

Planning Sub Committee

## **REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE**

### **1. APPLICATION DETAILS**

**Application:** HGY/2017/2045

**Ward:** Tottenham Hale

**Address:** Ashley Road, N17

**Proposal:** Demolition of the existing buildings at Ashley Gardens and erection of two buildings to provide 1,170 sqm of commercial floorspace (GEA) (Class A1/A3/B1/D1), 377 residential units (Class C3), new public realm, landscaped amenity space, car and cycle parking and all associated works.

**Applicant:** Berkeley Square Developments

**Ownership:** Private

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

**Site Visit Date:** 3 November 2017

**Date received:** 7 July 2017 **Last Amended:** 3 November

**Approved drawings and plans** – see Appendix 2

#### **Documents:**

Illustrative Masterplan Document; Design and Access Statement and Addendum dated October 2017; Landscape Strategy (contained within the Design and Access Statement); Planning Statement (and Addendum dated October 2017); Statement of Community Involvement (covers both the Ashley Gardens and the Berol Yard applications); Sustainability Design and Energy Statement (and Addendum dated October 2017); Affordable Housing and Viability Statement (and Addendum Statement dated October 2017); Arboricultural Impact Assessment and Method Statement (covers both the Ashley Gardens and the Berol Yard applications); Construction Logistics Plan; Delivery and Servicing Plan; PERS Audit (covers both the Ashley Gardens and the Berol Yard applications); Ashley Gardens: Ashley Road South Masterplan; Framework Travel Plan; Health Impact Assessment (covers both the Ashley Gardens and the Berol Yard applications); Equalities Impact Assessment (covers both the Ashley Gardens and the Berol Yard applications); Commercial Strategy.

Environmental Statement (June 2017) and Supplementary Statement (October 2017) incorporating:

- Townscape and Visual Impacts;
- 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; and
- 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 provision of more than 150 houses, flats, or houses and flats;
- 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**

1.3.1 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 component in the regeneration of Ashley Road South, in support of 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 35% 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 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 would be 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, taking into account the average density across the masterplan area.
- 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 Berol Link as a new east-west route from Down Lane Park towards Berol House 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 and duplex family housing on edges adjacent to the park.
- 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 secured, the noise, environmental wind, vibration and air quality impacts to future occupiers of the units are acceptable.
- The transportation impacts to the scheme are acceptable. The scheme will not generate a significant increase in traffic or parking demand. The

provision of cycle storage is policy compliant and further details are secured by planning condition.

- The interim solution to multiple energy centres is less efficient but accepted in the context of the commitment to a future district energy connection. Taking into account the proposed S106 obligations relating to carbon offset payment, 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.

## **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 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 February 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. COMPLIANCE - Development in Accordance with Approved Drawings and Documents
2. COMPLIANCE - Commencement
3. COMPLIANCE - Environmental Statement
4. COMPLIANCE – Land Use (Retail)
5. COMPLIANCE - Development in Conformity with Energy Statement
6. COMPLIANCE - Land Contamination – Part C
7. COMPLIANCE - Landscaping – Replacement of Trees and Plants (LBH Development Management)

8. COMPLIANCE - NRMM Inventory and Documentation Availability
9. COMPLIANCE – Accessibility
10. COMPLIANCE - Compliance with London Housing Design Standards
11. COMPLIANCE - Individual Satellite dishes or television antennas precluded
12. COMPLIANCE – 3 YEARS
13. PRE COMMENCEMENT - Phasing strategy & details
14. PRE COMMENCEMENT - Confirmation of Site Levels
15. PRE COMMENCEMENT Drainage Strategy (Thames Water)
16. PRE COMMENCEMENT - Archaeology (Written Scheme of Investigation)
17. PRE COMMENCEMENT - Tree protection meeting (pre-commencement)
18. PRE-COMMENCEMENT – Water supply (Thames Water)
19. PRE- COMMENCEMENT - Construction Environmental Management Plan
20. PRE COMMENCEMENT - Land Contamination – Part A and B
21. PRE COMMENCEMENT - Details of AQDMP (Dust)
22. PRE COMMENCEMENT - Waste Management Scheme
23. PRE COMMENCEMENT - Updated Construction Logistics Plan
24. PRE COMMENCEMENT - Piling method statement (Thames Water)
25. PRIOR TO ABOVE GROUND WORKS - Affordable Housing Strategy
26. PRIOR TO ABOVE GROUND WORKS – Broadband strategy
27. PRIOR TO ABOVE GROUND WORKS - Biodiversity Enhancement Plan
28. PRIOR TO ABOVE GROUND WORKS - Sustainable Urban Drainage
29. PRIOR TO ABOVE GROUND WORKS – Updated Energy Strategy
30. PRIOR TO ABOVE GROUND WORKS Sustainability Standards – Non-residential
31. PRIOR TO ABOVE GROUND WORKS – Details of mitigation for wind protection
32. PRIOR TO ABOVE GROUND WORKS - Green and Brown Roof
33. PRIOR TO ABOVE GROUND WORKS - Secured by Design
34. PRIOR TO INSTALLATION - Ultra Low NOx Boilers - Product Specification and Dry NOx Emissions Details (LBH Environmental Services and Community Safety)
35. PRIOR TO SUPER STRUCTURE – Bus stands
36. PRIOR TO SUPERSTRUCTURE WORKS - Cycle Parking Details
37. PRIOR TO OCCUPATION - Estate Management & Maintenance Plan
38. PRIOR TO OCCUPATION – Road safety audit
39. PRIOR TO OCCUPATION - Play Space
40. PRIOR TO OCCUPATION - Details Roof Top PV Panels
41. PRIOR TO OCCUPATION– Lighting strategy
42. PRIOR TO OCCUPATION - Car Parking Management Plan
43. PRIOR TO OCCUPATION - Details of Central Dish/Receiving System
44. PRIOR TO OCCUPATION – Delivery and Servicing Strategy

**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) Highways licensing (LBH Highways)
- 4) Hours of Construction Work (LBH Development Management)
- 5) Party Wall Act (LBH Development Management)
- 6) Requirement for Groundwater Risk Management Permit (Thames Water)
- 7) 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)
- 8) 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 35% affordable units (74% Intermediate / 26% Affordable Rented Units).
- Viability review mechanism – early and late stage review
- Any additional affordable housing uplift to be provided on-site.
- 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 including to persons who live or are employed in Haringey.

### Open Space/Public Realm Improvements

- Contribution to directly related public realm & open space improvements including Down Lane Park: £1,446,000.00. Payable within 12 months of Implementation.

### Transport

- Prior to commencement, to enter into s.72 agreement with the Council to transfer land (western side of Ashley Link)
- 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
  - Two or three years' car club membership for each residential unit including £50 annual credit for those who take up
  - £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 at point of request. No charging for these permits, in perpetuity.
- Parking spaces to be leased not sold. Car parking to be individually allocated in accordance with priority criteria. Details to be agreed through the car parking management plan.
- Joint CPZ review of the area in the vicinity (with adjacent owners) to review existing CPZ across the impact area (£12,000 payable upon implementation).

#### Commercial Strategy

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

#### Public Realm Delivery and Management/Temporary Works

- Prior to commencement, enter into s.278 for temporary works for Ashley Road
- Permanent public access to footpaths, cycleways and open spaces.
- Submit and implement an Approved Public Access Plan.
- 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.
- The Applicant shall complete the final form of the public realm and landscaping to the Berol Link, prior to the occupation of Building 1.
- Prior to the first Occupation of building 1A the Applicant shall procure the works identified in the Interim Works Plan, section to provide temporary accessible car parking.

#### Securing Design Quality

- The existing architects to be retained. Shall not engage or use any other architect until the Council has first approved such architect.

#### Skills and training

- End user skills training contribution payable within 12 months of implementation £29,000.
- 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).
- The Applicant will work with the Council and the Haringey Employment and Recruitment Partnership to ensure that employment and training opportunities including jobs and apprenticeships arising from the Development post implementation will be available to residents of the administrative area of the Council.
- Designate a named contact to ensure efficient management and supply of local Council residents for employment and training opportunities.
- Work with the Haringey Employment and Recruitment Partnership, who will provide and prepare the said Council residents for all employment and training opportunities.

#### Energy

- Provisions to connect to the Tottenham Hale District Energy Network (DEN) including delivery of pipework to highway edge.
- The Council to serve notice that the owner is required to connect to the DEN.
- Any shortfall in carbon offsetting required to ensure policy compliance (as set out in London Plan Policy 5.2) will be offset at £60 per tonne.

#### Construction

- Obligation to register with the Considerate Constructor scheme during the construction and demolition phase of the development.
- Contribution to a Tottenham Hale Construction Coordinator £20,000

#### Monitoring

- Environmental Monitoring Fee – the applicant will pay a maximum sum of £20,000 towards environmental monitoring of the construction of the development.

- 2.5 The consultation for the application ends on 1st December due to the requirement to place a notice in the local press. Letters were sent on 7th November so 21 days has passed since direct consultation. If members resolve to grant the application the decision will not be issued until the S106 is completed which will be after the 1st of December. If material representations are received following a committee decision and have not been addressed in this report the application will be returned to committee for a decision. Any representations received prior to the committee meeting will be presented as an addendum to this report.
- 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 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 DPD Policies DM 11 and DM 13, and Policies AAP3 and TH6.*
  - 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, 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, public realm improvements, 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, Policy DM31 and 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 Policies DM1, DM3, DM19 and DM20, and 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 DPD Policies DM 21, DM22 and Policy TH4.*
- 2.7 In the event that members choose to make a decision contrary to officers' recommendation members will need to state their reasons. 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. The Ashley Gardens site currently includes 6,025sqm of Class B2/B8 floorspace and 1,360sqm of D2 floorspace. The buildings are currently owned and used by a fabrics manufacturer, which is relocating to its factory in the north of England and no longer requires the site. An indoor climbing centre also operates from part of the site, which also includes a yard and car park.

- 3.2. The site is bounded: to the north and west by Down Lane Park and to the north east by the Harris Academy, which provides secondary education for 11-18 year olds; to the east by the Cannon Factory which is being redeveloped as part of the NHH outline application proposals (HGY/2016/4165) and the Berol Yard site which contains Berol House and existing low rise industrial units and yards within the ARSM site; to the south by Ashley House which forms part of the NHH outline planning application and will be redeveloped for residential use.

### *The Proposal*

- 3.2.1. The development comprises the demolition of existing buildings and erection of two buildings to provide 1,170sqm of commercial floorspace (Class A1/A3/B1/D1), 377 residential units (Class C3), new public realm, landscaped amenity space, car and cycle parking and all associated works.

Proposed Residential	377 units
Proposed non-residential floorspace	1,170sqm

*Table 1: quantum of development proposed*

- 3.2.2. The planning application area comprises of two buildings. Building 1 is located in the north western section of the Ashley Road South Masterplan area. Building 1 is a courtyard building comprising an urban block in itself. Residential front doors are proposed along the boundary with Down Lane Park and commercial units are proposed along the Berol Link and Ashley Road elevations. Car parking is provided at ground floor level underneath a raised podium which provides amenity space. The floors above ground floor level are all for residential use.
- 3.2.3. Building 1A is located centrally within the ARSM with a frontage onto Ashley Road and the Berol Link. It is of linear mansion block typology, forming the northern half of a courtyard building. The southern half is Building 2A and has resolution to grant outline planning permission. This completes the urban block.
- 3.2.4. The amended dwelling mix is as follows:

<b>Building</b>	<b>1 bedroom units</b>	<b>2 bedroom units</b>	<b>3 bedroom units</b>
Building 1	113	104	63
Building 1A	44	38	15
Total	157	142	78
% of total	42%	38%	21%

*Table 2: Dwelling mix*

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

- Detailed planning application drawings showing the detailed proposals showing the Ashley Gardens development alongside the existing context
- Masterplan-wide drawings showing the Ashley Gardens development alongside the existing buildings across the overall masterplan area
- Sustainable Design and Energy Statement (amended)
- Arboricultural Impact Assessment and Method Statement
- Construction Logistics Plan
- Delivery and Servicing Plan
- Framework Travel Plan

3.2.6. Further design changes were submitted as amendments and are set out below:

- Increase in affordable housing provision to 35% with a 74:26 (intermediate/affordable rent) tenure split
- Introduction of single storey additional massing to the northern and western sections of Building 1
- Revision of dwelling mix to increase the number of family dwellings
- Introduction of additional duplex units
- Removal of standalone single-storey pavilion in the Berol Link.

3.2.7. The residential development will provide the following car parking spaces. The breakdown per plot is shown below:

<b><i>Building</i></b>	<b><i>Car parking</i></b>
Total	28 spaces (19 allocated as accessible spaces with flexibility for a further 9 private spaces for disabled users, subject to demand).

*Table 3: Car Parking*

#### **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
- LBH Emergency Planning and Business Continuity
- LBH 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. A summary of the consultation responses received is below:

#### *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*

Environmental health officers provided a number of detailed comments on the original Environmental Statement. Further information was requested and this has been provided as part of revisions to the application. The borough is an Air Quality Management Area therefore the Band B emission standards must apply to the proposed boilers. A number of planning conditions are proposed and further assessment is provided in the main body of this report.

#### *LBH Environmental Health - Contamination*

Site investigations revealed a range of contaminants present. Further site investigations are recommended and these should be secured via planning conditions.

#### *LBH Carbon Management*

The updated version of the Sustainable Design and Construction Strategy (October 2017) follows a series of meetings between the GLA, LBH and the applicant. The current strategy indicates the scheme will deliver a 15.8% improvement over building regulations (Building Regulations 2013). 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 9.2% 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 Carbon Management Team accept that this carbon performance is less than the applicants preferred CHP-led ambition but this is viewed in the context of a longer-term commitment to connect to the future DEN. 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.

#### *LBH Senior Drainage Engineer*

The LBH Drainage Engineer is satisfied with the supplied calculations and overall approach. LBH Drainage require the applicant to supply detailed drainage design drawings, and maintenance plan including SuDS features for review and sign-off for approval.

#### *LBH Waste Management*

The application has been given a RAG traffic light status of GREEN for waste storage and collection. The application includes adequate storage provision for refuse and recycling storage for a once weekly collection

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 trees in relation to the Ashley Gardens area. No objection.

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.

*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 a range of detailed issues (see Appendix 7).

*Crossrail 2 Safeguarding Team*

CR2 advises Haringey Planning Authority that whilst the development site boundary is outside safeguarding limits it is in close proximity to a significant CR2 construction worksite (proposed). CR2 advises that the applicant should be made aware that in the event that CR2 is confirmed the site would be opposite a future worksite which would be required to deliver the railway and it would be necessary to consider noise mitigation measures to be incorporated as part of the development scheme.

*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*

No objections subject to suitable biodiversity enhancements.

*Greater London Authority [see full report in appendix 4]*

The GLA considered a Stage 1 report on 29 August 2017.

*Greater London Archaeological Advisory Service*

The archaeological interest should be conserved by attaching a planning condition.

*London Underground*

LU commented on the Berol Yard application and has no comment to make on the application except that the developer should continue to work with LU engineers.

*Designing out crime officer*

The officer requests a planning condition (prior to above ground works and prior to occupation) to detail the measures to be incorporated.



*London Fire & Emergency Planning Authority*

No response received. 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 impact on infrastructure.

## **5. LOCAL REPRESENTATIONS**

5.1 The following were consulted:

- XQ Neighbouring properties consulted by letter
- Resident's Association consulted by letter
- 4 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: 1
- Objecting: 1
- Supporting: 0
- Others: 0

*Individual response*

5.3 One objection was received to the application and the material issues raised are included in Appendix 1 and can be summarised as:

- Impact on local services and the community
- Transportation concerns leading to increased parking and congestion
- Impact on neighbours and the surrounding area
  - Air pollution
  - Overshadowing
- Detrimental impact on local business and jobs

## **6 MATERIAL PLANNING CONSIDERATIONS**

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

- Principle of the development – Assessment
- 1) Employment, retail and land use mix
- 2) Housing (including affordable housing) and density
- 3) Masterplanning, design & public realm
- 4) Conservation & heritage assets
- 5) Quality of Residential Accommodation
- 6) Development Impact to Adjoining Occupiers
- 7) Transportation and Parking
- 8) Flood Risk and Drainage

- 9) Energy and Sustainability
- 10) Waste and Recycling
- 11) Land Contamination
- 12) Equalities
- 13) Health Impact Assessment

## 6.1 Principle of Development – Assessment

### *Employment provision & land use mix*

- 6.1.1 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.
- 6.1.2 Adopted local and strategic policies restrict the 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.
- 6.1.3 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.
- 6.1.4 Specifically, 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.

- 6.1.5 The employment floorspace applied for includes commercial floorspace on the ground floor facing Ashley Road and Berol Link. The ground floor will provide dedicated B class uses with the flexibility to sub-divide to attract a range of employers. The proposals include scope for up to 1,170sqm commercial floorspace.
- 6.1.6 As part of a wider mixed use allocation in policies the existing and proposed employment provision must also be viewed in the context of the wider proposals for Ashley Road South. The Ashley Road Masterplan Area will provide a total of 16,424sqm of commercial and education floorspace compared with 16,041sqm existing. Therefore, there will be a small net gain in commercial floorspace and the proposals will deliver significant qualitative enhancement of accommodation on the site, replacing relatively low-grade and inefficient accommodation with high quality units that have been designed to appeal to a range of potential occupiers and employers.
- 6.1.7 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 1,170sqm. This level of provision would meet the overall objective of re-provision required across the masterplan area, subject to finding the right balance between retail and employment uses to secure policy objectives.
- 6.1.8 The proposals clearly demonstrate a significant improvement in the quality, type and flexibility of employment space provided. Whilst subject to market demand, 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.

#### *Number and type of jobs*

- 6.1.9 The existing buildings and yards are currently occupied by low grade commercial and industrial buildings (Class B1/B2/B8). The site currently provides 7,325sqm (GIA) of commercial floorspace (B1/B2 uses) used by Cannon Street Jersey Fabrics and Strong Hold (indoor climbing centre) with an associated yard for car parking. The site is estimated to provide in the order of 35 FTE jobs. The construction phase could lead to the displacement of various employment on-site activities. The current occupier of the Cannon

Factory Jersey Fabrics building is due to consolidate its operations in existing premises in the north of England and will therefore be vacating this site in the near future.

6.1.10 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 a maximum 98 jobs.

6.1.11 Applying this to the number of jobs based at Ashley Gardens and Berol Yard and assuming that two part-time jobs are equivalent to one Full Time Equivalent (FTE) suggests the site could support approximately 343 FTE net jobs on the basis that 162 FTE jobs currently exist and approximately half could be re-accommodated in the proposed scheme. 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.

#### *High-speed broadband*

6.1.12 Policy DM38: Local Employment Area – Regeneration Areas also requires new development within Mixed Use Employment Areas to be designed to enable connection to ultra-fast broadband. This requires ducting to be provided and a strategy to be in place for liaison with suitable communications providers and for the development to be ‘fibre-ready’. A planning condition is attached to secure these provisions.

#### *Balance of commercial land uses*

6.1.1 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.

6.1.2 The existing and 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 across the masterplan area including the option of an embargo on retail uses, and consider a limited amount of Class A3 use as appropriate in the circumstances of this particular site. The following restrictions will apply across the masterplan, controlled via planning conditions:

<b>Building</b>	<b>Non-residential floorspace restrictions (GEA)</b>
Notting Hill Housing	Max 450sqm A1 use Max 300sqm A3 use
Ashley Gardens	No A1 Retail Use Max 150sqm A3 use
Berol Yard	No A1 or A3 use
Total (ARS)	Max 450 sqm A1 use Max 450 sqm A3 use

- 6.1.3 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 150sq.m. of Class A3 use and a complete embargo on Class A1 use in the light of existing permissions and the employment-led role of the allocation.
- 6.1.4 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 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.
- 6.1.5 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.

## **6.2 Housing and density**

- 6.2.1 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.

### *Portfolio approach to sites and delivery of affordable housing*

- 6.2.2 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.
- 6.2.3 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 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.
- 6.2.4 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 Policy DM13. However, 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.

- 6.2.5 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. The revised affordable housing offer for Ashley Gardens includes provision for 74% intermediate housing and 26% affordable rent.
- 6.2.6 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.
- 6.2.7 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.
- 6.2.8 In order to reflect this the Tottenham Area Action Plan paragraph 4.14 sets out the following: 'a portfolio approach where a group of sites can be seen to work together to meet the overall objectives of the Plan will be encouraged. This could for example mean that two or more sites working in parallel deliver different mixes or tenures of units which together make a policy compliant outcome in the area.' Paragraph 2.34 of the London Plan Affordable Housing and Viability SPG 2017 also raises the potential for a portfolio approach to affordable housing across sites.
- 6.2.9 This means that each site will be considered in terms of its specific characteristics and suitability for different housing types and tenures and other non-residential uses, and balanced against proposals for other sites in Tottenham Hale, with the council playing a key role in managing the distribution across the area.
- 6.2.6 For example, some sites may be more appropriate for family or smaller units, whereas as others may lend themselves to particular tenure types. The same principle is true for non-residential uses where some areas are suited to different balances of social/community uses, retail and leisure and commercial.

- 6.2.7 In addition, the council has been coordinating the delivery of the wider package of infrastructure required to deliver the District Centre, bringing together developer, council and critically Housing Zone resources to support the significant infrastructure requirements set out in the Tottenham Hale District Centre Framework and its companion Delivery Strategies.
- 6.2.8 The council has also secured the land receipts from the Tottenham Hale Strategic Development Partnership for investment in affordable housing in the Tottenham Housing Zone and the delivery of infrastructure within the Tottenham Hale District Centre Framework area. These receipts are subject to both overage and profit-share arrangements. It was agreed at Cabinet that these land receipts would be used to fund the provision of additional affordable housing through this innovative mechanism.
- 6.2.9 As part of this managed approach, the council reports on its delivery progress to demonstrate the performance of the approach. The table below sets out performance of the portfolio approach against key site allocations in Tottenham Hale (those with active planning activity).
- 6.2.10 Current performance suggests that for the Tottenham Hale area, the level of affordable likely to be achieved is approximately 38%. If proposed levels are achieved within the SDP area, the overall total will increase to approximately 41%. This latter figure is subject to SDP planning applications which are yet to be submitted or determined.
- 6.2.11 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 35% 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. Viewed across the Ashley Road South site allocation the level of affordable housing is likely to be approximately 35%. The full breakdown across the Ashley Road sites is shown in the Table below.



Table 1: Ashley Road South – portfolio approach to affordable housing

Application	Buildings	Residential units		Total	% by unit (hab rooms)	Tenure split (by hab room)
Ashley Gardens Full (BSD)	Building 1 Building 1A	377	Market	249 (737)	66% (65%)	35% AH
			Intermediate	95 (290)	25% (26%)	74% Intermediate
			Affordable Rent	33 (103)	9% (9%)	26% AR
			Total	377 (1,130)		
Berol Yard – Hybrid (BSD)	Building 4 (Full)	166	Build to Rent	158 (378)	95% (90%)	5% AH
			DMR (Intermediate)	8 (20)	5% (5%)	100% DMR
			Total	166 (398)		
	Berol House (Outline)	18	Market	12 (56)	67% (65%)	35% AH
			Intermediate	6 (30)	33% (35%)	100% Int
			Affordable Rent	0 (0)	0% (0%)	
			Total	18 (86)		
	Total: Berol Yard	184	Build to Rent	158 (378)	86% (78%)	8% AH
			Market	12 (56)	7% (12%)	40% DMR
			DMR (Intermediate)	8 (20)	4% (4%)	60% Int
			Intermediate	6 (30)	3% (6%)	
			Total	184 (484)		
Ashley House and Canon Factory - Outline (NHH)  (Illustrative for assessment purposes)	Building 2 Building 2A Building 3	265	Market	118 (409)	44% (50%)	50% AH
			Intermediate	112 (290)	42% (35%)	71% Int
			Affordable Rent	35 (121)	13% (15%)	29% AR
			Total	265 (820)		
ARS Masterplan Totals	All buildings	826	Market	379 (1,202)	46% (49%)	35% AH 854 72% Int 2% DMR 26% A/R
			Build to Rent	158 (378)	19% (16%)	
			Intermediate	213 (610)	26% (25%)	
			Affordable Rent	68 (224)	8% (9%)	
			DMR (Intermediate)	8 (20)	1% (1%)	
			Total	826 (2,434)		

- 6.2.13 The affordable housing tenure split (74%/26% 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 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 Policy DM 13 and the negotiated approach to affordable housing articulated in Strategic Policy SP2.

- 6.2.14 As part of this managed approach, the council reports on its delivery progress to demonstrate the performance of the approach. The table below sets out performance of the portfolio approach against key site allocations in Tottenham Hale (those with active planning activity).
- 6.2.15 Taking account of all sites that have been through planning committee the level of affordable secured is 52% and with the two Ashley Road sites at this committee meeting the level of affordable secured will be 42%.
- 6.2.16 Current performance suggests that for the Tottenham Hale area, the level of affordable likely to be achieved is approximately 38%. If proposed levels are achieved within the SDP area, the overall total will increase to approximately 41%. This latter figure is subject to SDP planning applications which are yet to be submitted or determined.
- 6.2.17 The table below sets out the position that the Council expects to be in after all the sites consented or currently at pre-application in Tottenham Hale have secured planning consent. It is noted that the split between intermediate and affordable rented is split heavily in favour of intermediate units and this is considered to be acceptable given the high levels of social housing already existing in the area and the nature of the sites.

Tottenham Hale Portfolio Approach											Overall affordable (%)
				Tenure mix							
SITES					Market		Affordable				
Site Allocations DPD Reference	Site allocation	Site Title	Total Units		For Sale	For Rent	Shared Ownersh ip	Pocket	DMR / LLR	Afforda ble Rent	
A. Sites with Recommendation to Grant Planning Permission											
Ashley Road South	TH6	NHHG	265	no.	118	0	112	0	0	35	
				%	45%	0%	42%	0%	0%	13%	
Station Square West	TH4	One Station Square (BSD)	128	no.	11	0	117	0	0	0	
				%	9%	0%	91%	0%	0%	0%	
Hale Wharf	TH9	Hale Wharf (Muse)	505	no.	328	0	143	0	0	34	
				%	65%	0%	28%	0%	0%	7%	
Monument Way	TH10	Monument Way (Newlon)	54	no.	0	0	0	0	0	54	
				%	65%	0%	0%	0%	0%	100%	
Sub-total (A.)			952	no.	457	0	372	0	0	123	
				%	48%	0%	39%	0%	0%	13%	52%
B. Sites before Planning Committee in November 2017											
Ashley Road South	TH6	BSD	561	no.	261	158	101	0	8	33	
				%	47%	28%	18%	0%	1%	6%	
Sub-total (B.)			561	no.	261	158	101	0	8	33	15%
				%	27%	17%	11%	0%	1%	3%	
Running Total (A+B)			1513	no.	718	158	473	0	8	156	42%
				%	47%	10%	31%	0%	1%	10%	
C. Sites in Pre-application Discussions with the Planning Authority											
Hale Village Tower	TH8	HVT (Anthology)	279	no.	236	0	43	0	0	0	
				%	85%	0%	15%	0%	0%	0%	
Station Square West	TH4	Station Square West (AR)	541	no.	406	0	135	0	0	0	
				%	75%	0%	25%	0%	0%	0%	
Station Square North	TH5	Ashley Road East (AR) Ashley Road West (AR)	247	no.	235	0	12	0	0	0	
				%	95%	0%	5%	0%	0%	0%	
Monument Way & Welbourne Centre	TH10	Welbourne Centre (AR)	166	no.	66	0	0	100	0	0	
				%	40%	0%	0%	60%	0%	0%	
Sub-total (C.)			1233	no.	943	0	190	100	0	0	24%
				%	76%	0%	15%	8%	0%	0%	
Running Total (A+B+C)			2746	no.	1661	158	663	100	8	156	34%
				%	60%	6%	24%	4%	0%	6%	
D. Top-up affordable from Argent Related Strategic Development Partnership Development Agreement (Cabinet Authorities in Place)											
Running Total (A+B+C+D)			2746	no.	1543	158	781	100	8	156	
118 Additional Grant Funded Units on Ashley Road South (NHHG); Contract Under Negotiation				%	56%	6%	28%	4%	0%	6%	38%
E. Top-up affordable from Argent Related Strategic Development Partnership											
Running Total (A+B+C+D+E)			2879	no.	1543	158	914	100	8	156	
133 Additional Grant Funded Units on site TBD based on modelled returns from the SDP				%	54%	5%	32%	3%	0%	5%	41%

## *Viability*

- 6.2.10 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 (2016), 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.
- 6.2.11 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 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.
- 6.2.12 In addition, the Mayor's recently published the Affordable Housing and Viability Supplementary Planning Guidance (SPG August 2017) 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. As published guidance it is a material planning consideration.
- 6.2.13 Under the guidance published by the Mayor, schemes which do not meet the 35 per cent affordable housing threshold, or require public subsidy to do so, will be required to submit detailed viability information which will be scrutinised by the Local Planning Authority (LPA), and where relevant the Mayor, and treated transparently. Where a LPA or the Mayor determines that a greater level of affordable housing could viably be supported, a higher level of affordable housing will be required which may exceed the 35 per cent threshold. In addition, early and late viability reviews will be applied to all schemes that do not meet the threshold in order to ensure that affordable housing contributions are increased if viability improves over time. Taking development plan policies as a whole the Ashley Gardens application does not meet the thresholds identified in the guidance or the overall affordable housing target and therefore an independent review of the scheme is necessary.
- 6.2.14 The scheme has been independently assessed by the Council's viability consultant BNP Paribas. As part of the assessment process and interrogation of the appraisal officers have worked with the applicant to maximise the amount of affordable housing which, in the case of Ashley Gardens, increased during the course of negotiations from 22% to 35%. Initial evidence presented to the Council did not sufficiently reflect the growth

potential of the scheme and also undervalued unit values in some areas. These inputs have been amended in the revised appraisal prepared by the Council's consultant BNP Paribas and this will form the agreed baseline review for any future viability review. The revised viability baseline continues to show a deficit but the applicant is prepared to proceed on the basis of potential net value growth over the implementation period of the project.

6.2.15 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.

6.2.16 Review mechanisms have been agreed between the applicant and GLA/Council officers which requires the viability assessment to be revisited at an early stage should no substantial progress be made within two years. In accordance with the recently published SPG, a further late-stage review is also applied triggered by 75% completions. Officers are satisfied these review mechanisms are required to incentivise development and ensure that the maximum reasonable level of affordable housing is secured over the period of implementation.

6.2.17 Overall, having considered the information submitted by the applicants, the Council's independent consultant, and the revised 35% baseline offer, 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 local plan policies, which require the maximum reasonable amount of affordable housing to be delivered on sites subject to viability.

#### *Affordability*

6.2.14 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.

6.2.15 In relation to Affordable Rent, LBH's 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.

- 6.2.16 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).
- 6.2.17 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.
- 6.2.18 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 the amount of 'lower-cost shared ownership' within the scheme is a minimum of 34% of overall provision and this will be secured via the s106 agreement.
- 6.2.19 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.
- 6.2.20 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*

- 6.2.21 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 Development Management DPD continue this approach.
- 6.2.22 Haringey's Housing Strategy (2017-2022) does not set out a target dwelling mix for market housing, however, 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.

<b><i>Application</i></b>	<b><i>Building(s)</i></b>	<b><i>Number of units</i></b>	<b><i>1 bedroom units</i></b>	<b><i>2 bedroom units</i></b>	<b><i>3 bedroom units</i></b>
Ashley Gardens	Building 1 Building 1A	377 units	157 units 41.6 (%)	142 units 37.6 (%)	78 units 20.6 (%)

- 6.2.23 During the course of negotiations, the number of duplex units increased in order to improve the overall dwelling mix and increase the number of family units, which is particularly welcome. These units face west onto Down Lane Park. In the light of these changes the dwelling mix is supported.

#### *Density*

- 6.2.24 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 local policy documents.
- 6.2.25 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 proposed development equates to 328 u/ha and 976 hr/ha on the Ashley Gardens site. This would be above the density range within the London Plan's indicative range for 'urban' sites with a PTAL of 5-6a. However, the density of the Ashley Gardens site is higher than the Ashley Road South Masterplan as a whole due to the site's location next to Down Lane Park, making it the focus for the residential accommodation, with a larger proportion of commercial floorspace being provided in the Berol Yard sites. Taken as a whole, the density of the Ashley Road South Masterplan site is 252 u/ha which is comfortably within the indicative range for urban sites. 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 which all support the proposed density.

### **6.3 Masterplanning, design and public realm**

- 6.3.1 The NPPF should be considered alongside London Plan Policies 3.5, 7.4 and 7.6, Local Plan Policy SP11, and 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*

- 6.3.2 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.
- 6.3.3 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.

6.3.4 In response to QRP and officer comments a number of relatively small design changes have occurred. These include:

- Introduction of a single storey of additional massing to the northern and western sections of Building 1 at eight floor level between the taller corner pavilions.
- Removal of the standalone single-storey pavilion in the Berol Link and associated change to the commercial floorspace.
- Introduction of additional duplex units facing west onto the park.

6.3.5 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*

6.3.6 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.

6.3.7 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 Policies DM1 and DM3.

6.3.8 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.

6.3.9 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. 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. These will include:

- completion of works to Berol Link secured prior to the occupation of Buildings 1 and 1A and time limit interim measures;
- 24-hour 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;

6.3.9.1 estate management strategy to secure long-term management and maintenance.

#### *Berol Link*

6.3.10 The Design and Access Statement and Introduction to the Masterplan documents submitted with the application all show the potential for a high quality new public realm. The new links provided in the form of Berol Link, provide a positive framework of new public spaces contributing to the ambition to create a vibrant new creative neighbourhood.

6.3.11 In response to comments, the applicant has removed the previously proposed pavilion building within Berol Link as it was considered to hinder views across the new linear space as well as undermining adjacent commercial uses. This has allowed for an increase in planting, which is welcomed. These details will be secured via condition.

#### *Quality Review Panel (QRP)*

6.3.12 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 5 September 2017 and the Panel's stated:

*"The Quality Review Panel offers warm support for much of the Ashley Gardens application scheme (Buildings 1 and 1A of the overall masterplan). The proposals are well considered and promise high quality development. The panel supports the scale and massing, residential typology, architectural expression and landscape design proposed. Scope remains to improve the quality of the residential accommodation within Buildings 1 and 1A, to avoid single aspect units overlooking the courtyards or with a north-facing aspect, and to avoid bedrooms at ground level. There is also scope to improve daylighting of circulation cores and, to improve the quality of common areas.*

*Subject to resolution of these issues, the panel would recommend the Ashley Gardens scheme for planning approval. Further details on the panel's views are provided below."*

Further details on the panel's views are provided below.

6.3.25 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
<p><i>Massing</i> The panel supports the massing of the Buildings 1 and 1A. The design team have successfully refined the overall built form of these two blocks in line with feedback from the previous QRP reviews.</p>	Noted.
<p><i>Scheme layout and landscape design</i> The panel feels that further consideration of the layout of the residential accommodation is required in order to deliver a high quality development.</p>	Additional duplex units introduced. Further information on sunlight and daylight provided.
They note that there is a high percentage of single aspect flats within Buildings 1 and 1A, and question whether this level of compromise within the accommodation is appropriate.	Additional duplex units introduced. Number of single aspect units minimised. Single aspects are only proposed where they have an excellent outlook onto Berol Link or Down Lane Park.
Single aspect flats at ground level can be problematic in terms of privacy and security as bedrooms will front onto public areas. This is a particular issue for flats facing courtyard areas, and in north-facing single-aspect ground floor flats.	As above. Additional dual aspect duplex units proposed facing west onto the park.
In this regard, the panel would strongly encourage the design team to consider incorporating maisonettes at ground level, which would enable bedrooms to be located at a higher level, avoiding privacy conflicts at grade.	As above.
An alternative solution could be to explore raising the floor level of the ground floor accommodation by 600mm, to lift the height of the window sill towards eye level, mitigating any views into the accommodation from outside. If the ground floor level were raised, careful consideration of	As above.

inclusive design would be necessary to ensure that the scheme is compliant with Part M of the Building Regulations.	
Provision of a generous and well-maintained area of landscaped defensible space adjacent to the bedrooms may also reduce the privacy conflict.	This is illustrated in the revised drawings
In the panel's view levels of natural light within the cores and corridors of Buildings 1 and 1A will not be adequate. The panel would support refinement of the circulation spaces to maximise daylight levels, and avoid relying on borrowed light from 'slits' in the core.	Levels of natural light have been maximised within the cores and corridors and where possible included, including through the use of above door windows. The layouts seek to prioritise internal accommodation. There is natural light to 4 of 6 cores.
The panel welcomes the landscape proposals for the scheme. They note that the central courtyards will primarily function as 'arrival spaces' rather than as amenity spaces due to the local park adjacent, and feel that the landscape design supports this very well.	Support noted.
<p><i>Architectural expression</i></p> <ul style="list-style-type: none"> <li>• The architectural expression of Buildings 1 and 1A is very well-considered. The main body of the facades is very nicely articulated, with large areas of glass maximising the available daylight and sunlight penetration into the accommodation. The attic storey of accommodation also works very well.</li> </ul>	Support noted.
The large panels of glazing will be a very attractive feature; however, the panel notes its concern that such elements of the design may be compromised at the detailed design stage in order to make savings.	Support noted – details secured as part of application. Any changes would require further approval.
A commitment to embedding high quality design at the detailed design phase will be critical to ensure that a visually prominent development of this scale is convincing and elegant. In this regard, the panel highlights that the quality of materials and construction, for example the design of the large areas of glazing, will be essential to the success of the completed scheme. The panel would support planning officers in securing this through planning conditions.	Details secured through planning conditions.

In composition terms, the panel notes that the west elevation of Building 1 presents visually as two pavilions dropping down to the central line of symmetry. They would encourage the design team to further refine the detailed articulation of this face of the building, in order to visually link these two pavilions into a unified whole.	Further changes incorporated into the design including infilling the space between the pavilions on the northern and western edges of the building.
<i>Next Steps</i> Whilst the panel warmly supports much of the application scheme, they note some outstanding concerns regarding single aspect units, the inclusion of ground floor bedrooms, and the levels of daylighting within the circulation areas.	Addressed above.
Subject to resolution of these issues, the panel would recommend the Ashley Gardens scheme for planning approval.	Officers consider the overall changes to the scheme to respond positively and comprehensively to the QRP comments.

### *Overall Design Response to QRP*

- 6.3.26 The QRP expressed broad support, specifically supporting the massing, landscaping, architectural expression, especially the attic floor(s) and commitment to embedding high quality design. They were concerned about single aspect flats generally, especially where they were at ground floor, that not all cores and communal corridors would have any natural light, that articulation of the elevations should avoid it being read as two symmetrical pavilions and that quality of specification and detailing needs securing in robust conditions.
- 6.3.28 The layout avoids any north facing single aspect units already, except on upper floors facing the park which is accepted as providing a superb outlook. The applicants have changed the ground and first floor layouts to introduce 4 ground and first floor, dual aspect maisonnettes on the west side of Block 1, like the existing 4 ground and first floor maisonnettes on the north side, which have also been modified to put living rooms on the ground floor and all the bedrooms on the 1st. Other ground floor flats are at a raised ground floor level, above external ground level, and protected by widened defensible planting. This fully satisfies this QRP concern, and the quality of residential accommodation is considered to be high.
- 6.3.29 The applicants explain they were not able to bring natural light into every core. Officers accept they have made the best attempt to achieve this, balanced against good housing quality, and note that there is natural light to four of six cores. Elevations have been revised to visually unite the two wings of each block, to further improve what the panel already consider

excellent, well composed elevations. Materials and key building details should be secured by robust conditions.

*Site-wide Landscaping (for both Ashley Gardens and Berol Yard)*

- 6.3.30 The panel were entirely happy with the site wide landscaping, merely noting that to secure its quality, robust conditions would be needed on both materials, detailing and securing management of the spaces.

*Townscape and view management*

- 6.3.31 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 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.
- 6.3.32 At the Local Level, both the Urban Characterisation Study and 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.
- 6.3.33 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.
- 6.3.34 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.

- 6.3.35 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.
- 6.3.36 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.
- 6.3.37 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.
- 6.3.38 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.
- 6.3.39 With regards to London strategic views, GLA officers confirm via the Stage 1 Planning Report 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 viewpoints.

6.3.40 Overall, the Ashley Gardens scheme, as part of the wider masterplan area, 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 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.

#### *Access & building frontage*

6.3.41 The Mayor's Housing SPG 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.

6.3.42 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.

6.3.43 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.

6.3.44 In addition, Berol Link will offer an attractive route between the park and Berol House, incorporating a suitable amount of ground floor commercial floorspace. Officers consider the available ground floor frontage has been maximised 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.

#### *Secure by Design*



6.3.45 The applicant has worked with the Secured by Design officer to address a number of issues raised earlier in the consultation process. 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.

## 6.4 Quality of Residential Accommodation

6.4.14 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 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.

6.4.15 All of the units in the scheme are capable of meeting the space standards in the Mayor's SPG Housing and the scheme provides a high standard of residential accommodation.

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

6.4.16 In total, 67 children are predicted to live in the development, of which 40 would be under the age of 5, 18 aged 5-11 and 9 aged over 12 years old. The areas of play space and the key principles of the design and arrangement of the play space are shown in the landscape plans and amount to the following.

	<b>Units</b>	<b>Communal Play Space</b>	<b>Space Under 5 yrs</b>
Building 1	276	1286sqm	439sqm
Building 1a	101	539sqm	157sqm
<b>Total</b>	<b>377</b>	<b>1825sqm</b>	<b>596sqm</b>

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

6.4.17 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.

6.4.18 The proposals demonstrate the potential to provide a total of 1,825m<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 and contributions towards improvements for this are addressed in the open space section.

6.4.19 It is proposed that the play provision for the children aged up to eleven years old can be provided within the sites of this 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.

6.4.20 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.

6.4.21 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*

6.4.22 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.

6.4.23 The development will provide wheelchair accessible homes of varying unit sizes which will meet the 10% requirement in planning policy. The development will also provide 19 accessible parking spaces, with flexibility for a further 9 spaces subject to demand within Building 1.

6.4.24 Level access to the buildings will be provided throughout Buildings 1/1A 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.

6.4.25 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*

- 6.4.26 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.
- 6.4.27 The application includes daylight, sunlight and overshadowing assessments (revised October 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*

- 6.4.28 94% 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.
- 6.4.29 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.
- 6.4.30 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*

- 6.4.31 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.

6.4.32 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*

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

6.4.34 Additional dual aspect duplex units have been introduced to Ashley Gardens. The revised accommodation has been informed by daylight and sunlight analyses. The supplementary daylight and sunlight assessment focuses on the levels of natural light within the residential accommodation. Where possible, proposed stair cores have natural light and ventilation. Natural light will also be able to spill into the corridors via above door windows.

6.4.35 The assessment demonstrates that 90% and 71% of the habitable rooms assessed within the developments will comply with the BS/BRE guide levels for ADF and DD respectively. These are 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. As with the scenario on an independent basis, this is an improvement when compared with the original assessment (July 2017).

6.4.36 Certain windows serving the proposed units will receive sunlight levels below the BRE guide due to the overshadowing effects of the development's deep balconies which themselves serve an important amenity function. The rooms served by these windows will also receive high levels of interior daylight, so will provide a good residential environment.

6.4.37 Officers agree with the applicant's consultant's conclusion that the levels of daylight and sunlight availability within the proposed units, both with and without the wider masterplan in place, 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.

### *Overheating*

- 6.4.38 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.
- 6.4.39 Modelling of the 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. 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 a range of passive design measures and officers agree that all necessary design measures have been incorporated on all apartments in order to reduce the unwanted solar gains entering the building. This includes deep window reveals, optimised glazing-to-opaque building fabric ratio and solar-control glazing. The solar gain in the apartments is correspondingly low. To go further the apartments could fail the building regulations checks on thermal performance as beneficial winter solar gains offset heating energy. All mechanical ventilation systems will be capable of providing a boost function for use when conditions dictate.
- 6.4.40 In the light of the evidence submitted, 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 identified in policy.

### *Environmental Wind Impacts*

- 6.4.41 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. 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 Tottenham Area Action Plan Policy AAP6.
- 6.4.42 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).

- 6.4.43 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.
- 6.4.44 The results both in terms of safety and comfort of the Ashley Gardens Site proposed scenario show that there is no relevant difference with the results of the original assessment (July 2017). The change in use of the roof levels of Buildings 1 and 1A to become outdoor amenity areas has now been assessed and the results of the safety assessment show that all the newly proposed roof amenity areas are suitable for the intended use. However, in terms of mitigation, the revised assessment for Ashley Gardens scheme does show a small number of balconies and terraces where the wind environment is not suitable both in terms of safety and comfort and therefore additional 2m perimeter screens will be required. A planning condition is proposed to secure details of the proposed screening in these locations.

#### *Noise and Vibration Impacts*

- 6.4.45 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. Mitigation measures documented in the ES 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.
- 6.4.46 Unless the requirements for traffic management in the area dictate otherwise, works will not be undertaken outside of the usual core construction site hours of 08:00 to 18:00 hours Monday to Friday and 08:00 to 13:00 hours on Saturday. Several additional safeguards exist to minimise the effects of construction noise and vibration; these would apply during construction works. These safeguards include:
- The various EC Directives and UK Statutory Instruments that limit the noise emissions of a variety of construction plant;

- The guidance set out in BS 5228, which covers noise and vibration control on construction sites;
- The powers that exist for local authorities under Sections 60 and 61 of the Control of Pollution Act 1974 and Section 80 of the Environmental Protection Act 1990 to control environmental noise and pollution on construction sites;
- A CEMP will be secured via condition for the proposed development, which would consider, amongst other things, the effects of noise and vibration.

6.4.47 In order to minimise noise arising during the construction phase, it is recommended that a 2.4m high hoarding is erected around the western and northern edge of the Ashley Gardens site. Details will be agreed via planning condition.

#### *Air Quality*

6.4.48 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 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.

6.4.49 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.

6.4.50 The Council's Environmental Officer has assessed the application and provided comments to the applicant team following submission of the original Environmental Statement. The results of an Air Quality Assessment and an Air Quality Neutral Assessment (AQNA) has been submitted 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>.

6.4.51 Previously the proposed development included the following energy generating plant: Building 1 – three 846kW gas fired boilers (2 will be in operational, 1 for standby); Building 4 – three 639kW gas fired boilers (2 will

be in operational, 1 for standby); and, NCDS – two 450kW gas fired boilers. The change to the energy strategy means that the proposed development will now include the following energy generating plant: Building 1 – three 539kW gas fired boilers; Building 1A – three 190kW gas fired boilers; Building 4 – three 237kW gas fired boilers; Berol House – three 190kW gas fired boilers; and, NCDS – two 450kW gas fired boilers.

- 6.4.52 The air quality neutral assessment has been updated using the GIFA, total energy centre emissions per annum and the anticipated development trip rates of each proposed use once operational (the latter was unchanged from that assessed in the original Environmental Statement) to calculate the NO<sub>x</sub> and PM<sub>10</sub> emissions from the building and transport elements of the proposed developments.
- 6.4.53 Performance against the Building Emission Benchmarks for NO<sub>x</sub> emissions was found to be compliant, as was performance against the Transport Emission Benchmarks for NO<sub>x</sub> and PM<sub>10</sub>. Therefore, the proposed development is 'air quality neutral'. The Environmental Statement identifies no need for further mitigation measures and the residual effects are determined to be negligible overall.
- 6.4.54 With the Notting Hill development and Berol Yard Developments both operational, exceedances are predicted at the same two existing receptor locations. The results, both with and without the Notting Hill development and Berol Yard Developments, show that annual mean NO<sub>2</sub> concentrations are close to, or exceed, the objective at two receptor locations on the Notting Hill Housing (NHH) site (receptors 32 and 33) and one location on the Berol Yard Application site (receptor B41). No receptors on the Ashley Gardens site are identified as exceeding the levels.
- 6.4.55 The updated assessment shows that the proposed developments would cause either no change or small increases in pollutant concentrations at the receptors considered. Based on the assessment significance criteria and the worst case approach taken to the generation of vehicle movements associated with the proposed developments, the residual effects of the proposed developments once operational are considered to be negligible.
- 6.4.56 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.

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

- 6.5.14 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.
- 6.5.15 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.
- 6.5.16 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.
- 6.5.17 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.
- 6.5.18 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. 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.
- 6.5.19 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.

- 6.5.20 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.
- 6.5.21 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.
- 6.5.22 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.

### *Trees*

- 6.5.23 A total of ten low quality category C trees and one group were surveyed on or adjacent to the Berol Yard Site. The assessment concludes that these trees will require removal to facilitate development and include trees of poor form, small stature and/or limited visual appeal. Trees T4 – T12 are found on land belonging to the London Borough of Haringey. The Council is aware of the need to remove these trees in order to facilitate the formation of a new

shared cycleway and footway as part of wider implementation of the Streets and Spaces Plan.

- 6.5.24 A total of one tree and two groups of trees were surveyed adjacent to the Ashley Gardens site. None of these trees will require removal to facilitate development. All of the trees can be sustainably retained through the use of appropriate protection measures including ground protection, tree protection fencing and no dig construction. The proposal will not result in any additional pressure being placed upon existing trees and will not adversely affect their future growth or development. It is considered that the impact on existing trees can be suitably mitigated.

## **6.6 Development Impact to Adjoining Occupiers**

- 6.6.14 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*

- 6.6.15 Policy DM1 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. Policy DM23 also reflects this approach.
- 6.6.16 While the introduction of mixed use development will give rise to additional noise and comings and goings generated from future occupiers, the potential noise emanating from the scheme would not create a level of noise and disturbance over and above that of typical dwellings/flats or small scale commercial uses in an urban location. As noted above, the site is generally isolated from existing residential uses.
- 6.6.17 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.
- 6.6.18 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. The applicant will also be required to join the Considerate Contractors scheme, with proof of registration provided to the Local Authority.

- 6.6.19 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*

- 6.6.20 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.
- 6.6.21 The daylight/sunlight impacts to adjoining occupiers are acceptable for an urban site in London. 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, details of mitigation measures pertaining to a small number of balconies and rooftop spaces is secured by planning condition.
- 6.6.22 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.

## **6.7 Transportation and Parking**

- 6.7.1 This proposal includes demolition of the existing buildings, and constructions of two new buildings (1 and 1A) of mixed use development, which is part commercial and part residential. In total, there are 1,135 sqm of commercial floorspace proposed (Class A1/A3/B1/D1) and 377 residential units, (161 one bed; 140 two bed; 76 are three units).
- 6.7.2 Building 1, includes 680sqm of commercial space and 276 residential units, and building 1A includes 455sqm of commercial space and 101 residential units. Currently there are 35 people employed on the existing buildings, and this proposal increases the number to approximately 146.

- 6.7.3 The existing vehicular access is from Ashley Road, which connects to Burdock Road, Watermead Way and Hale Road. Other nearby roads which are not part of the local Highway Authority are: Monument Way and part of the Transport for London Road Network (TLRN), and A10 High Road part of the Strategic Road Network (SRN).
- 6.7.4 The development site is highly accessible with a score of Public Transport Accessibility Level (PTAL) 5 and 6a. PTAL ranges from 1 (described as 'very poor') to 6B (described as 'excellent'). There are six bus routes (41, 230, W4, 123, 76, 192) included in the PTAL calculations, including Tottenham Hale rail and underground station.

#### *Trip generation*

- 6.7.5 Trip Generation methodology was agreed with LBH and TfL in January 2017. The multimodal trip generation was derived, considering all likely trips to be generated by the proposed development and extracting existing trips. Trics database was interrogated for sites with similar characteristics to get the trip rate for uses included in this proposal. Also, 2011 Census travel to work database, Middle Super Output Area (MSOA) Haringey 15, (which includes proposed sites) was used, to identify current work patterns and establish the existing trip generation. The findings were reported on section 5.3 of the TA and to summarise. Based on the numbers identified, the proposal is predicted to generate a reduction of vehicular trips, while increasing the use of the public transport.

#### *Car parking*

- 6.7.6 A total of 34 accessible car parking spaces are included in this proposal. Out of these, 33 spaces will be primarily used for wheelchair accessible residential units, and one is assigned for commercial land uses included in this proposal.
- 6.7.7 Policy 6.13, of the London Plan sets out the car parking standards and strategic direction to facilitate new developments with appropriate levels of parking. It indicates that, maximum car parking standards for residential developments in the outer London with a high PTAL, is up to 1 space per unit. LBH is identified in map 2.2, of the London Plan, as part of the outer London.
- 6.7.8 Parking addendum to Chapter 6, contains recommendations for blue badge holders indicating that for residential developments the requirement is provision for at least one accessible on or off-street parking space. It is also stated that when off-street parking is provided then at least two parking spaces should be for blue badge holders. In addition, Policy 6A.1, of the addendum includes parking standards for blue badge holders for non-

residential uses, indicating that, at least one on or off street car parking should be provided, and designated for blue badge holders, even if no other parking is provided.

- 6.7.9 With regards to employment land uses the addendum necessitates parking provision for each disabled employee, and provision for disabled visitors. Policy 2.8 of the outer London Transport outlines strategic direction and recognises car parking requirements for outer London areas to be higher in comparison with central areas, although a flexible approach is encouraged in applying standards of the Policy 6.13 and Table 6.2.
- 6.7.10 Policy 3.8 of the London Plan recommends are that 10% of new housing should be, either designed to be wheelchair accessible from the start, or easily adaptable for residents who are wheelchair users. Policy DM32 on parking standards, part of the LBH Development Management DPD- January 2016, indicates that London Plan policies are valid when planning proposals are assessed.
- 6.7.11 When applying policy 3.8 this development should include a total of 37 residential units which are Wheelchair User Dwellings (WUD) at the point of construction, or easily adaptable afterwards. Thus, a ) It has been accepted that not all of the 10% included, will be wheelchair accessible residential units at the start of occupation, or at all times. Therefore, the % of WUD is subject to demand and would be varied over time.
- 6.7.12 The Housing Supplementary Planning Guidance (March 2016)-London Plan 2016 Implementation Framework, set up standards indicating that each designated wheelchair accessible unit, should have a car parking space. If all of the assigned WUD are in use as wheelchair accessible units, and each have access to a car parking space at the same time, then parking provision for this proposal should be 37 spaces.
- 6.7.13 Nevertheless, the London Plan recognises that car parking can take up considerable land and encourages the use of sustainable modes of transport, nonetheless a minimum car parking level for disabled users is considered an essential provision and must be fully satisfied at all times. Considering that not all disabled users who are residing at WUD will have cars, there is no need for each unit to have a car parking space, at all times.
- 6.7.14 In addition, there is considerable scope to optimise the use of unused spaces for other uses as part of the development given the mixed-use nature of the proposals, such as commercial uses. This is a car free development where all residents, (except disabled users of the WUD) will not have access to off or on-street car parking spaces. This will be secured via the s.106 agreement.

- 6.7.15 Having considered all of the above policies, the residential car parking provision is acceptable, subject to the above measures being secured via the S106. Each WUD will have access to a car parking space (off-street) at the point of request and provisions will be included in the s.106 to prevent the sale of car parking spaces. Disabled users of the WAU will be able to obtain a parking permit at the point of request and this will be managed and issued by developer's management company.
- 6.7.16 Future residents of this development will have an opportunity to use the three car club spaces, located in the vicinity of the development. Two of the car club spaces are located on Mafeking Road, (approximately 500m away which is equivalent to 6min walking), and the other is located on Antill Road (approximately 650m away, which is equivalent to 8min walking).
- 6.7.17 The London Plan parking standards for B1 employment in Outer London indicates a maximum provision of one car parking space for (100-600sqm). On the other hand, parking for the commercial part of this development (Class B2 or B8) is one space per 500sqm of gross floorspace. For the 891 sqm of commercial this means a car parking provision of between 2 and 9 (minimum and maximum) spaces.
- 6.7.18 Allocation for different uses is recommended as part of a package of planning conditions. These standards will also only apply to the restricted amount of retail area discussed elsewhere in this report. Therefore, car parking relating to retail uses is likely to be substantially less than indicated by the global levels applied for in the application and can be successfully managed through planning conditions.
- 6.7.19 Off-street car parking spaces will be managed through Car Parking Management Plan (CPMP), including:
- prior to occupation, all parking spaces must be in place, and marked on site as disabled spaces, and retained thereafter;
  - all parking spaces to be used in connection with this development only;
  - identification of WAU units and therefore eligible for parking permits;
  - review the demand for parking spaces and occupancy levels - include details on how this is proposed to be managed including duties and responsibilities for issuing, reviewing the off-street permit allocation and reassignment of permits;
  - include details of duties and responsibilities for issuing, reviewing of the off-street permit allocation, and reassignment of the parking permits.
  - details to be submitted: controlling access to the parking area, parking enforcement measure, swept paths, ramp details and show structural columns on a drawing (if any), visibility splays and vehicle circulatory movements, all while considering pedestrian movements and safety.
  - include locations of Electric Vehicle Charging Points (EVCP), and indicate criteria for reviewing the usage and converting passive points (if any)

proposed) to active. Minimum provision of 20% active and 20% passive Electric Vehicle Charging Points (EVCP) in accordance with the London Plan. Because of low number of parking spaces included in this proposal, recommendations are to aim for all spaces to have EVCP, either active or passive.

### *Cycle Parking*

- 6.7.20 The proposal includes a total of 639 cycle parking spaces - 601 long stay and 38 short stay. The spaces provided are assigned to: 604 for residential use (594 long stay and 10 short stay); 35 (7 long stay and 28 short stay) for commercial use (retail and office). The proposed cycle parking is less than minimum London Cycle parking standards although it should be noted that the spaces for Building 1A are likely to be shared with the adjacent development by Notting Hill Housing (Building 2a).
- 6.7.21 The locations of the proposed cycle parking spaces are shown on the proposed drawings. Also, there are a number of cycle parking spaces located on the public realm. Further details will be secured via planning condition.
- 6.7.22 In relation to commercial uses the location of the proposed cycle parking spaces is shown, with each commercial units having an allocated storage area. Further details will also be secured via planning condition. In addition, 32 cycle parking spaces located on the public highway. The proposed location is subject to change following the detailed design of the Ashley Road, which is being coordinated by the Council.

### *Alterations to the existing public highway and proposed links*

- 6.7.23 A bus stand exists on Ashley Road, which is planned to be relocated to allow for public realm improvements that are part of the wider Ashley Road South Masterplan. Its delivery is part of the adjacent applications submitted in relation to Cannon Factory/Ashley House and Ashley Gardens. Due to the need for the Council to adopt additional land in order to widen Ashley Road a planning condition is proposed in respect of Ashley Gardens application which will require details of the planned relocation to be provided and agreed by the Council, in consultation with TfL prior to implementation. A S278 highways agreement will also be required as part of any permission relating to Ashley Gardens.
- 6.7.24 There are several competing requirements for the limited space along Ashley Road which require careful consideration as part of wider proposals, one of which is, facilitating loading and meeting the needs for visitors parking who are Blue Badge holders. It is anticipated that Ashley Road will have different parking and loading restrictions, which will be incorporated as part of the detailed design. Because this is a public highway allocation of sections on Ashley Road can be adjusted in accordance with demand. Blue badge



holders can park for up to three hours on yellow lines, except where there are restrictions on loading or unloading. As existing, some sections of the existing Ashley Road are appropriate for visitors, but not for all day parking required for disabled residents. However, all this is subject for review prior to the Highways Authority approving the detailed design.

- 6.7.25 Blue badge holders can park for up to three hours on yellow lines, except where there are restrictions on loading or unloading. As existing, some sections of the existing Ashley Road are appropriate for visitors, but not for all day parking required for disabled residents. The full details will need to be agreed with the Highways Authority as part of the improvements to Ashley Road.
- 6.7.26 This proposal delivers a new pedestrian/cyclist link known as Berol Link, which improves east/west connections. Berol Link will connect Down Lane Park with Ashley Road and will prohibit vehicular access except for refuse/recycling/emergency vehicles. Berol Link will not be adopted by the local Highway Authority but permanent public access to Berol Link must will be secured through the S106 agreement. It must also be constructed to withstand the largest vehicle load, and maintained by the developer, thereafter. This will be secured via planning condition.

#### *Parking restrictions on the public highways*

- 6.7.27 In order to monitor potential parking displacement following the occupation of proposed development, specific S106 contributions are required to undertake a parking stress study. The s.106 heads of terms include a contribution of £12,000 towards an assessment and analysis of parking stress in the vicinity. The contribution will payable upon implementation. In the event the findings suggest there has been an increase in parking stress in areas which are not within the CPZ, or the timing of parking restrictions are not appropriate, then CPZ modifications may be required. Any changes would be subject to public consultation.

#### *Travel Plan*

- 6.7.28 A Framework Travel Plan (TP) is included, as part of the submission. The developer is responsible for creating a sustainable development and achieving the Travel Plan targets. The strategy is to appoint a Sustainable Travel Manager to ensure that targets of the travel plan are met. In addition, Travel Plan co-ordinators are proposed for each core component of the proposal. Each travel plan will be signed off only after the targets, as agreed by the LPA, have been met. Each detailed travel plan must have SMART targets, which will be monitored at regular intervals for at least five years, following occupation.

- 6.7.29 The obligation remains on the developer to implement travel plan measures. Travel plans will only be signed off when targets are met. Each detailed travel plan must have SMART targets, which must be monitored at regular intervals for at least five years, following occupation. The developer is responsible for achieving the TP targets.

*Delivery servicing plan*

- 6.7.30 A Delivery servicing plan framework is included in the submission. Although this document is accepted as framework, an updated plan will be required at a later stage.
- 6.7.31 Loading bays are likely to be included along Ashley Road and Burdock Road when modifications are made as part of wider proposals. Further details will be required to take account of wider emerging proposals, such as: locations per land use included in this proposal, details of managing and arranging times and servicing arrangements. An updated Delivery/Servicing Strategy is included as a planning condition.
- 6.7.32 Trip generation for the delivery/ servicing trips has been split into residential trips and commercial trips. The TRICS database has been interrogated and comparable sites were used to determine the trip rates. Trips were divided into two categories: Light goods Vehicles (LGV) and Heavy Goods Vehicles (HGV), and the rates derived are satisfactory.

*Refuse/ recycling*

- 6.7.33 Some details of refuse/recycling were submitted in the Waste Management Strategy. Twice weekly collections for refuse/recycling are anticipated due to the limited bin storage space. Agreement with Environmental Services will be required, including the site specific Facilities Manager who will be responsible for placing the bins to the agreed collection point. The application includes the communal bin storage areas the swept path analysis of the refuse collection vehicles.
- 6.7.34 The commercial waste storage space is separate from the residential part of the development and it is anticipated that collections to be done through either private service providers or other.

*Construction Logistic Plan*

- 6.7.35 The proposal includes a Construction Logistic Plan (CLP) but an updated Plan will be required closer to construction, once full details are known. This will be covered by a planning condition.

- 6.7.36 Some details of the refuse/recycling were submitted on the Waste Management Strategy. Twice a week collections for refuse/recycling each, are anticipated because of the limited bin storage space. Agreement with the Environmental services is required, including the facilities management who are responsible to place the bins to agreed collection point.

## **6.8 Flood Risk and Drainage**

- 6.8.1 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.
- 6.8.2 London Plan (2016) Policy 5.13 (Sustainable drainage) and Local Plan 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.
- 6.8.3 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.
- 6.8.4 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 a Drainage Strategy; the Strategy includes the use of Sustainable Urban Drainage Systems (SuDS).
- 6.8.5 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 Berol Link. The 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).

- 6.8.6 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 Drainage Strategy.
- 6.8.7 The Council's Senior Drainage Engineer has assessed the scheme and been involved in its design evolution and raises no objection. Thames Water and the Environment Agency also do not raise any objection to the scheme subject to conditions. Subject to the imposition of the conditions noted above, the development is acceptable in Flood Risk and drainage terms.

## **6.9 Energy and Climate Change**

- 6.9.1 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.
- 6.9.2 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.
- 6.9.3 Under Policy TH6 the site is identified as being in an area with potential for being part of a Decentralised Energy (DE) network. Development proposals should be designed for connection to a DE network, and seek to prioritise/secure connection to existing or planned future DE networks, in line with Policy DM22.

- 6.9.4 The applicant has submitted a Sustainable Design Energy and Construction Statement prepared by WSP, updated October 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 17.5%.
- 6.9.5 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*

- 6.9.6 The scheme delivers a 15.8% carbon reduction through lean (energy efficiency measures). On average, Haringey sees 10-12% improvement through energy efficiency measures so this is supported.

#### *Energy – Clean*

- 6.9.7 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(s) capable of connecting to the future DE network must be designed into the development.
- 6.9.8 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.
- 6.9.9 The scheme is now proposing a boiler-led heating system. Due to the flexibility and compatibility it offers in connecting to the future DEN, this is supported. The preferred option includes individual, initially unconnected boilers, within each building. 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 includes more energy centres than would normally be acceptable. However, in view of the interim nature of the strategy and commitment to connect to the DEN (secured via planning agreement) this approach is considered to be acceptable. In addition, a further planning condition is proposed which requires the applicant to revisit the number of energy centres and seek to minimise the number of connections required prior to commencement.

6.9.10 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 and revisiting the number of energy centres;
- Securing the reduction in energy demand through energy efficiency measures;
- Provision for connection to DEN;
- Inclusion of renewable energy technology to offset CO<sub>2</sub> emissions;
- Any shortfall in carbon offsetting required to ensure policy compliance (as set out in London Plan Policy 5.2) will be offset at £60 per tonne and should be given to the Council upon commencement on site based on an up-to-date assessment of carbon emissions;
- Overheating Mitigation Plan for each building to be submitted and approved by the LPA in advance of the main works commencing.

#### *Energy – Green*

6.9.11 The applicant has included 80m<sup>2</sup> of Solar PV panels as a renewable contribution. The Design and Access Statement illustrates the roof space with a balance of play space and landscaping to provide suitable amenity for future residents. This technology delivers a further reduction of 7.2 tonnes in CO<sub>2</sub> emissions.

6.9.12 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 £454,860.00. This will also be secured via planning agreement.

6.9.13 Overall, the target carbon emissions for the proposed development are calculated to be 352.4 tonnes CO<sub>2</sub> per annum. A planning condition is proposed to secure the savings outlined. 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.

### **6.10 Waste and Recycling**

**6.10.1** 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 requires development proposals make adequate provision for waste and recycling storage and collection. The

approach is reflected in DPD Policy DM4. The applicant has submitted a Delivery and Servicing Plan.

6.10.2 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 guidance. Bin storage access areas are shown on the plans with two main collection points within Building 1 and Berol Link.

**6.10.3** 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.

## **6.11 Land Contamination**

6.11.1 Policy DM32 requires 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.

6.11.2 The site is underlain by the relatively impermeable Enfield Silt Member and then subsequently by the Kempton Park Gravel Formation (Secondary (A) Aquifer). Beneath this is the London Clay Formation (unproductive stratum) overlying the Thanet Formation, Lambeth Group (both Secondary (A) Aquifers) and the White Chalk Subgroup (Principal Aquifer). It is likely that Made Ground is present onsite owing to its historical use as a factory and current commercial use.

6.11.3 These contaminants are anticipated to pose a Low to Moderate risk to future site users, such as residents and visitors. The risk to future construction and ground workers is Moderate due to a greater likelihood of direct contact with potentially contaminated soils.

6.11.4 A ground investigation compliant with BS10175 and Generic Quantitative Risk Assessment (GQRA) is required and will allow assessment of the identified plausible contaminant linkages. It is recommended that a ground investigation is designed based on the following technical objectives:

- Characterisation of the underlying ground and groundwater conditions;
- Undertake soil sampling for contamination analysis and geotechnical testing;
- Undertake ground gas and groundwater monitoring;
- Provide an assessment of risks to human health and controlled waters; and
- Provide a preliminary outline assessment of potential geotechnical constraints and possible foundation options for the proposed development.

6.11.5 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.

## 6.12 Equalities

6.12.1 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.

6.12.2 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.

6.12.3 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.

## 6.13 Health Impact Assessment



- 6.13.1** 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.
- 6.13.2** 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, Ashley Gardens falls within an LSOA that is within the 20% most deprived areas.
- 6.13.3** 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
- 6.13.4** 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.
- 6.13.5** 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.

## **6.14 Fire safety**

- 6.14.1 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.
- 6.14.2 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.
- 6.14.3 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.
- 6.14.4 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.
- 6.14.5 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.
- 6.14.6 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*

- 6.14.7 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*

- 6.14.8 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.

## 6.15 Conclusions

6.15.1 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 component in the regeneration of Ashley Road South, in support of 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 35% 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 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 would be 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, taking into account the average density across the masterplan area.
- 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 Berol Link as a new east-west route from Down Lane Park towards Berol House all of which weigh heavily in favour of the scheme.
- The development will relate positively to the adjacent Down Lane Park, providing new and improved pedestrian & cycle links and duplex family housing on edges adjacent to the park.
- 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 secured, the noise, environmental wind, vibration and air quality impacts to future occupiers of the units are acceptable.
- The transportation impacts to the scheme are acceptable. The scheme will not generate a significant increase in traffic or parking demand. The provision of cycle storage is policy compliant and further details are secured by planning condition. The adoption of currently private land to secure implementation of the public realm improvements to Ashley Road will be secured via s.72 agreement.
- The interim solution to multiple energy centres is accepted in the context of the commitment to a future district energy connection. Taking into account the proposed S106 obligations relating to carbon offset payment, 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 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)**

- 7.8.1** Based on the information given on the plans, the Mayoral CIL charge will be **£994,140.00** and the Haringey CIL charge will be **£ 413,291.25**. This is an estimated figure based on the 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

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

## 9 CONDITIONS AND INFORMATIVES

### CONDITIONS

1.	<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> <p>a) The following plans:</p> <p><b>Plans and Drawing Numbers (as amended):</b></p> <p>Level B1 Plan 1824-JMP-01-00-DR-A-3500 2 Level 00 Plan 1824-JMP-01-00-DR-A-3501 4 Level 01 Plan 1824-JMP-01-01-DR-A-3502 3 Level 02-05 Plan (typical) 1824-JMP-01-02-DR-A-3503 3 Level 06 Plan 1824-JMP-01-06-DR-A-3504 2 Level 07 Plan 1824-JMP-01-07-DR-A-3505 3 Level 08 Plan 1824-JMP-01-08-DR-A-3506 3 Level 09 Plan 1824-JMP-01-09-DR-A-3507 3 Level 10 Plan 1824-JMP-01-10-DR-A-3508 3 Roof Plan 1824-JMP-01-RF-DR-A-3509 1 Building 1: North and South Elevations 1824-JMP-B1-NS-DR-A-4001 2 Building 1: East and West Elevations 1824-JMP-B1-EW-DR-A-4002 2 Building 1A: North and South Elevations 1824-JMP-B1A-NS-DR-A-4101 2 Building 1A: East and West Elevations 1824-JMP-B1A-EW-DR-A-4102 2 Building 1: Sections AA and BB 1824-JMP-B1-AB-DR-A-5001 3 Building 1: Sections CC and DD 1824-JMP-B1-CD-DR-A-5002 3 Building 1A: Sections AA and BB 1824-JMP-B1A-AB-DR-A-5101 2 Building 1A: Section CC 1824-JMP- B1A-CC-DR-A-5102 2</p> <p><b>Masterplan Drawings (with existing context) – For Approval</b></p> <p>Masterplan: Level 00 Plan 1824-JMP-01-00-DR-A-2000 Rev 1 Masterplan: Level 02 Plan 1824-JMP-01-02-DR-A-2001 Masterplan: Roof Plan 1824-JMP-01-RF-DR-A-2002 Masterplan: North-West Elevations 1824-JMP-01-NW-DR-A-2100 Masterplan: North – South Sections 1824-JMP-01-S1-DR-A-2200 Rev 1 Masterplan: East - West Sections 1824-JMP-01-S2-DR-A-2201</p> <p><b>General Arrangement Plans (existing context) – For Approval</b></p> <p>Composite plan: Level B1 Plan 1824-JMP-01-B1-DR-A-3500 Rev 2</p>
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	<p><b>Elevational Details – For Approval</b>  Building 1: Typical Bay 1824-JMP-B1-XX-DR-A-6001  Building 1: Typical Bay 2 1824-JMP-B1-XX-DR-A-6002  Building 1: Typical Bay 3 1824-JMP-B1-XX-DR-A-6003  Building 1A: Typical Bay 1824-JMP-B1A-XX-DR-A-6101</p> <p><b>Landscape Drawings for approval:</b>  Landscape Plan – 00 449-02-100 Rev B  Landscape Plan – Berol Link East 449-02-110 Rev B  Landscape Plan – Berol Link West 449-02-111 Rev B  Landscape Plan – Down Lane Park Walk 449-02-112 Rev B  Landscape Plan – Ashley Road 449-02-113 Rev B  Landscape Plan – 01 Building 1 449-02-120 Rev A  Landscape Plan – Roof Building 1A 449-02-130 Rev A  Landscape Plan – Roof Building 1 South 449-02-131 Rev A  Landscape Plan – Roof Building 1 North 449-02-132 Rev A  Planting Plan – 00 449-02-501 Rev B  Planting Plan – 01 449-02-502 Rev A  Planting Plan – Roof Building 1A 449-02-503 Rev A  Planting Plan – Roof Building 1 South 449-02-504 Rev A  Planting Plan – Roof Building 1 North 449-02-505 Rev A  New Tree Planting – 00 449-02-551 Rev B  New Tree Planting – 01 449-02-552 Rev A  New Tree Planting – Roof Building 1A 449-02-553 Rev A  New Tree Planting – Roof Building 1 South 449-02-554 Rev A  New Tree Planting – Roof Building 1 North 449-02-555 Rev A</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>
2.	<p><b>COMPLIANCE – Commencement</b></p> <p>The development hereby authorised must be begun not later than the expiration of 3 years from the date of this permission, failing which the permission shall be of no effect.</p> <p>Reason: This condition is imposed by virtue of the provisions of the Planning &amp; Compulsory Purchase Act 2004 and to prevent the accumulation of unimplemented planning permissions.</p>
3.	<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 July 2017 and the Supplementary Environmental Statement dated October 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 environmental effects of the development.</p>



4.	<p><b>COMPLIANCE – LAND USE (Retail)</b></p> <p>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 include any Class A1 use and shall not exceed 150sqm 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>
5.	<p><b>COMPLIANCE - Development in Conformity with Energy Statement</b></p> <p>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 July 2017 (and addendum dated October 2017), and any energy strategy document thereafter approved.</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>
6.	<p><b>COMPLIANCE - Land Contamination – Part C</b></p> <p>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 with adequate regard for environmental and public safety.</p>
7.	<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>
8.	<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</p>

	<p>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>
9.	<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>
10.	<p><b>COMPLIANCE - Compliance with London Housing Design Standards</b></p> <p>The development shall comply, as far as is practicable, 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>
11.	<p><b>COMPLIANCE - Individual Satellite dishes or television antennas precluded</b></p> <p>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 application.</p> <p>Reason: to protect the amenity of the locality.</p>
12.	<p><b>COMPLIANCE – Lifetime Homes</b></p> <p>All residential units within the proposed development shall be designed to Part M4 (2) 'accessible and adaptable dwellings' of the Building Regulations 2015 (formerly Lifetime Homes Standard) unless otherwise agreed in writing with the Local Planning Authority.</p> <p>Reason: To ensure that the proposed development meets the Council's Standards in relation to the provision of wheelchair accessible homes and to comply with Haringey Local Plan 2017 Policy SP2 and the London Plan 2016 Policy 3.8.</p>

	<b>PRE COMMENCEMENT</b>
13.	<p><b>PRE COMMENCEMENT - 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> <ol 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 area, location and programme for construction of public open space, public realm and landscaping to be provided in that phase;</li> <li>3. the quantum and location of car parking to be provided in that phase;</li> <li>4. the quantum and location of cycle parking to be provided in that phase;</li> <li>5. the quantum and location of motorcycle and powered two wheeled vehicular parking to be provided in that phase;</li> <li>6. infrastructure, including the provision of energy infrastructure for that phase;</li> <li>7. the principles of waste / refuse and servicing for that phase; and</li> <li>8. the chargeable development(s) comprised in that phase for the purposes of the Community Infrastructure Levy.</li> </ol> <p>The Development shall only be carried out in accordance with the 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>
14.	<p><b>PRE COMMENCEMENT - Confirmation of Site Levels</b></p> <p>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>
15.	<p><b>PRE COMMENCEMENT Drainage Strategy (Thames Water)</b></p> <p>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>
16.	<p><b>PRE COMMENCEMENT - Archaeology (Written Scheme of Investigation)</b></p> <p>No demolition or development shall take place until a written scheme of 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> <ol style="list-style-type: none"> <li>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>The programme for post investigation assessment</li> <li>Provision to be made for analysis of the site investigation and recording</li> <li>Provision to be made for publication and dissemination of the analysis and records of the site investigation</li> <li>Provision to be made for archive deposition of the analysis and records of the site investigation</li> <li>Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.</li> <li>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> </ol> <p>No development shall take place within the area indicated until the</p>

	<p>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>
17.	<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 Arboricultural Report (June 2017), have been protected by secure, stout, exclusion fencing erected at the recommended distance for the Root Protection Areas (RPA), in 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>

18.	<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 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>
19.	<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</p>

	<p>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>
20.	<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 the Environmental Statement 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 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</p>

	<p>requirements of the condition is so fundamental to the development permitted that it would have been otherwise necessary to refuse the whole permission.</p>
21.	<p><b>PRE COMMENCEMENT - Details of AQDMP (Dust)</b></p> <p>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 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>
22.	<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</p>



	permitted that it would have been otherwise necessary to refuse the whole permission.
23.	<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> <ul style="list-style-type: none"> <li>i) Update to the Construction Logistics Plan prepared by WSP Parsons Brinkerhoff dated June 2017 to include phased development;</li> <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>
24.	<p><b>PRE COMMENCEMENT - 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>
	<p><b>PRIOR TO ABOVE GROUND WORKS</b></p>
25.	<p><b>PRIOR TO ABOVE GROUND WORKS- Affordable Housing Strategy</b>  Prior to commencement of above ground works an affordable housing strategy shall be submitted to and approved in writing by the local planning authority relating to the provision of a minimum of 35% 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>ii. The timing of the construction of the affordable housing;</li> <li>iii. The arrangements to ensure that such provision is affordable for both initial and subsequent occupiers of the affordable housing.</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>
26.	<p><b>PRIOR TO ABOVE GROUND WORKS – Broadband Strategy</b>  Prior to the commencement of any residential development, a strategy to facilitate super-fast broadband for future occupants of the site shall be submitted to and approved in writing by the Local Planning Authority. The strategy shall seek to ensure that upon occupation of a dwelling, either a landline or ducting to facilitate the provision of a broadband service to that dwelling from a site-wide network, is in place and provided as part of the initial highway works and in the construction of frontage thresholds to dwellings that abut the highway, unless evidence is put forward and agreed in writing by the Local Planning Authority that technological advances for the provision of a broadband service for the majority of potential customers will no longer necessitate below ground infrastructure. The development of the site shall be carried out in accordance with the approved strategy.</p> <p>Reason: to accord with Site Allocation Policy TH6 and DM policies that support the provision of broadband infrastructure and economic development objectives.</p>
27.	<p><b>PRIOR TO ABOVE GROUND WORKS - Biodiversity Enhancement Plan</b>  a) Prior to commencement of above ground works, a Biodiversity Enhancement Plan (BEP) shall be submitted to and approved in</p>

	<p>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>b)</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>
28.	<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 arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime.</li> </ul> <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</p>

	<p>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>
29.	<p><b>PRIOR TO ABOVE GROUND WORKS – Updated 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 buildings to a district energy and heating network and shall seek to minimise the number of connections to a future district energy network by rationalising the number of energy centres. The strategy shall explore all reasonable options for improving the energy efficiency of the buildings 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>
30.	<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 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>

31.	<p><b>PRIOR TO ABOVE GROUND WORKS – Details of wind mitigation measures</b></p> <p>Prior to the commencement of above ground development for each building identified in Chapter 8 (ES Addendum October 2017), details of the wind mitigation measures, including any screening around balconies 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 adequate mitigation in accordance with the measures identified in the addendum to the Environmental Statement and to secure a high quality design.</p>
32.	<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>
33.	<p><b>PRIOR TO ABOVE GROUND WORKS - Secured by Design Part A</b></p> <p>Prior to carrying out above ground works of the relevant phase details shall be submitted to, and approved in writing by, the Local Planning Authority to demonstrate that such phase (and buildings contained therein) can achieve full Secured by Design Accreditation. The development shall be implemented in accordance with the approved details.</p> <p><b>Part B</b></p> <p>Prior to the first occupation of each building or part of a building or use, a 'Secured by Design' accreditation shall be obtained for such building or part of such building or use.</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>
34.	<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>All boilers 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 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>

	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).
35.	<p><b>PRE SUPERSTRUCTURE WORKS – Bus Stands</b></p> <p>Prior to the commencement of the development (excluding demolition works) a report and plans detailing the location and arrangements for delivering the replacement of the bus stands on Ashley Road shall be submitted and approved, in consultation with Transport for London. The development shall be carried out in accordance with the approved details and the bus stands on Ashley Road shall remain in situ until such time as the delivery of replacement stands has been agreed.</p> <p>Reason: To secure and deliver appropriate public transport infrastructure and to accord with London Plan Policy 6.2 Providing public transport capacity.</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>
36.	<p><b>PRIOR TO SUPERSTRUCTURE WORKS - Cycle Parking Details</b></p> <p>Prior to any superstructure works on each approved building, details of arrangements for cycle storage (including provision for a total of 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>	
35.	<p><b>PRIOR TO OCCUPATION - Estate Management &amp; Maintenance Plan</b></p> <p>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>
36.	<p><b>PRIOR TO OCCUPATION – Landscaping and play space (details)</b></p> <p>Prior to occupation, details of the children's playspace and soft</p>

	<p>landscaping provision contained within the private amenity areas, plus the details of landscape proposals for Berol Link in accordance with the Design and Access Statement (Addendum October 2017) shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>The details shall include the:</p> <ol style="list-style-type: none"> <li>location, layout, design of the playspace; and</li> <li>equipment/ features</li> <li>hard surfacing materials</li> <li>minor artefacts and structures (e.g. furniture, play equipment, refuse or other storage units, signs, lighting)</li> <li>Proposed and existing functional services above and below ground (e.g. drainage, power, communication cables, pipelines, etc, indicating lines, manholes, supports etc)</li> </ol> <p>Soft landscape details shall include:</p> <ol style="list-style-type: none"> <li>Planting plans</li> <li>Written specifications (including cultivation and other operations associated with plant and grass establishment)</li> <li>Schedules of plants, noting species, planting sizes and proposed numbers / densities where appropriate</li> <li>Implementation timetables.</li> </ol> <p>The landscaping, playspace and equipment/features shall be laid out and installed prior to the first occupation of the development. The children's playspace shall be provided strictly in accordance with the details so approved, installed/erected prior to the first occupation of the residential dwellings and shall be maintained as such thereafter.</p> <p>REASON: To secure the appropriate provision and design of children's playspace.</p>
37.	<p><b>PRIOR TO OCCUPATION – ROAD SAFETY AUDIT</b></p> <p>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 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>
38.	<p><b>PRIOR TO OCCUPATION - Details Roof Top PV Panels</b></p> <p>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</p>

	<p>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>
39.	<p><b>PRIOR TO OCCUPATION– Lighting strategy</b></p> <p>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>
40.	<p><b>PRIOR TO OCCUPATION - Car Parking Management Plan</b></p> <p>Prior to the first occupation of each approved use within the development, a Car Park Management Plan shall be submitted to the Local Planning 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 temporary parking on Berol Link 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</p>



	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.
41.	<p><b>PRIOR TO OCCUPATION - Details of Central Dish/Receiving System</b></p> <p>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> <p>Reason: to protect the amenity of the locality.</p>
42.	<p><b>PRIOR TO OCCUPATION – Delivery and Servicing Plan</b></p> <p>Prior to occupation of the development, an updated Delivery and Servicing Plan shall be submitted to and approved in writing by the Local Planning Authority and the development thereafter managed in accordance with the approved details.</p> <p>Reason: To ensure that the development does not prejudice the free flow of traffic or public safety along the neighbouring highway.</p>

## 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.

Archeaology  
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

### Ashley Road South Masterplan

#### Applications: 2044/2017 (Ashley Gardens) & 2045/2017 (Berol Yard)

This introduction summarises the wider masterplan proposals, planning history and key planning policies pertaining to both applications as part of the wider Ashley Road South Masterplan. Each individual application is assessed directly in the detailed reports that follow. This summary includes the following:

- Site and surroundings (masterplan area)
- Planning history
- Strategic development planning policy

#### Site and Surroundings

##### *Ashley Road South Masterplan*

- 1.1 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.
- 1.2 Whilst not forming all of this application(s) the wider Ashley Road Masterplan area shows emerging proposals for the land uses shown below. An Outline Application (Notting Hill Housing Ltd) relating to Buildings 2, 2A and 3 has a resolution to grant planning permission, subject to s.106 and referral to the Mayor. 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*

Table 1: Ashley Road South – portfolio approach to affordable housing

Application	Buildings	Residential units		Total	% by unit (hab rooms)	Tenure split (by hab room)
Ashley Gardens Full (BSD)	Building 1 Building 1A	377	Market	249 (737)	66% (65%)	35% AH 74% Intermediate 26% AR
			Intermediate	95 (290)	25% (26%)	
			Affordable Rent	33 (103)	9% (9%)	
			Total	377 (1,130)		
Berol Yard - Hybrid (BSD)	Building 4 (Full)	166	Build to Rent	158 (378)	95% (90%)	5% AH 100% DMR
			DMR (Intermediate)	8 (20)	5% (5%)	
			Total	166 (398)		
	Berol House (Outline)	18	Market	12 (56)	67% (65%)	35% AH 100% Int
			Intermediate	6 (30)	33% (35%)	
			Affordable Rent	0 (0)	0% (0%)	
			Total	18 (86)		
	Total: Berol Yard	184	Build to Rent	158 (378)	86% (78%)	8% AH 40% DMR 60% Int
			Market	12 (56)	7% (12%)	
			DMR (Intermediate)	8 (20)	4% (4%)	
			Intermediate	6 (30)	3% (6%)	
			Total	184 (484)		
Ashley House and Canon Factory - Outline (NHH)  (Illustrative for assessment purposes)	Building 2 Building 2A Building 3	265	Market	118 (409)	44% (50%)	50% AH 71% Int 29% AR
			Intermediate	112 (290)	42% (35%)	
			Affordable Rent	35 (121)	13% (15%)	
			Total	265 (820)		
ARS Masterplan Totals	All buildings	826	Market	379 (1,202)	46% (49%)	35% AH 854 72% Int 2% DMR 26% A/R
			Build to Rent	158 (378)	19% (16%)	
			Intermediate	213 (610)	26% (25%)	
			Affordable Rent	68 (224)	8% (9%)	
			DMR (Intermediate)	8 (20)	1% (1%)	
			Total	826 (2434)		

Building	Car Parking
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<b>Ashley Gardens</b>	28 spaces - 19 allocated as accessible spaces with flexibility for a further 9 private spaces for disabled users.
<b>Berol Yard</b>	40 spaces - 16 accessible parking spaces and a further 24 standard parking spaces
<b>Cannon Factory/Ashley House</b>	18 spaces – 13 accessible spaces with flexibility for additional 5 on Ashley Link

*Table 2: Masterplan-wide Car Parking*

Application	Building	Existing commercial floorspace (GEA)	Proposed commercial floorspace (GIA/GEA)
Ashley Gardens Full (BSD)	Building 1	7,325 sqm (Class B2/B8)	1,098 sqm (GIA)
	Building 1A		1,170 sqm (GEA)
Berol Yard - Hybrid (BSD)	NCDS	1,198 sqm (Class B2/B8)	6,000 sqm (GIA)
	Building 4		7,275 sqm (GEA)
	Berol House	4,284.7 sqm (Class B1)	629sqm (GIA) 694sqm (GEA)
Ashley House and Canon Factory - Outline (NHH)  (Illustrative for assessment purposes)	Building 2	1,748 sqm (Class B1)	725 sqm (GIA)
	Building 2A		800 sqm (GEA)
	Building 3	1,486 sqm (Class B1)	2,565 sqm (GIA) 2,800 sqm (GEA)
ARSM	All buildings (including NHH building along DLP)	16,041.7sqm (GEA) (approx)	14,334 sqm (GIA) 16,424 sqm (GEA) (2% uplift on existing GEA)
		Policy Target	Proposed commercial floorspace (GEA)
Policy Targets (DCF)	All buildings	14,729 sqm (158,549 sqft) (GEA)	16,424 sqm (12% above policy target)
Policy Targets (TAAP)	All buildings (including emerging NHH land to the south of Building 2 and 2A)	15,300 sqm (Assumed GEA)	16,424 sqm (7% above policy target)

*Table 2: Employment floorspace across ARS*

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

- 1.3 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 on Broad Lane.

Masterplan images





*The proposed National College for Digital Skills*



*Proposals for Berol Yard*



*Ashley Gardens viewed from Down Lane Park*

- 1.4 The hybrid planning application (2017/2044) by Berkeley Square Developments includes proposals for the 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 counterpoints 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.

## **2.0 Relevant Planning and Enforcement history**

- 2.1 An outline planning application with all matters reserved was submitted by Notting Hill Housing in December 2017, amended in April 2017 and subsequently granted outline planning permission subject to referral to the Mayor, S.106 and related conditions in July 2017. The outline application involved 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. The Notting Hill Housing site lies directly to the south of this detailed application and Building 2A completes the urban block to the south.
- 2.2 A planning application was submitted in January 2017 in relation to 18 Ashley Road, within the red line area defined within this application. 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.

## **3.0 Strategic Planning policy framework**

- 3.1 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*

- 3.2 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 (July 2017), Development Management Policies (July 2017), Site Allocations and Tottenham Area Action Plan (July 2017).

### *The London Plan*

- 3.3 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*

- 3.4 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*

- 3.5 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 (with consolidated alterations 2017)*

- 3.6 Haringey's Local Plan Strategic Policies document highlights the importance of growth areas within the Borough and notes that Tottenham Hale will be a key location for the largest amount of Haringey's future growth.
- 3.7 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.

- 3.8 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.

#### *Tottenham Area Action Plan (AAP)*

- 3.9 The Tottenham AAP was adopted in July 2017. 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 alongside the Tottenham AAP to articulate the spatial vision for growth.

#### *AAP Site Allocation*

- 3.10 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.

- 3.11 The site requirements for the wider site allocation TH6: Ashley Road South Employment Area are as follows:

- 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 be permitted to cross subsidise improvements to employment stock.
- 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 floorspace.
- 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.
- Further employment will be supported, with cross subsidization from residential.
- 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*

3.12 The Tottenham Hale District Centre Framework (DCF) sets out that Tottenham Hale has been identified as having the capacity for a significant number of new homes, with numerous sites that are suitable for new residential or residential-led mixed-use development. In the next 10-15 years, it is expected that 5,000 homes will come forward on these sites. A mix of housing tenures will be delivered, with emphasis on the affordable end of the market, to provide choice.

3.13 The DCF is not a Development Plan Document 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.

3.14 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*

3.15 The Streets and Spaces Strategy sets out how to improve streets and public spaces around the area to make them safer, more user-friendly and inviting. The Strategy 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*

3.16 The Green and Open Spaces Strategy suggests way to improve and protect existing green spaces. The strategy suggests making it easier to get to the Lea

Valley with new and improved connections. The Strategy speaks to the need to invest in Down Lane Park to boost sports provision and enhance the park's wildlife. The document sits below the DCF and is not a development plan document.

#### *Tottenham Strategic Regeneration Framework*

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

#### *Urban Characterisation Study*

- 3.18 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.

- 3.19 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*

- 3.20 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.
- 3.21 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.

#### **4 Legal Position relating to Heritage Assets**

- 4.1 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*

- 4.2 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.
- 4.3 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.
- 4.4 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.
- 4.5 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.

4.6 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. Policy DM9 of the Councils Development Management DPD continues this approach.

END

## **Appendix 2 – Approved Plans and drawings**

### **Plans and Drawing Numbers (as amended for approval):**

Level B1 Plan 1824-JMP-01-00-DR-A-3500 2  
Level 00 Plan 1824-JMP-01-00-DR-A-3501 4  
Level 01 Plan 1824-JMP-01-01-DR-A-3502 3  
Level 02-05 Plan (typical) 1824-JMP-01-02-DR-A-3503 3  
Level 06 Plan 1824-JMP-01-06-DR-A-3504 2  
Level 07 Plan 1824-JMP-01-07-DR-A-3505 3  
Level 08 Plan 1824-JMP-01-08-DR-A-3506 3  
Level 09 Plan 1824-JMP-01-09-DR-A-3507 3  
Level 10 Plan 1824-JMP-01-10-DR-A-3508 3  
Roof Plan 1824-JMP-01-RF-DR-A-3509 1  
Building 1: North and South Elevations 1824-JMP-B1-NS-DR-A-4001 2  
Building 1: East and West Elevations 1824-JMP-B1-EW-DR-A-4002 2  
Building 1A: North and South Elevations 1824-JMP-B1A-NS-DR-A-4101 2  
Building 1A: East and West Elevations 1824-JMP-B1A-EW-DR-A-4102 2  
Building 1: Sections AA and BB 1824-JMP-B1-AB-DR-A-5001 3  
Building 1: Sections CC and DD 1824-JMP-B1-CD-DR-A-5002 3  
Building 1A: Sections AA and BB 1824-JMP-B1A-AB-DR-A-5101 2  
Building 1A: Section CC 1824-JMP- B1A-CC-DR-A-5102 2

### **Site and Survey Details**

Site Location Plan 1824-JMP-XX-XX-DR-A-0001  
Site Plan – Existing 1824-JMP-01-XX-DR-A-0002  
Site Plan – Proposed 1824-JMP-01-XX-DR-A-0003  
Site Plan – Demolition 1824-JMP-01-XX-DR-A-1001

### **Masterplan Drawings (with existing context) – For Approval**

Masterplan: Level 00 Plan 1824-JMP-01-00-DR-A-2000 Rev 1  
Masterplan: Level 02 Plan 1824-JMP-01-02-DR-A-2001  
Masterplan: Roof Plan 1824-JMP-01-RF-DR-A-2002  
Masterplan: North-West Elevations 1824-JMP-01-NW-DR-A-2100  
Masterplan: North – South Sections 1824-JMP-01-S1-DR-A-2200 Rev 1  
Masterplan: East - West Sections 1824-JMP-01-S2-DR-A-2201

### **Masterplan Drawings (with emerging context) – For Illustrative Purposes**

Masterplan: Level 00 Plan 1824-JMP-01-00-DR-A-2500 Rev 2  
Masterplan: Level 02 Plan 1824-JMP-01-02-DR-A-2501 Rev 1  
Masterplan: Roof Plan 1824-JMP-01-RF-DR-A-2502 Rev 1  
Masterplan: Elevations 1824-JMP-01-ES-DR-A-2600  
Masterplan: North – South Sections 1824-JMP-01-S1-DR-A-2700  
Masterplan: East - West Sections 1824-JMP-01-S2-DR-A-2701

### **General Arrangement Plans (existing context) – For Approval**

Composite plan: Level B1 Plan 1824-JMP-01-B1-DR-A-3500 Rev 2

### **General Arrangement Plans (emerging context) – For Illustrative Purposes**

Level B1 Plan 1824-JMP-01-B1-DR-A-3600  
Level 00 Plan 1824-JMP-01-00-DR-A-3601 Rev 1



Level 01 Plan 1824-JMP-01-01-DR-A-3602  
Level 02-05 Plan (typical) 1824-JMP-01-02-DR-A-3603  
Level 06 Plan 1824-JMP-01-06-DR-A-3604  
Level 07 Plan 1824-JMP-01-07-DR-A-3605  
Level 08 Plan 1824-JMP-01-08-DR-A-3606  
Level 09 Plan 1824-JMP-01-09-DR-A-3607  
Level 10 Plan 1824-JMP-01-10-DR-A-3608  
Roof Plan 1824-JMP-01-RF-DR-A-3609

**Elevational Details – For Approval**

Building 1: Typical Bay 1824-JMP-B1-XX-DR-A-6001  
Building 1: Typical Bay 2 1824-JMP-B1-XX-DR-A-6002  
Building 1: Typical Bay 3 1824-JMP-B1-XX-DR-A-6003  
Building 1A: Typical Bay 1824-JMP-B1A-XX-DR-A-6101

**Landscape Drawings for approval:**

Landscape Plan – 00 449-02-100 Rev B  
Landscape Plan – Berol Link East 449-02-110 Rev B  
Landscape Plan – Berol Link West 449-02-111 Rev B  
Landscape Plan – Down Lane Park Walk 449-02-112 Rev B  
Landscape Plan – Ashley Road 449-02-113 Rev B  
Landscape Plan – 01 Building 1 449-02-120 Rev A  
Landscape Plan – Roof Building 1A 449-02-130 Rev A  
Landscape Plan – Roof Building 1 South 449-02-131 Rev A  
Landscape Plan – Roof Building 1 North 449-02-132 Rev A  
Planting Plan – 00 449-02-501 Rev B  
Planting Plan – 01 449-02-502 Rev A  
Planting Plan – Roof Building 1A 449-02-503 Rev A  
Planting Plan – Roof Building 1 South 449-02-504 Rev A  
Planting Plan – Roof Building 1 North 449-02-505 Rev A  
New Tree Planting – 00 449-02-551 Rev B  
New Tree Planting – 01 449-02-552 Rev A  
New Tree Planting – Roof Building 1A 449-02-553 Rev A  
New Tree Planting – Roof Building 1 South 449-02-554 Rev A  
New Tree Planting – Roof Building 1 North 449-02-555 Rev A

### Appendix 3 – Consultation Responses

Objection from 3 Suffolk Road	Officer response
Objection to the planned development, along with other major residential developments that have recently been made. 1000's more people to be living in the borough without any more provision for schools, parks, workspaces, roads or space.	The cumulative impact of the development, together with other applications across Ashley Road South Masterplan has been assessed as part of the Environmental Statement. Where required, direct mitigation is secured as part of the proposed conditions and s.106 agreement.
The planned size of the development will overshadow everything around it and will be an eyesore being so much taller than any of the buildings nearby.	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.
This part of Tottenham near the highway is already very congested for trucks and traffic. I don't think it's fair to expose residence to this level of air pollutions with seemingly no plan to counteract it or any plan to alleviate the already heavy traffic running through the area. Only adding more people and more traffic into an already over developed area.	Due to the limited amount of car parking proposed the highways impact is acceptable. 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.
These light industrial areas in Tottenham provide an opportunity for growth and business in the local economy, already the studios locally provide employment and give needed life to local business. a huge building like this although it says it has commercial space on the ground floor we all know this means another Tesco local or similar killing local business.	Ashley Road South Masterplan will provide a range of new business premises, providing higher quality accommodation than currently provided with no overall net loss of commercial space.
<b>North London Waste Authority (Berol House)</b>	
The NLWA is concerned about losing the ability to	The application the subject of

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.	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 Yard are the subject of a separate application.
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.
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 will be the subject of a s.278 agreement with the Highways Authority. 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 employment location.	Changes to Ashley Way and the proposed one-way flow will impact upon staff and visitors visiting Berol House. 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 site by public transport and the scheme's benefits derived from making Ashley Way more pedestrian-friendly the benefits are considered to outweigh the dis-

	benefits.
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.	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.
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.	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.
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.	These issues are the subject of a separate planning application relating to Berol Yard.
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.	These issues are the subject of a separate planning application relating to Berol Yard.
The NWLA object to the development of the top floor/roof of Berol House and any principle of development to Berol House being established through this application.	These issues are the subject of a separate planning application relating to Berol Yard.
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.	
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### ***Appendix 3 Notes from DM Forum 24 April 2017 (relating to wider masterplan)***

The wider issues associated with the Ashley Road Masterplan were considered at a Development Management Forum meeting held in April 2017.

<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 is the subject of a separate planning application for Berol Yard.
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>Amenity space/community uses &amp; benefits</b>	
Question – there was very little mention of space for families and children. Why not?	The on 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.
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/Berol 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 community space? Who will be able to use the spaces and how will it be managed?	The on 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.
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	A range of house types and sizes has been secured including a larger number of duplex family units.
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 4 – GLA Stage 1 Report

GREATER LONDON AUTHORITY

planning report D&P/4336/01

29 August 2017

### **Berol Yard, Tottenham Hale**

in the London Borough of Haringey

planning application no. HGY/2017/2044

<b>Strategic planning application stage 1 referral</b> Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.
<b>The proposal</b> A hybrid planning application consisting of: <ul style="list-style-type: none"><li>• A full application for the demolition of the existing buildings (apart from Berol House) and erection of two buildings of between 8 and 14 storeys, providing 156 residential units, 891 sq.m. of flexible commercial floorspace, 7,275 sq.m. of education floorspace, car and cycle parking, open space, landscaping and associated work.</li><li>• An outline application, with all matters reserved, for the conversion of Berol House to provide up to 3,605 sq.m. of flexible commercial floorspace; a 2 storey roof level extension, containing up to 18 residential units; cycle parking and associated works.</li></ul>
<b>The applicant</b> The applicant is <b>Berkeley Square Developments</b> , and the architect is <b>John McAslan &amp; Ptnrs.</b>
<b>Strategic issues summary</b> <b>Principle of development:</b> The principle of mixed residential, educational, and commercial use for the site is supported; however, the applicant should provide details on the relocation plans and assistance for all current occupiers of the site. The Council should secure a minimum B1 floorspace requirement and confirm that a workspace provider has been secured. Affordable workspace provision should be considered in viability discussions, particularly in view of existing provision and proposed occupiers. (Para's 22-28.) <b>Affordable housing:</b> 14% (by habitable room), made up of 100% intermediate shared ownership. This offer, on a site within an Opportunity Area and a Housing Zone that has been in low grade employment use, is wholly unacceptable and should be significantly increased, particularly given the high-density nature of the proposal. GLA officers will robustly scrutinise the viability assessment to maximise affordable housing provision, including possibilities for grant funding, and in the context of the Mayor's Affordable Housing and Viability SPG. Early and late viability reviews must be secured in accordance with the SPG. (Para's 29-32.) <b>Urban design and tall buildings:</b> The proposals are generally of a high quality; however, further consideration of east-west connections across the site; ground floor layouts; and public realm around the College is required. (Para's 39-45.) Outstanding issues on <b>inclusive design, transport, and climate change</b> should be addressed.
<b>Recommendation</b> That Haringey Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 64 of this report; however, the possible remedies set out in that paragraph could address these deficiencies.

## Context

1 On 12 July 2017, 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 30 August 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 As part of the wider masterplan discussed under 'site description' below, Clause 2 of 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 1.15 hectare application site forms part of the wider Ashley Road South Masterplan area occupying 2.67 hectares. The masterplan site consists of four development parcels:

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. A



hybrid application has been submitted for this site alongside this application (GLA Ref: 4336).

4. Cannon Jersey Factory, a two-storey building in use by a fabric manufacturer; a neighbouring warehouse occupied by a steel fabrication company; and a low-rise warehouse building in use as an indoor climbing centre. This forms the current application site, which lies in the north-west corner of the masterplan, to the west of Ashley Road.

8 An application by Notting Hill Housing for development parcels 1 and 2 (GLA Ref: D&P/4177) was considered by the Council on 18 July 2017, which resolved to grant permission, subject to conditions, agreement of a section 106 agreement, and referral to the Mayor. Section 106 agreement negotiations are ongoing.

9 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 masterplan site is a petrol garage on the west side of Ashley Road and a single row of terraced houses fronting onto Hale Road; a number of small industrial buildings, some in use for other purposes such as the Styx music venue; 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 pre-school.

10 The site lies just to the north of a potential District Centre, as identified in the Tottenham Area Action Plan. The site is also within the Tottenham Housing Zone and the Upper Lee Valley Opportunity Area.

11 The nearest station is Tottenham Hale, which is approximately 300 metres to the south-east, providing access to rail services between 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 services. The nearest bus stops are approximately 100 metres away on Watermead Way, served by route 192. Consequently, the public transport accessibility level of the site ranges from 6a in the south, to 5 to the north (on a scale of 1 to 6, where 6 is excellent, and 1 is very poor).

### **Details of the proposal**

12 The application seeks to demolish the existing buildings and erect two buildings to provide 377 residential units, 1,211 sq.m. of flexible commercial floorspace (Class A1/A3/B1/D1), new public realm, landscaped amenity space, car and cycle parking and associated work.

13 Building 1, on the northern part of the site, is a courtyard building of between 8 and 10 storeys, containing 276 units, with 710 sq.m. of commercial floorspace (flexible Use Class A1/A3/B1/D1) along Ashley Road and the proposed 'Berol Link' public space to the south. Car parking is proposed at ground floor level underneath a raised podium, with communal amenity space above.

14 Building 1A, to the south of the Berol Link, is of a linear mansion block typology of between 6 and 8 storeys, forming the northern half of a courtyard building, with the southern half formed by Building 2A as part of the Notting Hill Housing application referred to above (GLA Ref: D&P/4177). It has been designed to act as a standalone building, but also to form an integrated courtyard block. The building contains 501 sq.m. of commercial floorspace (flexible Use Class A1/A3/B1/D1) bordering Ashley Road and the Berol Link at ground floor level, and 101 residential units above.

15 A single storey pavilion is proposed forming a cafe/retail unit set within the proposed Berol Link. Berol Link, in between Buildings 1 and 1A, will be a pedestrian and cycle route that links Down Lane Park to the west, to Ashley Road, with the intention to connect through an opening in Berol House, to the east.

16 The section of Ashley Road within the masterplan site boundary is included within the red line boundary for Ashley Gardens application site.

17 The Berol House hybrid application (GLA Ref: D&P/4336), submitted alongside this application, proposes:

- A full application for the demolition of the existing buildings (apart from Berol House) and the erection of two buildings of between 8 and 14-storeys, providing 156 residential units, 891 sq.m. of flexible commercial floorspace, and 7,275 sq.m. of education floorspace in the 7 storey National College for Digital Skills.
- An outline application for the conversion of Berol House to provide up to 3,685 sq.m. of flexible commercial floorspace, and a 2-storey roof level extension with up to 18 residential units.

## Case history

18 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; 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

19 The relevant issues and corresponding policies are as follows:

- |                        |                                                                                                                                                                |
|------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| • Opportunity Areas    | <i>London Plan</i>                                                                                                                                             |
| • Employment           | <i>London Plan</i>                                                                                                                                             |
| • Housing              | <i>London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG</i> |
| • Affordable housing   | <i>London Plan; Housing SPG; Affordable Housing and Viability SPG; Housing Strategy</i>                                                                        |
| • Historic environment | <i>London Plan</i>                                                                                                                                             |

- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG*
- Transport *London Plan; the Mayor's Transport Strategy*
- 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*

20 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 Alterations to Strategic Policies (July 2017), the Saved Policies within the Unitary Development Plan (July 2017), the Site Allocations DPD (July 2017), the Development Management DPD (July 2017), the Tottenham Area Action Plan (July 2017), and the London Plan (Consolidated with Alterations since 2011).

21 The following are also relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance.
- The Upper Lee Valley Opportunity Area Planning Framework (ULV OAPF) (July 2013).
- Tottenham Hale District Centre Framework (2015).

## **Principle of development**

### Residential uses

22 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 identifies the site as part of site TH6 Ashley Road South Employment Area, including 444 residential units. The proposal for 377 residential units is supported in line with these policies.

### Non-residential uses

23 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 Area Action Plan identifies the site as part of site TH6 Ashley Road South Employment Area, including 15,300 sq.m. of employment floorspace.

24 The existing site is currently occupied by 7,325 sq.m. of commercial/ industrial floorspace (Class B1/B2/B8), and an associated yard used for car parking. Cannon Street Jersey Fabrics is consolidating its operations in existing premises in the north of England, and will be vacating the site in the near future. The applicant must provide further details on the relocation plans for the other occupiers of the site and full details of the assistance that will be provided. The existing buildings will be demolished and new buildings constructed with 1,211 sq.m. of commercial floorspace (flexible Use Class A1/A3/B1/D1) at ground floor level. Although there will be a significant decrease in employment space on this application site, it is recognised that

and Ashley Gardens application sites, it is estimated that 162 existing FTE jobs are expected to be replaced by 395 FTE jobs.

26 The proposals will deliver significant qualitative improvement in the commercial space on the site; replacing low grade accommodation with high quality units designed to appeal to a range of prospective end users. Although the employment space will be of a different nature to that existing, it is recognised that no local or strategic protections are in place for the current use, and there will be an overall uplift in floorspace and employment capacity across the masterplan. However, the Council must secure a minimum B1 floorspace requirement, and subject to further discussions on the relocation and retention strategy, must secure measures to assist existing occupiers. Although the Council has no specific requirement, together with the assessment of affordable housing, consideration should also be given to affordable workspace provision, particularly considering the existing provision of affordable workspace in Berol House. The applicant must also confirm that a workspace provider has been secured, to ensure that the new commercial space is designed as flexibly as possible.

27 The Styx live music venue is located immediately to the south of the site; however, this is a meanwhile use with temporary permission granted for 2 years to November 2018. The proposed uses on the site would come forward after that permission has expired and no mitigation is therefore required.

28 The College will be a major local benefit in terms of education and employment, and is strongly supported in line with London Plan Policy 3.18 'Education Facilities'.

## Affordable housing

29 The proposal includes 174 residential units, as set out below:

	Full application		Outline application (indicative)		
Unit size	Intermediate (shared ownership)	Market	Intermediate (shared ownership)	Market	Total
1 bed	6	60	0	0	74 (43%)
2 bed	7	59	0	2	60 (39%)
3 bed	2	14	6	10	32 (18%)
<b>Total</b>	<b>15 (10% by hab room)</b>	<b>141</b>	<b>6 (34% by hab room)</b>	<b>12</b>	<b>174</b>
					<b>14% affordable</b>

30 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 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 or have a late stage review. The SPG also sets out a preferred tenure split of at least 30% low cost rent (social 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, with more flexibility in Opportunity Areas.



31 The application proposes 14% affordable housing, made up of 100% intermediate shared ownership, with only 10% in the full element of the application. This offer, on a site within an Opportunity Area and a Housing Zone that has historically been in low grade employment use, is wholly unacceptable and should be significantly increased. The lower affordable offer with 100% intermediate tenure, raises particular concerns when compared to the accompanying Ashley Gardens application, which includes a higher affordable offer with affordable rent tenure. GLA officers will robustly scrutinise the viability assessment to maximise affordable housing provision, including a review of tenures and unit sizes, possibilities for grant funding, and in the context of the Mayor's Affordable Housing and Viability SPG.

32 The Tottenham AAP confirms that the housing priority in this area is for intermediate accommodation, due to the existing concentration of social housing in Tottenham. It is noted that the other applications within the masterplan area are providing other affordable tenures and the affordable housing tenure split (70% intermediate/30% affordable rent) across the masterplan area is consistent with the agreed 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 Housing Zone-wide target. Subject to an increase in the total affordable housing offer and the outcome of viability review, the provision of 100% intermediate tenure on this site may therefore be acceptable. The Mayor's Affordable Housing and Viability SPG makes clear that intermediate tenures must be genuinely affordable and the applicant should provide further details of the proposed household income ranges for the intermediate units proposed, taking account of guidance in the Mayor's SPG. The requirement for review mechanisms as set out in the Mayor's SPG must also be met.

## **Housing**

### Housing Choice

33 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 proposals include a good range of unit sizes in the context of the proposed tenure, subject to an increase in the affordable offer and viability review.

### Density

34 London Plan Policy 3.4 'Optimizing 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.

35 The density is stated as 149 units, or 412 habitable rooms, per hectare; however, the density should be calculated according to the methodology set out under paragraph 1.3.72 of the Mayor's Housing SPG, in order to take account of the mixed-use nature of the proposals. This will more accurately reflect the impact of the non-residential uses, and in particular the College, in terms of scale and massing, and increased activity.

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.

34 The child yield is expected to be 83 children, with 46 under-fives. The proposal includes 597 sq.m. of under-fives play space in the courtyard and on roof terraces, with the illustrative proposals demonstrating how this could be delivered. It is also recognised that the play and sport facilities and open spaces of Down Lane Park are adjacent to the site, providing facilities for older children. The proposals are therefore acceptable.

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

35 The layout for the application site has been developed in conjunction with the neighbouring sites within the masterplan and in discussion with GLA and Council officers, which broadly meets that identified in the Tottenham District Centre Framework. The application delivers the 'Berol Link' between the two proposed blocks, which is strongly supported, providing a landscaped public space connecting Ashley Road to Down Lane Park, and linking further east as part of the accompanying Berol Yard application. The inclusion of a pavilion building in the Berol Link is questioned, since it blocks east-west views and may undermine demand for adjacent commercial units in Buildings 1 and 1A. The applicant should provide further justification or revise the proposals.

36 The simple arrangement of perimeter blocks is an efficient use of the site, creating a clear delineation between public and private realm, with high levels of active frontage to both blocks. The inclusion of duplex units along the north side of Building 1, adjacent to the park edge, creates a strong residential character. Units along the western edge of Building 1 also benefit from individual entrances fronting the park. Should the mix of units be revised, the introduction of further duplex units in this location should be considered.

37 The distribution of residential cores generally creates efficient internal layouts. The introduction of a break in the southern wing of Building 1 allows single aspect units facing north into the courtyard to be avoided; however, there is some concern about east/west single aspect units facing into the courtyard at lower levels. The applicant should provide further analysis to demonstrate that the units will achieve a good residential quality. Layout revisions may be required.

38 Although a number of north-facing single aspect units are included in Building 1, they will face onto the open green spaces of Down Lane Park and will therefore achieve an acceptable outlook and daylight levels. However, north-facing single aspect units in Building 1A facing onto the Berol Link raise some concerns as they are of limited outlook and face the 8-10 storey Building 1. As set out in the Mayor's Housing SPG, the use of bay windows or setbacks are not recognised as providing the full benefits of dual aspect units. The applicant should provide further analysis to demonstrate that these units will achieve a good residential quality, in line with Standard 29 of the Mayor's Housing SPG.

39 While there are instances where up to 12 units sharing the same core on each floor exceeds the Housing SPG standard of 8; locating the cores at the corners of blocks allows corridors to be separated into two, avoiding long corridors with multiple doors. This approach is supported; however, the applicant must consider revising layouts in order to introduce natural ventilation and daylight penetration to cores.

40 Both blocks allow for high quality courtyard amenity space for residents. Breaks in the south and east wings of Building 1 above ground floor level, with significant set-backs from level 7, allow sufficient levels of light to reach the raised podium level courtyard.

41 The public realm strategy improves the pedestrian environment along Watermead Way, which is strongly supported, along with the provision of an appropriate degree of enclosure to Berol Yard North, flanked with commercial frontages. The arrangement allows acceptable levels of daylight/sunlight to penetrate to the public amenity space, although the proposed use of large conifers is questioned due to overshadowing. Berol Yard South is less successful, being dominated by car parking, surrounded by servicing uses, blank frontages to the College, and with no pedestrian routes or spaces. Given the scale and ambition of the College, further work is needed to demonstrate that the public realm surrounding it is designed to accommodate the uplift in pedestrian flow that will be generated. The proposal also relies on the site immediately to the south, outside of the application boundary, to deliver a public space to address the main entrance of the building. The applicant must demonstrate how a suitably sized and high quality area of public realm can be delivered to provide the College with an appropriate civic presence, both with the existing buildings and uses to the south, as well as future development scenarios.

42 The simple layout and location of cores creates good residential quality in Building 4 overall. Single aspect north-facing units are avoided, although the layout results in a large proportion of single aspect units facing onto the heavily-trafficked Watermead Way. In response to this, all units facing Watermead Way have additional internalised space instead of external balconies, which is supported. Residential layouts in the Berol House extension are arranged around a new central core, splitting the first residential floor into two naturally ventilated corridors of eight duplex units, with roof pavilions and terraces. Residential quality is controlled through the accompanying design guidelines.

43 The massing and heights strategy is broadly supported. The 12-14 storey Block 4, together with the block to the north of the site proposed as part of the Notting Hill Housing application, results in a lengthy continuous elevation along Watermead Way; however, this is relieved by the use of set-backs, which breaks the mass into three vertical elements, avoiding the appearance of a singular building mass. The applicant should consider the comments raised above relating to the ground floor of the 14-storey element to ensure that the prominent south-east corner of the block is designed to positively address the public realm.

44 The use of high quality brickwork and simple articulation/detailing is welcomed. The key elevations will rely on the quality of detailing (including depth of window reveals, brick detailing and balcony treatments) to achieve the high standard of architecture required, which must be secured in any permission.

45 The distinctive form of the College building creates a landmark building for Tottenham Hale and the innovative architectural approach is welcomed. However, further consideration is required to ensure that the podium base does not turn its back onto Berol Yard South. Accentuating the secondary access and access to the podium deck, while allowing greater visual connection into the building would help to achieve this. As stated above, the setting of the building also requires further consideration.

## Historic environment

46 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should *"have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"* and in relation to conservation areas, special attention must be paid to *"the desirability of preserving or enhancing the character or appearance of that area"*. London Plan Policy 7.8 'Heritage Assets and Archaeology' states that development should identify, value, conserve, restore, re-use and

the proposals adjacent to public transport, this is acceptable in this case. As Building 1A is expected to be built out before Building 1 is complete, temporary accessible parking will be provided within the area of land that will eventually become the Berol Link.

## **Transport**

47 A total of 68 car parking spaces are proposed; 40 within the Berol Yard application and 28 within the Ashley Gardens application, with Blue Badge provision as set out above. The management of the demand responsive accessible parking proposal must be clearly set out in the car park management plan, which should be secured by condition. The electric vehicle charging proposal of 20% active plus 20% passive meets London Plan policy.

48 In line with the Mayor's ambition to make streets more attractive for active travel, the Council should secure contributions for local enhancements to the pedestrian environment, including wayfinding.

49 The full delivery and servicing plan should be secured by planning condition, in accordance with London Plan Policy 6.14 'Freight'. The construction logistics plan should be secured by pre-commencement condition and the travel plan should be secured through the section 106 agreement.

50 A total of 639 cycle parking spaces are proposed, comprised of 601 long-stay and 38 short-stay, which meets London Plan standards. However, primary access to basement level cycle parking via stairs is unacceptable, and must either be via ramp (the preferred option) or lift. Guidance in the London Cycle Design Standards must be followed.

51 The Ashley Road public realm proposals fall within the red line boundary of all three masterplan applications. Clarification should be provided as to how the works will be co-ordinated and delivered. Furthermore, limited, and sometimes contradictory, information is provided in the application documents regarding the design and treatment of Ashley Road, which should be clarified. As agreed with the Council, conditions must protect the bus stands on Ashley Road and Burdock Road.

## **Climate change**

### Energy

52 Based on the energy assessment submitted, further information is required on overheating, performance calculations, the district heating network, and the site energy network before the proposals can be considered acceptable and the carbon dioxide savings calculated and verified. Two separate energy centres to serve buildings 1 & 1A are not acceptable. Full details have been provided to the applicant. The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 200 sq.m. of photovoltaic panels, which is welcomed.

### Climate change adaptation

53 The area is within Flood Zone 2 and has some areas with a low risk of surface water flooding. The Flood Risk Assessment confirms that the site ground levels are above the modelled 1:1,000-year flood event, considering the presence of flood defences. Therefore, the proposals are compliant with London Plan Policy 5.12 'Flood Risk'



54 Although the site is generally at low risk of flooding, other locations in the local vicinity have a significant risk of surface water flooding. The Outline Drainage Strategy aims for three-times greenfield run-off rates, using a combination of green roofs, raingardens and tanked storage, which is acceptable in terms of London Plan Policy 5.13 'Sustainable Drainage'.

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

55 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. An October Committee date is expected.

### **Legal considerations**

56 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**

57 There are no financial considerations at this stage.

### **Conclusion**

58 London Plan policies on Opportunity Areas; employment; affordable housing; housing; urban design and tall buildings; historic environment; inclusive design; transport; and climate change are relevant to this application. The application does not comply with the London Plan for the reasons set out below; however, the possible remedies stated below could address these deficiencies:

- **Principle of development:** The principle of mixed residential and commercial use for the site is supported; however, the applicant must provide further details on the relocation plans for all current occupiers of the site and the assistance that will be provided. The Council should secure a minimum B1 floorspace requirement and confirm that a workspace provider has been secured. Consideration should be given to affordable workspace provision.
- **Affordable housing:** 21.5% (by habitable room), split equally between intermediate shared ownership, and affordable rent. This offer, on a site within an Opportunity Area and a Housing Zone that has been in low grade employment use, is wholly unacceptable and should be significantly increased, particularly given the high-density nature of the proposal. GLA officers will robustly scrutinise the viability assessment to maximise affordable housing provision, including possibilities for grant funding, and in the context of the Mayor's Affordable Housing and Viability SPG. Early and late viability reviews must be secured in accordance with the SPG.

- **Urban design and tall buildings:** The applicant should provide further justification for the Berol Link pavilion or revise the proposals. The applicant should provide further analysis of residential quality of single aspect units, or revise layouts, and must consider revising layouts in order to introduce natural ventilation and daylight penetration to cores exceeding 8 units per core.
- **Inclusive design:** The applicant should confirm that accessible units are spread across unit sizes and tenures and demonstrate that layouts of both accessible and easily adaptable units are accessible. The Council should secure M4(2) and M4(3) requirements by condition.
- **Transport:** The management of the demand responsive accessible parking proposal must be clearly set out in the car park management plan. Conditions must protect the bus stands on Ashley Road and Burdock Road. The Council should secure contributions for local enhancements to the pedestrian environment. The full delivery and servicing plan, and construction logistics plan should be secured by condition. The travel plan should be secured through the section 106 agreement. Primary access by stairs to basement level cycle parking is unacceptable, and must be amended. Further information is required regarding the design of Ashley Road.
- **Climate change:** Further information on overheating, performance calculations, the district heating network, and the site energy network has been requested from the applicant, which is required before it can be confirmed that the application meets London Plan requirements. Two separate energy centres to serve buildings 1 & 1A are not acceptable.

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