h/r)</b>	<b>Number of affordable units (h/r)</b>	<b>Percentage A.H (%) (by unit)</b>	<b>Percentage A.H (%) (by hab room)</b>	<b>Tenure split (by hab room)</b>
Full (BSD)	Building 1	377 units	138 units	36.6%	34.6%	60% Intermediate
	Building 1A	(1,120 h/r)	(387 h/r)	138 units <ul style="list-style-type: none"> <li>• 52no. AR units</li> <li>• 86no. Int units</li> </ul>	(387 h/r)	40% AR (156 h/r)
Hybrid (BSD)	Building 4	156 units (426 h/r)	15 units (43 h/r)	10%	10%	100 % Intermediate (43 h/r)
	Berol House	Up to 18 units (86 h/r)	6 units (30 h/r)	33%	35%	100% Intermediate (30 h/r)
Outline (NHH)	Building 2	Up to 265 units	Up to 147 units	55%	50%	71% Intermediate
	Building 2A	(820 h/r)	(411 h/r)	(147 units)	(411 h/r)	(290 h/r)

	Building 3					29% AR (121 h/r)
ARSM	All buildings	<b>816 units (2,452 h/r)</b>  <b>(including maximum NHH parameters)</b>	<b>Up to 306 (871 h/r)</b>	<b>37.5% (306 units)</b>	<b>36% (871 h/r)</b>	<b>68% Intermediate (594 h/r)</b>  <b>32% Affordable rent (277 h/r)</b>

**Table: Illustrative ARS Portfolio Approach to Affordable Housing**

6.4.10 The affordable housing tenure split (70%/30% intermediate/affordable rent) proposed by the applicant is also consistent with the portfolio 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 and this will be a baseline position.

6.4.11 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.

#### *Affordability*

6.4.12 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.

6.4.13 In relation to Affordable Rent, LBH's draft Housing Strategy 2015-2020 states that registered providers should aim for average rents to be no more than 65% of Market Rent. The housing strategy also sets out the maximum affordable rents as a percentage of Market Rent for each unit type.

6.4.14 The applicant's viability assessment has had regard to the maximum affordable rents as a percentage of market rent, as set out in the draft housing strategy. It has also had regard to the Local Housing Allowance (LHA) caps for the Outer North London Broad Rental Market Area (BRMA).

- 6.4.15 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. These are defined as ‘lower-cost shared ownership’ aimed at households earning less than £45,000 gross income per year.
- 6.4.16 The applicant notes in the Affordable Housing Statement that effective management will in part allow for affordability and the applicant, Notting Hill Housing, has longstanding experience in the management of affordable housing to ensure cost elements are proportionate.
- 6.4.17 While the final income limits will be determined by negotiation in the S106 process, the Mayor’s 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 worker’s officers have worked with the applicant to maximise the amount of ‘lower-cost shared ownership’ within the scheme and this has increased to a minimum of 34% of overall provision (up from 25%). Current financial modelling assumes the following mix of shared ownership units:

<b>LBH (Housing Strategy 2017-2022) Income Bands</b>	<b>Percentage</b>
<i>LBH Income Band 3</i> £40,000 - £56,000	28%
<i>LBH Income Band 5</i> 'Lower Cost' Shared Ownership for lower income households, including those at or just above proposed Pay to Stay threshold (currently £40,000) £30,000 - £40,000	34%
<i>LBH Income Band 6</i> 'Higher-cost Shared Ownership' £40,000 - £90,000	38%
<b>TOTAL</b>	<b>100%</b>

*Table 7: Affordability of Shared Ownership Units*

- 6.4.18 These assumptions indicate that, on average the income requirements across the proposed Shared Ownership homes achieve a mid-point of £48,416, which sits comfortably within the Council's Income Band 3, as defined in the Draft Housing Strategy.
- 6.4.19 The applicant has also agreed to a S106 obligation to market the scheme, for a time-limited period of three months, to persons who live or are employed in Haringey.
- 6.4.20 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 provide a significant number of affordable homes, including towards the lower end of the income scale. Taken as a whole, the affordable housing content will make a significant contribution to the overall balance of affordable housing within Tottenham Hale and is considered to weigh in favour of the scheme.

#### *Dwelling Unit Mix*

- 6.4.21 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.
- 6.4.22 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.

6.4.23 As the scheme is in outline at this stage, no detailed housing mix is approved at this stage although the urban block typology and illustrative drawings demonstrate the potential for a good housing mix. An illustrative dwelling mix has been shown below and shows the potential for the built form to provide a good residential mix. This will be addressed at reserved matters stage taking into account local and strategic housing need and the preferred housing mix identified in the District Centre Framework.

<b>Application</b>	<b>Building(s)</b>	<b>Number of units</b>	<b>1 bedroom units</b>	<b>2 bedroom units</b>	<b>3 bedroom units</b>
Ashley House and Cannon Factory NHH Outline Planning Application	Building 2 Building 2A Building 3	Up to 265 units	103 units (39%)	98 units (37%)	64 units (24%)

*Table 8: Indicative mix for assessment purposes (not for approval)*

#### *Affordable Housing Viability*

6.4.21 The scheme has been independently assessed by the Council’s viability advisors. As part of the assessment process and interrogation of the appraisal officers have worked with the applicant to maximise the amount of lower-cost shared ownership units and improve the overall affordability of the shared ownership homes. Officers agree with the conclusions of the consultant that the scheme provides the maximum viable and practical quantum of affordable housing and is consistent with local and strategic housing policies. A planning condition is recommended to secure further details of the affordable housing within each building. The proposed level of affordable housing is considered to be a significant factor in favour of the scheme.

6.4.22 A further review mechanism has been agreed between the applicant and GLA/Council officers which requires the viability assessment to be revisited should no substantial progress be made in terms of the progression of reserved matters within two years. Officers are satisfied this review mechanism is required to incentivise development and ensure that the maximum reasonable level of affordable housing is secured.

6.4.23 Having considered the information submitted by the applicants, the Council's consultant, and the revised 50% baseline offer including a higher proportion of low-cost intermediate units, officers are satisfied that the above affordable housing offer represents the maximum reasonable amount of affordable housing, taking into account the individual circumstances of the site. The rents and income levels specified within the S106 agreement will ensure that the affordable homes are genuinely affordable to local people. On this basis, the affordable housing provision complies with NPPF policy, as well as London Plan and Haringey Council's local policies, which require the maximum reasonable amount of affordable housing to be delivered on sites subject to viability.

#### *Summary of housing issues*

6.4.24 The scheme will make a significant affordable housing contribution required by local and strategic planning policies. 50% affordable housing by habitable room delivered by way of intermediate and affordable rent is welcomed by officers and weighs in favour of the scheme. The s106 process will secure the final income levels but the scheme will deliver a significant number of 'lower-cost shared ownership' units, in accordance with the Council's Housing Strategy.

6.4.25 As part of a wider masterplan-led approach, the scheme is considered to optimise the site potential and the potential range of tenures and mix of affordable housing offered is welcomed. 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 in line with draft GLA guidance seeking a tailored approach to affordable housing for Housing Zones.

#### *Density*

6.4.26 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.

6.4.27 Appropriate density ranges are related to setting in terms of location, existing building form and massing, and the index of public transport accessibility



(PTAL). The site is considered to be within an 'urban' setting where the density matrix sets a guideline of 45-260 units or 200-700 habitable rooms per hectare with a PTAL of 4-6. The density of the development equates to a maximum of 265 units per hectare if the scheme's maximum parameters are built out. This upper end of the range would be slightly above the density range within the London Plan's indicative range for 'urban' sites with a PTAL of 5-6a. Other local factors, including the quality of the scheme, its location within the Upper Lee Valley Opportunity Area and the Tottenham Housing Zone, high accessibility and proximity to nearby open spaces support the proposed density.

## **6.5 *Masterplanning, public realm & urban design***

- 6.5.1 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.

### *Masterplan-led approach*

- 6.5.2 The illustrative masterplan at Ashley Road South is a joint collaboration between Notting Hill Housing and Berkeley Square Developments, both bringing forward separate applications for their respective landholdings. New and improved links and public spaces provide the structuring 'grid' for the masterplan, namely;
- Ashley Road which will be improved to provide increased pavement widths and full environmental improvements providing a leafy avenue where pedestrians have priority;
  - Berol Link is a new public space linking Down Lane Park, through the development, to Ashley Road. It will be a green space with ornamental rain gardens, decks and play space, extending the park into the development.
  - Ashley Link connects to Haringey's wider networks. It will be a linear garden inspired by woodland belt with natural play.
  - The Yard, is a potential new square enclosed by employment floorspace at lower levels of Building 3 and Building 4.
  - The Campus, within which the new National College for Digital Skills will be the focus, with incubator facilities. The immediate surroundings of the college will be student-oriented.

- 6.5.3 A masterplan-led approach is encouraged by the District Centre Framework (2015) as part of a wider set of urban design and regeneration principles. The Quality Review Panel has reviewed the application proposals together with proposals for the wider masterplan on a number of occasions and is generally supportive of the wider masterplan, subject to a number of specific issues being addressed. The proposals, pertaining to the implementation of the wider masterplan, were recently submitted to the Council for consideration. The design, scale and massing of this application has evolved as part of a comprehensive and planned approach which is welcomed. The specific design issues pertinent to this application are dealt with elsewhere in this report.
- 6.5.4 The form, scale and massing of the building is considered to be appropriate to the site context, and will sit comfortably within new development envisaged in the Tottenham Hale District Centre. The mansion block layouts are a positive response to the creation of a new neighbourhood in this part of Tottenham Hale, while also creating a visual landmark within Tottenham Hale and optimising the site's potential. 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 in line with the aforementioned London Plan and local policy noted above.

*Public realm, landscaping & meanwhile conditions*

- 6.5.5 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 seeks to provide a north/south spine 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.
- 6.5.6 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.
- 6.5.7 The applicant has submitted an indicative landscaping plan prepared by Churchman Landscape Architects. This plan details wider proposals for public realm within and beyond the redline area based on liaison with adjacent landowners progressing schemes in Tottenham Hale. This also includes outline landscape proposals for areas around the curtilage of Buildings 2/2A and 3 including Ashley Link, Burdock Road and Ashley Road itself.

- 6.5.8 The applicant has also submitted proposals for interim or meanwhile landscaping conditions to allow for circumstances in which particular buildings or parts of the masterplan area come forward at different times. This is particularly relevant to the consideration of this application given the landownership pattern, juxtaposition of Buildings 2a and 3 to adjacent blocks, the need for coherent building and public realm design and the potential risks associated with delay to particular sites coming forward.
- 6.5.9 The Design and Access Statement, Design Guidelines and Introduction to the Masterplan documents submitted with the application all show the potential for a high quality new public realm, establishing a high standard for future phases to follow. The new links provided in the form of Ashley Link, improvements to Burdock Road and 'The Yard' provide a positive framework of new public spaces contributing to the ambition to create a vibrant new creative neighbourhood.
- 6.5.10 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.
- 6.5.11 The buildings provide a contextually appropriate built form and framework for 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.
- 6.5.12 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.
- 6.5.13 The applicant has agreed to meet site specific mitigation (as per the S106 Heads of Terms) to ensure the responsibility for a high quality public realm. 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.

6.5.14 Notwithstanding the delivery of the wider public realm on a comprehensive basis, detailed landscaping plans will be required as part of the reserved matters applications to ensure appropriate landscaping to the communal amenity areas, particularly the proposed Ashley Link and Burdock Road. A number of other planning conditions and s106 obligations are also proposed in order to secure the design and delivery high quality public realm consistent with site mitigation and wider regeneration aims. These will include:

- Completion of works to Ashley Link secured prior to the occupation of Buildings 2 and 2A
- Public access secured via planning agreement
- Completion of Burdock Road and Watermead Way works, including any wind mitigation measures prior to practical completion of Buildings 3.
- Estate management strategy to secure long-term management and maintenance
- Design & landscaping details in accordance with Design Guidelines

*Quality Review Panel (QRP)*

6.5.15 As noted above, the proposal has been assessed by Haringey's QRP at the application and pre-application stage. The final review took place on 8 March 2017 and the Panel's stated:

*"The Quality Review Panel thanks the project team for their presentation, and feels that in broad terms the proposals provide a good basis for the development of Buildings 2, 2A and 3 within the overall masterplan. Whilst the panel acknowledges the external pressures that have resulted in the Notting Hill Housing (NHH) parcels of land coming forward first through an outline application, they note that there are significant risks to design quality in granting outline permission for this high density scheme. A full planning application would have minimised these risks.*

*The proposals for Buildings 2, 2A and 3 seem to have addressed the key comments from the previous reviews. Subject to verification of daylight and sunlight levels in adjacent gardens and public space, the panel broadly supports the content of the parameter plans and design guidelines / codes. Integration with the wider development and ongoing management will need to be ensured through Section 106 agreements. The external views of the illustrative proposals promise high quality development. The panel notes that the reserved matters stage will be critical to ensure that this standard is delivered."* Further details on the panel's views are provided below.

6.5.16 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	Officer Response
<i>Scope of the outline application</i>	
Due to the scope and nature of the outline application presented for review, the panel's comments were focused on the parameter plans and design guidelines/codes. The parameter plans establish the silhouette of the buildings, demonstrating: layout; height scale and quantum; non-residential floorspace; residential accommodation; landscape parameters; Ashley Road; access and movement.	Commentary. No response required.
The design guidelines identify the proposed design qualities of the scheme, and comprise codes that will be formally approved.	The Design Guidelines will be secured via planning condition.
Accommodation layout, architectural expression, detailed landscape and public realm design were not considered in detail at this review, as they are outside the scope of the application.	These matters will be the subject of future reserved matters.
Consideration in detail of the other buildings within the overall site (Buildings 1, 1A, 4, Berol House and NCDS) was not undertaken at this review.	These matters form part of planning applications recently submitted to the Council.
<i>Building 2</i> The panel support the proposed uses within Building 2, and the configuration of the building envelope.	Noted
<i>Building 2A</i> The panel welcome the adjustments to the massing of Building 2A to increase the levels of daylight and sunlight in communal gardens and the public realm.	Noted
However, this needs to be supported by rigorous testing of daylight and sunlight levels, in addition to sections taken through the courtyard, to ensure that enough has been done in this regard.	Daylight/sunlight assessments, including cumulative assessments have been undertaken and the impacts are judged to be acceptable.
The depth of the plan suggests that a number of single aspect flats will be unavoidable; the panel reiterates that north facing single aspect units with a poor outlook are unacceptable.	Officers assess the quality of the accommodation to be high and the number of north facing flats has been minimised. Further attention to design will be secured via reserved matters and planning conditions.
The panel notes that interim solutions have been	Subject of s106

considered for the locations where the NHH block abuts the Berkeley Square Developments (BSD) proposals, at the shared courtyard and party wall location, and at the slot in the eastern section of the Ashley House site.	provisions and secured via Design Guidelines
However, concerns remain regarding how these different parts of the overall scheme will integrate, in terms of access and design. The panel strongly recommends that Section 106 agreements should be put in place to ensure that the two halves of the Ashley House courtyard (NHH Building 2A and BSD Building 1A), are coherently designed.	Coherent design will be secured via planning obligation & design guidelines.
The panel notes that the proposals for Building 3 have responded to the previous QRP feedback on heights.	Noted
The plan depth of Building 3 also necessitates a number of single aspect units. Whilst the panel highlights that north facing single aspect units with a poor outlook are unacceptable, they welcome the provision of two access cores and note that there is the potential for some very high quality flats within the scheme.	Noted
The panel recognises that interim solutions have been considered for the locations where the NHH block abuts the BSD proposals, at the yard and party wall location within the Cannon Futon Factory site. However, concerns also remain regarding how these different parts of the overall scheme will integrate, in terms of access and design.	Risk mitigated by s106 provisions requiring integrated design and via Design Guidelines
Design integration of the NHH Building 3, BSD Building 4 and the adjoining public realm will need to be controlled through Section 106 agreement.	As above
The BSD application for Building 4 and Berol House should facilitate and secure the overall vision for a commercially active and vibrant yard in this part.	Noted – subject of separate application
Whilst the panel understands the scope (and limits) of the NHH outline application, they note that there remain a number of elements within the wider scheme as a whole that require further consideration.	Noted – subject of separate application
They remain to be convinced by the scale and massing of Building 4, as outlined in previous reviews, and look forward to considering it in detail at a future review.	Noted – subject of separate application
In addition, the panel still have reservations about Building 1; they would welcome the opportunity for an early review of this section of the site.	Noted – subject of separate application

<i>Securing high quality development</i>	
The panel agree that the design guidelines / codes should establish a high quality for the architectural expression of the scheme.	Noted
This should include guidance on brick facades, to ensure sufficient interest, shadow and apparent depth, for example through recessed windows.	Amendments to the Design Guidelines include commentary on palette of materials, and requirement to enhance daylight into the dwellings.
Scrutiny of materials and construction details should form part of the reserved matters stage. The indicative designs presented alongside the application look very promising, and set a high standard for the next stage.	Noted – materials will be the subject of reserved matters, in accordance with the Design Guidelines.
Whilst the panel acknowledge that the parameter plans and design guidelines/ codes also seem reasonable, these alone will not guarantee the quality of the completed scheme.	Noted
As detailed design work progresses, it will be critical to the success of this prominent, high-density scheme, for the existing architects (or other architects approved by the local authority) to be retained.	Agreed – s106 obligation recommended to secure this.
Ensuring the design integration and robust management strategies will be critical to achieving a high quality scheme. The panel would support planning officers in securing this through Section 106 agreements.	Agreed – wider Estate Management Strategy will be required by condition and s106 provisions.

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 has evolved to respond to earlier Panel advice. The result is considered to be a high quality design that will deliver a significant quantum of high quality affordable housing within a new neighbourhood quarter. Future reserved matters applications will also be referred to the Quality Review Panel to secure future design quality.

#### *Access & building frontage*

6.5.17 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 overall movement and access strategy has been established in the ARS masterplan, taking into account the wider strategic ambitions outlined in the District Centre Framework.

- 6.5.18 Ashley Road South will re-establish itself as part of a newly defined north-south pedestrian friendly spine. The application includes provision for a broad pavement on the west side of Ashley Road. The route will be enhanced through the introduction of an avenue of trees and seating. It will become one-way northbound and a quiet way where pedestrians have priority and vehicular movement and speed are minimised. In relation to Buildings 2/2A and 3 Ashley Road will remain the main access into the site for pedestrians, cyclists and vehicles.
- 6.5.19 Building 2 commercial space will be accessed directly from Ashley Road. Illustrative material also shows the potential for three accesses to Building 3 centred on its north-western corner. Building 2 and 2A has vehicular access off Ashley Link whilst Building 3 has access directly from Burdock Road. Similarly, residential entrances are located on Ashley Link for Building 2A and on the north-eastern corner of and western side of Building 3. The accesses to the residential elements of the building area considered to be legible in line with London Plan guidance.
- 6.5.20 Access arrangements have not been designed in detail at this stage but will be guided by the submitted Design Guidelines. The design precedents shown in the guidelines are of a high standard. The detailed design of residential entrances will also be specified in accordance with detailed guidelines which requires prominent and obvious principal entrances. All entrances will be expected to follow Secure by Design principles and this will be secured by planning condition.

#### *Building Frontage*

- 6.5.21 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.
- 6.5.22 Building 2A is required to provide defensible space to facilitate visual privacy and private amenity with the treatment across all buildings seeking to minimise inactive frontages. It will also contain a new commercial frontage facing Ashley Road. Building 2 will be activated by a community use at ground level. Both buildings will front onto Ashley Link which is likely to produce an attractive and quiet residential street. Building 3 is a more challenging building to activate due to the length of the blocks along three



key routes. The concentration of activity along Ashley Road also risks diluting the potential for activation along Watermead Road and this will need to be revisited at reserved matters stage. The guidelines require Building 3 to have a two-storey base articulation with double storey commercial space and prescribe a maximum length of inactive frontage. The safeguards outlined in the Design Guidelines indicate the active frontage has been maximised and detailed design can be controlled through reserved matters and Design Guidelines.

- 6.5.23 Officers consider the available ground floor frontage has been maximised at this outline stage and in accordance with the different functions of the varying character areas defined in the masterplan and at points where the most pedestrian activity is programmed to occur. The applicant has also interspersed active and non-active elements of the frontage in line with London Plan guidance. Suitable design safeguards are included to guide future detailed design through reserved matters and implementation.

#### *Secure by Design*

- 6.5.24 The applicant has worked with the Secured by Design officer to address a number of issues raised earlier in the consultation process. As the application, including landscape proposals, are illustrative at this stage the points raised have been addressed through revisions to the Design Guidelines which now include a specific guidance section dealing with Secured by Design. The applicant has clarified visibility will be maintained along both Burdock Road and Ashley Link and seating areas within the public realm will be located away from residential entrances. A number of wider issues were also raised in relation to the wider masterplan and these will be addressed through separate planning applications. The outline scheme design is therefore likely to give rise to a safe and overlooked street environment in line with Tottenham AAP design and suitable design safeguards are in place to secure future attention to design. A planning condition will also be imposed requiring compliance with the principles and practices of the Secured by Design award scheme and liaison with relevant officers will continue through into detailed design.

## **6.6 Development Impacts to Heritage Assets**

- 6.6.1 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*

- 6.6.2 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.

- 6.6.3 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.
- 6.6.4 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.
- 6.6.5 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.
- 6.6.6 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 Councils Development Management DPD pre-submission version 2016 continues this approach.

#### *Impacts to Heritage Assets*

6.6.7 The Environmental Statement also includes a Heritage Statement which identifies a number of Conservation Areas and listed buildings in the wider area. However, all these are greater than 400 metres away from the site with limited visual connection. The locally listed Berol House lies adjacent to the site, forming an important element in the wider masterplan, and the heritage statement concludes that the proposal would have a moderate beneficial impact on its setting and preserve its significance. Its wider setting will also be the subject of separate planning applications. 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.

### **6.7 Quality of Residential Accommodation**

6.7.1 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.

6.7.2 All of the units in the scheme are capable of meeting the space standards in the Mayor's SPG Housing and the scheme gives considerable scope to provide a high standard of residential accommodation. Future reserved matters will be expected to comply with London Housing Design Guide Standards.

#### *Private amenity and children's play space*

6.7.3 Based on the maximum quantum of residential units proposed and an indicative mix of unit sizes, the development's potential child yield and play space requirements have been calculated as follows

<b>Age</b>	<b>Number of Children</b>
Under 5	33
5 to 11	22
12 +	11
Total Number of Children	66
<b>Play Space Required</b>	<b>663.7m2</b>

*Table 8: Projected Child Yield (London Plan requirements)*

6.7.4 In total, 66 children are predicted to live in the development, of which 33 would be under the age of 5. The illustrative strategy is presented in this scheme. The areas of play space and the key principles of the design and arrangement of the play space are captured in the Design Guidance. The parameter plans show where the play space can be included within the proposed area of public open space and communal amenity space.

	<b>Maximum Units</b>	<b>Communal Play Space</b>	<b>Space Under 5 yrs</b>
Building 2	12 (4.4%)	13m <sup>2</sup>	14m <sup>2</sup>
Building 2a	83 (31.2%)	95m <sup>2</sup>	102m <sup>2</sup>
Building 3	170 (64.4%)	196m <sup>2</sup>	212m <sup>2</sup>
<b>Total</b>	<b>265</b>	<b>305m<sup>2</sup></b>	<b>330m<sup>2</sup></b>

*Table 9: Play Space Requirements (Mayor's SPG)*

	<b>Play provision for under five year olds</b>	<b>Play provision for 5-11yrs</b>	<b>Communal amenity space</b>
Building 2	24sqm	-	48sqm
Building 2a	145sqm	-	626sqm
Building 3	459sqm	-	540sqm
Ashley Link		240sqm	
<b>Total</b>	<b>628sqm</b>	<b>240sqm</b>	<b>1214sqm</b>

*Table 10: Illustrative proposals for play space provision*

6.7.5 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.

6.7.6 The proposals demonstrate the potential to provide a total of 1,806m<sup>2</sup> of play and amenity space. It is also noted that the play facilities of Down Lane Park are in close proximity but that some remodelling and design work will be required to facilitate improved access to the adjacent park. The mitigation measures for this are addressed in the open space section. Landscaping and play space details are proposed to be secured by condition.

6.7.7 It is proposed that the play provision for the children aged up to eleven years old can be provided within the sites of this outline planning application. The under five years play provision will be provided at roof level and accessed by secure residential entrances. Therefore, the appropriate space provision for young children has been established for each building and accommodated in the proposals. The play provision for the 5 to 11 year olds for the application

site will be accommodated in Ashley Link to some extent. Older children will also have access to opportunities for play and sports/recreation in Down Lane Park. The site also has good access to the wider amenities of the Lea Valley. However, the shortfall in on-site provision for older children and introduction of new routes into the park necessitates remodelled access to the park and new boundary landscaping treatments. These mitigation measures are secured through the s106 agreement.

- 6.7.8 Overall, the proposals are capable of delivering high quality private amenity space and range of play spaces providing children with access to good quality, well designed, secure and stimulating play and informal recreation space. GLA officers support the play space provision within the scheme.

#### *Inclusive Access*

- 6.7.9 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.
- 6.7.10 The development will provide approximately 25 wheelchair accessible homes of varying unit sizes which will meet the 10% requirement in planning policy. The development will also provide 18 accessible parking spaces, 12 of which will be provided within Building 3 and 6 along Ashley Link serving Building 2 and 2A with the potential for additional spaces within a reserved car parking area. The detailed layouts of units will be secured via reserved matters and a minimum 10% provision will be secured by planning condition.
- 6.7.11 Level access to the buildings will be provided throughout Buildings 2/2A and 3 for both the main residential entrance doors and access from the courtyards, where applicable. Furthermore, level access will also be provided through the common areas and lobbies etc. Level access will also be provided from the street to commercial premises.
- 6.7.12 The development parameters have been designed having regard to these requirements and provide the basis from which to define an inclusive and equitable scheme. The principles of inclusive design are also adequately captured in the Design Guidelines, which will be secured by planning condition.
- 6.7.13 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. The accessibility of the scheme is judged to be acceptable and in accordance with the Mayor's Housing SPG and the Mayor's Accessible London SPG.

#### *Daylight/Sunlight Provision to Proposed Units*

- 6.7.14 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 and the need to optimise housing capacity.
- 6.7.15 The application includes daylight, sunlight and overshadowing assessments (revised April 2017) and considers the impacts of the proposed development on residential receptors on Hale Road, Park View Road and Emily Bowes Court, De Havilland Court and North Lodge within Hale Village. The combined effects of the Cannon Factory and Ashley House development and the wider Ashley Road South masterplan (as amended), and the cumulative effects of the development, the wider masterplan and other reasonably foreseeable developments on neighbouring receptors is also addressed in the Environmental Statement.

#### *Daylight*

- 6.7.16 99% of the 302 neighbouring windows requiring assessment are shown as achieving the guide levels for Vertical Sky Component (VSC) with the amended development in place. Officer's agree with the assessment that this represents a high level of proportionate compliance with the BRE guidance having regard to the site's urban context and the suburban basis of the guidance. The development will have no materially noticeable effects on Nos. 1, 3, 5, 7, 9, 11 and 15 Hale Road, Emily Bowes Court, De Havilland Court, North Lodge and Nos. 1A, 6 and 8 Park View Road. These impacts are defined as negligible.
- 6.7.17 Three isolated windows will experience departures from the guidance. In all cases these will be marginal (i.e. experiencing residual VSC levels within 78%, 79% and 79% of the BRE guide level of 80%). These effects are defined as minor adverse.
- 6.7.18 All of the classrooms within the neighbouring academy will continue to experience very high levels of Average Daylight Factor with the amended scheme in place (100% compliance). This reflects the large windows and dual aspect nature of many of the classrooms assessed.
- 6.7.19 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.

## *Sunlight*

- 6.7.20 The results of the sunlight assessment demonstrate that all of the windows assessed serving neighbouring residential properties will comply with the BRE guide levels for annual and winter sunlight with the development in place (100% compliance). The development's effect on these neighbouring properties is therefore defined as negligible. 14 of the 17 properties assessed showed no effect, whilst three were defined as negligible.
- 6.7.21 All of the windows assessed at the Harris Academy will comply fully with the BRE guide levels for annual and winter sunlight availability with the development in place. The impacts of the development on the sunlight levels at the school are therefore defined as negligible, reflecting the large windows and dual aspect nature of classrooms. The development's impact on the park has also been assessed. The assessment suggests the park will retain a sunlit area of 97.8% with the development in place. This remains well above the BRE guide level of 50%.

## *Internal Daylight, Sunlight and Conditions within the Development*

- 6.7.22 The assessment also considers the levels of daylight and sunlight within proposed residential units based on the illustrative development proposals (this outline application only). The assessment has considered the natural light conditions within the development both when considered in isolation and with the wider masterplan proposals in place. This also responds to a specific request from the Quality Review Panel for verification, particularly internal conditions for lower level apartments within Building 2A.
- 6.7.23 This analysis demonstrates that the majority of habitable rooms within the illustrative layouts assessed will achieve good levels of interior daylight. Overall, c. 96% of habitable rooms within the lower five floors of the development will achieve the guide levels for ADF and c. 90.3% will achieve the guide levels for Direct Daylight when the Cannon Street J Factory scheme is assessed independently. With the wider ARS masterplan in place, 87.5% of these habitable rooms will achieve the guide levels for ADF and 72.8% will comply in terms of Direct Daylight. Lower levels of annual sunlight will be experienced across the development owing to the obstruction caused by the proposed balconies.
- 6.7.24 Officers are of the view these remain good levels of compliance with the guide levels for a higher density urban development project in London, having regard to the flexible, suburban basis of the BS/BRE guidance. In particular, the ADF results remain high with the wider masterplan in place.
- 6.7.25 The internal daylight results considered in the context of the wider masterplan proposals represent an improvement on the comparable results contained in

the original assessment (December 2017). A limited number of the illustrative habitable rooms within buildings 2A and 3 will experience ADF levels below the guide levels. In most cases these effects relate to less sensitive bedrooms rather than main habitable rooms and many of the impacts are viewed as marginal. Overall, officers agree the daylight results for the illustrative accommodation demonstrate that the amended development parameters proposed again provide an appropriate basis from which to develop residential accommodation with good levels of interior daylight when considered in the context of the wider emerging Ashley Road South masterplan.

6.7.26 The levels of sunlight and shadow that would be experienced within the proposed areas of public realm and amenity space in the Cannon Factory and Ashley House development have also been assessed based on the amended development parameters. This exercise demonstrates that the majority of open spaces across the development will be well lit with the scheme in place, which will assist in establishing secure and active public spaces.

6.7.27 Officers agree with the applicant's consultant's conclusion that the levels of daylight and sunlight availability within the proposed (and illustrative) units are considered acceptable for an urban development project having regard to the suburban basis of the BRE guidance, the orientation and potential quality of the accommodation. The scheme is acceptable from a daylight/sunlight perspective. Further internal analyses of the levels of daylight, sunlight and shadow within the accommodation and the proposed open spaces in the Cannon Factory and Ashley House development will be required at the reserved matters stage.

#### *Overheating*

6.7.28 London Plan Policy 5.9 seeks to reduce the impact of the urban heat island effect in London and encourages the design of places and spaces to avoid overheating and excessive heat generation. Major development proposals are expected to demonstrate how the design, materials, construction and operation of the development would minimise overheating and also meet its cooling needs. New development in London should also be designed to avoid the need for energy intensive air conditioning systems as much as possible.

6.7.29 Modelling of the illustrative layouts has been undertaken by the applicant which suggests the majority of the bedrooms and one third of living rooms could potentially overheat under more extreme conditions. As the scheme remains illustrative at this stage it is not currently known which units have been assessed. However, it is understood the excess temperatures identified in the analysis use the more extreme weather files, partly due to the use of more stringent test years when high ambient temperatures were



evident. The applicant has considered passive design measures but further design work is recommended at detailed stage to ensure appropriate design mitigation. Further modelling of overheating is recommended at Stage 3 and 4 of the design process. Officers agree that this is necessary and a planning condition is proposed to ensure the units do not overheat and appropriate mitigation measures are incorporated to ensure homes do not overheat. It should be noted that this may impact on the overall design of the building (smaller windows, shading introduced etc).

- 6.7.30 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 conserve and enhance the natural environment and make the required carbon savings identified in policy.

#### *Environmental Wind Impacts*

- 6.7.31 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.
- 6.7.32 The outline application includes an environmental wind assessment the purpose of which is to determine the effect of the proposed development on the local pedestrian wind environment and on the surrounding areas as compared to the baseline conditions. The assessment also compares the effects of the proposed development in conjunction with the wider Ashley Road Masterplan area and relevant consented developments as part of the cumulative impacts assessment. In addition, the report has been revised in response to an independent review by RWDI (on behalf of the Council).
- 6.7.33 The results of the wind assessment indicate that the local wind environment once complete would change from the baseline scenario, improving in some areas and becoming windier in others. This is due to the position, massing and orientation of the buildings relative to the wind direction that create localised areas of wind acceleration particularly around corners, narrow areas where wind can channel through and accelerate, and areas where tall elements of the building deflect the wind flow down to ground level. In particular, the main changes with respect to the baseline conditions are registered around the taller north-eastern corner of the site, where areas previously suitable for sitting become suitable for standing.

- 6.7.34 Overall, however, the area remains suitable for the intended uses throughout the year with stronger winds being registered during colder periods. In terms of pedestrian safety, all areas within and surrounding the site remain within safety criteria. The assessment identifies the overall wind effects to be of negligible significance in the absence of any additional mitigation measures.
- 6.7.35 In terms of mitigation, the existing trees along Watermead Way, in the southern and western sides of Down Lane Park will help mitigate wind speeds in these areas. Likewise, additional trees proposed as part of the development along Ashley Road and in the west-east orientation are likely to have a positive impact on the wind environment within the site.
- 6.7.36 A number of clarifications and corrections were included in the Supplementary Information. The reports conclude additional trees to those existing or proposed as part of the illustrative design are not considered necessary at this stage but that additional testing to verify the effect of these trees could be considered.
- 6.7.37 Officers agree that no additional mitigation measures are required at this stage. Planning conditions are recommended to take wind conditions into consideration when designing sitting areas and building entrances at the detailed design stage. Further testing is suggested to test the effectiveness of the measures mentioned above and verify that pedestrians are sheltered from prevailing winds, particularly in the north-eastern corner of the site. This is proposed to be secured via planning condition.

#### *Noise and Vibration Impacts*

- 6.7.38 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.
- 6.7.39 The Council's Environmental Health Officer (Noise) has reviewed the noise impacts to the residential units created, and examined the Environmental Statement dated December 2016 produced by WSP/Parsons Brinckerhoff with respect to the above proposed development. The report considers the following potential impacts;
- Temporary noise and vibration arising from demolition, site preparation and construction activities associated with the proposed development;
  - Noise arising from changes in road traffic attributable to the proposed development post-construction; and

- Noise from any fixed plant associated with the proposed development.
- 6.7.40 Temporary noise and vibration due to demolition, site preparation and construction activities are further regulated by Enforcement Response (Noise) under sections 60, 61 of the Control of Pollution Act 1974. Although the exact plant equipment is speculative at this time, mitigation measures documented in section K.6.0 will adequately address any adverse impact or significant adverse impact with respect to noise and vibration. No mitigation measures are required due to the change in road traffic as the predicted increased noise levels will be negligible.
- 6.7.41 Noise from fixed plant will be designed or operated at such a level not exceed the existing background noise level when measured 1 metre from the nearest residential premises. This would confirm a low noise impact on the surrounding premises.

#### *Air Quality*

- 6.7.42 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 in 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.
- 6.7.43 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 (NO<sub>2</sub>) and particulate matter (as PM<sub>10</sub>). The primary source of emissions of these pollutants in the Borough is road traffic and the site itself is surrounded by heavily trafficked roads.
- 6.7.44 The Council's Environmental Officer has assessed the application. The results of an Air Quality Assessment and an Air Quality Neutral Assessment (AQNA) has been submitted along with the outline planning application to assess the air pollution impact of the proposed developments and determine the change in pollutant concentrations of NO<sub>2</sub> and PM<sub>10</sub>. 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 9.

6.7.45 For the construction phase, a qualitative assessment of the potential impacts on local air quality from construction activities has been carried out. This identified that there is a high risk of dust soiling impacts and a low risk of significant increases in particulate matter concentrations due to construction activities. Officers agree that through good site practice and the implementation of suitable mitigation measures, the effect of dust and particulate matter releases would be significantly reduced. The residual effects of dust and particulate matter generated by construction activities on air quality are therefore considered to be negligible. The residual effects of emissions to air from construction vehicles and plant on local air quality is considered to be negligible.

6.7.46 Since the ES was completed in December 2016, the proposed plant for the energy centre has been changed and instead of the CHPs proposed in Buildings 2A and 3, there will be three gas fired boilers in each building, with one of the three boilers acting as back-up only. The air quality modelling of emissions from the proposed energy centres has therefore been updated. The results of the updated modelling show that the use of boilers would result in a small increase in annual mean NO<sub>2</sub> concentrations predicted previously at a number of the assessment receptors. The updated residual effects of the Proposed Development once operational are moderate adverse at two receptors and negligible (as before). However, the actual change in concentrations at those receptors where moderate adverse effects are predicted is very small and therefore can be considered to be negligible.

6.7.47 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, together with further details of the energy plant boilers for space heating and domestic hot water, the air quality impacts of the scheme are considered to be acceptable and in accordance with the policies above.

#### **6.8.1 Open Space, Social and Community Infrastructure**

6.8.2 The London Plan includes a number of policies relating to social infrastructure. The overarching policy is 3.16 which states adequate provision for social infrastructure is particularly important in areas of major new development and regeneration.

6.8.3 A review of the NHS Choices register indicates there are currently 11 GP surgeries within the North East Locality of Haringey CCG, where the proposed development site is located. In total there are approximately 99,000 registered patients in this locality and 49 GP practitioners. This results in a ratio of one GP for every 2,020 patients. They are all accepting new patients which suggests that some capacity exists within GP surgeries in the local

impact area. A total of 49 GP practitioners are operating within these medical centres.

- 6.8.4 The review of the Haringey's School Place Planning Report 2016 indicates 15 primary schools in close proximity. The closest of these schools are Harris Academy Tottenham, Welbourne, The Green CE Primary School (formerly Holy Trinity) and Ferry Lane Primary School.
- 6.8.5 EduBase figures show that 6,737 pupils are currently enrolled in the primary schools in the planning area with an overall capacity for 7,944 pupils allocated to these schools. This indicates primary schools in the local impact area are presently operating with surplus capacity, with 1,207 spaces remaining, or 15%. In regards to the four primary schools situated in closest proximity to the proposed development site, these schools currently have a surplus, with a surplus of 1,333 places, or 51%. This is largely as a result of Harris Academy Tottenham which opened to reception and year 7 in September 2014.
- 6.8.6 The School Place Planning Report 2016 also indicates that of the 14 secondary schools in the Borough there are at present 2,577 year 7 places, with demand expected to increase in the coming years. The closest of these schools to the Cannon Futon Factory and Ashley Road site is Harris Academy Tottenham in Tottenham Hale. EduBase figures indicate that this school has a surplus of places with 224 enrolled pupils and 1540 places available. The School Place Planning Report 2016 identifies that at present there are sufficient places to meet in-year demand for years 8 to 11.
- 6.8.7 The additional population generated by the proposed development will place further demands on existing open space, sport and recreation facilities, particularly within the local impact area identified in the applicant's Environmental Assessment. London Plan Policy 3.5 states the design of all new housing developments should enhance the quality of local places, taking into account physical context and provision of, public, communal and open spaces, taking particular account of the needs of children, disabled and older people.
- 6.8.8 As outlined in the Council's Development Management Policies DPD (January 2016), a number of areas of the Borough are identified as being deficient in public open space including the Tottenham Hale ward. Nevertheless, Down Lane Park is located immediately adjacent to the proposed development site and has facilities including football pitches and walking paths. It is anticipated that the Park will cater for the new resident's needs to some extent but further mitigation is required to meet the needs of the resident population, particularly older children, which can't be met on-site. In addition, comments from Natural England highlight the potential for additional pressure on nearby Walthamstow Ramsar, SSSI sites with the

potential for mitigation measures at the park should space not be available on the development site itself.

- 6.8.9 The scale and location of the proposed development within a new district centre does not allow for large amounts of new open-space to be incorporated within the scheme but the scheme benefits from close proximity to existing strategic open space provision. The scheme design does provide for green infrastructure in order to enhance the site amenity and contribute to the open space needs of residents. Specific play space requirements are addressed elsewhere in this report.
- 6.8.10 However, the proposed design and introduction of new east-west routes into Down Lane Park will necessitate significant remodelling of landscaping and entrances into the park. These mitigation measures are also required to meet the needs of older children in particular and mitigate additional pressure on nearby SSSI sites and Walthamstow Ramsar. Provision for the re-design and remodelling of landscaping and entrances into Down Lane Park are included within the proposed Heads of Terms in order to mitigate the direct impact of the development. Overall, adequate provision is made for open space, social and community infrastructure, consistent with local and strategic plan policies.

## 6.9 Development Impact to Adjoining Occupiers

- 6.9.1 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.

### *Noise and Disturbance*

- 6.9.2 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.
- 6.9.3 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.

- 6.9.4 Given that noise intensive uses currently operate 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.
- 6.9.5 The impacts are 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 December 2016. The applicant will also be required to join the Considerate Contractors scheme, with proof of registration provided to the Local Authority.
- 6.9.6 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.

*Summary - Development Impact to Adjoining Occupiers*

- 6.9.7 The scheme is not anticipated to give rise to privacy or overlooking impacts given its separation distance from existing residential development. 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 and disruption are temporary and will be controlled by condition.
- 6.9.8 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 development will be in close proximity to the Academy but all of the classrooms within the neighbouring academy will continue to experience very high levels of Average Daylight Factor. In relation to environmental wind, further testing is suggested to test the effectiveness of the measures mentioned and verify that pedestrians are sheltered from prevailing winds, particularly in the north-eastern corner of the site. The assessment identifies the overall wind effects to be of negligible significance in the absence of any additional mitigation measures. The planning agreement Heads of Terms includes a requirement to modify the scheme, if required at a later stage.
- 6.9.9 Objections have also been raised on behalf of adjacent businesses currently operating from Berol House. These are summarised in Appendix 2 and relate to noise & disruption during and post construction; a reduction in the attractiveness of location for business and operational impacts relating to access and car parking for staff and visitors. The transport and access issues are discussed elsewhere in this report. Whilst there is likely to be an

impact on adjacent businesses in terms of noise and disruption this is not unusual for a regeneration scheme of this scale and nature. A range of safeguards are therefore suggested to mitigate the disruption and this includes a commitment to establish a construction coordinator to mitigate the environmental effects during the construction period.

## **6.10 Transportation and Parking**

6.10.1 The Public Transport Accessibility Level of the site is 6a (excellent) towards the southern end (Building 2 & 2A) and 5 (good) towards the northern end (Building 3). Nearby bus stops provide access to six bus routes with a combined frequency of 85 buses per hour (two-way). Tottenham Hale bus station and Tottenham Hale railway and tube stations are accessible from the site.

6.10.2 The nearest car club bays are located on Antill Road (1 bay) approximately 650m to the south of the site and Marketing Road (2 bays) approximately 500m to the north of the site. Illustrative drawings show a new 3-arm priority junction on Ashley road to connect a new access road (Ashley Link) running in an east west alignment to the south of Building 2 and 2A to Ashley Road. Ashley Link will provide pedestrian access, off-street parking provision (blue badge only), servicing provision and emergency access. A turning head is suggested at its western extent with no general through route to traffic. All matters are reserved at this stage, including access, and the applicant is not seeking detailed approval for any access arrangements at this stage.

### *Trip generation*

6.10.3 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.

6.10.5 These trip rates have then been applied to the proposed development and based on 2011 census travel to work mode shares, demonstrate that peak hour combined multi modal trip generation (including service trips) would be up to approximately 80 arrivals and 168 departures for the am peak period and up to 120 arrivals and 108 departures in the pm peak period.

6.10.6 Based on the above multi modal trip generation, the proposed development is likely to generate around 24 vehicles in the weekday morning peak and 15 vehicles during the evening peak hours respectively. The predicted vehicle trips generation is not expected to result in a significant or detrimental impact on the local highway network. It should be noted that the development will not be providing off-street car parking spaces (except for blue badge spaces) and it has been assumed that the majority of the proposed trips will be by



sustainable modes of transport. Person trips have therefore been largely redistributed across the remaining non car modes to account for the proposed low parking standard of 0.5 accessible parking spaces per accessible unit which is equivalent to approximately 0.04 parking spaces per dwelling. Given the car free nature of the development and the loss of trips associated with the existing industrial use, the scheme is expected to result in an overall net reduction in vehicle trips, including HGV/LGV trips.

### *Parking*

- 6.10.8 Policy 2.8 of the Outer London Transport Strategic direction recognises the car parking requirements for these areas to be higher in comparison with the central areas, although a flexible approach is encouraged in applying standards of the Policy 6.13 and Table 6.2.
- 6.10.9 Policy DM32 of the Council's Development Management DPD (January 2016) establishes standards in line with relevant London Plan policies. The addendum to chapter 6 in the London Plan includes recommendations for non-residential uses, indicating that at least one on-or-off street car parking space should be provided and designated for blue badge holders, even if no other parking is provided.
- 6.10.10 The proposal includes a total of 18 accessible car parking spaces, 16 of which are for residential units and the remaining two are for other uses included in this proposal. The Access Parameter Plan (existing context) submitted with the application shows the two areas where car parking is proposed. Car parking Zone A could accommodate 6 parking spaces and the car parking area in Zone B, and situated within the building 3, could accommodate 12 car parking spaces.
- 6.10.11 Owing to the 'car free nature' of the scheme (i.e. no general off-street parking provided), 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.
- 6.10.12 The majority of roads in close proximity of the site are controlled by yellow line 'at any time restrictions' including Burdock Road, Watermead Way (clearway) and sections of Ashley Road. Additionally, a number of Controlled Parking Zones (permit only parking) are located to the south and west of the application 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 west of the site with controls in operation Monday to Friday 8am to 6.30pm.

- 6.10.13 In order to monitor on-street parking, following the occupation of this development S106 mitigation measures are necessary. The contributions agreed will be used to assess and analyse parking stress in the vicinity and, subject to consultations, a revised Controlled Parking Zone (CPZ) could be introduced. Thus, S106 contributions to review the on-street parking, and cover the costs associated with revision of the existing CPZ are included within the heads of terms.
- 6.10.14 Taking the above parking constraints into consideration, the only other opportunity for legal parking close to the site and outside of yellow line controls is on Ashley Road (in parts), Mill Mead Road and Jarrow Road (in parts) all of which are not within a CPZ. It is also noted that as part of the consent for the neighbouring hotel development (Premier Inn), the council required a financial contribution by way of a S.106 agreement towards the investigation/implementation of a parking control scheme on Ashley Road. Any residual parking demand as a result of the development proposal being considered will be further minimised should the above mentioned controls be implemented.
- Accessible car parking spaces*
- 6.10.15 The London Plan recommends that ten per cent of all new housing should be designed to be wheelchair accessible from the start or easily adaptable for residents who are wheelchair users. This equates to a requirement to provide a total of 26 residential units, which are wheelchair user dwellings. The Housing Supplementary Planning Guidance (March 2016)-London Plan 2016 Implementation Framework reflects these standards, indicating that each designated wheelchair accessible unit should have a car parking space.
- 6.10.16 In response to concerns raised by the council regarding the level of blue badge parking being proposed, the applicant subsequently submitted a study of comparable sites in London as evidence of the level of blue badge parking demand likely to be generated by the proposals. In summary, the study concluded that the maximum parking demand is likely to equate to 0.38 spaces per accessible unit based on 38% utilisation at other sites the applicant manages. Both the council and TfL raised concerns regarding the study, particularly with regard to the sample size, type of housing (i.e. housing sites managed by the applicant only) and the possibility that the study may not capture future demand.
- 6.10.17 In response to the above concerns, the applicant has carried out a further assessment and provided details of sites where a lower provision of disabled parking (0% - 5% provision) was deemed acceptable by planning authorities in London, including the London Borough of Haringey. The above parking study suggests that blue badge parking provision/demand can vary and the level of parking demand can, in some instances, be lower in areas of higher PTAL and higher in areas of lower PTAL. Having given consideration to the

site in relation to accessible public transport connections (i.e. step free access at Tottenham Hale LU Station) and the level of accessible bus provision available in close proximity of the site, the proposed blue badge parking provision of 0.5 per accessible unit is considered acceptable.

6.10.18 Details of future provision will be secured and managed via a car parking management plan. Further details will also be required at detailed design stage, as part of the reserved matters. A Car Parking Management Plan (CPMP) condition is recommended to establish the overarching parking strategy for the whole development and agree arrangements for the management of accessible spaces. Following a comment by TfL, the applicant has confirmed that the proposed 'blue badge' residential parking spaces are to be leased rather than sold, to allow flexibility in the allocation of these spaces. This is in line with London Plan Policy 6.13 and the London Plan Housing SPG.

6.10.19 In addition, disabled users will be able to park for up to three hours on yellow lines except where there are restrictions on loading or un-loading. Furthermore, disabled badge holders may park in any shared-use bay for pay and display or resident's parking place, or Blue Badge holder's disabled bay for free and without a time limit. The limitation on the hours does, however, mean some sections of the existing roads are appropriate for visitors but not for all day parking required. Making appropriate provision for accessible spaces will also be considered when redesigning Ashley Road and Burdock Road, with parking provision reviewed and adjusted, balancing demand and other public realm considerations.

#### *Car club and electric vehicle charging points*

6.10.20 Based on all of the above, it is considered that this proposal complies with local and strategic policy in relation to car parking. In addition, there are a total of three car club spaces in the vicinity, which new residents can use on occasions. Two car club spaces are located on Mafeking Road (approximately 500m away from the centre point of this development) and equivalent to 6 minutes walking time. A further car club space is located on Antill Road (650m) that can be reached within an 8-minute walking time.

6.10.21 The London Plan policy requires a minimum provision of 20% active and 20% passive Electric Vehicle Charging Points (EVCP). Due to the low level of parking provision, officers recommend the inclusion of at least one EVCP in each parking cluster and all spaces to be used for commercial/retail use to have active EVCP. A planning condition is recommended, as part of the car parking management plan, to provide locations of Electric Vehicle Charging Points (EVCP) and indicate the criteria for reviewing the usage and converting passive points to active.

### *Cycle parking*

- 6.10.22 The proposal includes a total of 474 cycle spaces, the majority of which will be within the proposed building footprints, split between 434 for residential, 23 spaces for A1 food retail and 17 for the B1 business offices. The proposed provision is slightly lower than the recommended London Plan minimum standards. It is recommended the shortfall of 15 spaces for office use is secured via condition bringing the total provision to 489 spaces. To comply with the London plan minimum cycle parking standards, the requirement for long and short stay spaces for the residential part of the proposal equates to 434 spaces with a further requirement for 22 spaces for the A1 land use and 32 for the B1 business offices.
- 6.10.23 Taking into account the balance of commercial uses discussed elsewhere in this report, the overall level of provision will need to be reviewed at detailed stage. The illustrative plans show suitable space for future adjustment and an overall increase in cycle parking spaces. The proposals are considered acceptable at this stage subject to revisiting the level of provision at detailed stage and securing a minimum of 489 spaces through planning condition.
- 6.10.24 The submitted drawings show the area reserved for cycle parking with the detailed design reserved for later stages. Future detailed design will consider the need for parking space provision at a surface level, near to, and fronting different land uses of this proposal, including cycle parking long Ashley Road. Details of the locations, access to areas reserved for parking, and quality of the proposed spaces, maintenance of the area, will form part of the subsequent reserved matters submission.

### *Access and Servicing Arrangements*

- 6.10.25 The applicant has proposed providing residential refuse storage on the ground floor of Building 2 and 2A adjacent to Ashley Link (new access road) where refuse trucks will be able to stop and collect refuse on a refuse collection day/s. Track plans have been submitted and demonstrate that sufficient turning area will be provided on Ashley Link. Residential refuse storage areas are proposed on the ground floor of building 3 with an internal trolley route permitting collection from either Burdock Road or the proposed loading bay on Ashley Road. The servicing of non-residential uses on the site is expected from two new interim loading bays proposed on Ashley Road. Both bays are in close proximity of commercial frontages. The accompanying TA includes an assessment of the likely servicing demand (trip generation) of uses proposed (combined). The study demonstrates that the number of loading bays being proposed is likely to be sufficient to meet the demand expected to be generated by the proposals. It is advised that a revised Delivery and Servicing Plan is submitted once the end occupiers of the

commercial units are known, in order to ensure that the management and of servicing provision reflects the specific needs of end users.

#### *Highway works*

- 6.9.26 The proposed development would require changes to the highway network. These changes include the construction of two new vehicular access points and changes to the existing vehicular crossovers on Ashley Road. In addition, two on-street loading bays will be required as an interim highway measure, until the proposed public realm enhancements on Ashley Road and Watermead Way are finalised and delivered as part of the second stage of the council's Streets and Spaces Strategy for Tottenham Hale. The developer will therefore be required to enter into a S.278 agreement for the implementation of the above detailed interim measures.

#### *Bus stands*

- 6.10.27 Discussions are ongoing between the Council and Transport for London regarding the potential displacement of existing bus stands on Ashley Road as part of the wider implementation of the Council's Streets and Spaces Strategy. These are curtailment stands and as such do not have specific routes they support, but are used as stands for rail replacement services and to ensure the reliability of the bus network during Tottenham home football games. TfL has indicated these stands are very important to the smooth running of the network. One option being explored is re-provision along Watermead Way. The Council and TfL have agreed to continue to work together to agree a long-term solution looking across the regeneration area that balances public realm and transport infrastructure objectives. A specific requirement for future reserved matters (access) to address this matter is included in the planning conditions and has been agreed with Transport for London. The applicant will be expected to reflect any agreed solution in subsequent detailed reserved matters.

#### *Framework Travel Plan*

- 6.9.28 London Plan Policy 6.3 (Assessing effect of development transport capacity) makes clear that impacts on transport capacity and the network must be fully assessed and that, amongst other things, workplace and residential travel plans should be provided in support of significant applications.
- 6.9.29 The applicant has provided a draft Travel Plan which meets TfL's 'Attribute' travel plan assessment tool. The Travel Plan includes a monitoring schedule and list of measures including free car club membership for three years for each household. On street car club provision has not been included on the basis that preliminary discussion with ZipCar has indicated that current demand does not warrant an additional bay/s in this location. Given the scale of the development being considered, it is advised that the above discussion

is reviewed as part of the travel plan and any additional provision detailed in a revised Travel Plan action plan.

6.9.30 It is expected that a full travel plan will be submitted and thereafter re-submitted in accordance with a S.106 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 £6000 to cover the cost of reviewing the Travel Plan at each reporting stage. It will be necessary to secure its delivery via a S106 schedule.

6.9.31 London Plan Policy 6.3 (Assessing effect of development transport capacity) makes clear that impacts on transport capacity and the network must be fully assessed and that, amongst other things, Construction Logistics Plans should be submitted to support strategic development proposals. London Plan Policy 6.14 (Freight) states that development proposals should promote the uptake of Delivery and Service Plans and the use of the Blue Ribbon Network for freight transport. An update to the submitted Construction Logistics Plan, to take into account the phasing strategy, is secured via planning condition.

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

## **6.11 Flood Risk and Drainage**

6.11.1 The site is located within Flood Zone 2 and is therefore considered to have a low probability of flooding from rivers and sea. The site has a low probability of fluvial flooding due to the high standard of protection available in the area and the local topography. The key area of assessment is in relation to surface water drainage.

6.11.2 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.

6.11.3 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.

- 6.11.4 The potential for impacts of the proposed development on water resources and flood risk have been identified and is supported by a Flood Risk Assessment ('FRA'). The FRA assesses flood risks from all potential sources and investigates the potential for the development to increase flood risk elsewhere taking into account the potential impact of climate change. The FRA includes an Outline Drainage Strategy; the Outline Drainage Strategy includes the use of Sustainable Urban Drainage Systems (SuDS).
- 6.11.5 The site is currently entirely impermeable and therefore the volumetric surface water runoff is not expected to increase as a consequence of the development. Volumetric runoff will in fact be reduced through an increase in permeable areas such as external landscaping. This applies particularly in the case of landscaping along Ashley Link. The Outline Drainage Strategy has been designed to manage a rainfall event up to a 1:100 year return period including a climate change allowance which will help in reducing the risk of flooding in the area and for the residents and occupants of the surrounding areas. Surface water runoff discharged into the public drainage network is therefore likely to reduce both in terms of volume and of peak therefore having a positive, although limited effect on public surface water sewer capacity (i.e. potentially less flooding in the wider area).
- 6.11.6 Significant effects of the proposed development have been assessed in relation to flood risk, water supply, public sewerage systems and groundwater. All significant effects are classed to be having either a moderate or minor significance before mitigation. If the mitigation measures and in-built mitigation measures specified are incorporated, all residual effects are assessed as having a negligible significance. The assessment conducted has identified a number of beneficial significant effects as a result of the in-built mitigation measures proposed as part of the Flood Risk Assessment and Outline Drainage Strategy.
- 6.11.7 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 conditions noted above, the development is acceptable in Flood Risk and drainage terms.

## **6.12 Energy and Climate Change**

- 6.12.1 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 zero carbon target beyond Part L 2013 of the Building Regulations.

- 6.12.2 The London Plan also 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 in close proximity 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.
- 6.12.3 The applicant has submitted a Sustainable Design Energy and Construction Statement prepared by WSP, updated April 2017. The applicant has also provided supplementary comments in response to internal consultee comments from LBH Carbon Management and the GLA. The revised statement indicates that the proposed development will exceed the energy 2013 Building Regulation targets by 9.1%.
- 6.12.4 New 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*

- 6.12.5 The scheme delivers a 9.1% carbon reduction through lean (energy efficiency measures). Whilst at the lower end of the range, this is considered to be within an acceptable range. Haringey averagely sees 10-12% improvement through energy efficiency measures. The Carbon Management Team considers this to be acceptable, subject to a planning condition securing a minimum of 10% improvement on the site. Such a condition is contained in Section 9.

#### *Energy – Clean*

- 6.12.6 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.



6.12.7 A range of energy options have been considered and energy officers from Haringey Council and the GLA met with the applicant on several occasions to explore the scenarios for different energy strategies in terms of planning and implementation, construction, cost and carbon emissions. Given the proximity to a planned District Energy Network, officers are particularly concerned to ensure the proposed development, irrespective of future sequencing of development, is capable of easy connection to a future District Energy Network.

6.12.8 The scheme is now proposing a boiler-led heating system. This is a welcome change from the CHP proposed initially due to the flexibility and compatibility it offers in connecting to the future DEN. The preferred option includes individual, initially unconnected boilers, one within Building 3 and one in Building 2 to also be utilised by Building 2A. A connection will then be made to the DEN once the infrastructure is in place. This is a change from the earlier proposed CHP-led solution and is viewed as the optimum solution in terms of future proofing the development for connection to the DEN.

6.12.9 Planning conditions and Heads of Terms regarding a DEN connection are contained in Section 9. The planning condition includes the following requirements:

- Production of an updated site-wide energy strategy including a demand assessment (taking into account wider ARS masterplan proposals)
- Reduction in energy demand by 10% (a broad target) through energy efficiency measures
- Provision for connection to DEN
- NHH will work with the council in facilitating access to the Ashley Link in order for the Council to deliver the DEN.
- Inclusion of renewable energy technology to offset 10% CO2 emissions

6.12.10 In addition, the planning agreement will include the following measures to secure implementation of the energy strategy:

- All reasonable endeavours to connect to the DEN and safeguard a route for the appropriate pipework under Ashley Link;
- Fallback provisions should the DEN not be available (2 energy options with preference for district energy provision including requirement for appropriate sizing of pipework & infrastructure);
- If no DEN has been delivered within Tottenham Hale within a 5 years from planning approval, then the applicant will have the freedom to replace the boilers serving the development with CHP or other similar technologies;
- Any shortfall in carbon offsetting required to ensure policy compliance (as set out in London Plan Policy 5.2) will be offset at £1,800 per tonne and should be given to the Council upon commencement on site;

- Overheating Mitigation Plan for each building to be submitted and approved by the LPA in advance of the main works commencing.

6.12.11 It is acknowledged that the carbon performance is less than the applicant's preferred CHP ambition, but officers believe this is offset by the long-term benefits in reducing overall carbon emissions as a result of connecting to a decentralised energy network. This will need to be verified by detailed carbon emissions and the technology type proposed at detailed stage.

6.12.12 It is also acknowledged that this interim solution will have a marginal negative impact on carbon emissions in the short term but this is balanced against the longer-term gains of easy connection to a future District Energy Network and overall carbon emission reductions. On the basis the boiler-led solution meets a number of conditions secured via a planning agreement, the strategy is supported at this outline stage.

### *Energy – Green*

6.12.13 The applicant has included 100m<sup>2</sup> of Solar PV panels as a renewable contribution. There are no roof maps included within the energy statement but illustrative material within the Design and Access Statement illustrate the roof space with a balance of play space and landscaping to provide suitable amenity for future residents. This technology delivers a 1.3% improvement over building regulations.

6.12.14 In addition, to bring the proposals in line with policy (LP 5.2), the developer will be required to offset the shortfall against target emissions at a cost of £60 per tonne. The value of this offsetting is currently £944,700. This will also be secured via planning agreement.

6.12.15 Overall, the target carbon emissions for the proposed development are calculated to be 402.7 tonnes CO<sub>2</sub> per annum. A planning condition is proposed to secure these minimum savings and achieve a minimum agreed carbon reduction of 10% beyond Building Regulations 2013. The proposals provide an appropriate interim solution to meeting the energy needs of the site prior to implementation of the District Energy Network. This provides sufficient flexibility for future connection, subject to being secured via planning agreement, as recommended within this report and Heads of Terms.

## **6.13 Waste and Recycling**

6.13.1 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.

6.13.2 The application includes a Waste Management Strategy which includes storage provision in accordance with the Sustainable Construction and Design SPD Appendices (March 2013) guidance document. Volumes for the Proposed Development were calculated using LBH's. External bin storage access areas are shown on the illustrative plans with two access points to Building 2a and one to Building 2. Two separate bin storage access points are also shown to Building 3.

6.13.3 It is proposed that each commercial tenant will provide a suitable waste storage area within their own demise as part of their fit-out, which will include provision for the segregation of refuse, recyclables and food waste (if applicable). The capacity of the individual commercial waste stores will be dictated by the commercial tenants' business activities and the frequency that they will receive waste collections, which they will arrange to suit their own requirements. The overall level of provision is considered to comply with relevant policies and further details of waste storage will be secured via planning condition.

#### **6.14 Land Contamination**

6.14.1 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 Geo-Environmental Site Assessment for both sites by RSK Environment Ltd.

6.14.2 In relation to Cannon Factory, this identifies a hotspot of asbestos containing material to be present in the made ground, with the following recommendations:

- Further ground gas monitoring (completion of three monitoring visits)
- Groundwater monitoring and chemical testing for metals, PAH, TPH, solvents and PCBs
- Determine the boundary of the asbestos impacted hotspot within the made ground either prior to demolition or, via a watching brief during the demolition works and the removal of the concrete slabs are to be supported by deep pile foundations. At least one deep cable percussive borehole should be advanced on the site to a depth of approximately 25mbgl in order to provide information require to complete a pile design proposal.

6.14.3 In relation to Ashley House site elevated levels of arsenic, lead and Polycyclic Aromatic Hydrocarbons were determined in the made ground and oily black staining and hydrocarbon odour was identified in the south west area of the site. Shallow groundwater contained petroleum hydrocarbons, arsenic and naphthalene, likely to be associated with the historical tanks located in the south western area of the site. Gas monitoring determined elevated levels of methane and C)2 in the south west area of the site.

6.14.4 Recommend remediation works include:

- All the existing underground structures, including diesel tanks and associated pumps, the UST's, the interceptor and the effluent storage tank are to be removed and the underlying soils will need to be inspected and validated
- A localised excavation of impacted soils may be required from the vicinity of the above contamination sources
- A clean soil capping layer will be required in the areas of the proposed communal landscaping
- A barrier pipe will be required for the protection of water supply pipes, here passing through the impacted made ground
- A ground gas membrane and a potentially vapour resistant membrane will need to be incorporated into the proposed development

6.14.5 Further site investigations are also recommended as follows:

- Further ground gas/vapour monitoring to fully characterise ground gas regime beneath the site
- Post-demolition works including sampling and testing within the footprint of the existing buildings and the area of the Ashley House car park to delineate the hydrocarbon and asbestos impacted soils.
- In addition to those recommended by the applicant's consultant, a UXO survey is also recommended.

6.14.6 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 9.

## **6.15 Equalities**

6.15.1 In determining this planning application the Council is required to have regard to its obligations under equalities legislation including the obligations under the Equality Act 2010. In carrying out the Council's functions due regard must be had, firstly to the need to eliminate unlawful discrimination, and secondly to the need to promote equality of opportunity and to foster good relations between persons who share a protected characteristic and persons who do

not share it. Members must have regard to these duties in taking a decision on this application.

- 6.15.2 The proposed development would engage primarily with people with protected characteristics around physical access and have been designed to contemporary Building Regulations. The proposed development would offer step free access throughout including all entrances to private and affordable housing, as well as commercial spaces. All floors of the residential accommodation would be served by two lifts. All residential units would be built to Part M4 (2) 'accessible and adaptable dwellings' and 10% will be built to Part M4 (3) 'wheelchair user dwellings' of Building Regulations.
- 6.15.3 The proposed development would be likely to provide a range of socio-economic and regeneration outcomes for the Tottenham Hale area including the provision of new housing including affordable housing to increase affordability and reduce overcrowding. It would also result in local employment impacts including displacement of existing employment but the generation of construction employment and new employment opportunities to the benefit of all priority groups that experience difficulties in accessing employment.

## **6.16 Health Impact Assessment**

- 6.16.1 The purpose of the HIA is to identify, assess and present any potential effects on the health of the population arising from the proposed mixed-use development, and to identify any interventions or mitigation measures required to minimise potential adverse effects on health and inequalities and optimise the beneficial impacts of the development. The report is intended to assist in considering the planning application and positively influence the development of the Environmental Impact Assessment.
- 6.16.2 The HIA shows that over one quarter (26.2%) of the resident population of the local impact area comprises children and adolescents aged 0-17 years. This proportion exceeds Borough and London-wide equivalent figure which equates to c.22%. Furthermore, the proportion of 18-24 year olds in the local impact area is higher than that in the Borough and in London at 11% compared to 8.6-8.7%. Children and young people aged 0-24 years old are therefore a significant proportion of the population in the local area. Two thirds of the population comprise working-age adults (typically 18-64 years). Notably, the local impact area has a markedly lower proportion of elderly people (65 years plus) than the London average. In addition, Cannon Factory and Ashley House fall within an LSOA that is within the 20% most deprived areas.
- 6.16.3 Priority groups have been identified through the community profiling exercise undertaken by the applicant, and these include:

- Children and adolescents
- Older people
- People with a disability
- Low income groups

6.16.4 It is assessed that overall, the proposed development will have a short-term, temporary, minor adverse impact on the health of the local population and priority groups as a result of temporary construction activities. This will also generate some dust, noise and vibration. Nevertheless, these adverse impacts can be effectively overcome through mitigation, particularly the Construction Logistics Plan. Construction activities will also generate new employment, and will maximise the use of resources leading to beneficial health outcomes.

6.16.5 In terms of the operational phase, it is assessed by the applicant that overall the proposed development will have a long-term, permanent minor to moderate beneficial impact on the health of priority groups and new residents and a minor beneficial impact on the general public. Officers broadly agree with this assessment. This beneficial health outcome is linked to the provision of high quality, well-designed housing to meet local housing needs, provision of flexible commercial floorspace that supports employment opportunities and provides local amenities, public realm improvements that provide opportunities for social interaction, improve access to a range of local services and social infrastructure and create a safe environment.

## **6.17 Fire safety**

6.17.1 Fire safety is not a planning matter rather it is dealt with at Building Regulations stage. However, in light of recent events and the Council's understandable concern around this matter the applicant has been asked to provide information regarding its plans for fire safety in the development and in particular the sixteen storey element. High rise residential blocks are constructed in many different ways and the varying combinations of design and materials mean that all proposals have to be considered individually.

6.17.2 Building Regulations are minimum standards for design and construction for the erection of new buildings and the alterations of existing buildings. The regulations cover areas such as structure, fire, sound resistance, ventilation, drainage, conservation of fuel, electrical installations, security and access for disabled persons.

6.17.3 The development will be required to meet the Building Regulations in force at the time of its construction and these may well be changed from those in force currently. The Building Control Body (the Local Authority or an Approved Inspector) would carry out an examination of drawings for the proposed works and carry out site inspections during the course of the work

to ensure the works are carried out correctly as far as can be ascertained. As part of the plan checking process a consultation with the Fire Service would also be carried out. On completion of work the Building Control Body will issue a Completion Certificate to confirm that the works comply with the requirement of the Building Regulations.

- 6.17.4 Fire safety provisions have several components which subdivide the building into distinct fire compartments to prevent the rapid spread of fire. These areas are separated by fire doors. To prevent the building from premature collapse, the structural elements are protected to withstand the fire and heat to a specified period of time.
- 6.17.5 There are also provisions to prevent fire and smoke spreading unseen in cavities and concealed areas. Fire barriers are provided which are critical in ensuring the fire and smoke separation between compartments.
- 6.17.6 External walls and roofs are required to have sufficient resistance against the spread of fire between buildings. These are determined in relation to the proximity of other buildings and the boundaries.

#### *Provision of smoke detectors*

- 6.17.7 The Building Regulations require installation of a self-contained mains operated smoke alarm in the hallway (lobby) within each flat. These provide early warning to the occupants and aid early evacuation and expect them to alert the fire service. These requirements have been in place from 2006 for new flats. In large developments, smoke detection in common areas is provided that will activate automatic smoke vents. The applicant has confirmed that smoke detectors will be fitted in the development and that a smoke evacuation system will also be fitted.

#### *Provision of sprinklers*

- 6.17.8 New buildings with a floor more than 18m (approximately 6 stories) above ground level will be provided with a firefighting shaft which includes a firefighting lift, firefighting stairs and dry riser. A dry riser is a fixed vertical pipe positioned in or close to the staircase which the fire brigade can help to supply water to the upper floor levels. The applicant has confirmed this will be provided.
- 6.17.9 New blocks of flats over 30m in height (approximately 10 stories) or more would require installation of domestic sprinklers and those with a floor more than 50m above ground level would require a wet riser under the Building Regulations since 2006. The applicant has confirmed that these will be provided as appropriate in the blocks.

6.17.10 In general, sprinklers operate when the fire is developing and aim to keep the fire under control, to prevent further spread and aid the fire fighters to tackle the fire more effectively.

### *Materials*

6.17.11 This is an outline application and as such no precise materials are currently proposed. The applicant has confirmed that no Aluminium Composite Cladding of the type identified as problematic is proposed. When the materials are submitted for the discharge of the materials condition the materials will need to meet the Building Regulations in force at the time and taking account of the current Government Guidance.

## **6.18 Conclusions**

6.18.1 This would be a significant development on a prominent site within the new Tottenham Hale District Centre. Having considered all material planning considerations including the development plan and the environmental information submitted with the application, officers consider 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-led mixed-use development. The application forms an important first step in the regeneration of Ashley Road South, in support of emerging allocation TH6.
- The 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 scale of development is supported by its location within the Upper Lee Valley Opportunity Area; the Tottenham Area Action Plan and the Tottenham Housing Zone all of which envisage transformational change.
- The minimum overall affordable housing proposal of 50% will make a significant contribution to meeting the portfolio approach to the management of affordable housing within the Tottenham Hale Housing Zone, and contributing to a mixed and balanced new residential neighbourhood. The overall tenure balance accords with the portfolio approach and is acceptable.
- Taking into account the wider approach to employment re-provision across the Ashley Road South Masterplan, the overall balance of employment floorspace is considered to be acceptable. The overall balance of retail, food & drink and commercial floorspace, subject to the controls recommended in this report, is likely to contribute to a genuinely mixed use neighbourhood.



- The height of the north eastern tower element of the building at sixteen stories, is appropriate within the context of a clear block structure, announcing the new District Centre on approach from the north along Watermead Way. This is supported in the context of the step change in the urban context envisaged within the emerging Tottenham Hale District Centre.
- The masterplan has undergone rigorous testing since 2015 evolving with the potential to form a well considered new neighbourhood. The form, scale and massing of the proposed mansion blocks, of which this application is part, is appropriate to the site's changing urban context. The quality of the scheme is considered to be high.
- The density of the development equates to a maximum of 265 units per hectare if the scheme's maximum parameters are built out. This would be slightly above the density range within the London Plan's indicative range for 'urban' sites with a PTAL of 5-6a but would optimise the site's potential and is acceptable.
- The site is highly accessible, being located close to Tottenham Hale Station. The site is also adjacent to a significant open space in the form of Down Lane Park with Lee Valley Regional Park in close proximity. The mansion block structure presents the opportunity for a good housing mix and balance of residential units having regard to local need and site specific characteristics contributing to the creation of a mixed and balanced community.
- The scheme will make a significant new contribution to the quality of the public realm, facilitating the enhancement of Ashley Road as a new central spine and delivering a significant new east-west route from Down Lane Park towards the planned College (Ashley Link) all of which weigh heavily in favour of the scheme.
- The development, subject to s.106 provisions to secure remodelling of access to Down Lane Park, will relate positively to the adjacent Down Lane Park, providing new and improved pedestrian & cycle links. Building 2 in particular, holds the potential to be a high quality pavilion building at the interface between the park and a new neighbourhood.
- 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.

- No additional mitigation measures in relation to environmental wind are considered necessary at this stage. Planning conditions are recommended to take wind conditions into consideration when designing sitting areas and building entrances at the detailed design stage. Further testing is suggested to test the effectiveness of the measures mentioned above and verify that pedestrians are sheltered from prevailing winds, particularly in the north-eastern corner of the site.
- Following a request from officers, the applicant has provided additional information in respect of fire safety in the form of a question and answer sheet. No details are being approved at this outline stage and all details and materials will be the subject of reserved matters in addition to requirements relating to Building Regulations. Officers are satisfied that the commitments made would meet Building Regulations.
- 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.
- The applicant has committed to a future district energy connection and will work with the Council to safeguard a pipework route under the proposed Ashley Link. Taking into account the proposed S106 obligations to provide an updated energy strategy and agreement a carbon offset payment if required, the design of the scheme is considered to be sustainable. The issues of flood risk, drainage, land contamination and waste storage are able to be addressed by the imposition of conditions.
- The proposal, subject to appropriate planning conditions, will incorporate SUDs and would not increase flood risk and is considered to be a sustainable design.
- The proposals are not considered to give rise to any adverse equalities impact upon the protected characteristics of any individual or group and the operational phase of the proposal is assessed as being beneficial in the long-term.

## 7 COMMUNITY INFRASTRUCTURE LEVY (CIL)

7.11.1 Based on the information given on the plans, the Mayoral CIL charge will be **£513,240** and the Haringey CIL charge will be **£175,995**. This is an estimated figure based on the outline plans and 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

8.11 GRANT PERMISSION subject to conditions and subject to sec. 106 legal Agreement.

## 9 CONDITIONS AND INFORMATIVES

### CONDITIONS

No	Condition
1.	<p><b>Reserved Matter Approval (Scale, Appearance, Layout, Access, Landscaping)</b></p> <p>This permission is granted in OUTLINE, in accordance with the provisions of Article 5 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 and before any development is commenced, the approval of the Local Planning Authority shall be obtained to the following reserved matters:</p> <ul style="list-style-type: none"> <li>(a) appearance;</li> <li>(b) landscaping;</li> <li>(c) layout; and</li> <li>(d) scale</li> <li>(e) access</li> </ul> <p>Full particulars of these reserved matters, including plans, sections and elevations and all to an appropriate scale, and any other supporting documents shall be submitted to the Local Planning Authority for the purpose of obtaining their approval, in writing. The development shall then be carried out in complete accordance with those particulars.</p> <p>For the avoidance of doubt, the illustrative drawings submitted in support of the application including those set out within the approved Design and Access Statements are not approved.</p> <p>Reason: In order to comply with the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended) which requires the submission to and approval by, the Local Planning Authority of reserved matters.</p>
2.	<p><b>PRIOR TO RESERVED MATTERS - Affordable Housing Strategy</b></p> <p>Prior to the determination of Reserved Matters application an affordable</p>

	<p>housing strategy shall be submitted to and approved in writing by the local planning authority relating to the provision of a minimum of 50% Affordable Housing. The details set out in the strategy shall thereafter be implemented in accordance with the approved strategy, unless otherwise agreed by the Local Planning Authority. Such a strategy for each phase must include:</p> <ul style="list-style-type: none"> <li>i. The overall %, numbers, tenure, affordability and location of the affordable housing provision to be made within the related phase;</li> <li>iii. The timing of the construction of the affordable housing;</li> <li>iv. The arrangements to ensure that such provision is affordable for both initial and subsequent occupiers of the affordable housing; and</li> </ul> <p>Reason: To secure details relating to the provision of affordable housing and accord with London Plan Policy 3.11 Affordable housing targets.</p>
<p>3.</p>	<p><b>PRIOR TO RESERVED MATTERS - Phasing strategy &amp; details</b></p> <p>No part of the development hereby permitted shall be carried out unless and until a phasing strategy showing the location of each building and including details of the order in which the buildings will be commenced, has been submitted to and approved by the Local Planning Authority unless otherwise agreed in writing in the event that the component buildings are delivered concurrently.</p> <p>The phasing strategy shall include details of:</p> <ul style="list-style-type: none"> <li>1. the order in which the development and occupation of buildings within the relevant phase shall take place taking into account its relationship to the wider ARS masterplan;</li> <li>2. the quantum, tenure and location of affordable housing to be provided in that phase of the development;</li> <li>3. the area, location and programme for construction of public open space, public realm and landscaping to be provided in that phase;</li> <li>4. the quantum and location of car parking to be provided in that phase;</li> <li>5. the quantum and location of cycle parking to be provided in that phase;</li> <li>6. the quantum and location of motorcycle and powered two wheeled vehicular parking to be provided in that phase;</li> <li>7. infrastructure, including the capacity of shared energy infrastructure for that phase;</li> <li>8. the principles of waste / refuse and servicing for that phase; and</li> <li>9. the chargeable development(s) comprised in that phase for the purposes of the Community Infrastructure Levy.</li> </ul> <p>The Development shall only be carried out in accordance with the</p>

	<p>approved phasing strategy, subject to such amendments to such phasing strategy as may be approved by the Local Planning Authority from time to time.</p> <p>Reason: To ensure that the development is consistent with the principles of good masterplanning. It is necessary for condition to prevent commencement of the development until the requirements have been met because the timing of compliance is fundamental to the decision to grant planning permission.</p>
3.	<p><b>COMPLIANCE - Time limits for Reserved Matters</b></p> <p>All applications for the approval of Reserved Matters within the OUTLINE permission hereby approved, as depicted on the approved plans shall be made to the Local Planning Authority no later than the expiration of five years from the date of this permission, and the development hereby authorised must be begun not later than whichever is the later of the following dates, failing which the permission shall be of no effect:</p> <ul style="list-style-type: none"> <li>a) The expiration of five years from the date of this permission OR</li> <li>b) The expiration of two years from the final date of approval of any of the reserved matters.</li> </ul> <p>Reason: This condition is imposed by virtue of Section 92 of the Town &amp; Country Planning Act 1990 and to prevent the accumulation of unimplemented planning permissions.</p>
4.	<p><b>COMPLIANCE - Reserved Matters Specification (List of documentation to accompany Reserved Matters Applications)</b></p> <p>Each application for the approval of Reserved Matters submitted pursuant to condition 2 shall contain such information set out below as is relevant to the application and shall be consistent with the information approved for the relevant building pursuant to Condition 4 (Phasing Strategy).</p> <ul style="list-style-type: none"> <li>• A statement (including accompanying design material) to demonstrate compliance with the parameter plans, Development Specification and mandatory requirements in the approved Design Guidelines (April 2017)</li> </ul> <p>Access</p> <ul style="list-style-type: none"> <li>1) Notwithstanding submitted illustrative material the Ashley Road and Burdock Road bus stands shall remain in situ until such time as a report and plans detailing the location and arrangements for delivering the replacement of the bus stands on Ashley Road and Burdock Road have been submitted and approved as part of the reserved matters, in consultation with Transport for London.</li> </ul>

- 2) Detailed plans and drawings including such drawings to show method of construction, traffic calming measures, drainage, street lighting, kerb alignment, levels, areas of highway visibility and surface treatment.
- 3) A report and plans detailing layout including parking areas, servicing areas and plant areas; and
- 4) A report and plans detailing any necessary temporary layout and landscaping associated with boundary treatment and condition;

#### Layout

- 1) An updated commercial report and layout plan detailing commercial uses across the development, taking into account the wider commercial provision across the ARS masterplan;

#### Landscaping

- 1) Details of the play equipment proposed for the child play spaces;
- 2) Notwithstanding the Design Guidelines plans, drawings, sections and elevations to explain full details of the materials to be used on all external surfaces (including hard landscaping) and, where practicable, samples shall be provided and shall include:
  - hard surfacing materials
  - minor artefacts and structures (e.g. furniture, refuse or other storage units, signs, lighting etc.)
  - bat/bird boxes
- 3) Notwithstanding the Design Guidelines details of soft landscape works shall include:
  - how the landscaping will interface with Down Lane Park and facilitate access;
  - planting plans (for 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 detailing the timing of delivery.

#### Appearance

- 1) Details of rooftop and roofscape in accordance with Design Guidelines (April 2017).

Reason: To ensure the development is consistent with London Plan Policies 3.5, 7.4 and 7.6, Local Plan Policy SP11, and emerging Policy DM1. 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.

<p>5.</p>	<p><b>COMPLIANCE - Development in Accordance with Approved Drawings and Documents</b></p> <p>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.</p> <ul style="list-style-type: none"> <li>a) Development Specification (Revised April 2016);</li> <li>b) Design Guidelines (April 2017)</li> <li>c) The following plans:</li> </ul> <p>The approved plans comprise drawing no's: Site Location 1824-JMP-02-XX-DR-A-0001 Rev A; Planning Application Boundary 1824-JMP-02-00-DR-A-0002 Rev C; Site Location (proposed buildings shown) 1824-JMP-02-XX-DR-A-0003 Rev C; Demolition Plan 1824-JMP-02-XX-DR-A-1001; Existing Ground Levels 1824-JMP-02-XX-DR-A-1002 Rev A; Building Footprints – Maximum Parameters (existing context) 1824-JMP-02-XX-DR-A-0004 Rev E; Building Heights – Maximum Parameters (existing context) 1824-JMP-02-XX-DR-A-0005 Rev G; Access Parameters (existing context) 1824-JMP-02-XX-DR-A-0006 Rev E; Land Use Parameters – Ground Floor (existing context) 1824-JMP-02-00-DR-A-0007 Rev E; Land Use Parameters – First Floor (existing context) 1824-JMP-02-01-DR-A-0008 Rev D; Land Use Parameters – Typical Upper Floor (existing context) 1824-JMP-02-02-DR-A-0009 Rev E; Proposed Ground and Floor Levels (existing context) 1824-JMP-02-00-DR-A-0017 Rev C; Use Frontage Ground Floor (existing context) 1824-JMP-02-00-DR-A-0018 Rev A; Landscape Parameters Ground Level (showing existing context across the Ashley Road South Masterplan) 449-101 Rev 02; Landscape Parameters Upper/Roof Level (showing existing context across the Ashley Road South Masterplan) 449-103 Rev 02.</p> <p>Reason: In order to ensure the development is carried out in accordance with the approved details and for the avoidance of doubt.</p>
<p>6.</p>	<p><b>COMPLIANCE - Environmental Statement</b></p> <p>All submissions of details pursuant to the planning permission hereby approved shall be in substantial accordance with the Environmental Statement dated December 2016 and the Supplementary Environmental Statement dated April 2017.</p> <p>Reason: In order to ensure that the details of the development are within the parameters assessed in the Environmental Statement and that the development is carried out in accordance with the mitigation measures set out in the Environmental Statement in order to minimise the</p>

	environmental effects of the development.																				
7.	<p><b>COMPLIANCE - Environmental Statement: Reserved Matters Applications</b></p> <p>Each reserved matters application shall be preceded by the adoption of an EIA screening opinion by the LPA;</p> <ul style="list-style-type: none"> <li>I. if it is demonstrated that an application for reserved matters approval is not likely to give rise to any additional significant environmental effects in comparison with the Development as approved by this Permission and assessed in the Environmental Statement, a further environmental statement shall not be required;</li> <li>II. where an application for reserved matters approval would be likely to have significant environmental effects, as screened and agreed by the Council prior to the submission of any such application, that application will be accompanied by an Environmental Statement assessing the likely significant effects of the details applied for.</li> </ul> <p>Reason: In order to ensure that the details of the development are within the parameters assessed in the Environmental Statement and that the development is carried out in accordance with the mitigation measures set out in the Environmental Statement and to accord with the Environmental Impact Assessment Regulations (2017).</p>																				
8.	<p><b>COMPLIANCE - Quantum of Development</b></p> <p>The total quantum of built floorspace across the Development shall not exceed 265 residential units and 3,600 square metres (GEA) of non-residential floorspace. The development hereby permitted shall comply with the following amounts unless otherwise permitted:</p> <table border="1" data-bbox="354 1291 1393 1701"> <thead> <tr> <th data-bbox="354 1291 516 1365"><b>Building</b></th> <th colspan="2" data-bbox="516 1291 971 1365"><b>Non-residential floorspace (A1/A3/B1/D1)</b></th> <th data-bbox="971 1291 1393 1365"><b>Residential units</b></th> </tr> <tr> <td data-bbox="354 1365 516 1402"></td> <td data-bbox="516 1365 730 1402">Maximum</td> <td data-bbox="730 1365 971 1402">Minimum</td> <td data-bbox="971 1365 1393 1402"></td> </tr> </thead> <tbody> <tr> <td data-bbox="354 1402 516 1480">Building 2/2A</td> <td data-bbox="516 1402 730 1480">Up to 725sqm</td> <td data-bbox="730 1402 971 1480">600sqm</td> <td data-bbox="971 1402 1393 1480">Up to 97 units</td> </tr> <tr> <td data-bbox="354 1480 516 1558">Building 3</td> <td data-bbox="516 1480 730 1558">Up to 2.565sqm</td> <td data-bbox="730 1480 971 1558">2,150sqm</td> <td data-bbox="971 1480 1393 1558">Up to 168 units</td> </tr> <tr> <td data-bbox="354 1558 516 1701">Total</td> <td data-bbox="516 1558 730 1701">Up to 3,290 sqm (GIA)</td> <td data-bbox="730 1558 971 1701">3,000sqm (GEA) Up to 2,750 sqm (GIA)</td> <td data-bbox="971 1558 1393 1701">Up to 265 units</td> </tr> </tbody> </table> <p>Reason: To ensure that the Development is undertaken in accordance with the approved drawings and documents; the assessed Environmental Statement; and to protect local amenity.</p>	<b>Building</b>	<b>Non-residential floorspace (A1/A3/B1/D1)</b>		<b>Residential units</b>		Maximum	Minimum		Building 2/2A	Up to 725sqm	600sqm	Up to 97 units	Building 3	Up to 2.565sqm	2,150sqm	Up to 168 units	Total	Up to 3,290 sqm (GIA)	3,000sqm (GEA) Up to 2,750 sqm (GIA)	Up to 265 units
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9.	<p><b>COMPLIANCE – LAND USE (Community)</b>  Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking and re-enacting that Order) the community space at ground floor level in Building 2 hereby permitted shall only be used for D1 and for no other purpose unless otherwise agreed by the Local Planning Authority or any use permitted by the above order.</p> <p>Reason: In order to secure the Council’s placemaking objectives in pursuance of Local Plan policies SP11 and London Plan Policies 3.16 relating to community and social infrastructure.</p>
10.	<p><b>COMPLIANCE – LAND USE (Retail)</b>  Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking and re-enacting that Order) the non-residential space shall not exceed 450sqm in respect of Class A1 use and 300sqm in respect of Class A3 use hereby permitted unless otherwise agreed by the Local Planning Authority or any use permitted by the above order.</p> <p>Reason: In order to bring the proposal into line with the mixed-use employment-led policy DM38 which requires the maximum viable re-provision of employment floorspace.</p>
11.	<p><b>COMPLIANCE - Development in Conformity with Energy Statement</b>  The development hereby approved shall be constructed and delivered to the U-values set out in the document Sustainable Design, Energy and Construction Statement prepared by WSP Parsons Brinckerhoff dated April 2017 (and appended to the Planning Statement dated April 2017), and any energy strategy document thereafter approved, and the development shall achieve a minimum carbon reduction of 10% beyond Building Regulations 2013.</p> <p>Reason: to mitigate the impacts of climate change in accordance with policies 3.2, 5.3, 5.5, 5.6 and 7.14 of the London Plan 2015 (with FALP 2011/REMA 2013).</p>
12.	<p><b>COMPLIANCE - Land Contamination – Part C</b>  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.</p> <p>Reason: To ensure the development can be implemented and occupied</p>

	with adequate regard for environmental and public safety.
13.	<p><b>COMPLIANCE - Landscaping – Replacement of Trees and Plants (LBH Development Management)</b></p> <p>Any tree or plant on the development (including roof top 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.</p> <p>Reason: to protect the amenity of the locality.</p>
14.	<p><b>COMPLIANCE - NRMM Inventory and Documentation Availability</b></p> <p>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.</p> <p>Reason: To prevent adverse impact on air quality within an Air Quality Management Area (AQMA) as required by Policy 7.14 in the London Plan (2016).</p>
15.	<p><b>COMPLIANCE – Accessibility</b></p> <p>The development shall only be carried out in accordance with the inclusivity and accessibility measures identified in the Design and Access Statement dated April 2017 with regard to the fit out in accordance with Building Regulations Part M4 category 2. 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).</p> <p>Reason: To provide suitable access for disabled persons in accordance with London Plan (2015) policy 3.8 'Housing Choice'.</p>
16.	<p><b>COMPLIANCE - Compliance with London Housing Design Standards</b></p> <p>The development shall comply with the London Plan Policy 3.5 and draft London Housing Supplementary Planning Guidance (2016) space standards and as far as practical shall meet all other requirements within the draft London Housing Supplementary Planning Guidance 2016, particularly the requirements regarding dual aspect units.</p> <p>Reason: In order to ensure a satisfactory standard of accommodation for future occupiers of the development.</p>

17.	<p><b>COMPLIANCE - Individual Satellite dishes or television antennas precluded</b>  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.</p> <p>Reason: to protect the amenity of the locality.</p>
<b>PRE COMMENCEMENT</b>	
18.	<p><b>PRE COMMENCEMENT - Confirmation of Site Levels</b>  Prior to the commencement of the development (except 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.</p> <p>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.</p> <p>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.</p>
19.	<p><b>PRE COMMENCEMENT Drainage Strategy (Thames Water)</b>  Development, excluding demolition and site preparation works, 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.</p> <p>Reason: The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community.</p> <p>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.</p>
20.	<p><b>PRE COMMENCEMENT - Archaeology (Written Scheme of Investigation)</b>  No demolition or development shall take place until a written scheme of</p>

	<p>investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and:</p> <ul style="list-style-type: none"> <li>a. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works.</li> <li>b. The programme for post investigation assessment</li> <li>c. Provision to be made for analysis of the site investigation and recording</li> <li>d. Provision to be made for publication and dissemination of the analysis and records of the site investigation</li> <li>e. Provision to be made for archive deposition of the analysis and records of the site investigation</li> <li>f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.</li> <li>g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.</li> </ul> <p>No development shall take place within the area indicated until the implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.</p> <p>Reason: To protect archaeological interests by providing an opportunity to investigate and record the site in accordance with London Plan (2015) policy 7.8 ‘Heritage Assets and Archaeology’. 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.</p> <p>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.</p>
21.	<p><b>PRE COMMENCEMENT - Tree protection meeting (pre-commencement)</b></p> <p>No development shall start until all those trees to be retained, as indicated in the Tree Protection Plans (2931-ARB-03 Rev B) (April 2017), have been protected by secure, stout, exclusion fencing erected at the recommended distance for the Root Protection Areas (RPA), in</p>

	<p>accordance with BS 5837: 2012 Trees in Relation to Design, Demolitions and Construction. Any works connected with the approved scheme within the RPA shall be carried out under the supervision of the Arboricultural Consultant. No storage of materials, supplies or plant machinery shall be stored, parked, or allowed access within the RPA. The Local Planning Authority shall be given not less than two weeks' prior written notice by the developer of the commencement of works on the site in order that the council may verify via a site meeting attended by all interested parties to confirm all the protection measures to be installed for trees and discuss any construction works that may impact on the root protection areas. The tree protective measures must be inspected or approved by the Council Arboricultural officer, prior to the commencement of demolition works on site. All construction works within the root protection areas or that may impact on them, must be carried out under the supervision of the Consultant Arboriculturist.</p> <p>Reason: In order to safeguard the root systems of those trees on the site which are to remain after building works are completed in the interests of visual 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.</p> <p>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.</p>
22.	<p><b>PRE-COMMENCEMENT – Water supply (Thames Water)</b></p> <p>Prior to the commencement of development, excluding demolition and site clearance, impact studies of the existing water supply infrastructure shall be submitted to and approved in writing by the local planning authority in consultation with Thames Water. The studies shall determine the magnitude of any new additional capacity required in the system and a suitable connection point. The development shall not be commenced until the studies have been approved in writing by the local planning authority. The development shall not be brought into use until any necessary mitigation measures identified by the impact studies have been approved in writing by the local planning authority and carried out in full in accordance with the approved details.</p> <p>Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the additional demand in accordance with London Plan (2015) policies 5.14 'Water Quality and Wastewater Infrastructure' and 5.15 'Water Use and Supplies'. The Local Planning Authority is satisfied that the pre-commencement requirements of the condition are</p>

	<p>so fundamental to the development permitted that it would have been otherwise necessary to refuse the whole permission.</p> <p>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.</p>
23.	<p><b>PRE- COMMENCEMENT - Construction Environmental Management Plan</b></p> <p>Prior to the commencement a Construction Environmental Management Plan (CEMP) for the relevant Phase shall be submitted to and approved in writing by the Local Planning Authority. The CEMP shall provide details of how demolition and construction works are to be undertaken and include (a):</p> <ul style="list-style-type: none"> <li>i) The identification of stages of works;</li> <li>ii) Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays);</li> <li>iii) Details of all plant and machinery to be used during demolition and construction stage, including an inventory of all Non Road Non-road Mobile Machinery (NRMM);</li> <li>iv) Details of an Unexploded Ordnance Survey;</li> <li>v) Details of community engagement arrangements;</li> <li>vi) Details of any acoustic hoarding;</li> <li>ix) A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance);</li> <li>x) Details of external lighting</li> </ul> <p>b) The inventory of NRMM shall be kept on site during the course of the demolitions, site preparation and construction phases. All machinery shall be regularly serviced and service logs kept on site for inspection. Records shall be kept on site which details proof of emission limits for all equipment. This documentation shall be made available to local authority officers as required until development completion.</p> <p>The works shall only be carried out in accordance with an approved CEMP.</p> <p>Reason: To safeguard residential amenity, protect areas of nature conservation interest and prevent adverse impact on air quality within an Air Quality Management Area (AQMA) as required by Policies 7.14, 7.18 and 7.19 of the London Plan (2016), Policy SP13 of the Haringey Local Plan (2013) and Saved Policy ENV7 of the Haringey Unitary Development Plan (2006).</p>

	<p>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.</p>
<p>24.</p>	<p><b>PRE COMMENCEMENT - Land Contamination – Part A and B</b>  <b>Land Contamination – Part A and B</b>  Before development commences other than for investigative work:</p> <p>Using the information from Chapter L of the Environmental Statement (12944366v1) 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:-</p> <ol style="list-style-type: none"> <li>1. a risk assessment to be undertaken,</li> <li>2. refinement of the Conceptual Model, and</li> <li>3. the development of a Method Statement detailing the remediation requirements.</li> </ol> <p>The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority.</p> <p>B) If the updated 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 the potential effects set out in Section L5 of the Environmental Statement dated December 2016, and also detailing any post remedial monitoring shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.</p> <p>Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p>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.</p>
<p>25.</p>	<p><b>PRE COMMENCEMENT - Details of AQDMP (Dust)</b>  Prior to the commencement of the development an Air Quality and Dust Management Plan (AQDMP), detailing the management of demolition and construction dust, 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 an updated Dust Risk Assessment in substantial accordance with the Dust Risk</p>

	<p>Assessment dated December 2016. The plan shall be implemented as approved and maintained for the duration of the construction phase of the development.</p> <p>Reason: To prevent adverse impact on air quality within an Air Quality Management Area (AQMA) as required by Policy 7.14 in the London Plan (2016).</p> <p>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.</p>
26.	<p><b>PRE COMMENCEMENT OF SUPERSTRUCTURE - Waste Management Scheme</b></p> <p>Prior to the commencement of any superstructure works on the approved buildings, and notwithstanding the approved Delivery and Servicing Plan (Prepared by WSP Parsons Brinckerhoff dated December 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.</p> <p>The updated scheme shall address:</p> <ol style="list-style-type: none"> <li>1) Waste and recycling collection frequency, following liaison with Haringey's Waste Management Team and Veolia (Haringey's waste service provider)</li> <li>2) The cost implications of collection frequency to future occupiers</li> <li>3) The management of waste on site, including bin rotation and storage layout</li> <li>4) The collection storage areas</li> </ol> <p>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.</p> <p>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.</p>
27.	<p><b>PRE COMMENCEMENT - Updated Construction Logistics Plan</b></p> <p>No development shall take place until such times as an updated Construction Logistics Plan (CLP) for the relevant phase has been submitted to and approved in writing by the Local Planning Authority. The CLP shall include the following details:</p> <ol style="list-style-type: none"> <li>i) Update to the Construction Logistics Plan prepared by WSP</li> </ol>



	<p>Parsons Brinkerhoff dated December 2016 to include phased development;</p> <ul style="list-style-type: none"> <li>ii) Monitoring and joint working arrangements across Ashley Road South Masterplan area;</li> <li>iii) Site access and car parking arrangements;</li> <li>iv) Delivery booking systems;</li> <li>v) Construction phasing and agreed routes to/from the development replace lorry routeing;</li> <li>vi) Timing of deliveries to and removals from the site (to avoid peak times as agreed with HA) L07.00 to 9.00 and 16.00 to 18.00 where possible);</li> <li>vii) Construction works shall only proceed in accordance with the approved relevant CLP;</li> <li>viii) Travel plans for staff/ personnel involved in construction.</li> </ul> <p>Reason: To update the existing CLP to account for phased development in the area, reduce congestion and mitigate any obstruction to the flow of traffic on the transportation and highways network.</p> <p>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.</p>
<b>PRIOR TO ABOVE GROUND WORKS</b>	
28.	<p><b>PRIOR TO ABOVE GROUND WORKS - Piling method statement (Thames Water)</b></p> <p>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.</p> <p>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.</p> <p>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.</p>

29.	<p><b>PRIOR TO ABOVE GROUND WORKS - Biodiversity Enhancement Plan</b></p> <p>a) Prior to commencement of above ground works, a Biodiversity Enhancement Plan (BEP) shall be submitted to and approved in writing by the Local Planning Authority. The BEP shall be in accordance with the Environmental Statement (dated December 2016) and include:</p> <ul style="list-style-type: none"> <li>i) Integration of bird and bat boxes;</li> <li>ii) Details of native and 'nectar rich' landscaping; and</li> <li>iii) Soft landscaping management &amp; maintenance.</li> </ul> <p>b) The Biodiversity enhancement measures set out in the approved BEP shall be implemented.</p> <p>Reason: In order to ensure that the authorised development makes a positive contribution to biodiversity in accordance with Policies 7.18 and 7.19 of the London Plan (2015), Policy SP13 of the Haringey Local Plan (2013) and Saved Policy ENV7 of the Haringey Unitary Development Plan (2006).</p>
30.	<p><b>PRIOR TO ABOVE GROUND WORKS - Sustainable Urban Drainage</b></p> <p>Prior to the commencement of above ground works details of the design, implementation, maintenance and management of the sustainable drainage scheme shall be submitted to, and approved in writing by, the local planning authority. Those details shall include:</p> <ul style="list-style-type: none"> <li>1. 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;</li> <li>2. 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);</li> <li>3. Flood water exceedance routes, both on and off site;</li> <li>4. A timetable for its implementation, and</li> <li>5. 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</li> </ul>

	<p>arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime.</p> <p>Once approved, the scheme shall be implemented, retained, managed and maintained in accordance with the approved details.</p> <p>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 in accordance with Policy 5.13 of the London Plan.</p> <p>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.</p>
31.	<p><b>PRIOR TO ABOVE GROUND WORKS - Energy Strategy</b></p> <p>Notwithstanding the submitted details and prior to the commencement of above ground works, excluding demolition and site preparation works, a revised energy strategy shall be submitted to and approved in writing by the local planning authority. The Energy Strategy shall, unless otherwise agreed by the local planning authority, be based on connection of all residential and non-residential buildings to a district energy and heating network. The strategy shall explore all reasonable options for improving the energy efficiency of the building and reducing carbon dioxide emissions in accordance with the energy hierarchy set out in London Plan policy 5.2 'Minimising carbon dioxide emissions'. The Strategy will comply with the targets and measures set out in London Plan (2016) Policy 5.2 and will be submitted using the format set out in the GLA guidance on Energy Strategies. The development shall be carried out strictly in accordance with the details approved.</p> <p>Reason: To ensure that the development hereby approved is energy efficient and to contribute to the avoidance of need for new fossil fuel or other primary energy generation capacity and to reduce emissions of greenhouse gases and to minimise the impact of building emissions on local air quality in the interests of health, in accordance with policies 3.2, 5.3, 5.5, 5.6 and 7.14 of the London Plan 2015 (with FALP 2011/REMA 2013).</p>
32.	<p><b>PRIOR TO ABOVE GROUND WORKS Sustainability Standards – Non-residential</b></p> <p>Evidence that each commercial unit of the development is registered with a BREEAM certification body and that a pre-assessment report (or design stage certificate with interim rating if available) has been submitted</p>

	<p>indicating that the development can achieve the stipulated BREEAM level “Very good” shall be submitted to and approved in writing by the local planning authority prior to the commencement of the relevant works and a final certificate shall be submitted for approval to the local planning authority within 6 months of the occupation of the development.</p> <p>Reason: To ensure that the development achieves a high level of sustainability in accordance with Policies 5.1, 5.2, 5.3 and 5.15 of the London Plan (2016) and Policies SP0 and SP4 the Haringey Local Plan (2013).</p>
33.	<p><b>PRIOR TO ABOVE GROUND WORKS - External Solar Shading and Passive Ventilation Study</b></p> <p>Prior to the commencement of any superstructure work on each specific building, an external solar shading and passive ventilation study shall be submitted in writing to and for approval by the Local Planning Authority. The strategy shall clarify where glazing is required to reduce solar gain and how this has been balanced against the need to ensure good levels of daylight. 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 thereafter.</p> <p>Reason: To ensure sustainable development and mitigate the impacts of climate change in accordance with policies 3.2, 5.3, 5.5, 5.6 and 7.14 of the London Plan 2015 (with FALP 2011/REMA 2013).</p>
34.	<p><b>PRIOR TO ABOVE GROUND WORKS - Green and Brown Roofs</b></p> <p>Prior to the commencement of above ground development for each building, details of green/brown roofs, including planting and maintenance schedules, and ecological enhancement measures shall be submitted to and approved in writing by the Council. Development shall accord with the details as approved.</p> <p>Reason: To ensure the provision of green and brown roofs in the interests of sustainable urban drainage and habitat provision in accordance with policies 5.11, 5.13 and 7.19 of the London Plan.</p>
35.	<p><b>PRIOR TO INSTALLATION - Ultra Low NOx Boilers - Product Specification and Dry NOx Emissions Details (LBH Environmental Services and Community Safety)</b></p> <p>If boilers are required by an updated energy strategy they shall be Ultra Low NOx boilers. Prior to installation, 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</p>

	<p>conformity with the approved document Air Quality Assessment (The boilers shall be installed in accordance with approved details and maintained thereafter (WSP Report dated December 2016).</p> <p>Reason: To prevent adverse impact on air quality within an Air Quality Management Area (AQMA) as required by Policy 7.14 in the London Plan (2016).</p>
36.	<p><b>PRIOR TO SUPERSTRUCTURE WORKS - Cycle Parking Details</b>  Prior to any superstructure works on each approved building, details of arrangements for cycle storage (including provision for a total of 489 cycle parking spaces, 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 in consultation with Transport for London (Borough Planning), 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.</p> <p>Reason: To ensure that adequate cycle storage facilities are provided and promote sustainable travel.</p>
<b>PRIOR TO OCCUPATION</b>	
37.	<p><b>PRIOR TO OCCUPATION - Estate Management &amp; Maintenance Plan</b>  Prior to the occupation of the relevant phase an Estate Management and Maintenance Plan for that Phase in which development would be located, setting out maintenance and management responsibilities for all communal play spaces, communal amenity spaces and all publicly accessible open spaces, shall be submitted to and approved in writing by the Local Planning Authority and the open spaces shall thereafter be maintained and managed in accordance with the approved details.</p> <p>Reason: In order to ensure that the Local Planning Authority is satisfied with the details of the authorised development and to ensure the design of the new housing development enhances the quality of local places in accordance with London Plan Policy 3.5.</p>
38.	<p><b>PRIOR TO OCCUPATION – ROAD SAFETY AUDIT</b>  Prior to the occupation of any residential or commercial unit the applicant shall arrange for a road safety audit (Stage 1&amp;2) of the proposed site access on Ashley Road and Burdock Road to be carried out by an independent auditor not connected with the design of the scheme, in accordance with Department for Transport's Design Manual for Roads and Bridges (DMRB), HD 19/15 and shall submit the safety audit report to the Local Planning Authority for approval.</p> <p>Reason: to accord with Policy DM33 of the Council's Development Management DPD and in the interests of road safety.</p>

39.	<p><b>PRIOR TO OCCUPATION - Play Space</b>  The details approved in respect of play space(s), communal amenity space and private amenity space pursuant to condition 2 shall be implemented in full prior to occupation of 50% of the residential units within the relevant building to which they relate taking into account landscape drawings 449-101 P02 and 449-103 P02 and subsequently approved plans and drawings.</p> <p>Reason: To ensure that appropriate, accessible, play space and amenity space are provided, in accordance with the London Plan (consolidated with Alterations Since 2011 and published March 2016).</p>
40.	<p><b>PRIOR TO OCCUPATION - Secured by Design</b>  Prior to the occupation of the relevant phase a statement shall be submitted to, and approved in writing by, the Local Planning Authority showing how the development will be designed and constructed to Secured by Design Sections 2 and 3 Compliance. The development shall be implemented in accordance with the approved details.</p> <p>Reason: To ensure that the proposed development meets the Police standards for the physical protection of the buildings and their occupants, and to comply with London Plan (2016) Policy 7.3 and Haringey Local Plan 2013 Policy SP11.</p>
41.	<p><b>PRIOR TO OCCUPATION - Details Roof Top PV Panels</b>  Prior to the occupation of the development for residential purposes, details of the layout and specification of the PV solar panel installation for each individual building 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.</p> <p>Reason: To ensure sustainable development and mitigate the impacts of climate change in accordance with policies 5.1, 5.2 and 5.3 of the London Plan.</p>
42.	<p><b>PRIOR TO OCCUPATION– Lighting strategy</b>  Prior to the building being brought into use a lighting strategy to address all external lighting across the development shall be submitted to and approved in writing by the local planning authority. The development shall only be carried out in accordance with the approved details.</p> <p>Reason: In the interests of the character and appearance of the area in accordance with London Plan (2015) policy 7.4 ‘Local Character’.</p>
43.	<p><b>PRIOR TO OCCUPATION - Car Parking Management Plan</b>  Prior to the first occupation of each approved use within the development, a Car Park Management Plan shall be submitted to the Local Planning</p>

	<p>Authority for approval in writing. The plan should:</p> <ul style="list-style-type: none"> <li>• describe how parking will be managed on the site</li> <li>• arrangements for leasing and allocating residential car parking spaces for wheelchair users and others;</li> <li>• provide details of how disabled users of the commercial part of the development, can use the parking spaces and how this is going to be managed including details of priority criteria for allocation and access for Dial-a-Ride services;</li> <li>• details of how the loading bay(s) will be managed, and any agreed restrictions;</li> <li>• confirmation of the area reserved for off-street parking on Ashley link (Parking Zone B Parameter Plan – Access) to be used only in connection with the assigned residential units;</li> <li>• details of the controlled access to the parking area(s), parking enforcement, ramp details (if any), to show structural columns, swept paths, vehicle circulatory movements, visibility splays, all while considering pedestrian safety nearby and within the undercroft parking area;</li> <li>• demonstration that all car parking spaces are of the correct width and length, with in-between allowance of 6m, following the Manual for Street (MfS) guidance and taking into account the ‘IStructE Design recommendations for multi-storey and underground car parks’-third edition;</li> <li>• details of the width in-between spaces that enables maneuvering in/ out of parking spaces, include swept path analysis for corner spaces and show the structural columns;</li> <li>• provide a minimum of 20% active and 20% passive Electric Vehicle Charging Points including locations of the EVCP points, and details of the criteria for reviewing the usage and converting passive points to active points. All identified points spaces should be marked prior to occupation and retained &amp; maintained thereafter.</li> </ul> <p>Reason: To ensure suitable arrangements for car parking as part of the development in accordance with TfL and London Plan requirements. The London Plan and Policy DM32 of the Development Management DPD require a minimum provision of 20% active and 20% passive Electric Vehicle Charging Points.</p>
44.	<p><b>PRIOR TO OCCUPATION - Details of Central Dish/Receiving System</b>  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.</p>

	Reason: to protect the amenity of the locality.
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## INFORMATIVES

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.

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.

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.

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.

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](mailto:wwqriskmanagement@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk/wastewaterquality](http://www.thameswater.co.uk/wastewaterquality)."

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.

**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](http://thameswater.co.uk/buildover).

**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.

**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.

**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.

**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.

#### 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.

#### 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.

#### Archeology

INFORMATIVE: The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. this part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI The written scheme of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

#### Asbestos

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.

#### Highways Licenses

INFORMATIVE: The following highways licences may be required: crane licence, hoarding licence, on-street parking suspensions. The applicant must check and follow the processes and apply to the HA.

**Appendix 1 – neighbour response summary**

<b>2 Park View Road</b>	<b>Officer comments</b>
<p>I do agree with the development of this area as a mixed use development. However, I have major reservations with the scheme presented. Building 2 seems to be of an appropriate size and scale for the site and surrounding buildings. I raised an eyebrow at the six floors of building 2a. This seems to be above the height of a building I would expect in this location. I was horrified when I saw the plans for building 3. This building will be totally out of scale with the surrounding buildings.</p>	<p>The scale and massing of the buildings has evolved and been tested overtime as the Ashley Road Masterplan has evolved. The transformational change envisaged across Tottenham Hale is part of a wider planned process, having been tested through the examination of the Tottenham Hale Area Action Plan, of which Ashley Road South is a significant component. Combined with the environmental testing and impacts discussed elsewhere in this report the overall scale, height and massing of buildings is considered appropriate in this location.</p>
<p>It will bring a very high building across the railway tracks from where the current high-rise blocks are contained.</p>	<p>Significant change in scale and height of buildings is envisaged across the Tottenham Hale AAP and Housing Zone area, of which Ashley Road South is a significant element.</p>
<p>The existing high rise buildings at Hale village have their own scale which works due to their location.</p>	<p>As above.</p>
<p>Placing a block of this height on Ashley road would be incongruous with the surrounding low rise buildings and vicinity to the park.</p>	<p>The proposed heights represent a significant change in urban context in this part of Tottenham Hale but this part of a planned process of change to optimise the use of land in this highly accessible location and the buildings will replace low grade commercial uses. The transition between the new district centre and the residential and industrial hinterland is considered to be appropriate.</p>
<p>Properties on the other side of the park (Park View Road) will feel very overlooked and have their outlook spoilt.</p>	<p>The re-development of Cannon Factory would be visible alongside future development of Ashley Road South and would also be visible from the park. The development would also be visible from the west but in the context of other recent development in Hale Village. From these locations the masterplan and this application, subject to detailed design, are likely to form a new urban edge to the park, creating an attractive architectural</p>

	backdrop.
<b>North London Waste Authority (Berol House)</b>	
The NLWA is concerned about losing the ability to effectively carry on business from Berol House and the ability to retain and attract staff to work at NLWA if car parking spaces disappear. NLWA is concerned because the proposals are for 'car free' development; because existing car parking space is being removed from Ashley Road and because some of the site plans in the application are unclear. NLWA objects to the planning application if their existing allocation is going to be reduced.	The application the subject of this report does not include proposals for Berol House although the cumulative impact of development across ARS is considered as part of this application. Specific proposals relating to Berol will be determined by the Council as part of a separate determination.
The NLWA seeks reassurance that: car users will have access to parking at Berol House during demolition and buildings works; delivery and servicing arrangements and parking for Berol House will be retained to the east of the building; car parking for existing tenants will not be reduced.	Access arrangements during construction and demolition works will be controlled via the CLP and a range of conditions recommended elsewhere in this report. No changes to current access arrangements to Berol House are proposed as part of this application as it falls outside the applicant's landownership.
NLWA is concerned the proposals for redevelopment of the area will mean that the car park to Berol House is no longer secured and that general security risks increase as a result. NLWA wish to see alternative measures implemented to retain the overnight and weekend gating of the car park.	Does not form part of this application. No changes to current access arrangements are proposed as part of this application.
We welcome the introduction of loading bays along Ashley Road but NLWA currently has no access to our offices from this side of Berol House so these servicing areas will be of no benefit to us. It is important to receive confirmation the east side of Berol House will retain space for loading and unloading of vehicles.	Interim works to Ashley Road are proposed as part of this application and are deemed to be acceptable in transport terms. Access to Berol House is outside the scope of this application.
The proposal to make Ashley Way one-way means all staff and visitors arriving from the north will be inconvenienced and adding to already significant congestion at some times of day where Watermead Way ends and the road becomes Hale Road. This will inconvenience people coming to Berol House, increase congestion in an already busy network around Tottenham Hale and reduce the attractiveness of Berol House as an	Changes to Ashley Way and the proposed one-way flow will impact upon staff and visitors visiting Berol House and therefore. There is the potential for marginally longer journey times for those visiting Berol House by car but in the light of the overall accessibility of the

<p>employment location.</p>	<p>site by public transport and the other scheme benefits derived from making Ashley Way more pedestrian friendly the benefits are considered to outweigh the dis-benefits.</p>
<p>The NLWA is also concerned about the noise and disruption during the proposed 21month build process. There is already general level of noise and activity around Berol House but the introduction of a college and so many residents to such close proximity will inevitably create a significant increase in noise and activity. This concern is in addition to concerns about the disruptive and negative impact on employment at Berol House if site security and car parking are not maintained.</p>	<p>The noise and vibration impacts during demolition, construction and beyond have been considered as part of the overall environmental impact. Appropriate planning conditions are proposed in order to mitigate and minimise the overall impact on neighbouring properties. A Construction Logistics Coordinator will also be employed in order to manage impacts during the construction programme.</p>
<p>NLWA is concerned that the working environment could be very difficult for our staff for a period of nearly two years and potentially the noise impacts of being surrounded by many more people and a large college could also be significant post development. We urge LBH to place appropriate conditions upon the construction phase of the development such that existing local neighbours face the minimum reasonable disruption.</p>	
<p>We cannot see any analysis of the potential impact of the development on the internal daylight, sunlight or shadow effects on adjacent properties such as Berol House and are therefore concerned the analysis appears deficient. NWLA is particularly concerned we it is located within the ground floor level and light levels will be severely reduced and our view of the sky will be severely reduced.</p>	
<p>NWLA objects to any demolition of part of Berol House as indicated in some of the plans. This appears to be in areas containing the entrance, toilets and kitchen/eating area. Part of our objection could be withdrawn if LBH confirm what proportion of the area of Berol House marked on the drawings is proposed to be demolished.</p>	<p>This will be the subject of a separate planning application on behalf of Berkeley Square Developments.</p>
<p>The NWLA object to the development of the top</p>	<p>This will be the subject of a</p>

floor/roof of Berol House and any principle of development to Berol House being established through this application.	separate planning application on behalf of Berkeley Square Developments.
NWLA will continue to engage with the proposals as they progress but have specific practical concerns about working alongside the development as the demolition and construction takes place.	

**Appendix 2 Notes from DM Forum 24 April 2017 (relating to wider masterplan)**

The wider issues associated with the Ashley Road Masterplan were considered at a recent Development Management Forum meeting and the issues relevant to this application are highlighted below.

<b>Development Management Forum (in relation to wider Ashley Road Masterplan)</b>	<b>Officer Response (where relevant to this application)</b>
<b>Access/layout &amp; design issues</b>	
Question - the new college entrance appears on the south-side; previous understanding was that it would open up opposite 'The Hub' building. Is this correct?	This will be the subject of a separate planning application.
Question – In relation to proposed outline only application for Berol House, is this because of the proposed residential use above Berol House and why does it look like it's been 'stuck on the top'/materials are different?	This is the subject of a separate planning application for Berol Yard.
<b>Timescales for development</b>	
Question - what's the timescale?	The applicant has submitted separate planning applications for Buildings 1/1A, Berol House.
<b>Amenity space/community uses &amp; benefits</b>	
Question – there was very little mention of space for families and children. Why not?	The one and off-site open/play space provision is assessed elsewhere in this report and is considered to provide a good range of provision with equitable access. Details will be secured via reserved matters.
Question – will there be reasonable rates for Affordable Housing?	The affordability of the housing offer is assessed in the housing section of this report. The affordability and eligibility of the affordable rent and shared ownership will be secured via s106.
Question - how will access to Ashley/Berol Link be managed?	Planning obligations to secure public access along Ashley Link are proposed.
Question – where is the gain for local amenity? Too much reliance on existing provision next to park. Improvements promised before and not delivered. What is the overall vision for	The one and off-site open/play space provision is assessed elsewhere in this report and is considered to provide a good

community space? Who will be able to use the spaces and how will it be managed?	range of provision with equitable access. Details will be secured via reserved matters.
Question – is the proposed nursery next to the park a replacement or additional nursery space for existing provision within the park?	Community space is provided in the ground floor of Building 2 and it will be restricted to community use via planning condition.
<b>Housing design standards &amp; parking</b>	
Storage space is always lacking in new development, particularly for computers/home working e.g. Hale Wharf.	The London Housing Design Guide requires sets out essential minimum areas for dedicated built-in storage cupboards of 1.5 sq m for 2 person dwellings and 0.5 sq m for each additional occupant. Storage cupboards should be free of hot water cylinders, boilers, heat exchangers or washing machines and all parts of the cupboard should be a minimum of 2m high internally. This will be secured as a minimum. Developers are encouraged to exceed these standards.
Question – 2-bed 4-person homes, usually not enough room for two single beds, should have separate toilet & bathroom	This is noted and the Council will have a further opportunity to review the layout and mix of housing at detailed stage.
Question – parking – Hale Village lacked parking. What is the provision?	Parking provision is made for accessible homes and future car parking will be managed in accordance with a car management plan to be submitted and approved by the applicant.



## Appendix 3 GLA Stage 1 Report

GREATERLONDONAUTHORITY

planning report D&P/4177/01

30 January 2017

### Cannon Factory & Ashley House, Tottenham Hale

in the London Borough of Haringey

planning application no. HGY/2016/4165

#### Strategic planning application stage 1 referral

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

#### The proposal

Outline planning application for the demolition of the existing Cannon Factory and Ashley House and the erection of three buildings of up to 16 storeys to provide up to 3,600 sq.m. (GEA) of commercial floorspace (Class A1/A3/B1/D1), up to 265 residential units (Class C3), new public realm, landscaped amenity space, car and cycle parking, and associated works.

#### The applicant

The applicant is **Notting Hill Home Ownership Limited**, the architect is **John McAslan & Partners**, and the agent is **Nathaniel Litchfield & Partners**.

#### Strategic issues summary

**Affordable housing:** 50% (by habitable room), made up of 70% intermediate shared ownership, 30% affordable rent. It is understood that grant funding will be required to achieve 50%. The applicant should work with GLA officers to confirm the approach, taking account of the draft SPG requirements and noting review mechanism and section 106 requirements. The proposed tenure split meets the requirements of the draft SPG. The applicant has confirmed that assumed affordable rent levels are at local housing allowance levels or lower. Of the shared ownership units, 25% will be low cost shared ownership; however there are concerns about the affordability of the remaining 75%. (Para's 24-26.)

**Urban design and tall buildings:** The proposals are generally supported; however some amendments and clarifications are required, including the proximity of buildings; the parameters for frontage uses; maximum contiguous lengths of inactive frontages; the ground floor layout of building 3; and light penetration into the courtyard of building 2A. (Para's 32-39.)

**Transport:** The applicant should increase Blue Badge car parking provision. (Para's 45-53.)

**Climate change:** The approach of providing a separate site heat network for the two development parcels is not supported and a site-wide network is required. (Para's 54-59.)

#### Recommendation

That Haringey Council be advised that the application does not yet comply with the London Plan, for the reasons set out in paragraph 63 of this report; however the possible remedies set out in that paragraph could address these deficiencies.

## Context

1 On 21 December 2016, the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor has until 31 January 2017 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Categories 1A, 1B(c) and 1C(c) of the Schedule to the 2008 Order:

- 1A *"Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."*
- 1B(c) *"Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - outside Central London and with a total floorspace of more than 15,000 square metres."*
- 1C(c) *"Development which comprises or includes the erection of a building of more than 30 metres high and is outside the City of London."*

3 The Schedule to the Order is also relevant here:

- *"If the local planning authority receive an application for planning permission for development, which they consider forms part of more substantial proposed development, on the same land or adjoining land, they must for the purposes of this Schedule treat that application as an application for planning permission for the more substantial development."*

4 Once Haringey Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

5 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 has been taken into account in the consideration of this case.

6 The Mayor of London's statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## Site description

7 The 1.03 hectares application site forms part of the wider Ashley Road South Masterplan area occupying 2.67 hectares. The masterplan site consists of four development parcels, with this outline application site including development parcels 1 and 2, linked by Ashley Road:

1. Cannon Factory, a one-two storey warehouse/factory building in 'meanwhile' use, located in the north-east corner of the masterplan area, to the east of Ashley Road;
2. Ashley House, a two-storey warehouse/office buildings with yard and car parking in the south-west corner of the masterplan area, to the west of Ashley Road;
3. Berol House, a three-five storey locally listed building currently used as serviced offices and a collection of low-rise industrial buildings, with associated yards and car parking in the south-east corner of the masterplan area, to the east of Ashley Road; and
4. Cannon Jersey Factory, a two storey building, and a neighbouring low-rise warehouse building in the north-west corner of the masterplan, to the west of Ashley Road.

8 The masterplan site is bounded to the north by Down Lane Park, and the Harris Academy Tottenham beyond the tree-lined Burdock Road, which provides primary and secondary education and has planning permission to be extended to provide additional educational facilities (LPA ref: HGY/2015/3096). To the south of the site is a petrol garage on the west side of Ashley Road and a single row of terraced houses fronting onto Hale Road; and a number of small industrial buildings and Stratford College London in the three-storey Sentinel House to the east of Ashley Road. Beyond this lies Tottenham Hale Station and bus station, with several sites surrounding it coming forward for development, including a 22 storey building at 1 Station Square (GLA Ref: D&P/4063/01). To the east is Watermead Way (A1055), with a number of street trees on the site boundary, and beyond the railway line are student and residential blocks within Hale Village of up to 10 storeys. To the west are further facilities of Down Lane Park, including playgrounds, bowling green, tennis courts and the Pavilion Pre-school.

9 The site lies within a potential District Centre, as identified in the Tottenham Area Action Plan (Pre-Submission Version, January 2016). The site is also within the Tottenham Housing Zone and the Upper Lee Valley Opportunity Area.

10 The nearest section of the Transport for London Road Network (TLRN) is Monument Way, approximately 200 metres to the south-west of the site. The nearest section of the Strategic Road Network (SRN) is the A1010 High Road, approximately 1.4 kilometres to the north-west of the site. The nearest station is Tottenham Hale, which is approximately 300 metres to the south-east of the site, providing access to rail services to Liverpool Street, Cambridge and Stansted Airport, and underground services on the Victoria line. A taxi rank and bus station are also located at Tottenham Hale, with the latter providing access to six bus routes. The nearest bus stops to the site are located on Watermead Road; approximately 100 metres from the site and served by route 192. The public transport accessibility level (PTAL) of the site ranges from 6a in the south and 5 to the north (on a scale of 1 to 6 where 6 is excellent and 1 is very poor).

## Details of the proposal

11 This outline application site includes development parcels 1 and 2, linked by the Ashley Road corridor. Development parcel 1 in the north-east corner of the ARSM comprises a mixed use building of between 8 and 16 storeys. Development parcel 2 in the south-west corner comprises a 'pavilion' building of four storeys and a mixed use building of up to seven storeys. The western half of the 'Ashley Link' will be delivered through this application, connecting Ashley Road to Down Lane Park, with a temporary landscaped space to the south-west of the link, which is expected to form part of a development site to the south, also in the ownership of the applicant. The application proposes 3,000-3,600 sq.m. of commercial floorspace (Class A1, A3, B1 and D1) and up to 265 residential units. The application proposes to make Ashley Road one-way, with increased pavement width, tree planting and landscaping.

12 The application includes parameter plans detailing maximum and minimum footprints, heights, uses, and non-residential frontages; points of access; and ground and upper level landscape treatments. Design guidelines are also included, as well as illustrative building and landscape proposals meeting the requirements of the parameter plans and design guidelines.

13 The applicant has developed the proposals jointly with the owner of the other sites (Berkeley Square Developments) in the masterplan area, which is expected to submit two further applications later in 2017:

- An outline application for development parcel 3, including a series of mixed use buildings providing up to 1,000 sq.m. of uses (A1, A3 and B1) and up to 400 residential units.
- A detailed application for development parcel 4, including a new campus building (up to six storeys and 6,000 sq.m.) for the National College for Digital Skills (D1, ancillary B1); a

retained Berol House, with employment/commercial uses (B1) and a roof extension providing up to 15 residential units; and a mixed use building with up to 185 residential units and up to 170 sq.m. of commercial floorspace (A1, A3 and B1).

## Case history

14 On 7 October 2016, a pre-application meeting was held for the development of the wider masterplan site known as Ashley Road South, including a new campus for the National College for Digital Skills (NCDS); non-residential floorspace of up to 9,000 sq.m.; retention and redevelopment of the locally listed Berol House for employment workspace; the provision of up to 871 residential units, including affordable and family housing and wheelchair units; new social facilities and ancillary amenity and child play space. The GLA's pre-application advice report of 24 October 2016 concluded that the principle of the proposal was supported; however issues relating to the principle of development; affordable housing; housing; historic environment, urban design and tall buildings; inclusive design, transport, and climate change should be addressed in any subsequent planning applications.

## Strategic planning issues and relevant policies and guidance

15 The relevant issues and corresponding policies are as follows:

- Employment *London Plan*
- Town centre uses *London Plan; Town Centres SPG*
- Housing *London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG*
- Affordable housing *London Plan; Housing SPG; draft Affordable Housing and Viability SPG; Housing Strategy*
- Density *London Plan; Housing SPG*
- Historic environment *London Plan*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Tall buildings *London Plan*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG*
- Parking *London Plan; the Mayor's Transport Strategy*
- Transport *London Plan; the Mayor's Transport Strategy*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy*
- Climate change *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*

16 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is made up of Haringey's Strategic Policies DPD (2013), the Saved Policies within its Unitary Development Plan, and the 2016 London Plan (Consolidated with Alterations since 2011).

17 The following are also relevant material considerations:

- The National Planning Policy Framework, Technical Guide to the National Planning Policy Framework and National Planning Practice Guidance.
- The Upper Lee Valley Opportunity Area Planning Framework (ULV OAPF) (July 2013).

- The Tottenham Area Action Plan (Pre-Submission Version, January 2016).
- The Site Allocations DPD (Pre-Submission Version, January 2016).
- The Development Management DPD (Pre-Submission Version, January 2016).
- Alterations to Strategic Policies (Pre-Submission Version, January 2016).

## **Principle of development**

### Residential/town centre uses/employment

18 The site lies within the boundary of the Upper Lee Valley Opportunity Area, as identified in London Plan Policy 2.13 and Table A1.1, which states that the Opportunity Area is capable of accommodating at least 20,100 homes up to 2031. London Plan Policy 3.3 'Increasing Housing Supply' recognises the pressing need for new homes in London and Table 3.1 gives an annual monitoring target of 1,502 new homes per year in Haringey between 2015 and 2025. The site is also located within the Tottenham Housing Zone, which has a target for approximately 2,000 new homes. The Tottenham Area Action Plan (Pre-Submission Version, January 2016) identifies the site as part of site TH6 Ashley Road South Employment Area, with a target of 444 residential units and 15,300 sq.m. of commercial space.

19 The site is currently designated as a Local Employment Area. London Plan Policy 4.4 'Managing Industrial Land and Premises' provides a strategic aim for boroughs to adopt a rigorous approach to industrial land management, but recognises that managed release may be required to provide other uses in appropriate locations. The Tottenham AAP proposes to designate the area as a Local Employment Regeneration Area, with employment, residential and educational uses.

20 The site is within the potential District Centre identified in the AAP. London Plan Policies 2.15 'Town Centres', 4.7 'Retail and town centres', 4.8 'Supporting a successful and diverse retail sector' and supplementary planning guidance 'Town Centres' provide support for town centres as the focus for retail uses.

21 The existing site is currently occupied by 3,234 sq.m. (GIA) of low grade commercial/ industrial floorspace (Class B1/B2/B8), and an associated yard used for car parking. The existing buildings respond poorly to the emerging townscape context, and represent an inefficient and unsustainable use of this highly accessible site. The existing tenants occupy the site on a short-term lease as a temporary meantime use. The applicant estimates that the site provides approximately 63 full-time equivalent (FTE) jobs. The existing buildings will be demolished and new buildings constructed with between 3,000 sq.m. and 3,600 sq.m. of commercial floorspace (Class A1, A3, B1 and D1) on the ground and first floors. The applicant should provide an estimate of the number of jobs that may be provided on the site, and further information on the possibility of affordable workspace.

22 The existing low grade buildings respond poorly to the emerging townscape context, and represent an inefficient and unsustainable use of this highly accessible site. The re-provision of a similar scale of employment floorspace more compatible with residential uses, including town centre uses in an identified potential District Centre, is therefore supported. The proposed residential uses will contribute to London Plan and local policy targets and are also supported.

## **Housing**

23 The application states that up to 265 one to three bed units will be provided, although no detail is given beyond this, with details to be determined at reserved matters stage.

### Affordable housing

24 London Plan Policy 3.9 'Mixed and Balanced Communities' seeks to promote mixed and balanced communities by tenure and household income. Policy 3.12 'Negotiating Affordable Housing' seeks to secure the maximum reasonable amount of affordable housing. The Mayor's recently published draft Affordable Housing and Viability SPG introduces a threshold approach, whereby schemes meeting or exceeding 35% affordable housing without public subsidy are not required to submit a viability assessment. London Plan Policy 3.11 'Affordable Housing Targets' requires that 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale, with priority given to affordable family housing. The Mayor's draft Affordable Housing and Viability SPG sets out a preferred tenure split of at least 30% low cost rent social rent, or affordable rent significantly less than 80% of market rent), at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined by the LPA; however more flexibility is encouraged in Opportunity Areas.

25 The application proposes 50% affordable housing, made up of 70% intermediate shared ownership, 30% affordable rent. Although the funding for the scheme is not yet confirmed, it is understood that grant funding will be required to achieve 50%. The applicant should work with GLA officers to confirm the approach, taking account of the draft SPG requirements and noting review mechanism and section 106 requirements.

26 The proposed tenure split meets the requirements of the draft SPG. The application confirms that assumed affordable rent levels are at local housing allowance levels or lower, which is in line with the draft SPG. Of the shared ownership units, 25% will be low cost, affordable for gross household incomes between £35,000 and £40,000, which is in line with the draft SPG; however 75% will be affordable for gross household incomes between £40,000 and £90,000. This raises concerns about the affordability of these units, and the applicant should respond to paragraphs 2.38-2.41 of the draft SPG.

### Housing Choice

27 London Plan Policy 3.8 'Housing Choice' encourages a choice of housing based on local needs, while affordable family housing is stated as a strategic priority. Policy 3.11 also states that priority should be accorded to the provision of affordable family housing. The application states that regard will be given to the preferred dwelling mix at this location stated in the District Centre Framework, with the mix to be determined at reserved matters stage; however the Council should secure appropriate ranges within the section 106 agreement.

### Density

28 London Plan Policy 3.4 'Optimising Housing Potential' states that taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output within the relevant density range shown in Table 3.2. The site is within an 'urban' setting where the density matrix sets a guideline of 45-260 units or 200-700 habitable rooms per hectare with a PTAL of 4-6.

29 The density proposed is up to 265 units per hectare, based on the scheme's maximum parameters. While this is slightly above the density range, the London Plan notes that these ranges should not be applied mechanistically and other local factors support higher density development, such as the location in the Upper Lee Valley Opportunity Area and the Tottenham Housing Zone; the high accessibility of the site adjacent to Tottenham Hale Station; and the significant nearby open spaces of Down Lane Park and Lee Valley Regional Park.

### Children's play space

30 Policy 3.6 of the London Plan seeks to ensure that development proposals include suitable provision for play and recreation, with further detail in the Mayor's supplementary planning guidance 'Shaping Neighbourhoods: Play and Informal Recreation', which sets a benchmark of 10 sq.m. of useable child play space to be provided per child, with under-fives play space provided on-site as a minimum.

31 Based on the maximum parameters, the child yield is expected to be 66 children, with 33 under-fives. The design guidelines secure that this will be provided according to London Plan requirements on the Ashley Link, the courtyard of building 2A, and on roof terraces, with the illustrative proposals demonstrating how this could be delivered. It is also recognised that the play facilities of Down Lane Park are in close proximity. These proposals are acceptable.

### **Urban design and tall buildings**

32 The application includes parameter plans detailing maximum and minimum footprints, heights, uses, and non-residential frontages; points of access; and ground and upper level landscape treatments. Design guidelines are also included, as well as illustrative building and landscape proposals in line with the parameter plans and design guidelines. As requested at pre-application stage, illustrative landscape proposals have also been provided covering the whole of the Ashley Road South Masterplan.

33 The layout for the application site has been developed in conjunction with the neighbouring sites within the masterplan, which broadly meets that identified in the Tottenham District Centre Framework. The application delivers the western half of the 'Ashley Link' on its southern boundary, which is strongly supported, providing a landscaped public space connecting Ashley Road to Down Lane Park, and eventually linking to Hale Village (outside this application).

34 The design guidelines identify minimum distances between buildings in the masterplan area, which are generally acceptable with two exceptions. The minimum distance between building 2 and building 2A (both within this application) is 6.75 metres, and between building 2A (within this application) and Building 1A is 6.5 metres. The applicant should clarify how negative impacts on privacy and daylight/sunlight will be avoided, and revisions to the layouts and/or design guidelines may be required. A minimum distance between building 3 (within the application) and building 4 (outside this application) should also be specified in the design guidelines.

35 A design parameter identifies the minimum and maximum non-residential frontage and the residential maximum frontage; however a large part of building 3 has no use identified, which should be corrected. The illustrative plan for this building shows inactive uses taking up almost all of the north and east ground floor frontages. As the tallest proposed building on the site, marking the entrance to the new district centre from the north, the ground floor of this building should be wrapped with active frontage to achieve an appropriate quality for such a prominent element. Furthermore, the design guidelines only state that inactive uses across the application site "*should be minimised*"; however a maximum contiguous length of inactive frontage should be stated.

36 The form and massing strategy for the application site has been developed in conjunction with the masterplan sites and is broadly supported. The variation in building heights is particularly welcomed in order to avoid a monotonous uniformity of height. The building in the north-east parcel rises to 16 storeys on the corner of Burdock Road and the dual carriageway of Watermead Way, which will be the tallest building in the masterplan area and will

mark the proposed district centre when viewed from the north, with limited overshadowing impacts in this location. The 4 storey building in the south-west parcel steps down towards the adjacent park from the neighbouring 6-7 storey block, and its diagonally off-set floors provide a distinctive focal point reflecting the proposed design of the College building to the east. Building 2A, forming the south side of a perimeter block has a break only from level 5; whereas building 1A (outside this application), forming the north side of this perimeter block, has a full break to ground level. Although the courtyard space appears adequate, this raises some concerns about daylight/sunlight penetration to the proposed courtyard and the applicant should provide further information on daylight levels and justification for this layout.

37 Otherwise, the design guidelines and illustrative residential layouts suggest that a good residential quality could be achieved; however they should be strengthened to identify a minimum of 50% dual aspect units, and minimise the number of north-facing single aspect units. Although the design guidelines allow up to 12 units per core, which goes beyond the 8 units per core usually allowed by the Housing SPG; these units would be accessed from corridors either side of the core, with no more than 8 units per corridor, and would only apply to the lower floors of building 3, which is acceptable in this case.

38 The intention to deliver clear and simple articulation to the elevations is welcomed. The design guidelines include clear guidance for the roofscape; setbacks; balconies; frontages, entrances; awnings; signage; services; colour; and materials, which will primarily be brick.

39 In recognition of the relationship of the proposal to those of the larger masterplan area, the design guidelines include appropriate temporary approaches to cladding, boundary treatments, and landscaping, which is welcomed.

## **Historic environment**

40 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. London Plan Policy 7.8 'Heritage Assets and Archaeology' states that development should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate. London Plan Policy 7.8 also applies to non-designated heritage assets. The NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application, and a balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage asset.

41 The Environmental Statement includes a heritage statement and a townscape visual impact assessment, which identifies a number of Conservation Areas and listed buildings in the wider area, although these are greater than 400 metres away from the site with limited visual connection. The heritage statement finds that the proposed development would preserve the settings of designated heritage assets identified. The locally listed Berol House lies adjacent to the site, and the heritage statement concludes that the proposal would have a moderate beneficial impact on its setting and preserve its significance. Other buildings within and around the site are also considered, although these are of very low heritage significance and raise no concerns. GLA officers agree with this assessment. In coming to this conclusion, officers have taken account of the strong presumption against granting permission that would harm the character or appearance of the Conservation Areas, and have given considerable importance and weight to the assessment of harm to the setting of listed buildings.



## **Inclusive design**

42 The aim of London Plan Policy 7.2 'An Inclusive Environment' is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum). As requested at pre-application stage, the design guidelines include appropriate measures to secure inclusivity, in particular concerning shared surfaces.

43 Policy 3.8 'Housing Choice' requires that 90% of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and 10% meets Building Regulation requirement M4(3) 'wheelchair user dwellings', that is, designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. The application states that 10% of the units will be accessible/adaptable, with the detail to be determined at reserved matters stage. The Council should secure M4(2) and M4(3) requirements by condition. The reserved matters application should identify on the plans where the wheelchair accessible homes are located, and should be distributed across tenure types and sizes to give disabled and older people similar choices to others.

44 As discussed under 'transport' below, all wheelchair accessible/adaptable units (10% of total units) should have access to a Blue Badge parking space.

## **Transport**

45 The development would be car free, save for the provision of 13 accessible spaces, which is welcome given the high PTAL; however, the quantum of accessible parking should be increased in line with the Mayor's Housing SPG to provide a space for each wheelchair accessible/adaptable unit (26 spaces). The applicants' justification for lower provision is their reported finding of a 38% average utilisation rate for Blue Badge parking across a sample of sites managed; however this evidence is not satisfactory justification. The applicant proposes a car park management plan, which is also welcomed and should be secured by condition.

46 The net reduction in vehicle trips to/from the site is welcomed; however, in accordance with London Plan Policy 6.3A, bus impact should be addressed (including disaggregation of bus trip generation by route and direction) to determine whether any additional bus capacity will be needed as mitigation.

47 The pedestrian and cycling permeability of the site will encourage active, sustainable travel, and overall, the public realm proposals appear to be well considered. If the proposed Ashley Link will not be adopted highway, then 24 hour access should be secured through the section 106 agreement.

48 The existing bus stands on Ashley Road and Burdock Road must be retained, and further discussions should take place with TfL to ensure that additional parking and loading will not block the passage of buses; any changes will increase the length of bus cages; the smooth flow of buses will be facilitated; and improved lighting and security will be delivered. The proposed buildings should demonstrate good acoustic design practice to ensure that any noise impact arising from the bus stands is fully mitigated within the building envelope or the site boundary.

49 The applicant should provide a cycling infrastructure environment audit of the key cycle routes in the vicinity to identify improvements to cycling comfort and safety. The use of the cycling level of service (CLoS) methodology, as detailed in TfL's London cycling design standards, is recommended, which should also inform cycle design on Ashley Road.

50 Cycle parking provision meets the London Plan Policy 6.9Ba minimum quantity provision for land uses A1 food retail and C3-C4 dwellings; however, there is a shortfall in provision for B1 offices, which should be increased. The detailed location, access and design of all cycle parking should also be clarified to demonstrate secure, integrated, convenient, and accessible provision.

51 The detailed servicing requirements of the retail units should be addressed through a revised delivery and servicing plan when the end occupiers are known, which should be secured by planning condition and comply with London Plan Policy 6.14.

52 The Victoria line tunnels extend below the site and the construction logistics plan (CLP) must consider how the safety and integrity of this infrastructure will be maintained. The final CLP should be secured by a pre-commencement condition in consultation with TfL.

53 The Council should secure, enforce, monitor, review and ensure the funding of the travel plan through the section 106 agreement, to ensure conformity with London Plan Policy 6.3.

## **Climate change**

### Energy

54 Based on the energy assessment, an on-site reduction of 142 tonnes of CO<sub>2</sub> per year in regulated emissions is expected, compared to a 2013 Building Regulations compliant development, equivalent to an overall saving of 37%; however the carbon emissions for domestic and non-domestic elements should be presented separately for each stage of the energy hierarchy in light of the zero carbon target for dwellings. Any carbon shortfall on the commercial elements should also be met via a contribution to the borough's offset fund. Full details of additional information requirements have been provided direct to the applicant, with the key points summarised below.

55 The applicant has carried out an investigation and there are no existing district heating networks in the vicinity; however a proposed network has been identified. The applicant has provided a commitment to ensure that the development is designed to allow future connection to the district heating network.

56 A separate site heat network is proposed for the two development parcels within the application; however this approach is not supported and a site-wide network is required. The applicant should also facilitate an area wide network across all masterplan sites. The applicant is proposing three energy centres; however taking into account the phasing of the development, the applicant should minimise the number of energy centres and provide a single point of connection for the whole application site.

57 The applicant is proposing to install two gas fired CHP units as the lead heat source for each site; however the CHP option is only supported should the proposed site-wide network not go forward. If a CHP-led site-wide network is the strategy proposed during the detailed design stage, the applicant should provide a single CHP unit, in order to maximise the carbon savings on-site and increase system efficiency.

58 Air source heat pumps (ASHPs) are proposed for space heating and cooling in the commercial space; however this is not acceptable as commercial spaces comprise a significant part of the site. In order to demonstrate compliance with the energy hierarchy, the applicant should demonstrate that the use of CHP has been optimised before considering the use of renewables for heating. Further information should be provided on how the ASHPs will not

impact on the optimisation of the CHP system and the control strategy for ensuring that any air conditioning system installed on site is only used when needed.

#### Climate change adaptation

59 The site is located within Flood Zone 2, with some local surface water risks at or close to the site, and a flood risk assessment (FRA) has therefore been provided. The outline surface water drainage strategy proposes to attenuate surface water on-site using SuDS as appropriate, including lined permeable paving, rain gardens and green roofs. The surface water runoff generated at the development will subsequently be discharged at a controlled rate into the public sewer at greenfield runoff rates or a maximum discharge rate of 5 l/s where applicable for 1 in 1 year, 1 in 30, 1 in 100, 1 in 100 plus 30% climate change allowance pluvial events. The proposal meets the requirements of London Plan Policy 5.13.

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

60 The applicant has been engaged in pre-application discussions with the Council since May 2016 and it is understood that officers are generally supportive of the proposals.

#### **Legal considerations**

61 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008, the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

#### **Financial considerations**

62 There are no financial considerations at this stage.

#### **Conclusion**

63 London Plan policies on town centre uses; employment; housing; affordable housing; urban design and tall buildings; historic environment; inclusive design; transport; and climate change are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Residential/town centre uses/employment:** The applicant should provide an estimate of the number of jobs that may be provided on the site, and further information on the possibility of affordable workspace. The principle of the proposed residential led mixed-use development is consistent with London Plan policies and is supported.
- **Housing:** The principle of residential use is consistent with London Plan policies, and is supported. The housing density and play space proposals are supported. Ranges of housing mix should be secured in the section 106 agreement.
- **Affordable housing:** 50% (by habitable room), made up of 70% intermediate shared ownership, 30% affordable rent. It is understood that grant funding will be required to

achieve 50%. The applicant should work with GLA officers to confirm the approach, taking account of the draft SPG requirements and noting review mechanism and section 106 requirements. The proposed tenure split meets the requirements of the draft SPG, subject to the views of the Council. The applicant's viability assessment confirms that assumed affordable rent levels are at local housing allowance levels or lower. Of the shared ownership units, 25% will be low cost shared ownership; however there are concerns about the affordability of the remaining 75%.

- **Urban design and tall buildings:** The proposals are generally supported; however some amendments and clarifications are required. The applicant should clarify how negative impacts on privacy and daylight/sunlight due to the proximity of buildings will be avoided, and revisions to the layouts and/or design guidelines may be required. A minimum distance between building 3 (within the application) and building 4 (outside this application) should also be specified in the design guidelines. The design parameter identifying frontage uses for building 3 should be amended. The design guidelines should identify a maximum contiguous length of inactive frontage for all buildings. The applicant should provide further information on daylight levels to the courtyard of building 2A.
- **Historic environment:** The proposed development would preserve the settings of heritage assets.
- **Inclusive design:** The proposals are acceptable in relation to inclusive design, subject to an increase in Blue Badge parking spaces. The Council should secure M4(2) and M4(3) requirements by condition.
- **Transport:** The applicant should increase Blue Badge car parking provision; assess development trip generation impact on buses; increase cycle parking provision; and provide detail on location, access and design of all cycle parking. A car park management plan, delivery and servicing plan and travel plan should be secured by condition or section 106 agreement. A construction logistics plan should be secured by pre-commencement condition. Depending on results of bus impact assessment, a contribution towards bus impact mitigation may be required.
- **Climate change:** The approach of providing a separate site heat network for the two development parcels within the application is not supported and a site-wide network is required. Further information is required in order to verify the carbon savings. The proposal meets the requirements of London Plan Policy 5.13

64 On balance, the application does not yet comply with the London Plan; however the possible remedies set out above could address these deficiencies.

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## ***Appendix 4 Plans and Images***

[See separate appendix]

## Appendix 5 Fire Safety – additional information

### Cannon Factory and Ashley House Works – Frequently Asked Questions

Commercial Areas	Residential Areas
<b>Q1: Is the building protected with a Sprinkler System?</b>	
<p>B2, B2A – The single storey commercial areas at ground level do not require sprinkler protection.</p> <p>B3 – The commercial areas will be provided with sprinkler system.</p>	<p>B2 – The residential areas in the apartment building do not require sprinkler protection. (Building height below 30m).</p> <p>B2A, B3 – The residential areas as well as ancillary areas will be provided with sprinkler protection in accordance with BS 9251.</p>
<b>Q2: Are the areas provided with a fire detection and alarm system?</b>	
<p>B2, B2A, B3 – The commercial units will be provided with a minimum of a manual alarm system in accordance with BS 5839 Part 1.</p>	<p>B2, B2A, B3 – The flats will need to be provided with a mains-powered and battery backed up minimum LD2 Grade D fire detection and alarm system (in accordance to BS 5839 Part 6), consisting of smoke detectors in the circulation spaces and all rooms of the flat and a heat detector in the kitchen. Bathrooms, toilets and shower rooms are not required to be provided with fire detection as per code.</p>
<b>Q3: What are the materials used in escape routes?</b>	
<p>B2, B2A, B3 – The building materials in escape routes should be Class 0 in line with Building Regulations.</p> <p>Class 0 is the highest National product performance classification for lining materials. This is achieved if a material or the surface of a composite product is either:</p> <ul style="list-style-type: none"> <li>- Composed throughout of materials of limited combustibility;</li> <li>- Or a Class 1 material which has a fire propagation index (I) of not more than 12 and sub-index (i1) of not more than 6.</li> </ul>	
<b>Q4: What is the fire separation between the units?</b>	
<p>B2, B2A, B3 – The commercial units will be separated by at least 1 hour fire resistant construction.</p> <p>B2 – The floors in the building will be designed to provide 1 hour fire resistance between storeys.</p> <p>B2A – The floors in the building will be designed to provide 90min fire resistance between storeys.</p> <p>B3 – The floors in the building will be designed to provide 2-hours fire resistance between storeys. The stairs will be enclosed in 2-hours fire resisting construction.</p>	<p>B2, B2A, B3 – The flats will be separated by at least 1 hour fire resistant construction.</p> <p>The corridors also will have 1 hour fire resisting walls. The stair will be enclosed in 2-hours fire resisting construction.</p> <p>B2 – The floors in the building will be designed to provide 1 hour fire resistance between storeys.</p> <p>B2A – The floors in the building will be designed to provide 90min fire resistance between storeys.</p> <p>B3 – The floors in the building will be designed to provide 2-hours fire resistance between storeys.</p>
<b>Q5: How can the fire brigade enter the building?</b>	
<p>B2, B2A – Each commercial unit is accessible</p>	<p>B2 – The firefighting access will be provided</p>

<p>directly from the outside.</p> <p>B3 – The ground floor commercial units are accessible directly from the outside; the first floor units should be accessed through 2 stairwells.</p>	<p>through normal means of escape, a min 15% of the building perimeter will need to provide vehicle access. A dry fire main is likely to be required.</p> <p>B2A, B3 – The building will be provided with a firefighting shaft (i.e. firefighting lift, lobby and stair) that firefighters can use to reach the fire floor. The fire-fighting shaft will be enclosed in fire resistant construction and will be protected from smoke ingress by smoke ventilation system.</p> <p>A fire main which will provide water to all floors for firefighting operations, will be either:</p> <ul style="list-style-type: none"> <li>• A dry riser if the tower is below 50m; or</li> <li>• A wet riser if the tower is above 50m.</li> </ul>
<p><b>Q6: How many escape stairs are provided?</b></p>	
<p>B2, B2A – The commercial units will be evacuated directly to the outside and do not rely on stairs for evacuation.</p> <p>B3 – The ground floor commercial units will be evacuated directly to the outside and do not rely on stairs for evacuation; the commercial units located at first floor will evacuate through 2 stairwells.</p>	<p>B2 – the residential part will be provided with a single stair, but the corridors approaching the stair will have a smoke ventilation system to prevent smoke spread and as such keep it safe for evacuation &amp; firefighting.</p> <p>B2A, B3 – each tower be provided with a single stair, but the corridors approaching the stair will have a smoke ventilation system to prevent smoke spread and as such keep it safe for evacuation &amp; firefighting.</p>
<p><b>Q7: What is the Evacuation Strategy / Procedure for the Building in the event of a fire?</b></p>	
<p>B2, B2A, B3 – In the event of a fire, the fire detection system will alert the occupants in the area of fire origin (affected commercial unit) to evacuate.</p> <p>B2, B2A – The occupants of the commercial units will evacuate directly to the outside, with travel distance within the allowed limits.</p> <p>B3 – The occupants of the commercial units will evacuate directly to the outside, with travel distance within the allowed limits; the first floor units will evacuate through the stairs.</p>	<p>B2, B2A, B3 – In the event of a fire, the fire detection system will alert the occupants in the apartment of fire origin to evacuate.</p> <p>B2, B2A, B3 – On the residential floors, the common areas and the stairs will be designed to provide protected routes out of the building, supported by smoke ventilation systems in the corridors to prevent smoke spread into the escape stairs.</p> <p>Only the flat of origin will be evacuated. The other occupants remain in place until instructed otherwise by the Fire Service. This is the evacuation procedure recommended in the UK Building Regulations for flats.</p>
<p><b>Q8: What kind of materials have been used in the façade of the building?</b></p>	
<p>B2 – Top storey height less than 18m; no provisions for the external surfaces of walls, unless the boundary is less than 1m. Otherwise façade material shall be Class 0 (national class) or Class B-s3, d2 or better (European classification).</p> <p>B2A, B3:</p> <ul style="list-style-type: none"> <li>- If building boundary less than 1m, top storey height more than 18m; The external wall</li> </ul>	

<p>construction shall be Class 0 (national class) or Class B-s3, d2 or better (European class), i.e. profiled or flat steel sheet at least 0.5mm thick with an organic coating of no more than 0.2mm thickness is acceptable.</p> <ul style="list-style-type: none"> <li>- If building boundary 1m or more: <ul style="list-style-type: none"> <li>- Any dimension over 18m; The external wall construction shall be Class 0 (national class) or Class B-s3, d2 or better (European class).</li> <li>- Up to 18m above ground; Index (I) not more than 20 (national class) or class C-s3, d2 or better (European class), i.e. timber cladding at least 9mm thick is acceptable.</li> </ul> </li> </ul> <p>B2, B2A, B3 – Insulation product, filler material, etc. shall either be non-combustible where the height of the top storey is greater than 18m; or be tested in accordance with BR 135.</p>
<p><b>Q9: What are the precautions to prevent a fire climbing up the façade?</b></p>
<p>B2, B2A, B3 – The materials in the façade shall be chosen such that they do not contribute to fire spread. Also, at every floor level and partition wall at every opening in the façade e.g. windows, a fire stopping system (cavity barrier) is installed in the façade system to prevent a fire spread into the façade build up or through the façade cavity.</p>
<p><b>Q10: What is the fire resistance of the structure?</b></p>
<p>B2 – The buildings structures will be designed to withstand the impact of a fire for at least 1 hour.  B2A – The buildings structures will be designed to withstand the impact of a fire for at least 90min.</p> <p>B3 – The buildings structures will be designed to withstand the impact of a fire for at least 2 hours.  The 2-hours fire rating is the highest fire rating requirement for building structures in the UK Building Regulations.</p>

The above have been assumed on following building heights:

- Building 2 – 4 storeys, 13.5 - 25.4m, top occupied storey below 11m, single tower
- Building 2A - 6-7 storeys, 25.5 - 34.95m, top occupied storey below 30m, 2 towers
- Building 3 – 8-9 storeys 54.275m/ 13-16 storeys – 63.725m, top occupied storey above 30m, 2 towers