

Appendix 1: Consultation Responses from internal and external agencies

Stakeholder	Question/Comment	Response
INTERNAL		
Design Officer	<p>Height</p> <ul style="list-style-type: none"> · The principle of a tall building at this location is long established by a number and variety of different documents that have been consulted on and approved by the council previously, from the Tottenham Hale Urban Centre Masterplan, October 2006, now superseded by the Tottenham AAP, adopted July 2017, carrying forward the same vision, and in the original Hale Village Outline Planning Permission, and · The outline permission was for a tower on this site of 18 storeys height, along with and in deliberate contrast to blocks of 6-8 storeys (10 along the railway edge) on the remainder of Hale Village. All the other sites within Hale Village have been granted reserved matters consent and been or are being built out, but generally with one or two extra floors to the masterplan. · Since the adoption and granting of planning permission of the two masterplans, economic growth across London, increasing housing need, transport improvements, lifestyle changes and greater expectations of density have led to increased building height expectations at key highly connected growth points like Tottenham Hale, reflected in more recent revisions to the London Plan and Haringey's Local Plan. · Of greater significance, the vision for height across the Tottenham Hale Urban Centre, envisaged in the District Centre Framework (DCF), adopted December 2015, and now in the Tottenham Area Action Plan (AAP), adopted July 2017, to be a spaced out cluster of high-rise buildings rising to the highest points around the public transport interchange that is Tottenham Hale national 	<p>Comments noted. Materials to be controlled by condition 5.</p>

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	<p>rail, underground and bus station. This site is the closest high-rise development site to the transport interchange. The intended profile is best illustrated on pages 82-3 of the DCF.</p> <ul style="list-style-type: none"> · With high-rise buildings of 21 storeys at 1 Station Square and 22 storeys at Hale Wharf approved in the last year, it is expected that this site should go higher to maintain the intention for heights to build up towards the interchange. <p>Scale, Bulk and Massing</p> <ul style="list-style-type: none"> · I consider the profile and form of the tower to be commendably elegant, with a high degree of slenderness that is considered to give a high-rise building the most satisfying appearance from middle and long distant observation points. As a slender profile tower, it is unlikely to “block out” a significant part of the sky from most viewing points. · The plan form of the tower, as a faceted triangle, will present a comparatively slender form from all viewing points, unlike a more “slab-like” plan form. · The faceted ends of the tower at its western and south-eastern points, will present a particularly slender and elegant face to the two most significant views of the tower, from approaches along Ferry Lane and from the Tottenham hale Station Square. This is illustrated particularly well on pages 13 and 15 of the applicants Design and Access Statement. · The height of the tower is substantially mitigated at close-to, where that could appear oppressive and alien to human scale, with the addition of a substantial podium floor extending beyond the tower plan form on all sides and 	

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	<p>taking the building plot up to more appropriate building edges to enclose surrounding streets and the square propose for its western edge.</p> <ul style="list-style-type: none"> · This proposed square will form an “entrance square” to Hale Village, a space to mark the new eastern entrance to Tottenham Hale Station and a sitting-out space for the planned restaurant in the western half of the ground floor, animating and enlivening the street scene. · The form of the southern side of the podium tapers away from the line of Ferry Lane westwards, but by less than the taper in the line of the tower itself. These together will allow unfolding of views of the station and allow a green screen of trees and planters between the busy road, pedestrians and the residential building. · The form of the northern side of the podium curves to follow the line of the street, again contrasting with and emphasising its difference to the tower, whilst the east side forms a simple straight street. · The key visual refinement to the form of the tower is the indenting of the façades to the longer southern, eastern and northern faces in a series of bays. These create bay windows and balconies for the flats, but from the point of view of form, sculpt the facades and accentuate the tower’s verticality. · The tower form is further modified by the inclusion of a “sky garden” level at Level 11. This breaks up the tower form on its three main facades with a substantial break about a third of way up, in my view improving its sense of being well proportioned. Buildings of this scale appear more satisfying in longer views when their scale is mitigated at greater than the floor-by-floor scale, where expression and differences can appear relentless and repetitive. Instead, the tower has a substantial break, which “cuts into” the façade of either side, disrupting the otherwise repetitive fenestration pattern 	

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	<p>and the vertical banding of the bays, as well as creating a shelf to the east side.</p> <ul style="list-style-type: none"> · The difference between the broader thickness of the tower up to the sky garden level and its skinnier profile above also reflects its changing context, from where it sits within and amongst the medium rised existing blocks of Hale Village, forming enclosed urban blocks, to where it rises above the rooftops, to where it sits in thin air, only (eventually) surrounded by a few other, much more distant, high-rise towers. · The final significant formal element of the design is the way the “top” is celebrated, made special and distinctive. This is done by extending the bays to create a “castellated” parapet. This is achieved by extending the cladding a floor extra on outer bay elevations than on the inner facades. Further detailed refinements in materials to the top two residential floors pick out the distinctiveness of the top some more, as described below. <p>Detailed Design</p> <ul style="list-style-type: none"> · There will be a distinct and different elevational treatment, palette of materials and detailing to the podium and main body of the tower. The podium will be a predominantly glazed façade, with curtain walling and glazed doors into commercial premises, creating maximum transparency to the activities within and a sense of a lively but dignified arcade façade where it is most directly engaged with a busy, pedestrian oriented public realm. · The top of the podium has been the subject of further discussions between us and the applicants, after submission of the application, to ensure the podium and in particular its parapet had sufficient height and a sufficiently bold profile to give it a presence and emphasis from close-to, street level 	

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	<p>views, so that the podium dominates at street level and so that its proportioning is satisfying, and avoids looking “spindly”, in itself. I am happy that the modified form now achieves this and will ensure that in its human scale and physical presence, the podium will form an excellent transition between the street scale and tower.</p> <ul style="list-style-type: none"> · The podium roof is also landscaped, with a “green roof” of decent depth, to grow not just sedum but a wildflower meadow, with occasional taller bushier plants. It will therefore be a pleasant outlook for the lower flats and for the public at street level. · The main body of the tower is detailed in a repetitive, glassy, striated façade system of floor to ceiling glazing between bright white metal cladding. Although I have always been concerned this could be over-repetitive, I have to admit this is likely to be elegantly and slickly detailed and to provide a great unifying effect. Cladding panelling is arranged to pick out floors as continuous pieces of horizontal emphasis, with solid panels between windows of a more vertical emphasis. · Although detailing and materials should be subject to conditions, to be resolved by detailed design by specialist manufacturer as part of the construction works, I am confident they could be designed and installed to be finely and elegantly detailed to be robust, resistant to staining, discolouration and fire spread. · The bays as the key distinctions of the longer façade enliven and distinguish each façade, with on the southern façade having open balconies between the bays, the northern and eastern façade having their amenity internalised in wider bay windows, with the recesses between forming continuous vertical slots, and with the narrow facet ends of the tower, the 	

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	<p>western and south-eastern corners, being full width balconies.</p> <ul style="list-style-type: none"> · Balcony soffits are exploited as an opportunity for further contrasting detailed embellishment, with darker, coloured fibre-cement boards in changing colours, with a darker, richer red to the lower floors (up to sky garden level), a greyer-brown to the upper-middle levels and a lighter, yellower-brown to the top two floors. I am confident this will enrich the elevational appearance. · As mentioned above the sky garden forms a break in the overall tower sculptural form at about one third of its height. It will also be able to be lushly planted with bushes and small trees, further breaking up the length of the façade, sufficient to be visible from ground level. · Balustrades are patterned with a twisted weave pattern inspired by furniture historically manufactured on site by the Harris Lebus company <p>Key Views</p> <ul style="list-style-type: none"> · The proposal would clearly be visible from a wide range of locations across a wide area. However, there are not many heritage asserts nearby or likely to be such that the proposal would disturb important views from within their settings. Public open space and important streets are more likely to be effected. · In particular, the wide open spaces of the Lee Valley, containing a continuous range of open land, some used as public parks and recreation grounds (and therefore accessible), many with wildlife and biodiversity significance, designations and protections, much also currently used for water industries, but also planned to become a large continuous accessible public 	

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	<p>open space, the Walthamstow Wetlands.</p> <ul style="list-style-type: none"> · we asked the applicants to test their proposal from a large number of more sensitive locations; these are found in Appendix 7 of the applicants' Environmental Statement. · I do not consider the view of the proposals in any of the verified views would be unacceptable. 	
<p>Principal Conservation Officer</p>	<p>BACKGROUND: 1. This site is part of wider Tottenham Hale area. The site is currently a vacant sunken plot that forms the final phase of the wider Hale Village Masterplan. As a part of the existing planning application for Hale Village, the site was granted outline planning permission for an 18-storey residential led tower. 2. It does not fall within a conservation area or contain any listed or locally listed structures. However, due to the proposed scale of the building it is likely to have an impact on the wider setting of various heritage assets nearby. The applicant, in support of the application, has submitted a Heritage and Townscape Visual Impact (HTVI) Statement along with a detailed Design and Access Statement. I have reviewed these documents from a conservation point of view along with other planning documents and have considered the impact of the development in accordance with the Council's statutory duty as per Planning (Listed Buildings and Conservation Areas) Act, 1990.</p> <p>COMMENTS: 3. The new scheme proposes a new mixed use development ranging from 11 to 33 storeys comprising commercial space (flexible A1/A3/A4/B1/D1 uses), 279 residential units including affordable housing, together with roof garden and associated landscaping, the provision of basement car parking, bicycle spaces, associated plant including building</p>	<p>Comments noted.</p>

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	<p>maintenance unit and internal refuse storage at Plot SW, Hale Village. In their Design and Access Statement the applicant states that 'The development proposal is for an attractive and architecturally interesting tall building which marks the gateway to a number of key items: The Hale Village development and emerging development areas in close proximity; and, The key Tottenham Hale Station transport interchange.' The Tottenham Area Action Plan (AAP) states that the site is a suitable site for a tall building and that the site should be 'a marker for the entrance to the station from Ferry Lane'. 4. From a conservation point of view, the height of the building is such that it would have an impact on the wider setting of various assets within the Tottenham area. The structure would be most visible in context of the grade II listed Ferry Boat Inn. This building is within the borough of Walthamstow Forest and appropriate comments should be sought for the same. In my view, the building's location on the island between River Lee and Coppermill Stream and the nearby Nature Park gives it a rural setting away from the urban nature of the Hale Village. This setting adds to the significance of the building. The introduction of a 33 storey tower within the wider setting of the building would have some impact on this setting. However, given that Hale Village has been envisioned to become a District Centre in the future with a different scale of the buildings altogether, this impact would be inevitable. Additionally, I agree with the applicant's assessment in this matter that the site itself does not contribute to the significance of the setting of the Inn. The setting of the building can be appreciated in other views and within its immediate vicinity. As such I would agree with the applicant's assessment that the proposed development would have a neutral impact. 5. In addition, the structure would be visible from long distance views from other locations such as Markfield Beam Engine, 62 Monument Way, Tottenham High Cross, High Road, Bruce Castle and the Park as well as Alexandra Palace Park. Whilst the scale and height of the building would be visible in the long distance views and within the setting of these heritage assets, the impact is not considered to be negative and as such no harm would be incurred to the setting of these heritage assets.</p>	

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	<p>CONCLUSION: 6. Whilst the proposed development would be visible within the setting of several heritage assets and in long distance views, it would not lead to negative impact and as such is considered to cause no harm to setting of heritage assets. As such, the scheme would comply with current statutory and policy requirements and would be acceptable from a conservation point of view.</p>	
<p>Transportation</p>	<p>This proposal is a mixed use development comprising of 1,588 sqm commercial space (flexible A1/A3/A4/B1/D1 uses) and 279 residential units. The development site is part of the Masterplan and is the last one to be build out. The site forms a boundary in parts to the West and North with Daneland Walk and Unite student block, to the East with Coppermill Heights and Tottenham Hale Station and railway tracks to the West, and Ferry Lane to the South.</p> <p>The development site is highly accessible with a score of Public Transport Accessibility Level (PTAL) 6a. PTAL ranges from 1 (described as 'very poor') to 6B (described as 'excellent').</p> <p><u>Access</u></p> <p>The main vehicular access is proposed via Jarrow Road, next to the railway tracks and immediate to the south and below the Ferry Lane.</p> <p>The other access/ egress points is through a ramp located within the Hale Village development, and is located on Waterside Way to the north of proposed site. This first connects to Mill Mead Road and then to Ferry Lane. Residents that have parking space are able to gain access to the basement area via a fob key.</p> <p>Pedestrian access is provided off Ferry Lane and Daneland Walk through the main foyer at Gateway tower.</p>	<p>Observations have been taken into account. The recommended legal agreement clauses, conditions 25-28 and informatives will be included with any grant of planning permission as appropriate.</p>

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	<p data-bbox="533 272 1644 344">This proposal does not include changes to the public highway to accommodate the proposed vehicular or pedestrian access.</p> <p data-bbox="533 384 775 416"><u>Trip Generation</u></p> <p data-bbox="533 424 1644 600">Multimodal trip generation for residential units was derived from TRICS having considered similar sites to the proposed development. Also, 2011 Census database of travel to work for Middle Super Output Area (MSOA) Haringey 15, in order to identify current work patterns and predict the trips for commercial parts of this proposal.</p> <p data-bbox="533 639 1115 671">The trip rates are considered acceptable.</p> <p data-bbox="533 711 1644 855">This proposal is predicted to generate a total of 24 two-way car trips during AM peak, and 15 PM peak. The majority of two-way trips will be made by underground, bus and train, at: 78, 51 and 24 respectively, whereas during AM peak the predictions are 77, 50 and 23 during the PM peak.</p> <p data-bbox="533 863 1115 895">The trip rates are considered acceptable.</p>	

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	<p data-bbox="546 277 1120 300">Table 5.10 Total Expected Trips per Travel Mode - All Uses</p> <table border="1" data-bbox="557 320 1451 703"> <thead> <tr> <th rowspan="2">Travel Mode</th> <th rowspan="2">AM Mode Split (%)</th> <th colspan="3">AM Peak Hour</th> <th rowspan="2">PM Mode Split (%)</th> <th colspan="3">PM Peak Hour</th> </tr> <tr> <th>Arr</th> <th>Dep</th> <th>Total</th> <th>Arr</th> <th>Dep</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Underground</td> <td>37.9%</td> <td>19</td> <td>59</td> <td>78</td> <td>29.3%</td> <td>41</td> <td>36</td> <td>77</td> </tr> <tr> <td>Train</td> <td>11.4%</td> <td>6</td> <td>18</td> <td>24</td> <td>8.8%</td> <td>12</td> <td>11</td> <td>23</td> </tr> <tr> <td>Bus</td> <td>24.9%</td> <td>13</td> <td>39</td> <td>51</td> <td>19.2%</td> <td>27</td> <td>24</td> <td>50</td> </tr> <tr> <td>Taxi</td> <td>0.8%</td> <td>1</td> <td>1</td> <td>2</td> <td>1.5%</td> <td>2</td> <td>2</td> <td>4</td> </tr> <tr> <td>Motorcycle</td> <td>0.6%</td> <td>0</td> <td>1</td> <td>1</td> <td>0.3%</td> <td>1</td> <td>0</td> <td>1</td> </tr> <tr> <td>Car</td> <td>11.4%</td> <td>4</td> <td>20</td> <td>24</td> <td>5.6%</td> <td>10</td> <td>5</td> <td>15</td> </tr> <tr> <td>Passenger</td> <td>1.2%</td> <td>0</td> <td>2</td> <td>2</td> <td>0.6%</td> <td>1</td> <td>1</td> <td>2</td> </tr> <tr> <td>Bicycle</td> <td>2.4%</td> <td>1</td> <td>4</td> <td>5</td> <td>1.4%</td> <td>2</td> <td>2</td> <td>4</td> </tr> <tr> <td>On Foot</td> <td>8.7%</td> <td>6</td> <td>12</td> <td>18</td> <td>33.0%</td> <td>44</td> <td>43</td> <td>87</td> </tr> <tr> <td>Other</td> <td>0.6%</td> <td>0</td> <td>1</td> <td>1</td> <td>0.3%</td> <td>1</td> <td>0</td> <td>1</td> </tr> <tr> <td>Total</td> <td>100.0%</td> <td>51</td> <td>155</td> <td>206</td> <td>100.0%</td> <td>140</td> <td>123</td> <td>263</td> </tr> </tbody> </table> <p data-bbox="568 707 1417 743"><i>Notes: Based on 279 residential units and 1,600sqm of non-residential space (equally apportioned over A3, A4 and B1 uses). Potential arithmetical errors due to rounding.</i></p> <p data-bbox="533 794 741 820">1.0 Car parking</p> <p data-bbox="533 826 1648 932">A total of 36 car parking spaces are included in this proposal. The proposed spaces are of standard type (12 parking spaces) and for disabled users (24 parking spaces).</p> <p data-bbox="533 975 1648 1337">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. Parking addendum to Chapter 6, has recommendations for blue badge holders, indicating that: for non-residential developments, requirement is a 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.</p>	Travel Mode	AM Mode Split (%)	AM Peak Hour			PM Mode Split (%)	PM Peak Hour			Arr	Dep	Total	Arr	Dep	Total	Underground	37.9%	19	59	78	29.3%	41	36	77	Train	11.4%	6	18	24	8.8%	12	11	23	Bus	24.9%	13	39	51	19.2%	27	24	50	Taxi	0.8%	1	1	2	1.5%	2	2	4	Motorcycle	0.6%	0	1	1	0.3%	1	0	1	Car	11.4%	4	20	24	5.6%	10	5	15	Passenger	1.2%	0	2	2	0.6%	1	1	2	Bicycle	2.4%	1	4	5	1.4%	2	2	4	On Foot	8.7%	6	12	18	33.0%	44	43	87	Other	0.6%	0	1	1	0.3%	1	0	1	Total	100.0%	51	155	206	100.0%	140	123	263	
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	<p>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.</p> <p>With regards to employment land uses the addendum necessitates parking provision for each disabled employee, including provision for disabled visitors.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>When applying policy 3.8, this development should include a total of 28 residential units which are Wheelchair User Dwellings (WUD) at the point of construction, or easily adaptable afters.</p> <p>This proposal includes 28 WUD units.</p> <p>Thus,</p> <p>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.</p>	

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	<p>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 28 spaces.</p> <p>b). 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.</p> <p>Nevertheless, the London Plan recognises that car parking can take up considerable land and encourages the use of sustainable modes of transport, nonetheless car parking for disabled users is considered an essential provision and must be fully satisfied at all times.</p> <p>c). there is potential to utilise the unused spaces for commercial uses, which have no parking assigned, which may not be otherwise acceptable in policy terms.</p> <p>This is a car free development where all residents, (except disabled users of the WUD), do not have access to off or on-street car parking spaces</p> <p>S106: 'car free development'- constraints secured through s106.</p> <p>Having considered all of the above policies, it was concluded that, residential car parking provision is acceptable, if the following is attained and secured through S106,</p> <ul style="list-style-type: none"> • each WUD has access to a car parking space (off-street), at a point of request. 	

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	<p>S106: Disabled users of the WAU must be able to obtain one parking permit, at the point of request, issued by developer's management company. No charging for these permits, in perpetuity.</p> <p><u>Or, the other version</u></p> <p><u>(if the developer proposes to sell car parking spaces the other acceptable version.</u></p> <p><u>One parking space per WUD unit, so this is a 1:1 provision and is considered policy compliant.</u></p> <p>S106: <u>Each WUD unit must have one corresponding car parking space, clearly marked on a drawing, secured through a S106.)</u></p> <p>The London Plan includes non-operational maximum parking standards for B1 employment on the Outer London, and is based on the proposed floorspace, with maximum provision of one car parking space per (100-600) sqm of gross floorspace(GIA)</p> <p>For the 1,588 sqm of commercial included in this proposal the range of the car parking provision is (max 16 spaces- min 3).</p> <p>Furthermore, parking standards for retail parking, (if any included) is based on the PTAL score and for sites with PTAL 6and 5 those are:</p> <p>food (up to 500sqm) is one parking space per 75 sqm of gross floorspace, food (up to 2500sqm) is one parking space per (45-30) sqm of gross floorspace,</p>	

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	<p>food (over 2500sqm) is one parking space per (38-25) sqm of gross floorspace,</p> <p>non-food is one parking space per (65-45) sqm of gross florspace,</p> <p>Since commercial land uses are not fixed, car parking for disabled users must be made available. Allocations must be reviewed when land uses are fully known.</p> <ul style="list-style-type: none"> • Allocation of disabled car parking for commercial uses is recommended to be a part of condition. <p>Managing the off-street car parking spaces is done through Car Parking Management Plan (CPMP), and secured through:</p> <p>Condition: CPMP-further details to be submitted to cover matters (1-9), below:</p> <ol style="list-style-type: none"> 1. prior to occupation, all parking spaces must be in place, and marked on site as disabled spaces, and retained thereafter. 2. include which residential units are WAU, thus eligible for parking permits 3. submit a drawing and highlight parking spaces for each uses include in this proposal 4. review the allocation of car parking for commercial uses 5. all parking spaces to be used in connection with this development, only 6. review the demand for parking spaces and occupancy levels for residential part of this proposal - include details on how this is proposed to be managed. 7. Include details of duties and responsibilities for issuing, reviewing of the off-street permit allocation, and reassigning of parking permits. 	

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	<p>8. details to be submitted: 48</p> <p>Current London Plan policies require a minimum provision of 20% active and 20% passive Electric Vehicle Charging Points (EVCP). 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.</p> <p>9. include locations of Electric Vehicle Charging Points (EVCP), and indicate criteria for reviewing the usage and converting passive points (if any proposed) to active.</p> <p>2.0 Cycle Parking</p> <p>The proposal includes a total of 483 cycle parking spaces, 364 long stay and 164 short stay.</p> <p>Spaces provided are assigned to: a total of 445 for residential use, (438 long stay) located in the basement and (5 short stay) located at the basement level. 5% of the total are proposed to accommodate larger cycles.</p> <p>In addition, there are a total of 38 cycle parking spaces, (28 short stay and (10 long stay) for the commercial uses that are part of the proposal.</p> <p>The cycle parking provision is considered acceptable.</p> <p>Locations of the proposed cycle parking spaces are shown on the basement level. There are some potential issues with aisles being too narrow and easy accessibility to get to some of the cycle parking spaces. Recommendations are to revise the design so that all spaces are accessible.</p> <p>Condition: revise the design-create easy access to the cycle parking, cycle parking for each proposed land use to be shown on a drawing, parking spaces</p>	

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	<p>must be of suitable quality, details of how residents/staff gain access to the cycle parking areas, and maintenance arrangements of the area. Cycle parking should be available from the occupation, and all spaces must be retained, thereafter.</p> <p><u>3.0 Car Club</u></p> <p>The applicant conducted discussions with one of the car club operators. One car club space is likely to be provided, in a location to be determined.</p> <p>Grampian condition: provision of a car club.</p> <p><u>4.0 Pedestrian Environment Review System (PERS)</u></p> <p>It was accepted that as the highway network in the vicinity was undergone considerable change thus full PERS report is not necessary.</p> <p>Nevertheless, PERS brief audit was carried out which included the assessment of 4 pedestrian links, 4 crossing points, 2 public transport waiting areas, and the interchange to the Tottenham Hale Station. Most were rated positive in terms of permeability, road safety and environment quality.</p> <p>Overall all scored green, apart from the pedestrian link 2-Ferry Lane footpath on the northern side.</p> <p><u>5.0 Parking restrictions on the public highways</u></p> <p>In order to monitor potential parking displacement following the occupation of proposed development, S106 contributions are sought. Contributions will be used to assess and analyse parking stress in the vicinity to establish base</p>	

Stakeholder	Question/Comment	Response
	<p>data prior to occupation, and thereafter when the level of occupation is at 50% and 75% or over.</p> <p>In case the findings suggest that there has been an increase in parking stress, affecting areas which are not within the CPZ, or the timing of parking restrictions are not appropriate, then CPZ modifications would be proposed by the local HA, with the aim to implement the changes. Nevertheless, changes are subject to public consultations.</p> <p>S106 contributions_ parking stress review, including all costs incurred as a result of revision of the existing(s) CPZ.</p> <p>6.0 <u>Travel Plan</u></p> <p>The Framework Travel Plan (TP) was included, as part of the submission. The developer is responsible for creating a sustainable development and achieving the TP targets. Their strategy was to appoint a Sustainable Travel Manager by site's management company to ensure that targets of the travel plan are met.</p> <p>In addition, Travel Plan co-ordinators are proposed for each land uses included in this proposal.</p> <p>Nevertheless, obligation remains with the developer to implement travel plan measures. Each travel plans will be signed off only after targets, as agreed with the LPA, have been met.</p> <p>Each detailed travel plan must have SMART targets, which must be monitored at regular intervals for at least five years, following occupation. Although several actions were listed to be part of the TP, however further TP actions are required.</p>	

Stakeholder	Question/Comment	Response
	<p>One of the actions recommended, is contributions to car club membership for new residents.</p> <p>S106 include TP monitoring contribution and TP initiatives for the residential part of this proposal.</p> <p>S106 for commercial uses which meet the TP thresholds, request for workplace travel plan. Include smart initiatives and TP monitoring</p> <p>7.0 <u>Delivery/Servicing plan</u></p> <p>Delivery servicing plan framework was included in the submission.</p> <p>Due to the privately managed Hale Village, deliveries will be monitored and managed at all times. Access for deliveries is proposed from Mill Mead Road and Lebus Street and leave parcels with the concierge. The way out is via Waterside Way and Daneland Walk.</p> <p>This is considered acceptable.</p> <p>Servicing is proposed at the basement level, where a loading/servicing bay is located. Request for</p> <p>Condition: Swept path analysis- related to all vehicles using the loading bay</p> <p>8.0 <u>Refuse/ recycling</u></p> <p>The refuse strategy is the same and part of the wider Hale village.</p> <p>Some details where included such as, refuse vehicle reversing 70m into the site.</p>	

Stakeholder	Question/Comment	Response
	<p data-bbox="533 236 1644 308">Include the agreement with the Environmental Services, including is responsible to place the bins to the agreed collection point.</p> <p data-bbox="533 347 1644 419">The commercial refuse/ recycling is assumed to be done through private service providers. If other, please provide details.</p> <p data-bbox="533 459 1644 603">Condition: Further details to be submitted - for refuse collections: providing evidence on agreeing the collection There were no details on the recycling strategy/ areas area/ and collection arrangements. Therefore,</p> <p data-bbox="533 643 1644 754">Condition: Recycling recycling/ storage area and details on collections</p> <p data-bbox="533 794 922 818">9.0 <u>Construction Logistic Plan</u></p> <p data-bbox="533 858 1644 962">The proposal included the submission of Construction Logistic Plan (CLP). In order to manage the construction of this proposal the Construction Logistic Plan (CLP) should be submitted. This could be covered by a condition.</p> <p data-bbox="533 1002 1644 1185">Condition: Further details to be submitted and agreed, prior to start of the construction phase. Highways Authority(HA) must be notified before the construction phase has started. The construction traffic must be co-ordinated with other approved proposals in the area. Temporary access points may be required during the construction phase.</p> <p data-bbox="533 1225 1644 1297">Managing of the deliveries is proposed via booking system with pre-arranged slots, and allowing sufficient time to carry loading/unloading.</p> <p data-bbox="533 1337 1644 1361">Construction traffic to/from the site must avoid highway network peak times.</p>	

Stakeholder	Question/Comment	Response
	<p>All routes and n timings should be agreed in advance with the local HA.</p> <p><u>Reason:</u> to co-ordinate the construction traffic routes, generated to/from the site.</p> <p>Also,</p> <ol style="list-style-type: none"> 1. vehicles involved in construction should be part of Fleet Operator Recognition Scheme (FORS) 2. include swept paths of the largest vehicle that will enter/exit the site, and turnings 4. No temporary car parking for staff and personnel involved in the construction of this development. <p>The developer and/or their appointed contractor, must:</p> <ul style="list-style-type: none"> -display contact details of the project manager at all times. - have a communication plan to contain: first point of contact, how the developer will inform residents and others affected, for example: informing about road closures, alternative route/s, duration of works etc. <p>The developer is responsible in promoting the use of public transport to, all staff and personnel involved in the construction of this development. Staff/personnel should be aware of public transport provisions in the area, and aim to use sustainable modes of transport.</p> <p>A travel plan for personnel involved in the construction, showing routes to and from site, is considered a part of the CLP. Other travel plan measures should be included and reported to the LBH , as part of monitoring process. The applicant to agree the method of working with local HA prior to the start of construction.</p> <p>In addition:</p>	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • Please include Informative(s) about Highways licences. The applicant must check and follow the processes and apply direct to the HA <p><u>Recommendation</u></p> <p>On behalf of Highway Authority, I recommend this proposal for approval, subject to including Conditions and S106.</p>	
<p>Financial Viability Consultant</p>	<p>Executive Summary:</p> <ul style="list-style-type: none"> . We have been asked by LB Haringey to review the Financial Viability Report submitted by the Applicant, Anthology Hale Works Ltd. . We have reviewed the submitted information and table below our revised appraisal inputs/outputs for the proposed scheme for 236 private units and 43 intermediate units (see response document for Table of fogures) . The applicant's Residual Land Value for the proposed scheme is £15,079,057 against their proposed Site Value Benchmark of £17m, which they state cannot afford any additional affordable housing. . Our amended appraisal produces a Residual Land Value of £13,081,259 against our revised Site Value Benchmark of £12,556,143 which produces a surplus of £525,116. A copy of our appraisal can be found at Appendix 2. . We conclude therefore that the proposed scheme can viably provide a Payment in Lieu of Affordable Housing of £525,115 and would recommend reviews in line with the GLA document (Affordable Housing 	<p>Comments noted.</p>

Stakeholder	Question/Comment	Response
	<p>and Viability SPG (August 2017), which recommends an early and a late stage review.</p>	
Housing	<p>On the basis that the affordable housing offer on this scheme, is judged on the basis that the extant permission on the site is the benchmark land value, then the affordable housing offer of 43 Intermediate units is acceptable, on the following conditions</p> <ol style="list-style-type: none"> 1. The surplus above the benchmark land value of £521,116 is paid to the council on commencement of the permission, for the use of affordable housing within the borough 2. That the intermediate units proposed are transferred to a Registered Provider at the complete package price of no more than £13,653,548 (This being the agreed value of the Intermediate Units £12,880,705 plus 6% profit) . This price shall include all common parts and egress. 	<p>Comments noted and will feed into ongoing negotiations.</p>
Drainage Engineer	<p>It is suggested by the applicant that the adjacent, now developed, site has the drainage infrastructure in place that has been sized to take additional unattenuated flows from the proposed new development. The drainage layout drawings for the adjacent site show the system to drain in to Pymmes Brook at a controlled rate of 24l/s. The confirmation of capacity is based on the applicant running unattenuated flows from the proposed site through the originally created Micro-drainage model to show no surcharging for a 1 in 2 year event and no flooding for a 1 in 100 year plus climate change event.</p> <p>The main concern is whether there is sufficient evidence that the original designed drainage system was actually installed as per the design, bearing in mind the timescale involved (2006), and as a result whether the original Micro-</p>	<p>Comments noted, condition 20 attached.</p>

Stakeholder	Question/Comment	Response
	<p>drainage model is representative of the installed drainage network. As it stands we are not in a position to accept the proposal without further evidence being made available and now seek advice from yourselves (LPA) on how we can progress this.</p> <p>The applicant would normally be issued with Haringey's guidance along with a pro-forma to assist in the preparation of a drainage strategy. The minimum we would expect to see is an initial concept drawing of the proposed site to form the basis of early engagement and then look to agree the overall drainage strategy prior to progressing to full application. There appears to be no evidence of this having been provided by the applicant which is a concern, however, it could be a failure in our established procedure which has resulted in the applicant not receiving the Haringey documents for the initial development.</p> <p>Rainwater falling on the site should be controlled prior to leaving the site unless sufficient evidence is provided to confirm that there is capacity built into the previously constructed local drainage network. We do require that SuDS solutions (e.g. Green Roofs, Bio-Retention Planters, Permeable Paving, Rainwater Harvesting etc) have been suitably considered and maximised on this proposed development to ensure it manages surface water as close to source as well as contributing to other local environmental/sustainability policies.</p> <p>We also require a maintenance plan for the SuDS and this should be for the lifetime of the development detailing the frequency and the responsible party for the maintenance.</p> <p>Additional Comments:</p> <p>I am now satisfied with the maintenance regime for this site, I'm not completely</p>	

Stakeholder	Question/Comment	Response
	<p>satisfied the evidence has been provided to prove the previously developed site has a drainage system sized to receive the runoff from the proposed Anthology site. This could be proved by having a CCTV survey carried out on the system so a condition could be included if you agree this is appropriate.</p>	
<p>Carbon Management</p>	<p>Energy Strategy and Offsetting</p> <p>The energy strategy submitted addresses the needs for the full application for 279 dwellings and 1,588m² commercial space. The Energy Strategy is set out as per the London Plan guidance under Lean, Clean and Green Energy. It demonstrates that the design of the building will achieve a 33.6% reduction in carbon on site, and that the sites remaining carbon will be offset.</p> <ul style="list-style-type: none"> - Under Lean Measures: Under Lean Measures: 9.93% carbon reduction has been achieved by energy efficiency measures. This is a good standard to achieve on a scheme of this nature. - Under Clean Measures: Under Clean Measures: The scheme will connect to the Hale Village Community Heating Network. No onsite provision of space heating or hot water is proposed. Therefore, the Heating Network connection will provide the scheme with all the sites hot water and space heating requirements. There is no recommendation on the management of this network, but the GLA and Council have recommended that the scheme is signed up to the Heat Trust Scheme, to ensure customer protection. - Under Green Measures: Under Green Measures: No renewable technologies are included in this scheme. This is disappointing, but the offsetting contribution will enable schemes to be implemented in the local area to deliver the same outcome. Therefore if the offsetting is secured this impact can be mitigated. <p>The Energy Strategy is therefore accepted and this should be conditioned:</p> <p>Suggested Condition</p>	<p>Comments noted, condition 25, 33 and 34, and legal agreement clauses attached.</p>

Stakeholder	Question/Comment	Response
	<p>You must deliver the energy standards as set out in “Hale Works - Energy Strategy”, Version 6.0, 29.09.17 by Ridge. The development shall then be constructed and the deliver the carbon savings set out in this document. Achieving the agreed carbon reduction of 33.6% reduction beyond BR 2013 across the site. Confirmation that these energy efficiency measures and carbon reduction targets have been achieved must be submitted to the local authority at least 6 months of completion on site for approval.</p> <p>This report will demonstrate that the following have been delivered:</p> <ul style="list-style-type: none"> - show emissions figures at design stage to demonstrate building regulations compliance, and then report against the constructed building; - that the link to the Hale Village has been delivered and that this provides the Hale Works Site with all its space heating and hot water needs; and - that the community heating network is covered by the Heat Trust customer protection scheme (or better) and that all users will be members. <p>The Council should be notified if the applicant alters any of the measures and standards set out in the submitted strategy (as referenced above). Any alterations should be presented with justification and any new proposals for approval by the Council. Should the agreed target not be able to be achieved on site through energy measures as set out in the afore mentioned strategy, then any shortfall should be offset at the cost of £2,700 per tonne of carbon plus a 10% management fee. Reason: To comply with London Plan Policy 5.2. and local plan policy SP:04</p> <p>Offsetting</p> <p>After all measures have been implemented (Lean, Clean and Green Measures) the scheme will still emit 245.36 tonnes of carbon. This is significant and as referenced in the Energy Strategy it will need to be offset.</p>	

Stakeholder	Question/Comment	Response
	<p>They have not created any convincing argument to avoid this payment in the submitted strategy. If any other view point is considered this may require further work on the EIA and whether all appropriate mitigation strategies have been investigated and delivered (such as all low carbon energy sources). The applicant would not be able to build their permitted outline scheme as both Building Regulations and planning policy has moved on since that permission was granted.</p> <p>Of this total figure 168.91 tonnes come for the residential development which will need to fully offset to be policy compliant, and 5.31 tonnes will need to be offset from the non-domestic to achieve the policy requirement of a 35% improvement over BR 2013. This means 174.22 tonnes need to be offset at a total cost of £470,394.00. This needs to be secured by legal agreement which should be payable upon commencement.</p> <p>Suggested s106:</p> <p>The applicants Energy Strategy entitled “Hale Works - Energy Strategy”, Version 6.0, 29.09.17 by Ridge. Shows that the development will emit 245.36 tonnes of carbon per year in regulated energy consumption. Of this value 174.22 tonnes needs to be offset to achieve policy compliance as set out in the London Plan Policy 5.2 and Local Plan Policy SP:04.</p> <p>To do this a payment of £470,394.00 will be paid to the planning authority upon commencement. This offsetting contribution will be used to deliver carbon reduction projects in the borough of Haringey, as set out in the planning obligations document.</p> <p>Overheating</p> <p>The submitted overheating strategy demonstrates that several of the modelled</p>	

Stakeholder	Question/Comment	Response
	<p>units do overheat in current summer weather scenarios. To address this the applicant has installed blinds which will be required to close and prevent over heating into these units. Blinds are not a fixture and therefore are not a planning consideration.</p> <p>The modelling has also been undertaken for 2050 summer weather scenarios. This increases the number of units that overheat and even with blinds, 5 of the modelled units (out of 8) will be unfit for occupation in the summer weather of 2050. The applicant has stated that they have reduced the window size and 3 installed high g-rated glazing (which reduces thermal gains from the sun). But further reduction in the size of windows and the installation of design integrated solutions (such as Brise soleil, cross ventilation, or sunken windows) could and should have been considered. There is no information as to how the building will be adapted to address overheating risk in the future.</p> <p>Car Parking</p> <p>All car parking spaces will include electric recharging infrastructure.</p> <p>Suggested Condition:</p> <p>Details and location of the parking spaces equipped with Active Electric Vehicle Charging Points (EVCP's) must be submitted 3 months prior to works commencing on site. The details shall include:</p> <ul style="list-style-type: none"> • Location of active charge points covering all new parking spaces and provision • Specification of charging equipment • Operation/management strategy <p>Once these details are approved the Council should be notified if the applicant alters any of the measures and standards set out in the submitted strategy (as referenced above). Any alterations should be presented with justification and new standards for</p>	

Stakeholder	Question/Comment	Response
	approval by the Council. Reason: To comply with London Plan Policy 6.13.	
Pollution – Air Quality and Land Contamination	<p><u>Air Quality:</u></p> <p>The application is adjacent a main road, Ferry Lane; a major route for which modelling indicates likely exceedences of the Government’s air quality objectives for nitrogen dioxide (NO₂) and PM2.5. The proposed development is also adjacent an air quality NO₂ hotspot location. The whole of the borough of Haringey is a designated Air Quality Management Area (AQMQ) and is committed to being a ‘Cleaner Air Borough’ and working towards improving air quality and to minimise the risk of poor air quality to human health and quality of life for all residents. The proposed development will introduce new exposure adjacent this major arterial route; the proposed residential units being located adjacent Ferry Lane.</p> <p>The main air polluting operations associated with the proposed development include 36 car parking spaces and associated traffic movements. There are 448 cycle spaces also located within the basement. With regard to Energy use, the <i>‘development will be connected to the existing Hale Village district heating system run by Veolia as an ESCo. (Energy Service Company).’</i></p> <p>An air quality assessment (WYG , June 2017, ref: A101186) has been submitted along with the planning application to assess the air pollution impact of the proposed developments. This assessment confirms exceedences of the Government’s objective for NO₂ and states that the <i>‘.first floor to the 9th floor are predicted to exceed the AQO. The residential dwellings will be provided with filtration via an “AAC Eurovent Nitrosorb” (or similar) unit which is combined with the MVHR mechanical ventilation.’</i></p> <p>The London Plan, Policy 7.14 states that new development should:</p>	Comments noted and conditions 29-32 attached

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans • promote sustainable design and construction to reduce emissions from the demolition and construction of buildings; • be at least ‘air quality neutral’ and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)). • Ensure that where provision needs to be made to reduce emissions from a development, this is usually made on-site. <p>I recommend the following conditions:</p> <p><u>Air Quality:</u></p> <ul style="list-style-type: none"> • Details of the “AAC Eurovent Nitrosorb” units to be installed to the PR1 (1st to 10th Floor), PR2 (1st to 11th Floor), PR3, PR4 and PR5 (1st to 10th Floor), PR6 (1st to 11th Floor), PR7 (1st to 10th Floor), and PR9 (11th Floor), together with details of the MVHR mechanical ventilation and the annual maintenance programme shall be submitted for approval by the LPA prior to installation and occupation. 	

Stakeholder	Question/Comment	Response
	<p><u>Combustion and Energy Plant:</u></p> <ul style="list-style-type: none"> • Prior to installation, details of the Ultra Low NOx boilers for space heating and domestic hot water should be forwarded to the Local Planning Authority. The boilers to be provided for space heating and domestic hot water shall have dry NOx emissions not exceeding 20 mg/kWh. <p><i><u>Reason:</u> To protect local air quality.</i></p> <ul style="list-style-type: none"> • Prior to installation details of all the chimney heights calculations, diameters and locations will be required to be submitted for approval by the LPA prior to construction. <p><i><u>Reason:</u> To protect local air quality and ensure effective dispersal of emissions.</i></p> <ul style="list-style-type: none"> • Prior to commencement of the development, details of the CHP must be submitted to evidence that the unit to be installed complies with the emissions standards as set out in the GLA SPG Sustainable Design and Construction for Band B. A CHP Information form must be submitted to and approved by the LPA. <p><i><u>Reason:</u> To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction.</i></p> <p><u>Contaminated land: (CON1 & CON2)</u></p>	

Stakeholder	Question/Comment	Response
	<p><u>CON1:</u></p> <ul style="list-style-type: none"> • Before development commences other than for investigative work: <p>Further ground gas monitoring shall be undertaken. Using the results of the additional ground gas monitoring and the information provided within the contaminated land report summary (WYG, June2017), the site conceptual model and risk assessment shall be updated, if required and submitted to the Local Planning Authority together with a remediation Method Statement detailing the remediation requirements. Using the information obtained from the site investigation and also detailing any post remedial monitoring the remediation method statement shall be approved in writing by the Local Planning Authority prior to that remediation being carried out on site.</p> <p><u>And CON2 :</u></p> <ul style="list-style-type: none"> • Where remediation of contamination on the site is required completion of the remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied. <p><i><u>Reason:</u> To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</i></p> <p><u>Management and Control of Dust:</u></p>	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • No works shall be carried out on the site until a detailed Air Quality and Dust Management Plan (AQDMP), detailing the management of demolition and construction dust, has been submitted and approved by the LPA. The plan shall be in accordance with the GLA SPG Dust and Emissions Control and shall also include a Dust Risk Assessment. <p><i><u>Reason:</u> To Comply with Policy 7.14 of the London Plan</i></p> <ul style="list-style-type: none"> • Prior to the commencement of any works the site or Contractor Company is to register with the Considerate Constructors Scheme. Proof of registration must be sent to the LPA. <p><i><u>Reason:</u> To Comply with Policy 7.14 of the London Plan</i></p> <ul style="list-style-type: none"> • No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIA of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at http://nrmm.london/. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site. <p><i><u>Reason:</u> To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ.</i></p> <ul style="list-style-type: none"> • An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All 	

Stakeholder	Question/Comment	Response
	<p>machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.</p> <p><i>Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ.</i></p> <p><u>As an informative:</u></p> <p>Prior to demolition of existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.</p> <p>Additional comments:</p> <p>It was reported verbally to the case officer that the revised document air quality documentation submitted by the applicant in response to the GLA's comments do not change the initial comments provided.</p>	
<p>Waste Management Officer</p>	<ul style="list-style-type: none"> • Wheelie bins or bulk waste containers must be provided for household collections. • Bulk waste containers must be located no further than 10 metres from the point of collection. • Route from waste storage points to collection point must be as straight as possible with no kerbs or steps. Gradients should be no greater than 1:20 and surfaces should be smooth and sound, concrete rather than flexible. Dropped kerbs should be installed as 	<p>The comments are noted. The case officer has studied the submitted waste management plan in light of these comments and considered the provisions acceptable.</p>

Stakeholder	Question/Comment	Response
	<p>necessary.</p> <ul style="list-style-type: none"> • If waste containers are housed, housings must be big enough to fit as many containers as are necessary to facilitate once per week collection and be high enough for lids to be open and closed where lidded containers are installed. Internal housing layouts must allow all containers to be accessed by users. Applicants can seek further advice about housings from Waste Management if required. • Waste container housings may need to be lit so as to be safe for residents and collectors to use and service during darkness hours. • All doors and pathways need to be 200mm wider than any bins that are required to pass through or over them. • If access through security gates/doors is required for household waste collection, codes, keys, transponders or any other type of access equipment must be provided to the council. No charges will be accepted by the council for equipment required to gain access. • Waste collection vehicles require height clearance of at least 4.75 metres. Roads required for access by waste collection vehicles must be constructed to withstand load bearing of up to 26 tonnes. • Adequate waste storage arrangements must be made so that waste does not need to be placed on the public highway other than immediately before it is due to be collected. Further detailed advice can be given on this where required. • Other comments: <p>Proposal: 279 x Residential units and in addition varied commercial waste units. This proposed application will require adequate provision for refuse and recycling off street at the front of the property. I would like to confirm that space must be provided for the following and the management of the placement of bins on collection day must be as stated in the application provided. Bins must be placed no further than 10 meters from the waste collection vehicle and vehicles must be able to enter and exit the site using</p>	<p>Condition 15 attached.</p>

Stakeholder	Question/Comment	Response
	<p>forward motions only. Guidance for this application has been highlighted above and below. 47 x 1100L Euro bins for refuse 28 x 1100L Euro bins for recycling 20 x 140L Food waste bins 279 x Food waste kitchen caddy's Arrangements will need to be made to ensure waste is contained at all times. Provision will need to be made for storage of receptacles within the property boundary not on the public highway. The waste collection point will need to be at the front of the property from Hale Works N17 on the estate itself. Commercial waste will need to be stored separately from residential waste The business owner will need to ensure that they have a cleansing schedule in place and that all waste is contained at all times. Commercial Business must ensure all waste produced on site are disposed of responsibly under their duty of care within Environmental Protection Act 1990. It is for the business to arrange a properly documented process for waste collection from a licensed contractor of their choice. Documentation must be kept by the business and be produced on request of an authorised Council Official under section 34 of the Act. Failure to do so may result in a fixed penalty fine or prosecution through the criminal Court system.</p> <p>The above planning application has been given a RAG traffic light status of GREEN for waste storage and collection if the guidance above is followed and the management of the waste is carried out as stated within the application waste management plan.</p>	
Building Control	<p>I have read the fire strategy extract and agree with Andrews comment below, although what they have suggested does need to be discussed with us, but will comply. Of more interest however is the lack of information they provide with regard to external fire spread – they indicate compliance with unprotected areas, but give no indication of cladding material used, fire stopping etc.</p> <p>Further comments:</p>	<p>Comments noted. Further information on cladding will be sought and secured as part of condition 5.</p>

Stakeholder	Question/Comment	Response
	<p>I think that in light of the current circumstances, it would be prudent to ask what the cladding will be. They will (should) just come back and advise that the cladding will have been tested and have a BR135 report to show full compliance as a total system.</p>	
<p>Wind Assessment Consultant</p>	<p>Report Conclusions:</p> <p>In summary, this review highlights the following:</p> <p>Overall, the methodology, as described within the Environmental Statement and accompanying Technical Appendix 9.1, is suitable in assessing the expected wind microclimate in and around the proposed development.</p> <p>The results for all configurations are what would typically be expected for the site in question, the geometry of the proposed development and cumulative schemes. In regards to the cumulative schemes, a list of the cumulatives included within the wind tunnel tests should be provided.</p> <p>Mitigation measures have been suggested (in general terms within the Environmental Statement and more specifically for typical aerodynamic effects in appendix G and I of Technical Appendix 9.1) for unacceptable entrances and long term seating areas. However, the locations and specific dimensions of the mitigation has not been stated – only what would typically be used for these winder than desired locations. Furthermore, it is not stated whether these mitigation measures have been committed to by the developer and if they will be wind tunnel tested in order to assess their effectiveness</p> <p>It is noted that the LBH’s requirement to include climate change into the cumulative scenario wind assessment is unique, the approach used by the BRE is deemed sensible; however, it is the reviewer’s professional opinion that this may not be an accurate representation of the cumulative wind</p>	<p>Comments noted. Applicant has provided a detailed wind mitigation strategy in response to these comments. Furthermore, condition 10 is included.</p>

Stakeholder	Question/Comment	Response
	<p>microclimate.</p> <p>Technical Appendix 9.1 provides more detail on the methodology and results obtained from the study, alongside a graphical presentation of the results. It would be beneficial to include the graphically presented plots within the Environmental Statement for ease of reference.</p> <p>The comments in his report are based upon this reviewer's understanding/interpretation of the Applicant's presentation.</p> <p>Additional Comments:</p> <p>The consultant is stating that the proposed development has unacceptable winds when tested in the context of the existing surrounding buildings, however that once the future consented buildings are constructed these locations become comfortable. I agree that this is the case. This means that the proposal not to mitigate these uncomfortable winds is only acceptable if we are certain that the future consented buildings will be completed ahead of the proposed development.</p> <p>Further Additional Comments:</p> <p>If this is only a fire exit then we would consider this reasonable.</p> <p>With regards to outdoor seating, typically it is assumed that people won't expect to sit outside during the winter months due to the poor weather. The only exception to this would be locations where it is intended to locate a Christmas market.</p>	
Tottenham Team	No comments received.	Noted.

Stakeholder	Question/Comment	Response
Arboricultural Officer	<p>I would support their proposed species selection for new tree planting, as it is line with the Councils Tree Strategy, and also the proposed size of tree at time of planting, which would provide immediate impact.</p> <p>Additional comments: The proposed new podium roof is a welcome addition that provides a new amenity planting space. It will create a new flora rich habitat for invertebrates and birds that will increase local biodiversity.</p>	<p>Comments noted. Condition 9 included for tree planting and landscaping.</p>

Stakeholder	Question/Comment	Response
<p>Education</p>	<p>Hale Village is in our Planning Area 4, close to the Waltham Forest border.</p> <p>According to the latest 2017 School Place Planning report (attached), we are projecting a deficit of primary school places by 2023/24 of around 1 form of entry (-20) growing to 3-4 forms of entry (-103) by 2026/27– see pages 37-40 for more detail.</p> <p>Secondary projections are done borough wide rather than at planning area level and here we are projecting a deficit of Year 7 places (secondary transfer) by 2019/20 equivalent to 1 form of entry (-19) building to a peak of 5-6 forms of entry (-161).</p> <p>Additional comments:</p> <p>Primary The Primary places issue is currently less pressing since across the borough as a whole we are forecast to have a surplus of places – we are looking to reduce rather than increase capacity. Obviously this isn't in the case in Planning Area 4 but as pupil place projections are fluid and subject to change we aren't specifically looking to boost reception places yet.</p> <p>Secondary With regard to secondary place planning, I've adapted a recent response to a Members Enquiry sent in September as it covers much the same ground:</p> <p>School place planners in Haringey have been aware of the projected need for additional capacity in its secondary year 7 cohort for a number of years as a result of the school roll projections for our borough that are reported in our annual <u>School Place Planning report</u>.</p>	<p>Comments noted.</p>

Stakeholder	Question/Comment	Response
	<p>Through judicious planning of places, together with the addition of a new secondary school in the borough in the last five years, we have increased the total number of places in Year 7 (secondary transfer) from 2,357 (2013/14) to 2,628 (2017,18) – equivalent to an additional nine forms of entry (271 places). However, even allowing for these increases we still project a shortfall of -19 places by 2019/20 rising to a peak of -161 places by 2023/24.</p> <p>To address this further deficit of places we have had initial conversations with the secondary Head teachers of our community schools (Highgate Wood, Park View School, Hornsey School for Girls and Gladesmore Community School) about how additional capacity <i>might</i> be achieved, and these conversations are reflected in a <u>Cabinet report</u> dating from July 2017. We continue to maintain a dialogue with all of our secondary schools to establish how we can provide further additional capacity through the provision of one-off or ‘bulge’ classes.</p> <p>While the Local Authority can only provide additional capacity in the following community schools: Gladesmore School, Hornsey School for Girls, Highgate Wood School, Park View School, we do also have an open and regular dialogue with our academy and foundation schools to effect sufficiency of places.</p> <p>On a wider scale, councils across London are working to boosting capacity in their secondary schools and we liaise quarterly with other local authorities in north London and beyond to take account of their plans to increase capacity and ensure that our approaches are joined up. Further information on how additional capacity is being planned in London can be found in the London Councils report, <u>Do the Maths 2017</u>.</p>	
Licensing	I have no comments from a licensing perspective at this time.	Comments noted.

Stakeholder	Question/Comment	Response											
Noise Specialist	<p>I have examined the Noise and Vibration Impact Assessment (Ref 176001-AC-R001) dated 27th June 2017 authorised by Romill Bettany of Optimise in response to the proposed development.</p> <p>This mixed development will fall within the Hale Village Master Plan and lies in close proximity to the busy (A503) Ferry Lane Road and Tottenham Hale Railway Station. The development will be constructed directly above the northbound London Underground Victoria Line tunnel.</p> <p>There is no objection made in principle to this application, however the following conditions shall apply;</p> <p>Internal Noise Levels within Residential Units (in accordance with BS8233:2014)</p> <table border="1" data-bbox="533 826 1644 1054"> <thead> <tr> <th data-bbox="533 826 902 866">Time</th> <th data-bbox="902 826 1252 866">Area</th> <th data-bbox="1252 826 1644 866">Maximum Noise level</th> </tr> </thead> <tbody> <tr> <td data-bbox="533 866 902 978" rowspan="2">Daytime Noise 7am – 11pm</td> <td data-bbox="902 866 1252 938">Living rooms and Bedrooms</td> <td data-bbox="1252 866 1644 938">35dB(A)</td> </tr> <tr> <td data-bbox="902 938 1252 978">Dining Room/Area</td> <td data-bbox="1252 938 1644 978">40dB(A)</td> </tr> <tr> <td data-bbox="533 978 902 1054">Night Time Noise 11pm -7am</td> <td data-bbox="902 978 1252 1054">Bedrooms</td> <td data-bbox="1252 978 1644 1054">30dB(A)</td> </tr> </tbody> </table> <p>With no individual noise events to exceed 45dB L_{Amax} (measured with F time weighting) in bedrooms with windows closed between 23.00hrs - 07.00hrs.</p> <p>Sound Insulation between Residential and Commercial Properties. Sound insulation between the commercial premises on the ground floor and residential units on level 1 shall be provided and installed in the premises in accordance with a scheme submitted to and approved by the Local Planning Authority before the commencement of any building works.</p>	Time	Area	Maximum Noise level	Daytime Noise 7am – 11pm	Living rooms and Bedrooms	35dB(A)	Dining Room/Area	40dB(A)	Night Time Noise 11pm -7am	Bedrooms	30dB(A)	<p>Comments noted. Conditions 15-19 included.</p>
Time	Area	Maximum Noise level											
Daytime Noise 7am – 11pm	Living rooms and Bedrooms	35dB(A)											
	Dining Room/Area	40dB(A)											
Night Time Noise 11pm -7am	Bedrooms	30dB(A)											

Stakeholder	Question/Comment	Response
	<p>Requirement: The applicant shall submit respective schemes of Sound Insulation (glazing and separating floor) to the Local Planning Authority for approval before the commencement of any building works.</p> <p>Plant Noise Design Criteria Noise arising from the use of any plant and associated equipment <u>shall not exceed</u> the existing background noise level ($L_{A90\ 15mins}$) when measures 1 metre external ($L_{Aeq\ 15mins}$) from the nearest residential or noise sensitive premises.</p> <p>Vibration and Ground-Borne Noise The results from the Vibration Assessment undertaken in accordance with BS6472:2008 indicate that “Adverse Comments are unlikely”. Whilst this was the case for measurement locations B, C and D, results for measurement location A which is positioned closer to and directly above the LU Victoria Line tunnel has not been included in this report.</p> <p>The report confirmed that 4% of the total residential units will exceed the ground-borne noise criterion and further mitigation measures will be required.</p> <p>Requirement: The applicant shall submit evidence that the ground-borne noise criterion will not be exceeded within any of the residential units. This submission shall be approved by the Local Authority before the occupancy of the residential units.</p>	
EXTERNAL		
Greater London Authority	London Plan policies on Opportunity Areas; affordable housing; housing; urban design and tall buildings; inclusive design; transport; and climate change are relevant to this application. Whilst the principle of the proposal is	Comments noted.

Stakeholder	Question/Comment	Response
	<p>supported in strategic planning terms, further information is required regarding the following issues before it can be confirmed that the proposal complies with the London Plan:</p> <ul style="list-style-type: none"> • Affordable housing: 15% (by habitable room) of the total units, or 48% of the uplift, made up of 100% intermediate shared ownership. GLA officers will work with the Council and the applicant to maximise affordable housing provision, and in the context of the Mayor’s SPG, will robustly scrutinise the viability assessment, including the affordability of shared ownership units and potential grant funding. Early and late viability reviews must be secured in accordance with the SPG. • Urban design and tall buildings: The applicant should replace a proportion of those units that have additional internalised space, with winter gardens. • Transport: The applicant should consider an increased level of Blue Badge parking; increase the cycle parking to London Plan standard; and reconsider the layout of basement cycle storage. The section 106 obligations relating to the delivery of the public realm should ensure that the applicant is required to work with TfL to enable the pedestrian footbridge to be linked to the site. Crossrail 2 safeguarding, a full delivery servicing plan, and a construction logistics plan should be secured by condition. • Climate change: Further information has been requested from the applicant, including the potential for on-site renewables, which is required before it can be confirmed that the application meets London Plan requirements. <p>Additional comments – Air Quality:</p> <p>Summary: The development proposes to link to the nearby energy centre, which would require the activation of a currently unused biomass system and</p>	

Stakeholder	Question/Comment	Response
	<p>the possible addition of a new 1 MW gas fired CHP plant, which would have significant impacts on both the proposed development and surrounding residential properties. The applicant's assessment also suggests that the development will not meet Air Quality Neutral requirements for building emissions. The separate transport emissions benchmark will be met. London Plan Policy: The development does not meet the requirements London Plan Policy 7.14</p> <p>Recommendations: 1. The proposed mitigation of the significant air quality impacts from the upgraded energy centre only affects the proposed development itself, impacts on surrounding developments are not addressed. This is not sufficient. Furthermore, the modelled emission rates for the existing and proposed new/newly activated elements of the energy centre do not meet the limits set out in the GLA SPG "Sustainable Design and Construction" The applicant should investigate the steps necessary for, at least the new or reactivated elements of the energy centre to be brought up to the required standards (ideally the gas boilers should also be brought up to current standards as well). This could be done either by retro fitting abatement equipment or by a different choice of installed unit (for the new parts of the energy centre). The modelling exercise should then be re-done with the new specification of equipment to demonstrate whether the significant impacts have been removed. We would expect that by using equipment that meets our emissions limits the majority of the impacts will be removed, and that the Air Quality Neutral requirement should be met. Emissions characteristics and, if necessary retro-fitted abatement equipment, should be secured by condition or s106 agreement. 2. In order to comply with London Plan policy 7.14(b) and the associated SPG "Control of Dust and Emissions during Construction and Demolition" compliance with the Non-Road Mobile Machinery Low Emission Zone must be secured by condition. The following example condition, or similar wording, could be used:</p>	

Stakeholder	Question/Comment	Response
	<p>Condition: 1) All Non Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall meet at least Stage IIIA of EU Directive 97/68/EC (as amended) if in use before 1 September 2020 or Stage IIIB of the directive if in use on 1 September 2020 or later. 2) If NRMM meeting the relevant Stage in paragraph 1 above is not available the requirement may be met using the following techniques: Reorganisation of NRMM fleet Replacing equipment (with new or second hand equipment which meets the policy) Retrofit abatement technologies Re-engining This is subject to the local planning authority's prior written consent. 3) If NRMM meeting the policy in paragraph 2 above is not available every effort should be made to use the least polluting equipment available including retrofitting technologies to reduce particulate emissions. This is subject to the local planning authority's prior written consent. Unless it complies with the above standards under paragraphs 1, 2 or 3 above, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at https://nrmm.london/</p> <p>Reason: To protect local amenity and air quality in accordance with [local policy] and London Plan policies 5.3 and 7.14</p> <p>Additional comments – Energy:</p> <p>The applicant has proposed to use the SunGuard SN 70/37 glass, or equivalent, for the apartments on the scheme. It has been confirmed that the glazing has a visible light transmission of 70% and a corresponding G value (solar transmission) of 37%, which marginally exceeds the performance requirements currently assumed in the Overheating Study. Nothing further required.</p>	

Stakeholder	Question/Comment	Response
	The be lean BRUKL has been provided; nothing further outstanding.	
Planning Casework Unit	I confirm that we have no comments to make on the environmental statement.	Noted.
Environment Agency	<p>Thank you for consulting the Environment Agency.</p> <p>We have no comments on this application but wish to offer the following advice in relation to flood risk and contaminated land.</p> <p>Flood Risk The application site lies within Flood Zone 2 defined by Table 1 of the National Planning Practice Guidance, Flood Risk and Costal Change (section 25) as having medium probability of flooding (from rivers or sea).</p> <p>We have produced a series of standard comments for local planning authorities (LPAs) and planning applicants to refer to on 'lower risk' development proposals where flood risk is an issue. These comments replace the requirement for direct case by case consultation with us. This planning application sits within this category. Our standard comments are known as Flood Risk Standing Advice (FRSA). We recommend that you view this standing advice in full to obtain the relevant comment or guidance for this proposal.</p> <p>Contaminated Land We are currently operating with a significantly reduced resource in our Groundwater and Contaminated Land Team in Hertfordshire and North London Area. This has regrettably affected our ability to respond to Local Planning Authorities for some planning consultations. We are not providing specific advice on the risks to controlled waters for this site as we need to concentrate our local resources on the highest risk proposals.</p>	Comments are noted.

Stakeholder	Question/Comment	Response
	<p>We recommend however that the requirements of the National Planning Policy Framework and National Planning Policy Guidance (NPPG) are still followed. This means that all risks to groundwater and surface waters from contamination need to be identified so that appropriate remedial action can be taken. This should be additional to the risk to human health that your Environmental Health Department will be looking at.</p> <p>We expect reports and Risk Assessments to be prepared in line with our 'Groundwater protection: Principles and practice' document (commonly referred to as GP3) and CLR11 (Model Procedures for the Management of Land Contamination).</p> <p>In order to protect groundwater quality from further deterioration:</p> <ul style="list-style-type: none"> - No infiltration based sustainable drainage systems should be constructed on land affected by contamination as contaminants can remobilise and cause groundwater pollution. - Piling or any other foundation designs using penetrative methods should not cause preferential pathways for contaminants to migrate to groundwater and cause pollution. <p>The applicant should refer to the following sources of information and advice in dealing with land affected by contamination, especially with respect to protection of the groundwater beneath the site:</p> <ul style="list-style-type: none"> - From www.gov.uk: <ul style="list-style-type: none"> <input type="checkbox"/> Groundwater Protection: Principles and Practice (August 2013) <input type="checkbox"/> Our Technical Guidance Pages, which includes links to CLR11 (Model Procedures for the Management of Land Contamination) and GPLC (Environment Agency's Guiding Principles for Land Contamination) in the 'overarching documents' section <input type="checkbox"/> Use MCERTS accredited methods for testing contaminated soils at the site - From the National Planning Practice Guidance: 	

Stakeholder	Question/Comment	Response
	<p data-bbox="533 236 1014 268">☐ Land affected by contamination</p> <p data-bbox="533 309 1559 379">- British Standards when investigating potentially contaminated sites and groundwater:</p> <ul style="list-style-type: none"> <li data-bbox="533 384 1464 416">☐ BS 5930: 1999+A2:2010 Code of practice for site investigations <li data-bbox="533 427 1451 497">☐ BS 10175:2011 Code of practice for investigation of potentially contaminated sites <li data-bbox="533 509 1644 579">☐ BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points <li data-bbox="533 590 1599 660">☐ BS ISO 5667-11:2009 Water quality. Sampling. Guidance on sampling of groundwaters <p data-bbox="533 699 1637 954">All investigations of land potentially affected by contamination should be carried out by or under the direction of a suitably qualified competent person. The competent person would normally be expected to be a chartered member of an appropriate body (such as the Institution of Civil Engineers, Geological Society of London, Royal Institution of Chartered Surveyors, Institution of Environmental Management) and also have relevant experience of investigating contaminated sites.</p> <p data-bbox="533 975 1644 1082">If you have any questions please contact me on 0203 025 5486 or email me at HNL SustainablePlaces@environment-agency.gov.uk, quoting the reference at the beginning of this letter.</p>	
Thames Water	<p data-bbox="533 1102 790 1134">Waste Comments</p> <p data-bbox="533 1139 1630 1390">Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the</p>	<p data-bbox="1675 1102 2024 1241">Observations have been taken into account and condition 19 and informatives included</p>

Stakeholder	Question/Comment	Response
	<p>boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. The contact number is 0800 009 3921. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.</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. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure.</p> <p>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>'We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any</p>	

Stakeholder	Question/Comment	Response
	<p>discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality."</p> <p>Water Comments</p> <p>The existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development. Thames Water therefore recommend the following condition be imposed:</p> <p>Development should not be commenced until: Impact studies of the existing water supply infrastructure have been submitted to, and approved in writing by, the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point. Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand.</p> <p>No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility</p>	

Stakeholder	Question/Comment	Response
	<p>infrastructure.</p> <p>Piling has the potential to impact on local underground water utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.</p> <p>Thames Water recommend the following informative be attached to any planning permission: There are large water mains adjacent to the proposed development. Thames Water will not allow any building within 5 metres of them and will require 24 hours access for maintenance purposes. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.</p> <p>Supplementary Comments</p> <p>Proposed in drainage strategy connection points are not to the public sewer hence it is the responsibility of a developer to make proper provision with sewer owner. Based on drawing L16007/DS/201Rev P1 we believe that foul water will be connected to public sewer via private sewer and discharge at manhole TQ3489661A.</p> <p>We have no objection to foul water sewer proposal based on gravity connection. Regarding surface water we have no comments as entire system, as presented on drawing L16007/DS/201Rev P1, does not belong to Thames Water. Private owner agreement should be arranged.</p> <p>Additional Comments:</p> <p>Further to your enquiry below Thames Water can confirm that we would have no issue with water capacity and rescind the impact study condition, although</p>	

Stakeholder	Question/Comment	Response
	<p>the piling condition and trunk mains proximity conditions should still remain as the development is close to our network.</p> <p>Additional Comments 2:</p> <p>Please submit a single piling layout plan clearly indicating the locations of all piles across the development site that are to be installed and indicate the minimum horizontal separation between the proposed piles and all Thames Water assets in separate detailed drawings. This plan should also show the positions of the piles in relation to Thames Water assets and local topography such as roads, waterways (please include road names), existing buildings and/or any other notable features. Do not include other assets in the area on the plan drawings. Please ensure that all drawings have a scale bar. If any basements are intended to be constructed as part of the development, please clearly indicate the location and footprint and produce separate details with cross sectional views showing depths and location in relation to TW assets. Assume that the cover to the crown of the existing raw water main is 6.74m AOD.</p> <p>Without a drawing showing the clearances between the face of the piles/ other type of foundations and confirmed location of the Thames Water assets the condition cannot be discharged.</p> <p>Please see the guidance document 'Working Near Our Assets' available at the following link for more details on Thames Water policy with regards to piling, demolition, excavation and abnormal loading: (available online at https://developers.thameswater.co.uk/developing-a-large-site/planning-yourdevelopment/working-near-or-diverting-our-pipes).</p> <p>Plans of Thames Water apparatus can be obtained through our website at www.thameswaterpropertysearches.co.uk. Please contact Developer Services</p>	

Stakeholder	Question/Comment	Response
	<p>if you wish to discuss further (by email at DSCLX2039@thameswater.co.uk). Please use the following reference in all future correspondence: DTS54484</p>	
<p>Metropolitan Police</p>	<p>With reference the above application I have now had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on available information, including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.</p> <p>1.0 It is my professional opinion that crime prevention and community safety are material considerations, because of the proposed use, design, layout and location of the development proposed.</p> <p>1.1 To ensure the delivery of a safer development in line with Local Development Framework policies SP11 (See Appendix for details of these policies), I have highlighted some of my main areas of concern in Section 2 and I have recommended the attaching of a suitably worded condition, together with an informative.</p> <p>Recommendations:</p> <p>2.0 I can confirm that I have not met with the project architects or agents to discuss the intention around Secured by Design (SbD) as laid out in L.B. Haringey' SP11 policy, The London Plan and the project planning statement, (s3.3.37).</p> <p>Crime analysis and research with commercial outlets & CCTV control centre on the the Hale village development indicates that, Street crime, such as Theft from the person, Theft Snatch, Fraud (ATM), Alcohol/Drugs misuse & Anti Social Behaviour (ASB) are the main types of crime that affect the residents on a regular basis. Having attended the location & noted the site</p>	<p>Observations have been taken into account and amendments to the plans made where possible. Condition 21 included.</p>

Stakeholder	Question/Comment	Response
	<p>perimeter hoarding position and current CCTV positions I am concerned pre & post construction will hugely effect the current coverage, particularly to the public walkway off Ferry Lane and adjacent to Tesco leading to a rise in crime on this area.</p> <p>I have reviewed the planning application and due to the areas of concern (See 2.1 below) request the completion of the relevant SbD application forms at the earliest opportunity.</p> <p>Following consultation with the MPS Designing Out Crime team, the project has the potential to achieve a Secured by Design Gold Award & Commercial Award.</p> <p>Concerns:</p> <p>2.1 In summary I have site specific concerns in relation to the following items:</p> <ul style="list-style-type: none"> • Community/Amenity space • Basement Car parking undercroft/s • Perimeter treatments • Access Control • Postal strategy • Refuse Store/s • Bicycle Stores • Compartmentalisation • Physical Security • External Lighting • Vehicle Delivery strategy • CCTV (Public Realm) <p>Community Safety – Secured by Design Conditions:</p>	

Stakeholder	Question/Comment	Response
	<p>3.0 (1) I request that prior to carrying out above grade works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve full Secured by Design' Accreditation.</p> <p>The development shall only be carried out in accordance with the approved details.</p> <p>(2) 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>Community Safety - Informative:</p> <p>3.1 In aiming to satisfy the condition the applicant should seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs). The services of MPS DOCOs are available free of charge and can be contacted via <i>docomailbox.ne@met.police.uk</i> or 0208 217 3813.</p> <p>Crime Figures:</p> <p>4.0 Crime and disorder is a factor for consideration with this application. Crime data affecting this application are highlighted in appendix 2 below.</p> <p>Legislation & SBD Guidance:</p> <p>5.0 The LB Haringey LPD Core strategy requires all developments to demonstrate and apply the principles and practices of the Secured by Design (SBD) scheme. The measures recommended below are not intended to be prescriptive but to provide a suitable direction for the development. As a matter of course, all due consideration should be given to the SBD 'Homes 2016' guide (available online via</p>	

Stakeholder	Question/Comment	Response
	<p data-bbox="533 236 1400 268">http://www.securedbydesign.com/professionals/guides.aspx)</p> <p data-bbox="533 312 1644 528">Crime prevention and community safety are material considerations. If the L.B. Haringey are to consider granting consent, I would ask that the condition(s) and informative detailed above are attached. This is to mitigate the impact and deliver a safer development in line with national, regional and local planning policies. I would also like to draw your attention to Section 17 CDA 1988 and the NPPF, (See appendix) in supporting my recommendations.</p> <p data-bbox="533 568 1630 783">5.1 Whilst I accept that with the introduction of Approved Document Q of the Building Regulations from 1st October it is no longer appropriate for local authorities to attach planning conditions relating to technical door and window standards I would encourage the planning authority to note the experience gained by the UK police service over the past 26 years in this specific subject area.</p> <p data-bbox="533 826 1637 1190">That experience has led to the provision of a physical security requirement considered to be more consistent than that set out within Approved Document Q of the Building Regulations (England); specifically the recognition of products that have been tested to the relevant security standards but crucially are also fully certificated by an independent third party, accredited by UKAS (Notified Body). This provides assurance that products have been produced under a controlled manufacturing environment in accordance with the specifiers aims and minimises misrepresentation of the products by unscrupulous manufacturers/suppliers and leads to the delivery, on site, of a more secure product.</p> <p data-bbox="533 1233 1626 1342">I would therefore request that the benefits of certified products be pointed out to applicants and that the Local Authority encourages assessment for this application.</p>	

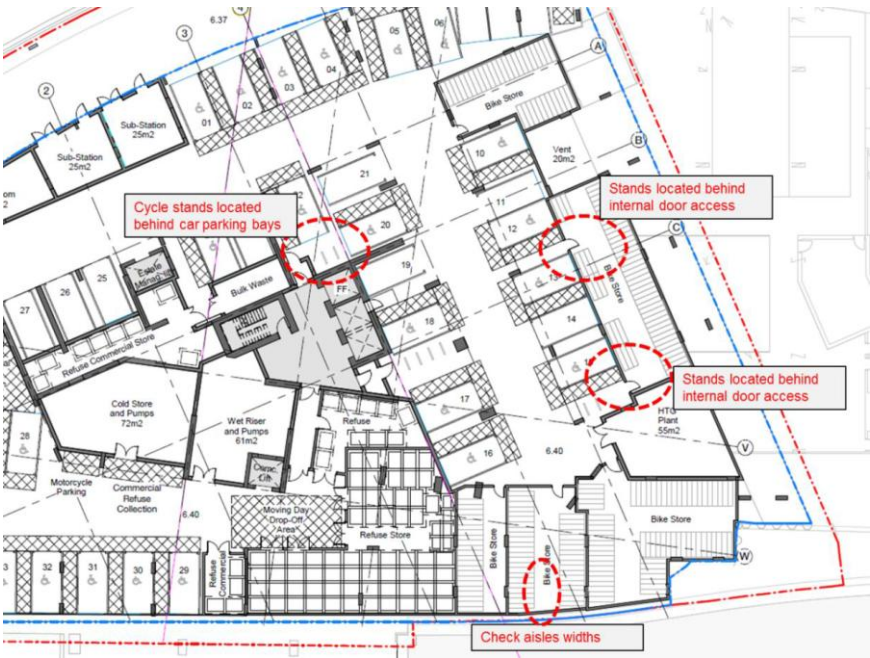
Stakeholder	Question/Comment	Response
	<p>For a complete explanation of certified products please refer to the Secured by Design guidance documents which can be found on the website. www.securedbydesign.com .</p> <p>Conclusion:</p> <p>I would ask that my interest in this planning application is noted and that I am kept apprised of developments. Additionally, I would welcome the opportunity of sitting in on any meeting you might have concerning this proposal.</p> <p>Should the Planning Authority require clarification of any of the above comments please do not hesitate to contact me at the above office.</p>	
London Fire Service	<p><i>The Service originally objected but had not seen the Fire Safety Strategy document submitted. After this was pointed out the following comments were provided:</i></p> <p>The Brigade is satisfied with the proposals for fire fighting access.</p> <p>This Authority strongly recommends that sprinklers are considered for new developments and major alterations to existing premises, particularly where the proposals relate to schools and care homes. Sprinkler systems installed in buildings can significantly reduce the damage caused by fire and the consequential cost to businesses and housing providers, and can reduce the risk to life. The Brigade opinion is that there are opportunities for developers and building owners to install sprinkler systems in order to save money, save property and protect the lives of occupier. Please note that it is our policy to regularly advise our elected Members about how many cases there have been where we have recommended sprinklers and what the outcomes of those recommendations were. These quarterly reports to our Members are public documents which are available on our website.</p>	Comments noted.

Stakeholder	Question/Comment	Response
<p>Transport for London</p>	<p>I write following receipt of the Transport Assessment (TA) dated 28 June 2017 submitted in support of the above planning application to the London Borough of Haringey.</p> <p>The following comments represent the views of Transport for London officers and are made on a “without prejudice” basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. These comments also do not necessarily represent the views of the Greater London Authority.</p> <p>Site description</p> <p>The site is bounded by A503 Ferry Lane to the south, and Daneland Walk to the north and west, with rail lines just beyond to the west. The nearest section of the Transport for London Road Network (TLRN) is the Hale / Broad Lane junction, approximately 200 metres to the west of the site. The nearest section of the Strategic Road Network (SRN) is the A1010 High Road, approximately 1.4km to the north-west of the site. The nearest station is Tottenham Hale, which is approximately 100 metres to the west of the site, providing access to rail services between Liverpool Street, Cambridge and Stansted Airport and underground services on the Victoria Line. With the forthcoming redevelopment of the station, there will be a new pedestrian footbridge linking directly into Hale Village with a new station entrance opposite the SW Plot Hale Village development site. 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 to the site are the pair of Mill Mead Road bus stops that are located just south of the site on A503 Ferry Lane: these stops are served by routes 123, 230, N73 and W4. Due to the aforementioned public transport connections, the Public Transport Accessibility Level (PTAL) of the site ranges from 5-6a (on a scale of 1 to 6 where 6 is excellent and 1 is very poor).</p>	<p>Comments noted and will be dealt with by conditions 23, 26 and 27 and legal agreement as appropriate.</p>

Stakeholder	Question/Comment	Response
	<p>Proposed development TfL understands that the proposals are for a new mixed use development comprising:</p> <ul style="list-style-type: none"> □ 1,588sqm commercial space (flexible A1/A3/A4/B1/D1 uses); □ 279 residential units. <p>Trip generation The approach to trip generation forecasting is acceptable and in accordance with our guidance. TRICS has been used to forecast the development site trip generation and local census data has been used to forecast how these trips will be split between different modes of transport, whilst taking account of the low car nature of the development and excellent public transport links. We have reviewed the trip generation forecasts, including modal splits, and we find these forecasts to be reasonable.</p> <p>Car Parking A total of 36 car parking spaces are proposed, which we find an acceptable number. A total of 24 of these 36 car parking spaces are Blue Badge spaces, which equates to one Blue Badge space for 8.6 per cent of the proposed residential units. This represents an under provision against the London Plan Policy 6.13 requirement for each wheelchair accessible unit to have an accessible parking space (based on the assumption that 10 per cent of the residential units will be accessible). We therefore ask that the applicant investigates whether the accessible parking quantum could be revised upwards within the constraints of the site.</p> <p>Highways impact The development is forecast to generate 24 morning peak vehicle trips and 15 evening peak vehicle trips. We do not have a concern regarding the highways impact of these vehicle trip numbers.</p>	

Stakeholder	Question/Comment	Response
	<p>Buses The development is forecast to generate 51 bus trips in the morning peak and 50 bus trips in the evening peak. TfL is satisfied that, when distributed across the local bus network, these trips will not have a material impact on any individual bus route and therefore no bus contribution is sought.</p> <p>Walking The PERS audit does not identify any opportunities to improve the pedestrian environment. We encourage the Council to consider whether the local pedestrian network could be improved as part of the TfL Healthy Streets approach to promoting walking to/from the site.</p> <p>We consider that there is the opportunity for this development to deliver Legible London signage in coordination with other development in the area. We would welcome further discussion with the Council and the applicant on this matter.</p> <p>Cycling Assessment of local cycling conditions. The applicant has identified cycle routes in close vicinity of the site and potential cycle routes to the site. The applicant has not however provided an assessment of the quality of these routes neither severance issues for those cycling to/from the site. Therefore, we recommend that the Council request the applicant provide a Cycling Level of Service (CLoS) analysis of key links and junctions in close vicinity of the site. Such an assessment would help to identify the key safety issues for those cycling to/from the site, as well as possible improvements to the local cycling environment. The scope of the CLoS analysis should also include routes to key local cycle destinations.</p> <p>Access to / from and through the site</p>	

Stakeholder	Question/Comment	Response
	<p>In line with London Plan Policy 6.9, the applicant should clarify which parts of the site can be cycled through. Cyclists should be able to ride up to the entrance of cycle parking storage areas (i.e. not be required to dismount). This is an accessibility requirement for those using cycles as mobility aids as well as a practical recommendation.</p> <p>Cycle parking numbers A total of 438 long stay and 7 short stay cycle parking spaces are proposed for the residential element of the development. We are satisfied that these numbers adhere to the London Plan minimum standards. A total of 10 long stay and 28 short stay cycle parking spaces are also proposed for the flexible commercial element of the development. It is not possible for us to assess whether these numbers adhere to the London Plan minimum standards without further disaggregation of the land use. Further clarification is sought from the applicant.</p> <p>Cycle parking location and access Residential long-stay cycle parking is proposed at the basement level and is distributed across five storage rooms. Access to the basement level is made via a ramp and via a lift. The basement plan submitted raises a series of concerns. The internal layout of some of the storage rooms suggests that aisles may be too narrow for users to manoeuvre and park their bicycles without blocking the access to or through the facility. The location of two-tier stands behind the internal access doors is similarly a concern, as the operation of the upper level of the two-tier rack is likely to restrict access to the facility. The location of Sheffield stands in the basement also raises concerns. Some of the stands are likely to block/restrict access to the cycle storage room due to their alignment with the main doors. Additionally, some spaces are located behind car park bays and therefore may have restricted access.</p>	

Stakeholder	Question/Comment	Response
	<p>We welcome the provision of short-stay cycle parking in the public realm. However, we would recommend a more even distribution across the site.</p>  <p>The diagram is a detailed site plan of a building complex. It shows various rooms and areas such as 'Sub-Station 25m²', 'Bulk Waste', 'Cold Store and Pumps 72m²', 'Wet Riser and Pumps 61m²', 'Commercial Refuse Collection', 'Motorcycle Parking', 'Refuse Store', 'HT Plant 55m²', and 'Bike Store'. Red dashed circles and boxes highlight specific areas where cycle stands are proposed. Callouts include: 'Cycle stands located behind car parking bays' (pointing to a red circle near the top left), 'Stands located behind internal door access' (two red circles pointing to areas near internal doorways), and 'Check aisles widths' (a red box at the bottom center). The plan also shows 'Vent 20m²' and 'Disposal Area'.</p> <p>Type of cycle parking The information submitted suggests that there will be a mix of two-tier racks and Sheffield stands. We welcome that 5% of all spaces are to be capable of accommodating larger cycles. Two-tier racks should have a mechanically or pneumatically assisted system for accessing the upper level, as many people find using these spaces difficult. The product must also allow for double-locking. Minimum aisle widths, as set out in the London Cycling Design Standards and recommended by manufacturers, must be met in order for these stands to be usable.</p>	

Stakeholder	Question/Comment	Response
	<p data-bbox="533 272 1592 379">London Underground capacity The development proposal in isolation does not give TfL concern regarding Victoria Line capacity at Tottenham Hale.</p> <p data-bbox="533 419 1637 526">London Underground infrastructure The developer is working with London Underground engineers on this scheme and should continue to do so.</p> <p data-bbox="533 566 1637 715">London Underground infrastructure You will be aware that the proposed development is adjacent to and above London Underground infrastructure. Accordingly, the applicant is working with London Underground engineers on this scheme and should continue to do so.</p> <p data-bbox="533 754 1637 1050">The interface between the development and the new Hale Village link into the station, referred to above, is important – this link will use the existing station footbridge which will be extended to connect into the Hale Village development. This will provide step-free access into the station from Hale Village, enhancing station access for residents and visitors. In addition, the link will provide a step-free route through the station for non-station users, providing a direct and convenient connection to Tottenham bus station and the emerging district centre.</p> <p data-bbox="533 1090 1637 1193">We request that through the S106 agreement the developer is obliged to work with TfL to facilitate the delivery of the Tottenham Hale Station – Hale Village link.</p> <p data-bbox="533 1233 1626 1378">Crossrail 2 Tottenham Hale station would become a key interchange station on the Crossrail 2 route, and would require improvement works to accommodate the new Crossrail 2 services. These plans are still in the early stages of</p>	

Stakeholder	Question/Comment	Response
	<p>development, but proposals would include platform and station works together with track realignment. The proposals would be adjacent to the limits of land subject to consultation by the Crossrail 2 Safeguarding Direction. It is therefore essential to ensure that both projects can be delivered without one prejudicing the other.</p> <p>If the Council, in its capacity as Local Planning Authority, is minded to grant planning permission, TfL who have responsibility for administering the Crossrail 2 Safeguarding Directions requests that the following condition is imposed: “None of the development hereby permitted shall be commenced until detailed design and construction method statements for all of the ground floor structures, foundations and basements and for any other structures below ground level, including piling and any other temporary or permanent installations and for ground investigations, have been submitted to and approved in writing by the Local Planning Authority which accommodate the proposed location of the Crossrail 2 structures including temporary works.”</p> <p>The application site would be adjacent to a major Crossrail 2 worksite and therefore TfL advises Haringey Council that: the applicants are encouraged to engage with Crossrail 2 in respect of the foundation design for the proposals in the course of preparing detailed design and method statements and can be contacted at crossrail2@tfl.gov.uk; the applicant and Local Planning Authority should also be aware that the site is adjacent to a proposed major Crossrail 2 worksite and it is recommended that the design of the proposals include noise mitigation measures particularly to windows and openings to the residential units.</p> <p>Deliveries TfL has reviewed the Delivery and Servicing Management Plan and find it to be satisfactory.</p>	

Stakeholder	Question/Comment	Response
	<p>TfL expects that the full delivery servicing plan (DSP) be secured by planning condition, to comply with London Plan policy 6.14 “Freight” to rationalise and manage servicing activities for the proposal.</p> <p>Construction TfL has reviewed the Framework Construction Logistics Plan (CLP) and find it to be satisfactory.</p> <p>The CLP should be secured by pre commencement condition.</p> <p>Travel Plan The Travel Plan mode share targets should flow from the trip generation forecasts as set out in the transport assessment i.e. the trip generation forecasts in the TA should represent what the applicant considers a realistic forecast for year 1, with year 3 and 5 forecasts representing change from year 1 (change from the TA forecast). TfL asks that the Travel Plan targets are adjusted to follow this logical, transparent structure.</p> <p>TfL welcomes the applicant’s commitment to appoint a Travel Plan Co-ordinator to take control of the development and management of the Travel Plan, and to ensure its delivery. The Travel Plan should be secured through the Section 106 agreement.</p> <p>Summary In order to comply with London Plan policies, TfL requests the following:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Where feasible, increase Blue Badge parking provision to meet the London Plan Policy 6.13 requirement; <input type="checkbox"/> Clarify cycle routes through the site in line with London Plan Policy 6.9; <input type="checkbox"/> Demonstrate that the London Plan minimum standards for non-residential cycle parking are being met (London Plan Policy 6.9); <input type="checkbox"/> Revise the design of the basement cycle parking to address TfL’s design 	

Stakeholder	Question/Comment	Response
	<p>concerns in line with London Plan Policy 6.9;</p> <ul style="list-style-type: none"> <input type="checkbox"/> That the developer works with TfL to facilitate the delivery of the Tottenham Hale Station – Hale Village link; <input type="checkbox"/> Ensure that Crossrail 2 is safeguarded by imposing the following condition: <p>“None of the development hereby permitted shall be commenced until detailed design and construction method statements for all of the ground floor structures, foundations and basements and for any other structures below ground level, including piling and any other temporary or permanent installations and for ground investigations, have been submitted to and approved in writing by the Local Planning Authority which accommodate the proposed location of the Crossrail 2 structures including temporary works.”</p> <ul style="list-style-type: none"> <input type="checkbox"/> Secure a full delivery servicing plan (DSP) by planning condition, to rationalise and manage servicing activities in accordance with London Plan policy 6.14 “Freight”; <input type="checkbox"/> Secure the CLP by pre commencement condition; <input type="checkbox"/> Secure and monitor the Travel Plan through the Section 106 agreement. <p>I trust that the above provides you with a better understanding of TfL’s current position on the planning application. Please do not hesitate to contact me if you have any questions or need clarification on any of the points raised.</p>	
Network Rail	<p>Thank you very much for consulting with Network Rail in regards to application HGY/2017/2005 and offering us the opportunity to comment, please also be advised your application has been passed onto the Crossrail2 team to review who will respond directly in due course. The developer/applicant must ensure that their proposal, both during construction and after completion of works on site, does not:</p> <ul style="list-style-type: none"> . encroach onto Network Rail land . affect the safety, operation or integrity of the company's railway and its 	<p>Comments noted. Condition 24 has been included.</p>

Stakeholder	Question/Comment	Response
	<p>infrastructure</p> <ul style="list-style-type: none"> . undermine its support zone . damage the company's infrastructure . place additional load on cuttings . adversely affect any railway land or structure . over-sail or encroach upon the air-space of any Network Rail land . cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future <p>The developer should comply with the following comments and requirements for the safe operation of the railway and the protection of Network Rail's adjoining land.</p> <p>Please see below & attached comments,</p> <p>Future maintenance</p> <p>The development must ensure that any future maintenance can be conducted solely on the applicant's land. The applicant must ensure that any construction and any subsequent maintenance can be carried out to any proposed buildings or structures without adversely affecting the safety of, or encroaching upon Network Rail's adjacent land and air-space, and therefore all/any building should be situated at least 2 metres (3m for overhead lines and third rail) from Network Rail's boundary. The reason for the 2m (3m for overhead lines and third rail) stand off requirement is to allow for construction and future maintenance of a building and without requirement for access to the operational railway environment which may not necessarily be granted or if granted subject to railway site safety requirements and special provisions with all associated railway costs charged to the applicant. Any less than 2m (3m for overhead lines and third rail) and there is a strong possibility that the applicant (and any future resident) will need to utilise Network Rail land and air-space to</p>	

Stakeholder	Question/Comment	Response
	<p>facilitate works. The applicant / resident would need to receive approval for such works from the Network Rail Asset Protection Engineer, the applicant / resident would need to submit the request at least 20 weeks before any works were due to commence on site and they would be liable for all costs (e.g. all possession costs, all site safety costs, all asset protection presence costs). However, Network Rail is not required to grant permission for any third party access to its land. No structure/building should be built hard-against Network Rail's boundary as in this case there is an even higher probability of access to Network Rail land being required to undertake any construction / maintenance works. Equally any structure/building erected hard against the boundary with Network Rail will impact adversely upon our maintenance teams' ability to maintain our boundary fencing and boundary treatments.</p> <p>Drainage No Storm/surface water or effluent should be discharged from the site or operations on the site into Network Rail's property or into Network Rail's culverts or drains except by agreement with Network Rail. Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run-off onto Network Rail's property. Proper provision must be made to accept and continue drainage discharging from Network Rail's property; full details to be submitted for approval to the Network Rail Asset Protection Engineer. Suitable foul drainage must be provided separate from Network Rail's existing drainage. Soakaways, as a means of storm/surface water disposal must not be constructed near/within 10 - 20 metres of Network Rail's boundary or at any point which could adversely affect the stability of Network Rail's property. After the completion and occupation of the development, any new or exacerbated problems attributable to the new development shall be investigated and remedied at the applicants' expense.</p> <p>Plant & Materials</p>	

Stakeholder	Question/Comment	Response
	<p>All operations, including the use of cranes or other mechanical plant working adjacent to Network Rail's property, must at all times be carried out in a "fail safe" manner such that in the event of mishandling, collapse or failure, no plant or materials are capable of falling within 3.0m of the boundary with Network Rail.</p> <p>Scaffolding Any scaffold which is to be constructed within 10 metres of the railway boundary fence must be erected in such a manner that at no time will any poles over-sail the railway and protective netting around such scaffold must be installed. The applicant/applicant's contractor must consider if they can undertake the works and associated scaffold/access for working at height within the footprint of their property boundary.</p> <p>Piling Where vibro-compaction/displacement piling plant is to be used in development, details of the use of such machinery and a method statement should be submitted for the approval of the Network Rail's Asset Protection Engineer prior to the commencement of works and the works shall only be carried out in accordance with the approved method statement.</p> <p>Fencing In view of the nature of the development, it is essential that the developer provide (at their own expense) and thereafter maintain a substantial, trespass proof fence along the development side of the existing boundary fence, to a minimum height of 1.8 metres. The 1.8m fencing should be adjacent to the railway boundary and the developer/applicant should make provision for its future maintenance and renewal without encroachment upon Network Rail land. Network Rail's existing fencing / wall must not be removed or damaged and at no point either during construction or after works are completed on site</p>	

Stakeholder	Question/Comment	Response
	<p>should the foundations of the fencing or wall or any embankment therein, be damaged, undermined or compromised in any way. Any vegetation on Network Rail land and within Network Rail's boundary must also not be disturbed. Any fencing installed by the applicant must not prevent Network Rail from maintaining its own fencing/boundary treatment.</p> <p>Lighting Any lighting associated with the development (including vehicle lights) must not interfere with the sighting of signalling apparatus and/or train drivers vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signalling arrangements on the railway. The developers should obtain Network Rail's Asset Protection Engineer's approval of their detailed proposals regarding lighting.</p> <p>Noise and Vibration The potential for any noise/ vibration impacts caused by the proximity between the proposed development and any existing railway must be assessed in the context of the National Planning Policy Framework which holds relevant national guidance information. The current level of usage may be subject to change at any time without notification including increased frequency of trains, night time train running and heavy freight trains.</p> <p>Landscaping Where trees/shrubs are to be planted adjacent to the railway boundary these shrubs should be positioned at a minimum distance greater than their predicted mature height from the boundary. Certain broad leaf deciduous species should not be planted adjacent to the railway boundary as the species will contribute to leaf fall which will have a detrimental effect on the safety and operation of the railway. We would wish to be involved in the approval of any landscaping scheme adjacent to the railway. Where landscaping is proposed as part of an application adjacent to the railway it will be necessary for details</p>	

Stakeholder	Question/Comment	Response
	<p>of the landscaping to be known and approved to ensure it does not impact upon the railway infrastructure. Any hedge planted adjacent to Network Rail's boundary fencing for screening purposes should be so placed that when fully grown it does not damage the fencing or provide a means of scaling it. No hedge should prevent Network Rail from maintaining its boundary fencing. Lists of trees that are permitted and those that are not permitted are provided below and these should be added to any tree planting conditions:</p> <p>Permitted: Birch (Betula), Crab Apple (Malus Sylvestris), Field Maple (Acer Campestre), Bird Cherry (Prunus Padus), Wild Pear (Pyrus Communis), Fir Trees - Pines (Pinus), Hawthorne (Cretaegus), Mountain Ash - Whitebeams (Sorbus), False Acacia (Robinia), Willow Shrubs (Shrubby Salix), Thuja Plicatata</p> <p>"Zebrina" Not Permitted: Alder (Alnus Glutinosa), Aspen - Poplar (Populus), Beech (Fagus Sylvatica), Wild Cherry (Prunus Avium), Hornbeam (Carpinus Betulus), Small-leaved Lime (Tilia Cordata), Oak (Quercus), Willows (Salix Willow), Sycamore - Norway Maple (Acer), Horse Chestnut (Aesculus Hippocastanum), Sweet Chestnut (Castanea Sativa), London Plane (Platanus Hispanica).</p> <p>Vehicle Incursion</p> <p>Where a proposal calls for hard standing area / parking of vehicles area near the boundary with the operational railway, Network Rail would recommend the installation of a highways approved vehicle incursion barrier or high kerbs to prevent vehicles accidentally driving or rolling onto the railway or damaging lineside fencing.</p> <p>As the site is adjacent to Network Rail's operational railway infrastructure, Network Rail strongly recommends the developer contacts</p>	

Stakeholder	Question/Comment	Response
	<p>AssetProtectionAnglia@networkrail.co.uk prior to any works commencing on site. Network Rail strongly recommends the developer agrees an Asset Protection Agreement with us to enable approval of detailed works. More information can also be obtained from our website at www.networkrail.co.uk/aspx/1538.aspx.</p>	
London Overground Infrastructure Management	<p>Rail for London (RfL) has reviewed the application and from an Infrastructure Protection perspective, has no comments to make. We have forwarded this to Network Rail who may have assets in this area.</p>	Comments noted.
London Underground Infrastructure Provision	<p>I can confirm that the planning applicant is in communication with London Underground engineers with regard to the development above. Therefore, we have no comment to make on the application except that the developer should continue to work with LU engineers.</p> <p>These comments relate only to the London Underground infrastructure protection issues raised by the application. They should not be taken to be representative of the position which may be taken by the Mayor and/or another part of TfL. You are advised to consider whether it is also necessary or appropriate to consult other parts of TfL and whether the application should be referred to the Mayor as an application of potential strategic importance pursuant to the provisions of the Town and Country Planning (Mayor of London) Order 2008. All other consultations with TfL should be made by emailing boroughplanning@tfl.gov.uk.</p>	Comments noted.
Crossrail 2 Safeguarding	<p>Transport for London administers the Crossrail 2 (CR2) Safeguarding Direction made by the Secretary of State for Transport on 23 March 2015. Crossrail 2 has been advised via Network Rail's development team of the proposed planning application at Tottenham Hale.</p> <p>Crossrail 2 would like to make comment on this application and advises</p>	Comments noted. Condition 23 and informatives included.

Stakeholder	Question/Comment	Response
	<p>Haringey Planning Authority that whilst the development site boundary is currently outside safeguarding limits it is in close proximity to a proposed and significant Crossrail 2 construction worksite.</p> <p>Tottenham Hale station would also become a key interchange station on the route, and would require improvement works to accommodate the new Crossrail 2 services. These plans are still in the early stages of development, but proposals would include platform and station works together with track realignment. The proposals as set out on the application for planning permission are adjacent to the limits of land subject to consultation by the Crossrail 2 Safeguarding Direction. It is therefore essential to ensure that both projects can be delivered without one prejudicing the other.</p> <p>If the Council, in its capacity as Local Planning Authority, is minded to grant planning permission, TfL who have responsibility for administering the Crossrail 2 Safeguarding Directions have requested the following condition is applied to any Notice of Permission:</p> <p>None of the development hereby permitted shall be commenced until detailed design and construction method statements for all of the ground floor structures, foundations and basements and for any other structures below ground level, including piling and any other temporary or permanent installations and for ground investigations, have been submitted to and approved in writing by the Local Planning Authority which accommodate the proposed location of the Crossrail 2 structures including temporary works.</p> <p>The application site would be adjacent to a major Crossrail 2 worksite and therefore TfL has advised the LPA that:</p> <p>The applicants are encouraged to engage with Crossrail 2 in respect of the foundation design for the proposals in the course of preparing detailed design</p>	

Stakeholder	Question/Comment	Response
	<p>and method statements and can be contacted at crossrail2@tfl.gov.uk</p> <p>The applicant and Local Planning Authority should also be aware that the site is adjacent to a major Crossrail 2 worksite and it is recommended that the design of the proposals include noise mitigation measures particularly to windows and openings to the residential units.</p> <p>In addition, the latest project developments can be found on the Crossrail 2 website www.crossrail2.co.uk , which is updated on a regular basis. I hope this information is helpful, but if you require any further information or assistance then please feel free to contact a member of the Safeguarding Team on 0343 222 1155, or by email to crossrail2@tfl.gov.uk</p>	
<p>Natural England</p>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>The Wildlife and Countryside Act 1981 (as amended) The Conservation of Habitats and Species Regulations 2010 (as amended)</p> <p>Natural England's comments in relation to this application are provided in the following sections.</p> <p>Statutory nature conservation sites – no objection Natural England has assessed this application using the Impact Risk Zones data (IRZs). Natural England advises your authority that the proposal, if undertaken in strict accordance with the details submitted, is not likely to have a significant effect on the interest features for which Lee Valley SPA and RAMSAR has been classified. Natural England therefore advises that your</p>	<p>Comments noted. Condition 12 has been included.</p>

Stakeholder	Question/Comment	Response
	<p>Authority is not required to undertake an Appropriate Assessment to assess the implications of this proposal on the site's conservation objectives.</p> <p>In addition, Natural England is satisfied that the proposed development being carried out in strict accordance with the details of the application, as submitted, will not damage or destroy the interest features for which the Walthamstow Reservoir SSSI has been notified. We therefore advise your authority that this SSSI does not represent a constraint in determining this application.</p> <p>Should the details of this application change, Natural England draws your attention to Section 28(l) of the Wildlife and Countryside Act 1981 (as amended), requiring your authority to re-consult Natural England.</p> <p>Protected species</p> <p>We have not assessed this application and associated documents for impacts on protected species.</p> <p>Natural England has published Standing Advice on protected species. You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.</p> <p>The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected Species (EPS) that the proposed development is unlikely to affect the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence is needed (which is the developer's responsibility) or may be granted.</p> <p>If you have any specific questions on aspects that are not covered by our Standing Advice for European Protected Species or have difficulty in applying</p>	

Stakeholder	Question/Comment	Response
	<p>it to this application please contact us with details at consultations@naturalengland.org.uk.</p> <p>Biodiversity enhancements This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the National Planning Policy Framework. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that <i>‘Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity’</i>. Section 40(3) of the same Act also states that <i>‘conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat’</i>.</p> <p>Sites of Special Scientific Interest Impact Risk Zones The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on “Development in or likely to affect a Site of Special Scientific Interest” (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website.</p> <p>We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</p>	

Stakeholder	Question/Comment	Response
<p>GLAAS</p>	<p>The planning application lies in an area of archaeological interest.</p> <p>The application site lies close to the Saxon settlement of Tottenham Hale, a traditional river crossong of the Lea and may also include part of the GLS air raid shelters. It also has potential for prehistoric and Roman remains.</p> <p>Appraisal of this application using the Greater London Historic Environment Record and information submitted with the application indicates the need for field evaluation to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a condition could provide an acceptable safeguard. A condition is therefore recommended to require a two stage process of archaeological investigation comprising: first, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. The archaeological interest should therefore be conserved by attaching a condition as follows:</p> <p>No demolition or development shall take place until a stage 1 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, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.</p> <p>If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall</p>	<p>Comments and recommended. Condition 22 and an informative included.</p>

Stakeholder	Question/Comment	Response
	<p>include:</p> <p>A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works</p> <p>B. 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 stage 2 WSI.</p> <p>Informative</p> <p>Written schemes 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.</p> <p>I envisage that the archaeological fieldwork would comprise the following:</p> <p>Evaluation</p> <p>An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy</p>	

Stakeholder	Question/Comment	Response
	<p>after permission has been granted.</p> <p>Further information on archaeology and planning in Greater London including Archaeological Priority Areas is available on the Historic England website.</p> <p>Please do not hesitate to contact me should you require further information or assistance. I would be grateful to be kept informed of the progress of this application.</p> <p>Please note that this response relates solely to archaeological considerations. If necessary, Historic England's Development Management or Historic Places teams should be consulted separately regarding statutory matters.</p>	
Lee Valley Regional Park Authority	<p>Having looked at the application despite its size it is well outside the Park boundary and it may be that we will be seeking CIL to be directed to the Regional Park. I will present this application to our members in late September when I will send over the formal minute but I can send over a draft recommendation in advance to meet your deadline. Personally I think it could be an attractive addition to the skyline.</p>	Comments noted.
London Borough of Hackney	<p>Particulars of Decision: OBJECTION Reasons: At 33 storeys the proposed development is significantly taller than the approved 18 storey building and the other buildings approved on sites nearby, and as such will be visually obtrusive when viewed from various sites within Hackney including Springfield Park, which is included in the applicant's verified views document. It is suggested that the height be reduced so that it is closer to that of other approved buildings nearby.</p>	<p>Comments noted. Although an objection has been received the submitted documentation notes that the impact on Springfield Park and other key views within LB Hackney would be 'minor' or less. The Council's Principal Conservation Officer and</p>

Stakeholder	Question/Comment	Response
		the GLA have also raised no objection. Therefore, the objection is not considered to be reasonable in this case.
London Borough of Waltham Forest	<p>Thank you for your consultation and I apologise for the late response. I had understood my comments had already been sent to you some weeks ago. My understanding is that the proposal involves construction of a 33 storey tower in Hale Village and there has been some suggestion it might impact on its surroundings (understandably) and perhaps some Listed buildings such as the Ferry Boat Inn some 400 metres away in our borough</p> <p>Given the degree of separation however and the fact the Ferry Boat Inn is a 2 and a half storey pub which can't be expected to have dominance in terms of height, it is not considered that the proposal would have any adverse affect (see photo 4 below)</p> <p>As advised however the proposal would result in a significantly more intensive use of the local area and would put considerable additional pressure on the need for open space. We would expect this to be mitigated by financial contributions towards the wetlands and that this should be secured by any S106 legal agreement so please do advise us prior to instructing your legal team and preparing your committee report.</p>	Comments noted. All open space requirements are provided within this and the surrounding Hale Village site and therefore a contribution towards is not considered to be reasonable.
Canal and River Trust	The Trust has reviewed the application. This is our substantive response under the Town and Country Planning (Development Management Procedure) (England) Order 2015. Based upon the information available we have no specific comments to make on the proposal.	Comments noted.

Stakeholder	Question/Comment	Response
	<p>However, we note that the development is significantly taller than surrounding development, and that the number of units is likely to increase the number of visitors to the Lee Navigation and its towpath, which would put pressure on the Trust's maintenance of this publicly accessible, open space facility. The Trust would therefore welcome a discussion with the LPA to discuss how funds that are secured through CIL from the development are to be allocated to mitigate the impact of the proposal in the Lee Valley and waterway corridor.</p> <p>In order for the Canal & River Trust to monitor our role as a statutory consultee, please send me a copy of the decision notice and the requirements of any planning obligation.</p>	
<p>LOCAL REPRESENTATIONS (80)</p>	<p>Summary of responses:</p> <p><u>Design</u></p> <p>1) Out of keeping with local character;</p> <ul style="list-style-type: none"> • Developments must be in keeping with the surroundings • Wrong location for a building of this size • No balance with existing buildings • Development does not fit in with existing buildings <p>2) Poor design;</p> <ul style="list-style-type: none"> • Design is bland • Poor quality landmark 	<p>The development would be in accordance with the emerging character of Tottenham Hale which is increasingly of tall buildings with a contemporary design. This specific site is identified for a landmark tall building.</p> <p>The design contrasts positively with the</p>

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • Aesthetics differ from other local buildings • Will materials be high quality? • Negative impact on appearance of the skyline • Angular corner design is oppressive <p>3) Poor street scape;</p> <ul style="list-style-type: none"> • Creation of a narrow urban canyon • Development would not integrate into existing built form • Hale Village and Ferry Lane will be separated • Size will create the sense of a ghetto <p>4) Excessive height;</p> <ul style="list-style-type: none"> • Too tall • Height is very excessive • Height is repressive • Much taller than expected and previously approved plans • Height is exaggerated • Four times taller than adjacent buildings • Tower blocks of this size are usually unsuccessful • Too high for marshland/canal environment • Building heights should decrease from town centres • Adjacent buildings are only nine stories 	<p>extremely colourful finish of some buildings within Hale Village, and would have an elegant articulation. Design has been ratified by the QRP and Design Officer. Materials would be of a very high quality.</p> <p>Street layout meets the previously approved Masterplan parameters. Site was always intended for a building significantly taller than the surroundings. Separation of Hale Village from main road was an objective of original masterplan.</p> <p>Building was always intended to be significantly greater in height than remainder of Hale Village masterplan, and emerging character of Tottenham Hale is of tall buildings. Location is suitable for dense and</p>

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • Too many tall buildings in Tottenham <p>5) Excessive scale, bulk and massing;</p> <ul style="list-style-type: none"> • Over-scaled • Out of proportion • Gross mismatch with size of other local buildings • Located too close to Coppermill Heights <p>6) Dominating appearance;</p> <ol style="list-style-type: none"> a. Impact on local views b. Impact on long-distance views c. Overbearing relationship <p><u>Neighbouring Amenity</u></p> <p>1) Loss of day/sunlight;</p> <ul style="list-style-type: none"> • Existing flat already has poor access to light (Coppermill Heights) • Reduction in afternoon sun • Natural sunlight reduced • Loss of sunlight to Coppermill Heights • Loss of sunlight will be very bad in the winter 	<p>tall development. Distance from much smaller buildings and open space is significant. Tottenham Hale is an emerging district 'town' centre.</p> <p>Proportions are consistent with the emerging character of Tottenham Hale, which is of tall buildings. Host plot is suitable for dense development. Boundary parameters set by original masterplan.</p> <p>Impact on local and long views would be no greater than minor, and in some cases positive. Human relationship at street level would be facilitated by podium element.</p> <p>Sun and daylight matters are dealt with in detail in the case officer report. In</p>

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • Loss of light to balconies • Increased overshadowing • Loss of light to communal garden at Coppermill Heights • Loss of light to play areas • Light study is inaccurate <p>2) Loss of outlook;</p> <ul style="list-style-type: none"> • Clear outlook removed and replaced with flats <p>3) Loss of privacy;</p> <ul style="list-style-type: none"> • Complete loss of privacy as new block 10m away from flat <p>4) Increased wind tunnelling;</p> <ul style="list-style-type: none"> • Wind tunnel will be unavoidable • Existing wind tunnelling would excessively increase <p>5) Increased pollution;</p> <ul style="list-style-type: none"> • Dangerous levels of air pollution would increase further • Light pollution would increase 	<p>many cases the impact on existing properties would be reduced compared to the size parameters of the outline planning permission.</p> <p>Parameters of a tall building at this site are already set by outline permission.</p> <p>Parameters of a tall building with residential units on the eastern side have been set by outline permission.</p> <p>Wind movements would remain within acceptable limits, subject to mitigation to be secured by condition.</p> <p>Number of vehicles</p>

Stakeholder	Question/Comment	Response
	<p>6) Increased noise disturbance;</p> <ul style="list-style-type: none"> • Disturbance from building works over a long period; • Area is already very loud; • New residents will create additional noise particularly to Coppermill Heights properties; <p><u>Layout and Density</u></p> <p>1) Overdevelopment/overcrowding;</p> <ul style="list-style-type: none"> • Already a high amount of pedestrian movements • Very large for small plot • Too many flats for a small area • Area is already overcrowded • Tottenham Hale station is already too crowded • Station renovation will not sufficiently increase capacity • Victoria underground line is already too crowded • Lack of infrastructure for the development • Large increase in local population <p>2) Lack of affordable housing;</p> <ul style="list-style-type: none"> • Level of affordable housing provided is low 	<p>would result in insignificant or negligible increases in air pollution. Light pollution would not be significant for an urban area.</p> <p>Construction works are for a limited period only. Additional noise from occupiers would not be significant for an urban area.</p> <p>Site is identified for a tall building and is suitable for very dense development. Investment in local transport and other infrastructure are ongoing.</p> <p>See officer report for more detail. Scheme viability has been tested and maximum possible</p>

Stakeholder	Question/Comment	Response
	<p>3) Poor internal layout;</p> <ul style="list-style-type: none"> • Floor plans are poor <p>4) Insufficient local services and community facilities;</p> <ul style="list-style-type: none"> • Increased negative impact on health and social services • Lack of infrastructure for proposed number of residents • Inadequate schools and doctors' services • Site could be used for community activities for young people • Insufficient shops and cash points <p><u>Parking/Highways</u></p> <p>1) Increased traffic congestion;</p> <ul style="list-style-type: none"> • Detrimental to road traffic • Increased congestion • Roads are already congested • Increase in unnecessary traffic <p>2) Insufficient parking;</p> <ul style="list-style-type: none"> • Parking is a big local problem • Parking provision is inadequate <p>3) Disturbance from building works traffic</p> <ul style="list-style-type: none"> • Vehicle movements can be unsafe <p><u>Open/Green Space</u></p>	<p>provision has been sought.</p> <p>Layout meets Mayor's Housing SPG criteria where appropriate.</p> <p>Medical and other social services are available nearby. Schools in the borough are anticipated to expand as local population grows. Many shops are available nearby.</p> <p>No significant increase in private vehicles would occur from the proposal.</p> <p>On-street parking would be monitored as per the legal agreement.</p> <p>Construction to follow requirements of a</p>

Stakeholder	Question/Comment	Response
	<p>1) Impact on nearby marshes;</p> <p>2) Loss of green space;</p> <ul style="list-style-type: none"> • Building would be located on a green space • Impact on the green belt <p><u>Other Matters</u></p> <p>1) Insufficient local consultation;</p> <ul style="list-style-type: none"> • Consultations were poorly advertised; • Meetings were sales pitches not real consultations • Only one site notice posted • Emailed questions have not been responded to <p>2) Increased anti-social behaviour</p> <ul style="list-style-type: none"> • Anti-social behaviour is already a problem • Building would create dark alleys increasing anti-social opportunity <p>3) Lack of safety</p> <ul style="list-style-type: none"> • Tall buildings are high fire risks 	<p>Construction Management Plan.</p> <p>Proposal is too far away from marshes to have an impact.</p> <p>The site has been laid to lawn whilst awaiting completion of the masterplan, and is not within or adjacent to green belt.</p> <p>See the applicant's SCI for details of consultations. Council has followed statutory requirements including posting several site notices around Hale Village.</p> <p>Proposal would be built to secured by design standards. Condition would be included for street lighting.</p>

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • Tall buildings pose a fire risk to neighbouring buildings • Will a sprinkler system be provided? • Vehicle movements unsafe for pedestrians <p><u>Non-Material Considerations</u></p> <ol style="list-style-type: none"> 1) Loss of a private view; 2) Loss of property value; 3) Previous plans were never approved. 	<p>Fire safety requirements have been considered in detail. Sprinklers provided. Fire safety is a building control matter. No vehicles for this scheme would enter the internal Hale Village street layout.</p> <p>Loss of a private view or property value is not a material planning consideration.</p> <p>Outline parameters were approved as part of the planning permission approved in 2007.</p>