

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference No: HGY/2018/2223

Ward: Tottenham Hale

Address: Strategic Development Partnership (SDP) Sites Welbourne, North Island, Ferry Island, Ashley Road East and Ashley Road West Station Road N17

Proposal: Demolition works and clearance of existing site to provide a mixed-use development comprising 6 buildings up to 38 storeys in height, which together with pavilion and basement accommodation will provide up to 104,053m² of floorspace (GIA), comprising residential (Use Class C3) (up to 1,036 units), retail (Use Class A1-A4), health centre (Use Class D1), office (Use Class B1), leisure (Use Class D2) parking and servicing areas, hard and soft landscaping (including the provision of a new public square), highways works, creation of new vehicular accesses and the realignment of Station Road, decentralised energy network works and other associated works.

Applicant: TH DM Limited (Argent Related)

Ownership: Private/Council

Case Officer Contact: James Hughes

Site Visit Date: 01/08/2018; 19/10/2018

Date received: 30/07/2018 **Last amended date:** 19/10/2018

- 1.1 This application is required to be reported to Planning Sub-Committee under the Council's constitution as it is major development. The development is also required to be reported as it is partly on Council land.
- 1.2 This application has been referred to the Mayor of London as it meets Categories 1A, 1B(c) and 1C(c) as set out in the Town and Country Planning (Mayor of London) Order 2008

1.3 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The Strategic Development Partnership (SDP) proposal will play a highly significant role in delivering the strategic vision for Tottenham Hale.

- The substantial quantum of residential development proposed (1030 homes) meets with Haringey's aspirations to deliver the regeneration and re-vitalisation of Tottenham Hale. These homes would make a significant contribution to meeting Haringey's targeted housing requirements.
- The provision of a new health centre on the Welbourne site is vital to allow expansion and improvement of health care services to local residents. The NHS strongly supports the development proposal. The health centre would provide a permanent, fit-for-purpose facility in an accessible location. Funding to deliver the health centre is contingent on the planning permission being granted.
- The level and type of affordable housing is compliant with London Plan and Local Plan policy and is above the maximum reasonable amount. The scheme is scheduled to deliver more than 10% of the Council's 1000 Council Homes target in the draft Borough Plan, subject to Cabinet's decision to purchase the units.
- The proposed mix of flexible Town Centre uses is supported and judged key to delivering the vision for Tottenham Hale and the new District Centre. The development will enable a comprehensive mix of community, commercial and leisure uses set within new streets and spaces. The developer has an established track record of high quality delivery of urban commercial space.
- The density of the scheme within an Opportunity Area will optimise the potential of a site with excellent public transport links. The scheme is comprehensively master planned across all relevant site allocations in the Tottenham Area Action Plan and would not prejudice the Council's future planning objectives.
- A Skills and Training Plan will be secured by S106 obligation. This will include a commitment to ensure that not less than 20% of those employed during construction are residents of the borough. A financial contribution to support apprenticeships and opportunities for local people is also secured.
- The scheme provides very high quality residential accommodation that meets with London Plan space standards. There are no north facing single aspect units in the scheme and all units will receive good levels of daylight and sunlight. The proposal incorporates a policy compliant level of accessible and adaptable wheelchair units and a suitable number of units per core. The residential units will be protected from noise impacts and will have adequate ventilation.
- There is clear and specific policy support for the principle of tall buildings in Tottenham Hale. A cluster of tall buildings will positively engage with the surrounding built environment. Building 1, the tallest building at 38 storeys, is considered to achieve a distinctive and unique form that will allow for wayfinding

to Tottenham Hale Station and present as a local landmark. All of the buildings proposed are of an excellent design quality.

- The building heights proposed are fully and robustly supported by the independent Quality Review Panel and the tall buildings are considered to meet relevant planning policy criteria in terms of design and sustainability. The tall buildings are judged key to delivering a viable and comprehensive scheme.
- The impacts of the proposal to strategic and local views are acceptable. The effects of the cluster of buildings on wider townscape views are also acceptable. The overall design quality of the public spaces and landscaping is considered to be very high.
- The layout of the development is considered to optimise an underutilised site with excellent public transportation links. The layout of the development accords with the vision to change the character of Tottenham Hale to a pedestrian oriented, mixed-use destination. The Pavillion Building is a strong feature of the development that will provide a focal point for Ferry Square.
- The proposed development will result in a significant reduction in vehicle trips at peak times. The development will not have undue impacts on local public transport services.
- Car free development and the provision of a car club will support sustainable travel. The scheme will ensure cycle connectivity to future routes and incorporates a compliant level of cycle parking. The development is acceptable in transportation terms.
- There is a surplus of available school places to address the increased population created by the scheme and the proposal will add GP capacity. The applicant's playspace proposals are high quality and offset contributions will mitigate impacts to existing local playspaces. The development provides suitable community infrastructure or will make a contribution via CIL or the S106 agreement to existing infrastructure with capacity to absorb the new residents.
- The site is comparatively isolated from existing residential development (except the Welbourne Plot), and would be anticipated to give rise to fewer and less intensive amenity impacts than may be expected from other large infill locations in London.
- While there will be some localised daylight/sunlight impacts to existing properties (largely confined to Hale Gardens) the development overall performs well in respect of daylight and sunlight impacts to surrounding development and amenity spaces. The proposal will have a negligible effect on the wind conditions on

adjoining occupiers. The construction and operational noise impacts arising from the scheme are acceptable.

- The air quality impacts to current and future occupiers are acceptable. The applicant's methodology in reaching a conclusion of Air Quality Neutral is sound. The construction phase impacts to air quality are temporary and will be monitored by the Local Authority. The scheme is well designed and the impacts to adjoining occupiers are considered acceptable.
- Haringey's Principal Conservation Officer considers that the proposal causes less than substantial harm to heritage assets. Officers have given considerable weight to this harm, however the public benefits of the scheme are substantial, including new and affordable homes, commercial space, a new health centre, and public open space as part of the creation of a new town centre; and bringing an under-used site in an Opportunity Area into more intensive and appropriate use. These benefits are considered to clearly outweigh the harm and the heritage planning impacts are acceptable.
- The scheme is highly sustainable. The proposed development exceeds the level of carbon emissions savings set out in Part L 2013. The development proposes to connect to the Tottenham Hale District Energy Network (DEN) and in the interim gas boilers are proposed. A carbon offsetting contribution of £939,650 will be secured in the Section 106 agreement together with a DEN connection fee of £250,000 and delivery of pipework or an additional £400,000 contribution. There will be a net gain in trees in the area resulting from the redevelopment.
- The issues of ecology, flood risk, waste and servicing, basement development, land contamination and archaeology are adequately addressed by the development proposal and where required will be mitigated by planning conditions.
- The scheme makes a significant contribution to the delivery of the Local Plan and the allocated sites TH2, TH4, TH5 and TH10, which seek to meet Haringey's strategic aspirations for the revitalisation of Tottenham Hale and the wider regeneration of the borough.
- In making a recommendation to grant permission, the Local Authority has considered the significant environmental effects of the proposed development as set out in the Environmental Statement and addendum, and taken into account the responses to consultation and other relevant information in accordance with EIA Regulations, and other relevant legislation and guidance including Section 63(1) of the Conservation of Habitats and Species Regulations 2017.

2. RECOMMENDATION

- 2.1 That the Committee resolve to GRANT planning permission and that the Assistant Director Planning or the Head of Development Management is authorised to issue the planning permission and impose conditions and informatives subject to the signing of a section 106 Legal Agreement providing for the obligation set out in the Heads of Terms below.
- 2.2 That delegated authority be granted to the Assistant Director Planning or the Head of Development Management to make any alterations, additions or deletions to the recommended heads of terms and/or recommended conditions as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice-Chair) of the Sub-Committee.
- 2.3 That the section 106 legal agreement referred to in resolution (2.1) above is to be completed no later than 28 February 2019 or within such extended time as the Head of Development Management or the Assistant Director Planning shall in her/his sole discretion allow; and
- 2.4 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.2) above, planning permission be granted in accordance with the Planning Application subject to the attachment of the conditions.

Conditions

The full text of recommended conditions is contained in **Appendix 1** of this report. A summary list of conditions is below. Recommended conditions are split between those that apply to the whole site and those that apply to individual 'plots'.

Conditions Relating to the Whole Site

- 1) Three Year Expiry (HGY Development Management)
- 2) Development in Accordance with Approved Drawings and Documents (LBH Development Management)
- 3) Range of Non-Residential Floorspace (LBH Development Management)
- 4) Tree/Plant Replacement – 5 Years (LBH Development Management)
- 5) Wheelchair Accessible Dwellings (LBH Development Management)
- 6) Part M4 (2) Accessible and Adaptable Dwellings (LBH Development Management)
- 7) BREEAM Very Good Certification (LBH Carbon Management)
- 8) Green/Living Roof – Amenity Access Precluded (LBH Carbon Management)
- 9) Tree Removal In Accordance with Relevant Standards (LBH Arboricultural Officer)
- 10) New Tree Provision – Industry Best Practice (LBH Arboricultural Officer)

- 11) Electric Charging Points (LBH Transportation)
- 12) Noise Levels – Compliance (LBH Environmental Health – Noise)
- 13) Building Services Plant Noise (LBH Environmental Health – Noise)
- 14) Infiltration of Surface Water Drainage (Environment Agency)
- 15) Intermittent and Exceptional Use of Diesel Generators (LBH Environmental Health)
- 16) Back-Up Diesel Generators – Details of EU Stage V Emission Standards Compliance (LBH Environmental Health)
- 17) Diesel Generator Fuel - Ultra Low Sulphur Diesel (ULSD) - (LBH Environmental Health)
- 18) Flue Height Termination Above Highest Roof - (LBH Environmental Health)
- 19) Plant and Machinery – EU Air Quality Compliance (LBH Environmental Health)
- 20) Hard and Soft Landscaping (LBH Development Management) – Part A+B
- 21) Public Lighting Strategy (LBH Development Management)

Conditions Relating to Individual Plots. The Plots are:

- Plot A – North Island
- Plot B – Ferry Island
- Plot C – Welbourne
- Plot D – Ashley Road West
- Plot E – Ashely Road East
- Plot F – The Pavilion

The summary list sets out conditions that will apply to every plot, followed by bespoke conditions that apply to individual plots only. The full text of every condition recommended for each plot is contained in **Appendix 1**. Note that some residential conditions may not be applied to the Pavilion Plot.

- 1) Materials Samples (LBH Development Management)
- 2) Waste Management Plan (LBH Waste Management)
- 3) Drainage – Attenuation Details (LBH Local Lead Flood Authority)
- 4) Drainage - Design Implementation, Maintenance Management (LBH Local Lead Flood Authority)
- 5) BREAAAM – Post Occupation Certificate (LBH Carbon Management)
- 6) Overheating and Model Report (LBH Carbon Management)
- 7) Biodiversity Plan (LBH Carbon Management)
- 8) Green/living Roof Plan (LBH Carbon Management)
- 9) Boiler Details (LBH Environmental Health/Carbon Management)
- 10) Accessible Parking Demarcated (LBH Transportation)
- 11) Cycle Parking (LBH Transportation)
- 12) Service and Delivery Plan (LBH Transportation) (Part A+B)
- 13) Noise Level Testing Details (LBH Environmental Health – Noise)
- 14) Sound Insulation Between Residential and Commercial Properties (LBH Environmental Health – Noise)

- 15) Secure by Design Accreditation (Metropolitan Police)
- 16) Site Levels (LBH Development Management)
- 17) Open Space Management & Maintenance Plan (LBH Development Management)
- 18) Child Playspace Strategy (LBH Development Management)
- 19) Monitoring and Maintenance Plan – Contamination (Environment Agency)
- 20) Contamination Not Previously Identified (Environment Agency)
- 21)) Written Consent for Piling or Other Intrusive Ground Works (Environment Agency)
- 22) Method of Piling (LBH Environmental Health)
- 23) Written Scheme of Investigation (WSI) – Historic England (GLAAS)
- 24) Contaminated Land – Part 1 (LBH Environmental Health)
- 25) Contaminated Land – Part 2 (LBH Environmental Health)
- 26) Development Near Subsurface Potable Water Infrastructure (Thames Water)
- 27) Central Satellite Dish/Receiving System (LBH Development Management)
- 28) Satellite Dish or Television Antenna (LBH Development Management)
- 29) Demolition/Construction Environmental Management Plans (Part A+B)
- 30) Details of Roof Top PV Panels
- 31) Legal Agreement – Interested Parties (LBH Development Management)
- 32) Installation of roof top structures

Plot B Only

- B33) Source Protection Strategy (Ferry Island) – (Thames Water)
- B34) Internal Street Details (LBH Development Management)

Plot C Only

- C33) Health Centre Operation and Parking Plan (LBH Development Management)

Plot D Only

- D33) Ashley Road Façade (LBH Development Management)
- D34) Hale Road Gable Opportunity (LBH Development Management)

Plot E Only

- E34) Updated Ecological Survey (LBH Nature Conservation)
- E35) Existing Business Occupier Retention (LBH Development Management)

Plot F Only

- F33) Pavilion Signage Strategy (LBH Development Management)

Informatives (the full text of recommended informatives are contained in **Appendix 2** of this report)

- 1) Working With the Applicant (LBH Development Management)
- 2) Community Infrastructure Levy (LBH Development Management)
- 3) Hours of Construction Work (LBH Development Management)
- 4) Party Wall Act (LBH Development Management)
- 5) Development Numbering (LBH Land Charges)
- 6) Site Constraints (Environment Agency)
- 7) Advice to Applicant on Model Procedures and Good Practice (Environment Agency)
- 8) Waste on Site and Reuse of Materials (Environment Agency)
- 9) Advice to applicant on Review of Further Documents (Environment Agency)
- 10) Suitably Qualified Professional – WSI (Historic England – GLAAS)
- 11) Deemed Discharge - Written Scheme of Investigation (Historic England – GLAAS)
- 12) Evaluation - Written Scheme of Investigation (Historic England – GLAAS)
- 13) Asbestos Survey (LBH Environmental Health)
- 14) Positive Pumped Device (Thames Water)
- 15) Groundwater Risk Management Permit (Thames Water)
- 16) Minimum Pressure (Thames Water)
- 17) Water Mains Crossing or Close to Development (Thames Water)
- 18) Development within 15m of Thames Water Assets (Thames Water)
- 19) Ground Water Source Protection Strategies (Thames Water)
- 20) Network Rail Asset Protection (Network Rail)
- 21) Safe Operation of the Railway (Network Rail)
- 22) Safe Operation of the Railway - Future Maintenance (Network Rail)
- 23) Safe Operation of the Railway - Drainage (Network Rail)
- 24) Safe Operation of the Railway – Plant and Materials (Network Rail)
- 25) Safe Operation of the Railway – Scaffolding (Network Rail)
- 26) Safe Operation of the Railway – Piling (Network Rail)
- 27) Safe Operation of the Railway – Fencing (Network Rail)
- 28) Safe Operation of the Railway – Lighting (Network Rail)
- 29) Safe Operation of the Railway – Noise and Vibration (Network Rail)
- 30) Safe Operation of the Railway – Vehicle Incursion (Network Rail)
- 31) Asset Protection Agreement (Network Rail)
- 32) Commercial Waste Disposal (LBH Waste Management)
- 33) Noise Receptors (LBH Environmental Health – Noise)
- 34) Phasing for CIL Purposes (LBH Development Management)

Section 106 Heads of Terms:

- 1) **Considerate Constructor Scheme** – Applicant participation (All plots)
- 2) **Construction Management** – Financial contribution of **£40,000** (Contribution to a Tottenham Hale Construction Coordinator)
- 3) **Energy Plan**
 - a. District Energy Network (DEN) Connection - Reasonable Endeavours
 - b. DEN Connection Fees **£250,000**
 - c. Carbon Offset Payment **£939,650**
 - d. DEN Pipework:
 - i. Installation of DEN pipework within Station Road and/or Ferry Link;
OR
 - ii. Payment in lieu of DEN pipework (up to sum of **£400,000**)
- 4) **Local Marketing** to Haringey Residents
- 5) **Affordable Housing Plan**
 - a. **51** Social Housing units (Welbourne)
 - b. **80** London Living Rent units (Welbourne)
 - c. **108** Shared Ownership Units (Ashley Road West and North Island - Building 3)
 - d. **Early** and **Late Stage** Viability Review
 - e. Restriction on occupation of market homes prior to completion of affordable housing (restriction on a plot by plot basis).
 - f. Option to acquire and **amend tenure** to provide **131 council-owned social homes** on the Welbourne Plot
 - g. **Additional child playspace contribution** in the event of acquisition noted above at f.
- 6) **Car Free Development** – Future Occupiers ineligible for Residential Parking Permits (excepting resident Blue Badge Holders)
- 7) Provision of an onsite **Car Club**
- 8) Provision of **1 Car Club Membership** per dwelling and a **£50 credit** for a period of **2 years- £103,000**
- 9) **Controlled Parking Zone** – Financial contribution of **£15,000** toward review, design and consultation, and implementation of parking management measures in:

- Chesnut Road, Park View Road, Monument Way, Watermead Way, Station Road, Ashley Road, Hale Road, The Hale and Ferry Road; and;
- other roads as deemed appropriate by the Council

10) **Residential Travel Plan** provision

11) **Framework Travel Plan** (commercial uses)

12) Appointment of a **Travel Plan Coordinator**

13) **Travel Plan Monitoring** – Financial Contribution **£6,000**

14) **Haringey Employment and Recruitment Partnership**

- a. 20% local labour during construction phase of development
- b. Pre-employment training (Construction Skills Certification Scheme) to be provided to that part of the onsite workforce comprising residents
- c. Provision of Apprenticeships
- d. Assistance for local tenders
- e. Career Education workshops and local employment promotion via Harris Academy, ADA and CONEL.
- f. Apprentices – Financial contribution **£94,000**

15) End User Skills Training Contribution – Range between **£19,944 - £123,288** (Depending on Flexible Use Floorspace quantum)

16) **Highway Improvement Works** secured by way of highways S278 agreement:

- Widening of Hale Road to provide two eastbound traffic lanes on the approach to the junction with Ashley Road;
- Installation of traffic signal controls at the Watermead Way junction with Ashley Road and Station Road, which incorporates a relocated toucan crossing across Watermead Way;
- Reconfigured bus station layout and creation of signalised junction at the northern end of the bus station;
- New signalised pedestrian crossing on Watermead Way, to the north of Cygnet Way junction;
- The provision of bus standing space on Watermead Way, to the north of the Cygnet Way junction;
- Realignment of Station Road;
- Any other works reasonably necessary to facilitate those works described above such as relocation of street furniture and highway drainage, paving and carriageway resurfacing works; and in general accordance with the approved Highway Works Plan;

17) **Terms of Access** to Public Areas

18) **Public Access Management Plan**

19) **Public Art - £50,000.** Details and location of installation to be agreed with Local Planning Authority

20) **Child Play Space** – Off site financial contribution **£50,350 (to increase in the event of acquisition noted above at 5.f)**

21) **Architect Retention** – Local Planning Authority agreement – All Plots.

22) **S106 Monitoring** - Financial contribution of **£50,000**

23) **Off Site Public Realm Improvements**

- Station Road
- Chestnut Road
- Hale Road/Watermead Way
- Down Lane Park

Sub-Total Public Realm - £2,906, 670

Total Contribution: £ 4,524,614

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

2.6 That, in the absence of the agreement referred to in resolution (2.1) above being completed within the time period provided for in resolution (2.2) above, the planning permission be refused for the following reasons:

- i. In the absence of a legal agreement securing 1) the provision of on-site affordable housing 2) marketing of the scheme to local residents 3) an option to acquire the Welbourne site, and 4) an option to amend the tenure on the Welbourne site (allowing for additional child playspace contributions), the scheme would fail to foster mixed and balanced neighbourhoods where people choose to live, and which meet the housing aspirations of Haringey's residents. The scheme would not make full use of Haringey's capacity for housing to meet targeted delivery of required homes. As such, the proposal is contrary to London Plan Policies 3.9, 3.11 and 3.12, Strategic Policy SP2, and DPD Policies DM 11 and DM 13, and Policies AAP3 and TH4, TH5 and TH10.*

- ii. *In the absence of a legal agreement securing local employment opportunities and training, assistance for local tenders, career education and financial contributions towards End User Skills and Training (including an update confirming the quantum of B1 floorspace) and Apprenticeships, the proposal would fail to facilitate training and employment opportunities for the local population. The scheme would fail to contribute to the social regeneration of the area. As such the proposal is contrary to Local Plan Policies SP8 and SP9, Policy DM48 and Policies AAP4, TH4, TH5 and TH10.*
- iii. *In the absence of legal agreement securing 1) residential and framework Travel Plans, 2) Traffic Management Order (TMO) amendments to preclude the issue of parking permits 3) a travel plan coordinator 4) financial contributions toward travel plan monitoring, car club provision, and CPZ review, and 5) a S278 Highways Agreements, the proposal would have an unacceptable impact on the safe operation of the highway network, and give rise to overspill parking impacts and unsustainable modes of travel. As such, the proposal would be contrary to London Plan policies 6.9, 6.11 and 6.13. Spatial Policy SP7, Saved UDP Policy UD3 and emerging Policy DM31 and emerging Policy AAP7.*
- iv. *In the absence of a legal agreement securing the terms of access to the public realm and a public access management plan, the proposal would fail to secure publicly accessible open spaces and compromise the Council's vision for the future Tottenham Hale District Centre. As such, the proposal would be contrary to London Plan policies 7.5, 7.9, Policy SP12, Policy DM20 and Policies TH2, TH3 and TH4.*
- v. *In the absence of a legal agreement securing 1) off site public realm enhancements 2) public art 3) architect retention, and 4) a child playspace plan, the proposal would give rise to an illegible public realm, poorly detailed building elevations and a poor quality public realm and child play spaces. As such, the proposal would be contrary to London Plan policies 7.1, 7.4, 7.6, 7.18, Strategic Policies SP11 and SP13 and Policies DM1, DM3, DM19 and DM20, and Policies AAP6, AAP9, TH4, TH5 and TH10*
- vi. *In the absence of a legal agreement securing an Energy Plan to address a carbon offset payment requirement and demonstrate a connection to a future district energy network, the proposal would fail to mitigate the impacts of climate change. As such, the proposal would be unsustainable and therefore contrary to London Plan Policy 5.2 and Strategic Policy SP4, and DPD Policies DM 21, DM22 and Policies TH4, TH4 and TH10.*
- vii. *In the absence of the legal agreement securing a financial contribution to coordinated construction management in Tottenham Hale and the applicant's participation in the Considerate Constructors Scheme, the development would give rise to construction phase amenity impacts*

related to road traffic, noise, air quality and safety. As such, the proposal is contrary to London Plan Policies 6.3 and 6.14, the Upper Lea Valley Opportunity Area Framework and Policy AAP11.

- viii. In the absence of a legal agreement securing a financial contribution to address the administration, monitoring, and reporting of the discharge of planning obligations, the development would give rise to costs incurred by the Local Authority if the development were not in place. As such, the proposal would be contrary to London Plan Policy 8.2, Strategic Policies SP16, SP17, Policies AAP1 and AAP11 and Policy DM48.*

2.7 In the event that the Planning Application is refused for the reasons set out in resolution (2.6) above, the Head of Development Management (in consultation with the Chair of Planning sub-committee) is hereby authorised to approve any further application for planning permission which duplicates the Planning Application provided that:

- (i) There has not been any material change in circumstances in the relevant planning considerations, and
- (ii) The further application for planning permission is submitted to and approved by the Assistant Director within a period of not more than 12 months from the date of the said refusal, and
- (iii) The relevant parties shall have previously entered into the agreement contemplated in resolution (1) above to secure the obligations specified therein.

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3.0 PROPOSED DEVELOPMENT AND LOCATION DETAILS

3.1 Proposed development

- 3.1.1. This is a full application for comprehensive mixed-use re-development of the Strategic Development Partnership (SDP) sites in Tottenham Hale. In April 2017, Haringey formed a SDP with the applicant to progress the development of five plots. The SDP facilitates a joined-up approach to the design and delivery of homes, town centre uses, and new public realm.
- 3.1.2. The scheme incorporates 6 buildings on 5 plots totalling 104,053m² of floorspace. The proposal includes 1,030 dwelling units (including 51 Council homes at social rents, 108 shared ownership units and 80 units for intermediate rent), as well as retail uses, a health centre, and office and leisure uses. The applicant has proposed two options for the scheme. Option B includes a cinema.
- 3.1.3. A tabulation of the proposed uses is below, followed by a summary of the proposed development for each plot. A site plan is **Appendix 3**. Floor plans and elevations for each plot are set out in **Appendix 4**. Indicative images of the proposals are **Appendix 5**.

Option A – Land Use	Area (Minimum)	Area (Maximum)
Residential	97, 645m ² (1,030 Units)	
Retail	Up to 3,505m ²	
Leisure	Up to 1,167m ²	
Office	831 m ²	4,336 m ²
Health Centre	1,643 m ²	
TOTAL	103,623 m²	

Option B – Land Use	Area (Minimum)	Area (Maximum)
Residential	97, 645m ² (1,030 Units)	
Retail	Up to 4,306 m ²	
Leisure	Up to 2,288 m ²	
Office	831 m ²	5,137 m ²
Health Centre	1,643 m ²	
TOTAL	104,053 m²	

Welbourne

- 3.1.4. This plot is proposed to contain a 16 storey block on Park View Road, with a 7 storey wing on Monument Way, and a 6 storey wing on Chesnut Road. A 4 storey element faces Fairbanks Road. The development is set around a landscaped podium providing residents' shared amenity and play spaces. The building will contain 131 residential units and 265m² of flexible commercial floorspace.
- 3.1.5. The Welbourne unit mix has been updated and the building is now proposed to be 100% affordable housing (comprised of 51 Social Rent units and 80 London Living Rent units). The number of family sized units has also increased: the block will comprise 36 one-bedroom units, 73 two-bedroom units and 22 three-bedroom units.
- 3.1.6. In response to consultation, and pending cabinet approval and final agreement, Haringey is proposing to proceed with an option to purchase the proposed building on the Welbourne Plot. The application will be subject to a cascade agreement in the section 106, which will secure, as a first choice, the delivery of these units as 131 Social rented units, and as a second choice, delivery of the units as 51 social rented units and 80 Discount Market rented units at London Living Rent levels. Should the Council not buy the building as 131 Shared Ownership units, Haringey may also seek to secure funding to allow the tenure amendment noted above.
- 3.1.7. A health centre is also proposed to be incorporated in the Welbourne Plot (1,643m² GIA). The centre comprises two storeys of accommodation fronting Monument Way. The space will significantly increase much needed local health care capacity and allow consolidation of local health care services as described below. The current unit mix and tenure of the Welbourne plot is tabulated below.

WELBOURNE	Social Rent	London Living Rent	TOTAL
1-Bedroom	10	26	36
2-Bedroom	20	53	73
3-Bedroom	21	1	22
TOTAL	51	80	131

Ashley Road West

- 3.1.8. This plot is proposed to contain a Part 15/Part 7/Part 5 storey building. The building elevations along Hale Road and Ashley Road frame a courtyard which accommodates car and cycle parking. In total 98 residential units are proposed 70 are market units and 28 shared ownership units. The quantum of flexible retail/office floorspace proposed is 522m² across 2 ground units.

ASHLEY ROAD	Market	Shared	TOTAL
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WEST		Ownership	
1-Bedroom	14	12	26
2-Bedroom	54	8	62
3-Bedroom	2	8	10
TOTAL	70	28	98

Ashley Road East

3.1.9. The Ashley Road East plot comprises a mixed-use building (19 and 13 storeys, with a 5 storey link) around a landscaped podium providing residents' shared amenity space. The plot proposes 183 residential units (all market) and flexible retail/office/leisure floorspace. This plot proposes 551m² of flexible retail/office floorspace, 519m² of flexible retail/office/leisure floorspace, and 831m² of dedicated office floorspace. The building fronts a new public open space on the corner of Watermead Way and Ashley Road (Watermead Place) and flexible use units on the northern side of the building fronting the National Collage for Digital Skills (NCDS).

ASHLEY ROAD EAST	Market	TOTAL
Studio	11	11
1-Bedroom	97	97
2-Bedroom	64	64
3-Bedroom	11	11
TOTAL	183	183

North Island

3.1.10. On the North Island plot, Building 3 (18 storeys) is mixed-use, providing 136 residential units (80 shared ownership and 56 market) and 317 m² flexible retail/office/leisure accommodation. A ground level external amenity space, incorporating children's playspace, is located to the north of the building.

NORTH ISLAND (BUILDING 3)	Market	Shared Ownership	TOTAL
Studio	0	16	16
1-Bedroom	21	22	43
2-Bedroom	35	42	77
3-Bedroom	0	0	0
TOTAL	56	80	136

Ferry Island

3.1.11. On the Ferry Island plot, the applicant proposes two buildings set around a landscaped square and a pavilion. Building 1 (38 and 19 storeys, with a 7 storey link) and Building 2 (13 and 7 storeys) are mixed-use, providing 482 residential

units (market) and flexible retail/office/leisure floorspace. Option B for Ferry Island incorporates a cinema in the basement shared between both buildings, with associated facilities at ground and mezzanine level.

3.1.12. In Option A, 615 m² of flexible retail/office floorspace is proposed in Building 1; and 136m² of flexible retail/office floorspace and 332m² of flexible retail/office/leisure in Building 2. In floorspace Option B, 295m² of flexible retail/office floorspace and 1,002m² of flexible retail/office/leisure floorspace is proposed in Building 1; and 136m² of flexible retail/office floorspace and 450m² of flexible retail/office/leisure in Building 2.

3.1.13. A two-storey pavilion building is proposed on the southern side of Ferry Square, comprising 249 m² of flexible retail/office floorspace. Building 1 incorporates a double height glazed link providing a pedestrian connection between the bus station and Ferry Square. Building 2 has a single storey route through the building from Ferry Square to Station Road.

FERRY ISLAND (Building 1)	Market	TOTAL
Studio	36	36
1-Bedroom	181	181
2-Bedroom	131	131
3-Bedroom	27	27
TOTAL	375	375

FERRY ISLAND (BUILDING 2)	Market	TOTAL
Studio	13	13
1-Bedroom	37	37
2-Bedroom	46	46
3-Bedroom	11	11
TOTAL	107	107

Public Highway and Landscaping

3.1.14. The proposed development will provide a number of dedicated public spaces. The largest is Ferry Square which is located on Ferry Island and framed by Buildings 1, 2 and the pavilion. This has a direct link with the bus station and Station Square through and to the south of Building 1.

3.1.15. Watermead Place is located to the south of Ashley Road East and will provide relief and public space for future and existing occupiers in the Ashley Road area. Public space will also be provided adjacent to the realigned Station Road (Station Place) which can be utilised for a variety of flexible uses.

3.1.16. The applicant proposes a comprehensive and detailed public paving and landscaping proposal set out in detail in the sections below.

October 2018 Alterations

3.1.17. As noted above, following consultation and discussions with officers, the applicant amended the proposal following the submission of the application primarily to increase the number of family-sized units and introduce social rented homes on the Welbourne Plot. Several other alterations were also included, including a minor amendment to the red line area along the northern boundary adjoining the NCDS building. These changes were the subject of statutory re-consultation as noted in the section below. The key alterations were:

- The residential entrance in Building 1 has increased at ground floor. A secondary entrance is added on the southern element of the building to provide direct access from the internal route.
- The quantum of retail in Building 1 has marginally reduced to accommodate the increased size of the residential entrance.
- Dedicated cycle entrances have been introduced in Buildings 1 and 2.
- Change of tenure in Building 3. From level 1 to level 10 the tenure remains Shared Ownership with a total of 80 units. From level 11 above, the tenure is changed from Shared Ownership to Market, with a total of 56 units;
- Change to the location of the residential entrance from The Hale to Station Road in Building 3.
- Some cycling provision in Building 3 has been relocated to a new cycle store at ground floor level.
- Remove two proposed trees between Building 1 on the Ferry Island plot and the Tottenham Hale bus station following a request from Transport for London (“TfL”) to aid passengers boarding and alighting buses

3.1.18. The changes will allow for implementation of additional affordable housing and respond to Quality Review Panel comments. They are further assessed in the design section below.

3.2. Site and Surroundings

3.2.1. Tottenham Hale is dominated by traffic with poor pedestrian links and lacks civic space. However, the site benefits from excellent public transport links, including rail and underground services. The area has outstanding access to green spaces and nature, include the amenities of the Lea Valley that lie to the east of the SDP sites and Down Lane Park.

3.2.2. The SDP sites are predominantly characterised by a mixture of low rise industrial uses and a car-centred retail park. The land is under-utilised.

Images of the existing site are **Appendix 6**. Each plot is described briefly below.

Welbourne

- 3.2.3. This is the westernmost of the five plots, and is bounded by Monument Way to the south, Fairbanks Road to the west, Chesnut Road to the north and Park View Road to the East. The plot is currently vacant but formerly contained a community centre. There are several existing trees on this site.

Ashley Road West

- 3.2.4. This plot is west of Ashley Road and north of Hale Road. It is currently occupied by a petrol filling station and a retail shop. The plot is bound by hardstanding associated with a light industrial yard to the north.

Ashley Road East

- 3.2.5. The plot is situated to the east of Ashley Road West separated by Ashley Road. The plot contains Stratford College, which is a three storey building fronting Hale Road and also contains other meanwhile street food and bar uses (Styx, which is due to close shortly) to the rear. Ashley Road East is bound by a light industrial estate to the north.

Ferry Island

- 3.2.6. This is the southernmost plot and is bound by Ferry Lane/The Hale to the south, Station Road to the north and west and Tottenham Hale Bus Station to the east. Ferry Island is currently occupied by Ferry Island Retail Park, which includes KFC and Pizza Hut and the former Maplin store, and associated car parking.

North Island

- 3.2.7. This plot is currently occupied by a vacant former public house (a non-designated heritage asset) and car wash yard. The plot also incorporates a section of Station Road and associated public highway in the south. The plot is located to the north-west of the Ferry Island. The North Island is bound by two retail units to the north, a hotel to the east, Station Road to the south and The Hale to the west.

Land Use Designations

- 3.2.8. The plots are not located within or adjacent to any Conservation Areas and do not contain any statutory or locally listed buildings. The western end of

Ferry Island and the western edge of North Island lie within an Archaeological Priority Area (APA).

- 3.2.9. The SDP sites cover several allocations in the Tottenham Area Action Plan (TH2, TH4, TH5 and TH10). Tottenham Hale is also a Housing Zone and identified as an area for accelerated housing delivery. A locally protected linear view from Quernmore Road crosses the southern part of the site.
- 3.2.10. Tottenham Hale is a Growth Area identified for significant redevelopment. The centre of Tottenham Hale site is also programmed to become a District Centre. Part of the site lies within a Crossrail 2 safeguarding area. The site is an Opportunity Area as designated by the London Plan.

3.3. **Relevant Planning and Enforcement History**

- 3.3.1. There are a number of historic planning applications in the Council's records that pertain the various plots, however these are not relevant to the current application.
- 3.3.2. In May 2018, planning permission (HGY/2017/3649) was granted for the reconfiguration of the existing Tottenham Hale Bus Station. These works will improve the efficiency of bus operations (including reduced journey times for some routes), improved pedestrian movement through and around Station Square, and reduce the bus station footprint.
- 3.3.3. The Council issued a Scoping Opinion (HGY/2018/0268) pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in March 2018. The decision set the scope for the current application's Environmental Statement.
- 3.3.4. There are a number of emerging and consented developments in the vicinity of the SDP sites in Tottenham Hale. A map of recently approved development in Tottenham Hale and summary of key planning applications and their status is contained in **Appendix 7**.

4. **CONSULTATION REPONSE**

4.1. **Planning Committee Pre-Application Briefing**

- 4.1.1. The proposal was presented to Planning Sub-Committee as a 'Pre-Application Briefing' on 9th July 2018. The relevant minutes of the meeting are summarised below:
- Following the Officer presentation, Cllr Gordon addressed the Committee in her capacity as ward councillor. Concerns regarding the health centre

capacity and car park. Objected to lack of social housing in pre-application scheme.

- Councillor Brabazon addressed the Committee in her capacity as ward councillor. Concerns regarding definition of affordable housing and objections regarding lack of social housing in the pre-application scheme.
- Committee noted the following response to their comments and questions at pre-application committee:
 - There would be one building at full height of 38 storeys.
 - Developer only had an obligation to deliver health centre building. The Council would secure the tenants and the Clinical Commissioning Group was working with the Council to create an appropriate business case. Site in Hale Village would close, as it had only been granted temporary permission.
 - The parking levels were in line with London Plan guidance, and the development was classed at PTAL 6b, so high levels of parking were not needed. There would be a maintenance plan in place and a concierge to cover the whole estate.
 - It would be possible to include a clause in the lease to prevent Air BnB rentals.
 - All buildings would be fully fitted out with sprinklers, and no combustible cladding would be used.
 - Cycle routes would be contained in a separate highways application.
 - There would be further information regarding jobs in the planning application, but there would be an increase in employment figures.

4.2. **Quality Review Panel**

- 4.2.1. Argent Related has worked extensively with Haringey's independent Quality Review Panel (QRP) throughout the planning pre-application and application processes to progress the design of the development.
- 4.2.2. Various parts of the scheme have been presented to Haringey's Quality Review Panel at different stages. In total, the Panel has considered the SDP sites 8 times. The final two reviews were undertaken at application stage. These two reviews (on 17 September and 14th November 2018) considered the final scheme in the round.
- 4.2.3. The Panel offered its full support for the planning application. As per the design section below, Haringey and GLA officers concur with the QRP that the scheme represents an impressive and well considered design and delivers the comprehensive and sensitive large-scale regeneration envisaged by adopted policy.

4.2.4. The 14th November 2018 review is **Appendix 8**. The QRP's support is clearly set out in the review and states "the Panel feels that the overall development strategy is extremely successful and rises to the challenge and aspirations of Tottenham Hale Area Action Plan. Its supports the inclusion of Tall Buildings"

4.3. **Development Management Forum**

4.4. The proposal was presented to a Development Management Forum on 20th June 2018. The key planning concerns highlighted at the meeting by residents were centrally the heights of proposed buildings, cycling infrastructure, affordable housing, and various design issues. An officer note summarising the forum is set out in **Appendix 9**.

4.5. **Non-statutory Consultation**

4.6. The applicant has submitted a Statement of Community Involvement (SCI) that sets out the applicant's pre-application consultation activities. The applicant has primarily undertaken two phases of public exhibitions as part of the pre-application process.

4.7. Alongside these, the applicant has set out a stakeholder engagement plan, which included meetings, presentations and workshops with local community and amenity groups, as well as three newsletters distributed to local residents and businesses. A popup event was held outside Tottenham Hale station across two separate days.

4.8. **Application Stage Consultation**

4.9. The following were consulted regarding the application:

Internal:

- LBH Design Officer
- LBH Head Of Carbon Management
- LBH Regeneration Tottenham Team
- LBH Housing
- LBH Flood and Surface Water Drainage
- LBH Economic Regeneration
- LBH Parks
- LBH EHS – Pollution, Air Quality, Contaminated Land
- LBH EHS - Noise
- LBH Conservation Officer
- LBH Arboricultural Officer
- LBH Nature Conservation
- LBH Emergency Planning and Business Continuity
- LBH Building Control

- LBH Transportation
- LBH Planning Policy
- LBH Waste Management
- LBH Homes for Haringey

External:

- Network Rail
 - London Fire Brigade
 - Lee Valley Regional Park Authority
 - Metropolitan Police - Designing Out Crime Officer
 - Transport For London
 - Environment Agency
 - London Underground
 - Natural England
 - Crossrail 2
 - Health and Safety Executive
 - Canal and River Trust
 - Royal Society for the Protection Birds (RSPB)
 - Greater London Authority
 - Thames Water
 - Historic England
 - Historic England - Greater London Archaeology Advisory Service
-
- Tottenham Conservation Area Advisory Committee
 - Friends of Down Lane Park
 - Ferry Lane Action Group
 - Ferry Lane Estate Residents
 - Tottenham Civic Society
 - Chesnut Residents Association

Other Local Authorities:

- London Borough of Hackney
- London Borough of Waltham Forest
- London Borough of Enfield

- 4.10. A summary of consultation responses received is below. The full text of comments from internal consultees is **Appendix 10**. The full of external consultees that responded to consultation is contained in **Appendix 11**.

Internal:

LBH Environmental Health – Pollution: No objection to proposal subject to condition. Air Quality Neutral Assessment demonstrated that the development is

air quality neutral in terms of both building and road traffic emissions. Dispersion modelling study indicates that air quality will not present a significant constraint on the development. Sites have history of contamination. Standard Conditions and informatives recommended.

LBH Environmental Health – Noise: No objection to proposal subject to a condition around noise levels in conformity with British Standards recommended. Condition around noise level testing recommending. Noise Plant condition recommended. No mitigation measures are required for vibration. Condition around sound insulation between commercial and residential uses recommended. Informative recommended.

LBH Waste Management: No objection to proposal subject to condition. Request for twice weekly residual and recycling waste collection has been made. It is felt that due to the size and nature of the development a twice weekly collection of residential residual and recycling waste would be more suited. Some of the distances between waste storage areas and collection vehicles are further than the 10 metre distances. Management plan required.

LBH Carbon Management: No objection to proposal subject to condition. The majority of the issues raised by the Carbon Management Team have been accepted by the developer. Where they have not, the applicant has given justification that has been accepted by the Carbon Management Team. Therefore, the Carbon Management Team supports this application and the positive benefits that it brings to carbon reduction in Tottenham Hale.

Developments are estimated to achieve a reduction of 174 tonnes per annum (12%) in regulated CO2 emissions through Lean measures. BREEAM conditions required. Developments are estimated to achieve a reduction of 461 tonnes per annum (32%) in regulated CO2 emissions through Clean measures. Condition required for boiler details. A reduction in regulated CO2 emissions of 37 tonnes per annum (3%) will be achieved through Green measures. Condition required – overheating assessment. Condition required – living roof and bio-diversity.

LBH Transportation: No objection to proposal subject to condition and S106 obligations. Trip generation acceptable. The development will not create a significant level of additional public transport trips - no major consequences for local public transport services. Car parking and access acceptable subject to S106 and S278 obligations. Car club and cycle parking acceptable subject to condition. S278, S247 and S38 agreements required. Other standard conditions and obligations required.

LBH Conservation Officer: Proposed buildings incongruous in isolation however changing context of the area includes tall buildings. The proposed development would better integrate with this emerging context. Proposed

buildings would dominate Berol House, however a number of other taller buildings have been consented around the development sites, and the locally listed Berol House itself has consent for a two-storey rooftop extension

Visual impacts would be wide and should be comprehensively assessed through AVR assessment of views into and out of the affected Conservation Areas – Conservation Officer aware the applicants AVR has been considered by QRP. The potential cross borough impacts should be thoroughly assessed. Proposal is considered to result in 'less than substantial harm' to heritage assets, and this will need to be weighed against the public benefits of the scheme.

LBH Local Lead Flood Authority: No objection to proposal subject to condition. The proposed discharge rates are based on 3 x Greenfield as per LBH guidance and are agreed in principal. The proposed SuDS to be included across the developments include Blue and Green Roof, tree pit systems and permeable paving which will in effect collect and store rainwater at source, this in turn will decrease water volumes. Further discussion with highways required. Detailed management and maintenance plan required.

LBH Arboricultural Officer: No objection to proposal subject to condition. No objection to the proposed removal of the 10 trees on LBH land. New planting plan will provide more than adequate replacement tree cover. Alterations to Tree Strategy required given species mix in area. Proposed tree location require confirmation. Conditions concerning tree removal and replanting to ensure conformity with industry standard required.

LBH Nature Conservation: No objection to proposal subject to condition. Confirmation that, prior to the demolition of the current Stratford College building on the Ashley Road East plot, an internal bat survey is undertaken to ensure that the building is not being used by bats (as per the recommendation from the Ecological Appraisal).

External:

Canal and River Trust: No objection to proposal. Contributions sought to address tow path widening and operational equipment dealing with aquatic weeds.

Crossrail 2 Safeguarding Team: No objection to proposal. Land within limits of safeguarding direction. Configuration of Buildings 1 and 2 supported. Further discussion between Crossrail 2 and the developer encouraged. Soundproofing should be incorporated into design.

Environment Agency: No objection to proposal subject to condition. The proposed development is acceptable subject to listed conditions and a

remediation strategy carried out by a competent person in line with the NPPF. Conditions and Informatives recommended for imposition.

Health and Safety Executive: No objection to proposal. HSE is a statutory consultee on relevant developments within the Consultation Distance (CD) of a hazardous installation or a major accident hazard pipeline. As this development does not lie within a CD, HSE has no comments.

Greater London Authority: Principle of residential, town centre uses, and a health centre, as part of a high density mixed-use development on this under-utilised site is strongly supported. Proposals are of a high quality, with negligible impacts on strategic views, and no harm to designated heritage assets. Further information is required, including trip generation; Blue Badge parking; and shared surfaces. Bus route mitigation may be required. Further information on the energy strategy and surface water drainage required. The Greater London Authority Stage 1 report is **Appendix 12**.

Greater London Authority – Viability Officer: No objection to proposal is viability terms. The revised proposal is in excess of the maximum reasonable amount of affordable housing assessed on an objective basis. However, a relatively small reduction in build costs or increase in sales values would result in the development being much more viable. Given the place making nature of this development, GLA Officers consider that values may well exceed current expectations. A late stage viability review should be included in the s106 agreement. The assessment for this should be based on the build costs and sales values, but include agreed values for the health centre and affordable housing dwellings, assessed on an objective basis.

Historic England: No objection to proposal. Development supported in principle, however LPA should take impact of building height into account in coming to a view around heritage assets. Loss of non-designated heritage asset (former White Hart public house) is regrettable. Tall buildings should be assessed against local plan provisions to ensure duties established in legislation and policy concerning the conservation of the historic environment have been satisfied. [Officer note: the location is designated in the Local Plan as suitable for tall buildings, there are already tall buildings consented in the vicinity and these buildings will be viewed as part of a cluster. There were no objections from Historic England to the tall building locations in the Local Plan]

Historic England - Archaeological Service: No objection to proposal subject to condition. The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified for the Local Plan. Condition around a two-stage scheme of Written Scheme of Investigation (WSI) and informatives recommended for imposition.

London Fire Brigade: No objection to proposal (Initial concerns resolved). The Commissioner is satisfied with the proposals for fire fighting access as compliance with B5 of the Building Regulations following further consultation and information provided via email.

London Underground: No objection to proposal. No comment to make on the application except that the developer should continue to work with LU engineers for each stage of the development.

Metropolitan Police – Designing Out Crime Officer: No objection to proposal subject to condition. MET have studied the EIO Scope Haringey Island - Planning Statement and are satisfied that the requirements of the Metropolitan Police are met within the statement. The proposed development within the planning scope appears to positively seek engagement with Secured by Design to ensure that the current Police accredited standards are met. (Comments received following scheme alterations – no change in position.)

Natural England: No objection to proposal subject to condition. Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on designated sites and has no objection. Additional advice on other natural environment issues included. Future monitoring should be reviewed.

Network Rail: No objection to proposal subject to condition. Developer should comply with the comments and requirements for the safe operation of the railway and the protection of Network Rail's adjoining land. Informatives around asset protection provided.

NHS Haringey CCG: No objection to proposal. New health centre in Tottenham Hale is essential. Tottenham Hale Medical Practice in Hale Village is a temporary site in a portakabin, only available for a limited period. Dowsett Road Surgery is currently located in a converted terraced house, unsuitable for the delivery of modern healthcare. New facility would enable the general practice to provide enhanced services to patients that would not be possible in their current premises. The CCG supports the planning application. NHS likely to receive a substantial capital grant to support the delivery of the health centre, subject to planning permission being granted.

Thames Water: No objection to the proposal subject to condition. Regarding water network infrastructure capacity, no objection. Regarding surface water proposal no objection however concerning foul water discharge - TW expect further developer engagement to ensure suitable sewerage infrastructure is in place. Source Protection Piling Strategy condition applies to Ferry Island only. Other standard conditions and informatives required.

Transport for London: No objection to proposal subject to condition. Trip generation and healthy streets – further detail required. Urban realm issues in relation to disabled users require further clarification. Cycle parking is London Plan compliant. Draft London Plan requirement for disabled parking is met, however details on future converted provision required. S106 obligations around bus provision may be required. (Re-consultation: No comment)

Adjoining London Boroughs

LB Waltham Forest: LBWF offer their support to the application and consider that the level and height of built development proposed would be seen in the context of other approved tall buildings in this location and as such is considered acceptable. No adverse impact on LBWF noting in particular our approved and built developments and those coming forward shortly in the Blackhorse Lane Growth Area. Officer engagement around highways and the Wetlands encouraged. Contribution to support Wetlands sought. [Officer note: LBH has already made substantial contributions to the wetlands and additional contributions are not considered necessary.]

LB Hackney: Concerns about the height of the tallest element of the proposed development. Hackney officer consider harmful impact of view from Springfield Park and various other unspecified locations. Reduction requested however possible viability issues and wider planning balance acknowledged by Hackney Officers. [Officer Note: proposals that Hackney has approved in its own borough appear in this view and the view is in the distance in any case. The building will appear as part of a cluster with already approved buildings.]

LB Enfield: No objection to proposal. Proposals would not have any strategic implications for this Borough, however concerns cumulative schemes do not take account of the impact of the proposed Meridian Water development, or the developments at Tottenham Hotspur or Northumberland Park, especially with regards to the future capacity at Tottenham Hale. [Officer Note: the impact of developments in the vicinity were taken into account in assessments of the application. TfL raises no objection to the proposal.]

5. LOCAL REPRESENTATIONS

First Round of Consultation – August 2018

On 1st August 2018 the following consultation activity was undertaken:

- 1446 Letters to neighbouring properties
- 5 Letters Residents Association and local groups (as noted above)
- 8 site notices erected close to the site, publicising:
 - An application for Planning Permission (Major Development)

- An application accompanied by an Environmental Statement
- Development affecting the setting of a conservation area
- 3 Press Advertisements (placed in Haringey Independent on 3th August 2018) publicising:
 - An application for Planning Permission (Major Development)
 - An application accompanied by an Environmental Statement
 - Development affecting the setting of a conservation area

Second Round of Consultation – October 2018

The applicant submitted amendments to the application (including to the Environmental Statement) on 17th October 2018. A second round of consultation was undertaken on 19th October 2018 to publicise changes to the proposal. The second round of consultation replicated the first in terms of letters and site notices, and e-mail notification of the updates to those who already commented was sent. Press advertisements as per the above ran in the Haringey Independent on 19th October 2018.

- 5.1. The number of representations received from adjoining occupiers in response to notification and publicity of the application were as follows:

No of individual responses: 121
 Objecting: 88
 Supporting: 25
 Others: 8

(Any additional comment following the publication of this report will be tabled at the planning sub-committee meeting.)

- 5.2. The following local groups/societies made representations:

- **Chesnut Residents Association:** Objection to proposal via petition (4 signatories). Application should be withdrawn. Council should work with local residents on a plan for a low rise proposal for the Welbourn Site. Follow Up Objection 15.11.2018. Application is too large. Development on public land unacceptable. Proposal will give rise to air pollution. Portfolio approach unacceptable and will lead to gentrification. Impacts on infrastructure unacceptable.
- **Bridge Renewal Trust:** Supports proposal - welcome the mixed tenure options on the proposed homes, new large health centre, serving 30,000 local people and potential use of the facilities by local community whilst it reaches full capacity.

- **Friends of the Earth (Tottenham and Wood Green)** – Objection to the proposal. DEN supported but transition plan required. High glazing ratio increases the risk of overheating. The development does not meet the zero carbon standard. Heat pumps supported. PV supported but additional PV should be sought. Where the development still does not meet standards, the Council should impose the full zero carbon levy at £60.
- **Haringey Citizens:** Neither Supports nor Objects. Changes to scheme should be sought. Affordable Housing should be increased. Public Space should not be overly commercial and make provision for local groups. Health centre is welcomed. (Officer Comment: Response pre-dates scheme amendments. No response to second round of consultation)
- **Haringey Defend Council Housing:** Objection to the proposal. Lack of Council or social rent housing, Tenure segregation, Equality Issues, Fire Safety, Unexplained site boundary, and use of GLA funding. (Officer Comment: Response pre-dates scheme amendments. No response to second round of consultation)
- **Haringey Green Party:** Objection to the proposal. King's Cross Square, which was also built by Argent, is very attractive but, given that the majority of this development is on council property, scheme would need to be genuinely public. Lack of social housing unacceptable. Scheme should cater to local workers. 38 storey building (over 100 metres tall) will be visible over large area. Development would require matching transport infrastructure. Unit mix unsuitable. (Officer Comment: Response pre-dates scheme amendments. No response to second round of consultation)
- **Haringey Health Watch:** Support Proposal. Failure of GP provision to keep pace with local population growth a long standing problem in the local area. Health Watch investigation into local health care indicates local area underserved in terms of primary care provision. (Health Watch study attached). Health centre will address provision and health inequality in local area.

5.3 The following Councillors made representations. A summary of the representations is below. The full text of representations from Councillors, the MP for Tottenham, the London Assembly Member for Haringey and Enfield (as set out below) and other London Boroughs, is contained in **Appendix 13**. An officer response to objections is also provided.

- **Cllr Ruth Gordon:** Objection to proposal. Lack of Social Housing unacceptable. The scheme will increase inequality in Haringey. The scheme is a contravention of the Equalities Act. Affordable Housing product is aimed at attracting buyers from outside Haringey. Height of development is

unacceptable and will impact the amenity of adjoining occupiers in terms of daylight/sunlight.

Updated comments following scheme alterations: Affordable housing being delivered with funds flowing from Development Agreement is unacceptable. Height of development is unacceptable and a departure from guidance. The site allocation for Welbourne calls for a Green Buffer and the proposal does not achieve this - mature trees are being removed. The proposal will increase noise and air quality issues contrary to the Tottenham AAP. The Welbourne proposal does not accord with the character of the Chesnut Estate and will overshadow existing properties. Scheme contains insufficient playspace.

- **Cllr Zena Brabazon:** Objection to proposal. Lack of Social Housing unacceptable. The scheme will increase inequality in Haringey. The scheme is a contravention of the Equalities Act. Affordable Housing product is aimed at attracting buyers from outside Haringey. Reversal of tenure split for affordable housing not suitable as the scheme involves sale of public land. Height of development is unacceptable and will impact the amenity of adjoining occupiers. The development will impact air quality of local schools.
- **Cllr Daniel Stone:** Objection to proposal. Lack of Social Housing unacceptable. The council's objective is that social housing should constitute 70% of the 50% affordable housing within developments of ten or more units. Fire Safety concerns and single lack of egress. Infrastructure concerns with increased population in Tottenham Hale.
- **Cllr Mahir Demir:** Objection to proposal. Lack of Social Housing unacceptable. Quantum and type of affordable housing unacceptable. Height of tall buildings in Tottenham Hale unacceptable.
- **Cllr Matt White:** Objection to proposal. Lack of Social Housing unacceptable. The development will attract commuters and local residents. Applicant process is undemocratic as there are too many documents included and local people do not have ability to effectively comment.
- **Cllr Noah Tucker:** Objection to proposal. Lack of social housing unacceptable. Height of scheme and impacts on skyline unacceptable given – lack of affordable means impacts are not justified.

5.4 **The Right Honourable David Lammy, Member of Parliament for Tottenham,** made representations. A summary of the objection is below. The full text of the objection is Appendix 13.

- Objection to proposal. MP has received objections from local residents. Lack of social housing in scheme is unacceptable. Shared ownership is not affordable for some Tottenham residents. Social housing should be priority

given local authority waits lists. Proposal should achieve 40% affordable housing. MP considers proposal will give rise to further social polarisation in Tottenham. The height of the development is unacceptable and will impact on adjoining occupiers. Fire safety concerns regarding single egress from Building 1.

5.5 **Joanne McCartney, London Assembly Member for Haringey and Enfield** made representations. A summary of the objection is below. The full text of the objection is Appendix 13.

- Objection to proposal. There is too much shared ownership in the scheme and a lack of affordable housing which will not benefit local residents. Concerns regarding the height of the proposed development. Concerns regarding the fire safety and fire suppression systems in new build development. Air quality implications of scheme should be considered in further detail, especially impacts on local schools.

5.6 The issues raised in representations from adjoining occupiers that are material to the determination of the application are tabulated in **Appendix 14** together with an officer response. The material planning issues are briefly summarised below:

Affordable Housing

- The scheme contains an absence of social housing
- The scheme proposes a low proportion of affordable housing
- The affordable rent element of the scheme will not be truly affordable for local residents
- The affordable housing offer is too oriented toward shared ownership.
- The development should be marketed exclusively to Haringey residents for a set period of time
- BAME residents on comparatively lower incomes will be unable to access shared ownership housing

Development Design

- The buildings will be visually unattractive
- The buildings are too tall for the local area
- The buildings will loom over existing development and Down Lane Park
- The Pavilion finishes may weather poorly
- More green space should be incorporated into the design
- The tall building are located too close to the Walthamstow wetlands
- The affordable and market units should have integrated access points
Separate access points are unsuitable and stigmatising
- The density of the scheme is too high given the context of the area
- The amount of child playspace in the scheme is insufficient

Housing Quality

- Highrise development will yield unsuitable living conditions for future occupiers
- The highrise element of the scheme will have low levels of light and poor outlook in the lower floors
- The overall unit mix is too oriented toward 1-bedroom and 2-bedroom units at the expense of family housing. This is a policy contravention. This unit mix will promote population churn

Amenity to Adjoining Occupiers

- The buildings will block light to adjoining occupiers

Public Access

- The development contains publically accessible areas as opposed to public rights of way

Infrastructure

- Additional numbers to the local population will put a strain on existing health and schooling facilities
- The Council should ensure that improvements at Tottenham Hale station will handle the extra capacity as the station is already congested in the mornings.
- The loss of the petrol station and the cash machine will be detrimental for the night-time economy
- The level of local CIL is not sufficient to address the impacts of the scheme

Transport

- The health centre should incorporate metered parking on Chestnut Road so local residents can drive to the health centre if unwell
- The development will give rise to local highway safety concerns
- The health centre will give rise to localised overspill parking impacts in the area
- The development will give rise to overspill parking impacts specifically to Hale Gardens

Fire Safety

- Buildings of the height proposed should not be permitted following the Grenfell Tower Fire.
- Layout of Buildings should be reviewed following the Grenfell Tower Fire.
- The 38 storey building only has a single point of escape.

- London Fire Brigade equipment is not suitable for a building of this height.

Flood Risk

- Tottenham Hale is in a Flood Plain and the buildings would over sit London Underground Tunnels

Air Quality

- The build out time (given the site size) will give rise to worsening air quality in Tottenham
- The applicant's submission understates the air quality impacts to the Welbourne School
- The removal of trees from the site will give rise to air quality concerns. The trees on the Welbourne Centre are a roosting habitat and should not be removed
- Residents on lower floors of the development will be impacted by higher levels of pollution than on higher floors
- The applicant is using out-of-date air quality data
- The proposal will give rise to additional car travel and therefore more air pollution
- Construction traffic and onsite impacts will worsen air quality in the local area
- School Air Quality Audit Program notes two schools in the vicinity of the site have air quality issues – the development will worsen local air quality

5.7 The following is a summary of comments received from adjoining occupiers in support of the development:

- Proposal will provide much needed new housing
- The scheme will make excellent use of existing transportation links
- Tottenham Hale needs investment and regeneration
- Redevelopment will bring new jobs in the area
- Development should be welcomed by local residents following a lack of historic investment in Tottenham.
- A local cinema is a positive feature of the development
- Proposal would provide good quality homes
- There is sufficient social housing in Tottenham and no further provision is required
- Similar high density proposals in Stratford have yielded family friendly development
- The Health centre is welcome, but should be large enough to accommodate local needs
- The Health Centre will help address the acute lack of access to primary care in the ward

- This development represents a much better alternative to building low density development on a greenfield site

5.8 The following issues raised are not material planning considerations:

- Any social housing provided would not be allocated to key workers or local residents as the Council would prioritise asylum seekers to occupy any social units created. (Officer Comment: Haringey's Housing Allocations Policy as it relates to the circumstances of those on the housing register is not a material planning consideration.)
- The units as sold would be left empty (Officer comment: while a S106 obligation around local marketing is included in the Heads of Terms, the occupation of any unit post sale or construction is not a material planning consideration.)
- Development approved by Haringey at Seven Sisters is visually unappealing and overshadowing adjoining properties (Officer comment – only the current development proposal may be considered by Planning Sub-Committee. Development approved in Seven Sisters is not material to the planning decision.)
- The application should be 5 separate applications or made in outline. (Officer comment: Officers requested that Argent make a full application in order to make a full assessment of the proposals as a whole. The choice of redline is one for Argent, however Officers think it is appropriate that it should cover all 5 areas. The applicant's redline area is not a material planning consideration in so far as the application boundaries are configured. The applicant has submitted a full Environmental Statement which considers the cumulative environmental impacts of the development.)
- The Council's sale of land to the applicant represents poor value for money and the Development Agreement between the applicant and Haringey should be rescinded. (Officer comments: issues of land ownership are not a material planning consideration.)
- The planning documents are too numerous and too complex for the local community to consider. (Officer comment: the Council has placed the submitted application documents in the planning register in line with the Development Management Procedure Order. The applicant has met validation requirements.)
- The proposal contravenes the Equalities Act 2000 because it will have a 'negative equalities' impact on local residents. The application is not accompanied an in Equalities Impact Assessment. (Officer comment: An equalities assessment is generally required a plan making stage. The proposal is in conformity with the Local Plan. The issue of equalities is dealt with in additional detail in Section 6.20 in the report).
- The heights of the buildings is not disclosed in the application. (Officer comment: the specific building heights and number storeys are contained in the application submission and are set out in this report in Section 6.5.)

- The red line area encompasses public highway and include cycle lanes. (Officer comments: land ownership is not a material planning consideration. Part of the proposal requires the stopping up of public highway, and updates to the public highway require cycle lanes to be included in the redline area.)
- The Greater London Authority did not consent to its grant funding being used by Haringey to deliver this scheme. (Officer comments: the Greater London Authority supports the scheme in planning terms [subject to the resolution of the issues noted in the Stage 1 report] however the GLA's decision to grant funds to Haringey is not material to the planning decision).

6 MATERIAL PLANNING CONSIDERATIONS

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

- 6.2 Principle of the Development
- 6.3 Policy Assessment
- 6.4 Affordable Housing
- 6.5 Development Design
- 6.6 Residential Quality
- 6.7 Social and Community Infrastructure
- 6.8 Child Playspace
- 6.9 Heritage Conservation
- 6.10 Impacts on Amenity of Adjoining Occupiers
- 6.11 Parking and Highway Safety
- 6.12 Energy and Climate Change
- 6.13 Flood Risk and Drainage
- 6.14 Trees and Ecology
- 6.15 Waste and Recycling
- 6.16 Land Contamination
- 6.17 Basement Development
- 6.18 Archaeology
- 6.19 Fire safety and Security
- 6.20 Equalities

6.2 Principle of the development

6.2.1 *Policy Background*

6.2.2 The revised National Planning Policy Framework (NPPF) establishes overarching principles of the planning system, including the requirement of the system to support development through the local development plan process and supports approving development proposals that accord with the development plan without delay.

- 6.2.3 The NPPF expresses a presumption in favour of sustainable development. The revised NPPF also strengthens the requirement to make effective use of land, including brownfield land and increased transparency with respect to viability.
- 6.2.4 *The Development Plan*
- 6.2.5 For the purposes of S38(6) of the Planning and Compulsory Purchase Act 2004 the Development Plan includes the London Plan (2016), Haringey's Local Plan Strategic Policies and the Tottenham Area Action Plan (AAP) and Development Management Policies Development Plan Document (DPD).
- 6.2.6 *The London Plan*
- 6.2.7 The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. The consolidated London Plan (2016) sets a number of objectives for development through various policies. The policies in the London Plan are accompanied by a suite of Supplementary Planning Guidance (SPGs) that provide further guidance.
- 6.2.8 The current London Plan is the adopted Development Plan, but the Draft London Plan is a material consideration in planning decisions. The significance given to it is a matter for the decision maker, but the draft plan gains more weight as it moves through the process to adoption.
- 6.2.9 Public consultation on the Draft London Plan took place from 1st December 2017 to 2nd March 2018. On 13 August 2018 the Mayor published a version of the draft Plan that includes minor suggested changes. The plan is proceeding to an Examination in Public (EiP) which opens on 15th January 2019. The Draft London Plan currently has limited weight.
- 6.2.10 *Upper Lea Valley Opportunity Area Planning Framework*
- 6.2.11 The Upper Lea Valley Opportunity Area Planning Framework (OAPF) (2013) is supplementary guidance to the London Plan. The OAPF sets out the overarching framework for the area (which includes the application site) and the objectives for the Upper Lee Valley. The OAPF identifies Tottenham Hale as suitable for tall buildings and a new landmark building as a focal point of the new district centre.
- Housing Zone*
- 6.2.12 Key to the delivery of regeneration at Tottenham Hale is the Council's participation in the Mayor of London's Housing Zone program. Tottenham

Hale's designation as a Housing Zone provides funding for new infrastructure and allows policy interventions such as tax incentives, simpler planning regulations and the use of compulsory purchase powers.

- 6.2.13 The programme seeks to deliver 5,500 new homes – 1,700 more than would otherwise be viable – through the unlocking of brownfield sites. The Housing Zone also seeks a portfolio approach to housing delivery to better align public sector resources. This approach also balances housing tenures and dwelling mixtures across Housing Zone areas.

Haringey Strategic Policies

- 6.2.14 Haringey's Local Plan Strategic Policies document highlights the importance of growth areas within the Borough and notes that Tottenham Hale will be the key location for the largest amount of Haringey's future growth. The Strategic Policies also make clear the need for affordable housing outstrips supply in Haringey.

Tottenham Area Action Plan (AAP)

- 6.2.15 The Tottenham AAP provides site specific and area-based policy to underpin the delivery of the spatial vision for Tottenham Hale set out in the Strategic Policies. The AAP seeks to provide clarity and certainty about how the opportunities for improving Tottenham's places will be realised. Specifically, it prescribes a vision for how neighbourhood areas, including Tottenham Hale, can develop and allocates strategic sites for particular uses and types of development.

District Centre Framework (DCF)

- 6.2.16 The District Centre Framework provides an illustrative masterplan for the centre of Tottenham Hale, with a range of building heights mainly stepping up to the focus of the District Centre, south of Hale Road and north of Ferry Lane/The Hale and the Welbourne Centre where 'Higher Rise' buildings are considered appropriate.

AAP Site Allocations

- 6.2.17 The AAP sets out 3 site allocations that are relevant to the application: TH4: (Station Square West); TH5 (Station Square North) and TH10 (Welbourne Centre & Monument Way). A brief summary of each allocation's concept is below. An assessment of the development proposals against site allocation requirements and guideline is contained in the section following.

TH4: Station Square West

- 6.2.18 Comprehensive redevelopment incorporating new District Centre uses at ground and first floor levels, including a hotel use, with residential and commercial above. Creation of a high quality public realm including the extension of Ashley Road as the primary route through the site.

TH5: Station Square North

- 6.2.19 Comprehensive redevelopment of the southern end of Ashley Road for ground floor town centre uses with a mix of residential and employment above, forming part of the new District Centre.

TH10: Welbourne Centre and Monument Way

- 6.2.20 Comprehensive redevelopment of the Welbourne Centre for secondary town centre uses (which could include a health centre) at ground floor level, and residential above. Limited new residential development to the south of Chesnut Estate.

6.3 Policy Assessment

- 6.3.1 Planning policy at all levels supports the principle of a comprehensive mix used redevelopment of the application site to provide residential and non-residential uses.
- 6.3.2 The NPPF fundamentally prioritises the re-use of brownfield land in urban locations to deliver required homes, jobs and community facilities. The London Plan identifies Tottenham Hale as being located within an Opportunity Area (OA), where residential and non-residential output and densities should be optimised and higher density prioritised.
- 6.3.3 Local policy articulates a vision seeking to capitalise on the dynamics of the area and unlock Tottenham's potential as an increasingly attractive place to live, work, study and visit, a neighbourhood fully benefitting from London's growth and its position in a world city.
- 6.3.4 As set out below, the proposal is judged to play a highly significant role in delivering the strategic vision for Tottenham Hale as set out in adopted policy, enabling Tottenham Hale to provide a new much needed Health Centre and to become a bustling hive of activity with a vibrant mix of community, commercial, leisure and residential uses set within a public network of streets and spaces. The sections that follow assess the principle of the various elements of the scheme against adopted policy and guidance.
- 6.3.5 *Principle of Provision of Housing*

- 6.3.6 London Plan Policy 3.3 sets a target for Haringey to deliver a minimum of 15,019 homes per year in the period 2015-2025. Draft London Plan Policy H1 and Table 4.1 of the draft London Plan sets Haringey a target of 1,958 of homes per year between 2019/20 and 2028/29. Policy SP2 states that the Council will maximise the supply of additional housing to meet and exceed its minimum strategic housing requirement.
- 6.3.7 Planning policy is clear that Tottenham Hale will be a key location for the largest amount of Haringey's future growth. The site lies within the London-Stansted-Cambridge-Peterborough Growth Corridor and is identified in the London Plan as an Area for Intensification and an Opportunity Area respectively. The application site is therefore suitable for large scale redevelopment with a significant increases in jobs and homes.
- 6.3.8 The 1030 units of residential accommodation proposed would make a significant contribution to meeting Haringey's allocated housing target. The quantum of development accords with a spatial location designated for significant levels of growth. Subject to a detailed assessment of the type and tenure of housing (including affordable housing), the principle of the provision of housing is acceptable.

Provision of Flexible Commercial Floorspace

- 6.3.9 London Plan Policies 2.15, 4.7 and 4.8 support the provision of high quality town centres as the main focus for commercial development and intensification. This approach is reflected in the Draft London Plan. Policy SP10 promotes the distribution of retail growth to meet Haringey's required additional floorspace, centrally in district centres. SP10 also encourages commercial growth alongside a mix of residential uses.
- 6.3.10 The Tottenham AAP identifies the site as within a potential District Centre, with new District Centre uses at ground/first floor, and residential and employment uses above. The Tottenham AAP targets a quantum of town centre floorspace by AAP site allocation as per the below:
- Ferry Island and North Island plots (part of TH4): **5,200m²**
 - Ashley Road West and Ashley Road East plots (part of TH5): **7,300m²**

Loss of Existing Uses

- 6.3.11 The existing site is currently occupied by approximately 3,500 m² of non-residential floorspace. Within this, retail space occupies 952m², educational use 872m² and 575m² is occupied as a meanwhile music/bar venue (which will be closing shortly). Given the new floorspace provision noted below, the loss of this existing space is acceptable, subject to a condition seeking to secure a

business relocation and retention strategy as per the comments of GLA Officers.

Proposed Town Centre Uses

- 6.3.12 The application proposes 4335m² – 5137m² of flexible commercial space (depending on if the applicant includes a cinema in the proposal). The flexibility of this space is in part a response to a rapidly changing retail market, but also in recognition of the challenges of creating a new town centre. The flexible nature of the floorspace is supported by Haringey and GLA Officers.
- 6.3.13 The application is accompanied by a Retail Strategy, which takes account of the Tottenham AAP and DCF objectives, as well as existing and proposed non-residential uses in the vicinity of the site. The applicant's aspiration is for a range of uses, from national multiple convenience stores, local cafes, creative arts facilities, all-day restaurant operators and amenity uses providing for both the local market of residents and those visiting the area. Officers note Argent has demonstrable experience of successfully achieving this type of development in other locations in London, including in King's Cross.
- 6.3.14 Food and beverage and leisure users are targeted for the Ferry and North Island plots, focused around a new civic space (Ferry Square) at the core of the new district centre. The office space is targeted at creative/SME occupiers.
- 6.3.15 Taking into consideration existing jobs that would be displaced and depending on the final nature of the flexible floorspace, the proposal would deliver a net increase of between 75 and 415 jobs, with the actual employment yield likely falling somewhere between this range.
- 6.3.16 The quantum of flexible commercial floorspace against AAP policy targets (and in consideration of other consented schemes) is supported. Officers welcome Argent's experience managing a diverse mix of commercial uses that will draw users to Tottenham Hale and facilitate the commercial regeneration of the area. The uplift in the quantum and quality of employment floorspace will offset the loss noted above and will add jobs and grow the local economy. The proposed mix of flexible Town Centre uses is strongly supported and considered a key element of the vision for Tottenham Hale and the new District Centre.

Provision of Health Centre

- 6.3.17 London Plan Policy 3.17 states that development proposals which provide high quality health facilities will be supported in areas of identified need, particularly in places easily accessible by public transport, cycling and walking. Strategic Policy SP14 supports the provision of new health facilities that are well

integrated into existing areas and that address Haringey's health needs. This approach to community facilities is reflected by Policy DM49.

- 6.3.18 The Tottenham AAP indicates new development and growth must be supported by adequate social infrastructure, including health facilities for new and existing residents. Policy TH10 notes the Welbourne plot may include a health centre as part of the strategic allocation.
- 6.3.19 The applicant proposes a two-storey health centre comprising 1,643m² of D1 floorspace on the Welbourne Site. The applicant has committed to delivery of the shell and core of the building, whilst the internal fit out of the health centre and its operation will be the responsibility of the NHS. The NHS has funding for the fit out.
- 6.3.20 The applicant's socio-economic assessment in the Environmental Statement notes there is currently no surplus GP capacity at the local level in Tottenham Hale. The capacity of local GP surgeries was assessed using the Healthy Urban Development Unit (HUDU) benchmarks and the assessment concludes an additional 1,600 residents would yield a need for the equivalent of 0.9 GPs.
- 6.3.21 A Healthwatch report produced in 2014 highlighted the major issue of shortfall in GP provision in the Tottenham Hale area which was made worse when the NHS did not take up space offered in the Tottenham Hale Development. Healthwatch has been campaigning for this shortfall to be addressed for several years. The temporary location of a health centre in temporary buildings on Hale Village has met some of this shortfall pending the development of the Health Centre proposed in this application.
- 6.3.22 A new health centre with capacity to accommodate up to 10 GPs would address the increased demand created by the development and add much needed substantial new health care capacity in the local area. The NHS Haringey Clinical Commissioning Group (CCG) strongly supports the application.
- 6.3.23 The NHS CCG notes that the proposed health centre would meet demand generated by the development as well as providing significant additional capacity for the local area. The CCG is also clear the proposed development would provide a permanent, fit-for-purpose site to consolidate existing health care services.
- 6.3.24 In 2016, the Tottenham Hale Medical Practice was opened on a temporary site at Hale Village to accommodate the need for more primary care in the area, with the intention that the practice would move into the Welbourne Centre on completion of the building. The Hale Village provision is a temporary site in a portakabin, only available for a limited period.

- 6.3.25 It is planned that the Dowsett Road Surgery will move into the new health centre. The NHS CCG notes this surgery is currently located in a converted terraced house which is unsuitable for the delivery of modern healthcare. The NHS also notes that the provision of a new modern facility will assist with staff recruitment in a difficult market.
- 6.3.26 The provision of a health centre is an important element of the redevelopment of Tottenham Hale and key to delivering the vision articulated in adopted policy. Delivery will allow for consolidation and expansion of health care services. The increased provision will both address the new household growth created by the development and allow for increased future capacity. A condition concerning health centre operational management is recommended for imposition.
- 6.3.27 A new health centre will benefit new and existing residents in accordance with London Plan and local policy health objectives. Provision of a health centre in a highly accessible location is therefore acceptable in principle and strongly supported by both Haringey and GLA officers, and the NHS. It is a significant public benefit of the scheme.

Principle of Master Planned and Comprehensive Development

- 6.3.28 Policy AAP1 indicates that the Council expects all development proposals in the AAP area to come forward comprehensively to meet wider planning and regeneration objectives. To ensure comprehensive and coordinated development is achieved, masterplans will be required to accompany development proposals which form part of a site allocation included in the AAP. This policy approach is also reflected in Policy DM55.
- 6.3.29 The various site allocations listed above set out the site requirements and development criteria to ensure comprehensive development in Tottenham Hale. The applicant has provided a detailed masterplan, as set out in Volume 1 of the Design and Access Statement and Addendum. This has been prepared having regard to other approved and emerging development within the district centre area.
- 6.3.30 There are some parcels of land within AAP site allocations TH4, TH5 and TH10 that sit outside the SDP sites. Some of these parcels already have planning permission and the applicant has developed the current proposal with regard to existing permissions. The TH10 allocation is comprised of the Welbourne Plot and a linear strip of land adjoining Monument Way that has been granted planning permission for 54 affordable homes (HGY/2018/0050). Officers are satisfied the applicant's proposal completes the TH10 allocation in line with relevant site criteria and the development will be comprehensive.

- 6.3.31 The applicant has also produced plans to show how development could come forward on the remaining land within the TH5 allocation. The existing terrace of Victorian homes fronting Hale Road west of the BP garage form part of the strategic allocation, however the Ashely Road West plot ensures a separation distance from existing development, a suitable step down in adjoining heights and a treatment for the flanking elevation of the new building. The applicant has also amended the redline area along the northern edge of the Ashely Road East plot to ensure a comprehensive public realm that accords with other approved development.
- 6.3.32 Officers are satisfied the delivery of the remainder of TH5 will not be prejudiced by the current proposal and the applicant has taken a master-planned approach.
- 6.3.33 Within the TH4 allocation, the land north of Building 3 also lies outside the application site. The applicant has demonstrated that this parcel is capable of being delivered separately in the future, but care will need to be taken to ensure that any future mixed use proposals protect the amenity and privacy of current and future occupiers, and achieve a suitable separation distance from Building 3 and future play spaces.
- 6.3.34 Officers note a small part of the TH2 site allocation (Tottenham Hale Station) falls within the application site, but this is largely land released with the approved changes to Tottenham Hale Bus Station and would not prejudice comprehensive delivery.
- 6.3.35 The applicant's scheme is comprehensively master planned. Haringey's Quality Review Panel has considered the scheme and as per the design section below, judges the master planned areas to be coherent and unified in design terms. The proposals meet the relevant site allocation criteria and will achieve comprehensive and coordinated delivery in line with the policy cited above.

Principle of the Development – Summary

- 6.3.36 The principle of a health centre is strongly supported. The provision of a mixed use scheme comprising housing and flexible commercial uses is acceptable in principle given the site allocations noted above. The significant quantum of residential development proposed meets Haringey's planning policy aspirations to deliver the regeneration and re-vitalisation of Tottenham Hale and would significantly contribute to meeting Haringey's targeted housing requirements. As assessment of affordable housing follows in the section below.
- 6.3.37 The flexible nature of the new commercial space is supported given the challenging commercial environment for retail development in the UK. The

proposal will create employment and jobs. The quantum and type of non-residential floorspace meets with planning policy objectives to create a new district centre. The scheme is considered to be comprehensively master planned and the proposal will not prejudice wider planning policy objectives. There is an identified and pressing need for a new health centre in Tottenham Hale. The development is acceptable in principle and is strongly supported given that it creates a new district centre, is high quality and provides much needed housing and affordable housing.

Development Density

- 6.3.38 London Plan Policy 3.4 indicates that a rigorous appreciation of housing density is crucial to realising the optimum potential of sites. This approach to density is reflected in the Tottenham AAP. While the draft London Plan proposes to remove the London Plan's density matrix, the current adopted London Plan retains the matrix. The local approach to density mirrors the current London Plan.
- 6.3.39 The applicant proposes 1030 residential units, incorporating 2,608 habitable rooms (hr). The majority of the site has a Public Transport Accessibility Rating (PTAL) of 6a (the highest possible), indicating excellent access to public transportation. The net redline area (deducting footways/roadways) is 1.7 Hectares (Ha). The development would therefore yield a density of **589 u/ha** and **1490 hr/ha**.
- 6.3.40 Officers consider the site to be urban in character, although it has some central characteristics. The London Plan sets a target range of 70-260 u/ha and 200–700 hr/ha for schemes with an average of 2.7-3.0 habitable rooms/unit (hr/unit) and a PTAL rating of between 4 and 6. The proposal therefore exceeds the London Plan density range for both units per hectare and habitable rooms per hectare.
- 6.3.41 The London Plan Housing SPG states that in appropriate circumstances, it may be acceptable to exceed the ranges in the density matrix, providing key concerns are addressed. Considerations include:
- The location of a site in relation to existing and planned public transport connectivity;
 - Quality of design in terms of liveability, public realm, residential and environmental quality and accordance with housing quality standards;
 - Contribution to overall 'place making';
 - Residential mix; and
 - Locations appropriate for higher density development such as town centres, Opportunity Areas and other large sites.

- 6.3.42 The scheme is considered to meet the considerations above given its spatial location within a growth area in close proximity to public transport. As per the design assessment below, the development represents exemplary design and its contribution to place making (given the existing context in Tottenham Hale) is significant. The units will be high quality housing that incorporate a significant number of Council homes.
- 6.3.43 The site is also in close proximity to a significant open space in the form of Down Lane Park, which lies across Hale Road, immediately to the north of the site, with Lee Valley Regional Park in close proximity. All units have private amenity space or are oversized (and the amenity space is therefore internalised rather than having balconies) and communal amenity is incorporated into each building. Given the developments high quality and spatial location, Haringey and GLA officers consider the density yield of the scheme is acceptable.

Dwelling Unit Mix

- 6.3.44 London Plan Policy 3.8 requires new residential developments to offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors. Strategic Policy SP2 and Policy DM11 of the Council's Development Management DPD continue this approach.
- 6.3.45 Policy DM11 states that the Council will not support proposals which result in an overconcentration of 1 or 2 bed units overall unless they are part of larger developments or located within neighbourhoods where such provision would deliver a better mix of unit sizes.
- 6.3.46 The unit mix was updated during the planning process to increase the amount of family sized housing. The tables below set out the current mix by unit and by habitable room.

Tenure by Unit	Studio	1-Bed	2-Bed	3-Bed	TOTAL UNITS
Market	60	350	330	51	791
Affordable	16	70	123	30	239
TOTAL UNITS	76	420	453	81	1,030
%	7%	41%	44%	8%	100%

Table 1.9 – Scheme Unit Mix

Tenure by	Studio	1-Bed	2-Bed	3-Bed	TOTAL
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Hab Room					HAB ROOM
Market	60	700	990	204	1,954
Affordable	16	140	369	129	239
TOTAL HAB ROOM	76	840	1,359	333	2,608
%	3%	32%	52%	13%	100%

Table 1.10 – Scheme Unit Mix by Habitable Room

- 6.3.1 The amended scheme has oriented the dwelling mix more toward family housing on the Welbourne site. The scheme will yield 81 (8%) 3-bedroom units which is 13% by habitable room, across all tenures. Due to the location and surrounding amenities Officers consider the location of the 3-bedroom family housing primarily on the Welbourne Site to be the correct approach. The mix of units proposed on sites closer to the centre of the site respond to their location with 1 and 2 bedroom units within the more dense elements of the proposal, close to the transport interchange.
- 6.3.2 Although the proposal itself has a high concentration of 1 and 2 bedroom units, this is appropriate within the context of the e the Portfolio Approach to housing mix within the Housing Zone. The portfolio approach seeks to balance the mix of units across sites in Tottenham Hale with each site contributing a suitable range of units based on its characteristics. Sites with planning permission on Monument Way and Ashley Road will provide a higher concentration of family sized units close to Down Lane Park and further from the Transport interchange. The current permissions provide 274 x 3 bedroom units which allows for higher density, 1 and 2 bedroom units on the SDP sites where they are consider appropriate.
- 6.3.3 The dwelling mix is consistent with the AAP approach to deliver smaller units in close proximity to public transport. London Plan Policy 3.4 states while there is usually scope to provide a mix of dwelling types in different locations, higher density provision for smaller households should be focused on areas with good public transport accessibility.
- 6.3.4 A breakdown of the dwelling mix of affordable tenure is in the Affordable Housing Section below. The proposal is considered to deliver a balance of unit sizes across tenures and the dwelling mix proposed makes an appropriate contribution given the site characteristics as part of a portfolio of development sites in the area, this is in accordance with Policy DM11 and the London Plan and is supported and considered to meet the needs of Haringey. The proposal does not represent an overconcentration of 1 or 2 bedroom units as part of a portfolio of development sites in the area.

6.4 Affordable Housing

Policy Background

- 6.4.1 The revised NPPF (Paragraph 62) states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required. London Plan Policy 3.12 states that Boroughs should seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes.
- 6.4.2 Draft London Plan Policy H5 and the Mayor's Affordable Housing and Viability SPG set a strategic target of 50% affordable housing London-wide. Policy H6 identifies a minimum threshold of 35% affordable housing by habitable room (rising to 50% on former industrial sites) below which a viability assessment is required. The SPG sets guidance on the use of viability reviews in the planning process.
- 6.4.3 Policy SP2 of the Local Plan requires developments of more than 10 units to provide a proportion of affordable housing subject to viability to meet an overall borough target of 40%, with the maximum reasonable amount of affordable housing to be provided on a site by site basis. This approach is reflected in Policy DM13. Policy AAP3 sets out affordable housing policy in Tottenham.

Housing Zone and Strategic Development Partnership

- 6.4.4 Key to delivering regeneration in Tottenham Hale is the Council's participation in the Mayor of London's Housing Zone programme. This programme seeks to deliver a total of 5,500 new homes in the Zone – 1,700 more than would otherwise be viable – through the unlocking of brownfield sites.
- 6.4.5 Policy AAP3 supports the Housing Zone's "Portfolio Approach" to housing delivery. This approach balances housing tenures and dwelling mixes across Housing Zone areas with each site within Tottenham Hale making its own specific contribution based on its characteristics.
- 6.4.6 Under the Strategic Development Partnership (SDP) between the applicant and Haringey, a number of disparate land assets held by both parties are pooled together to facilitate a more joined up approach to redevelopment. This also enables the sites to deliver more affordable housing than in a conventional approach. This approach will enable development to come forward without the constraints of land ownership boundaries.

Affordable Housing Policy - Tenure Split

- 6.4.7 Policy H7 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG sets out a preferred tenure split of at least 30% low cost rent, with London Affordable Rent as the default level of rent, at least 30%

intermediate (with London Living Rent and share ownership being the default tenures), and the remaining 40% to be determined in partnership with the Local Planning Authority and the GLA.

- 6.4.8 Policy AAP3 sets out the affordable tenure split in the Tottenham AAP area should be provided at 60% intermediate accommodation and 40% affordable rented accommodation. Policy DM13 states also states the Council may seek to alter the tenure of affordable provision to be secured on a case-by-case basis.
- 6.4.9 Haringey's Housing Strategy 2017-22 and Haringey's Intermediate Housing Policy statement 2018 provide guidance on the preferred tenure mix for affordable housing across the borough in order to deliver the overall aims of the Local Plan and meet housing need.
- 6.4.10 Revisions to the Haringey's Housing Strategy (2017-22) agreed by Cabinet in January 2018 set out that the Council's preference for General Needs affordable housing is Social Rent or London Affordable Rent. The preference in terms of intermediate rented housing is London Living Rent or Discount Market Rent, at rent levels equivalent to London Living Rent.

Affordable Housing Offer – Assessment

- 6.4.11 The scheme initially proposed 25% affordable housing by habitable room, of which 100% would have been shared ownership. Following feedback from consultation, the applicant amended their affordable housing position to include more social rented housing and London Living Rent units, as is set out below.
- 6.4.12 Whilst the overall quantum of affordable housing is proposed to remain at 25% by habitable room, the Welbourne plot is now to be provided as 100% affordable housing. The section 106 agreement will include a cascade with the first option comprising all social rented homes and the second option comprising a mixture of social rent and intermediate London Living Rent (LLR) homes with a fall back position of all shared ownership homes if the Council do not go through with buying the building. Other than in the fall back position the homes on the Welbourne Plot will be owned and managed by the Council.
- 6.4.13 It is now envisaged that it is likely that the Welbourne will comprise 131 social rented homes however the application is also assessed on the basis of having 51 social rented homes and 80 intermediate rented DMR homes at LLR levels with a fall back position of 131 shared ownership units. The unit mix has also been reconfigured to increase the number of 3-bedroom units. The scheme proposes shared ownership units in the North Island (Building 3) and in Ashley Road West. These homes will be providing an important contribution (over

10%) of the Council's 1000 Council Homes Programme, with the aspiration for occupation in 2021.

6.4.13 The current development proposal will therefore yield 239 Affordable Homes. Of these units, 131 will be on the Wellbourne site and the first option is for the Council to purchase the building and deliver these as Social rented Council owned units and 108 will be Shared Ownership. Overall, this represents an affordable tenure split of 35% low cost rent, 65% intermediate (by habitable room). The market and affordable housing by building is set out in the table below.

Building	Affordable/Market Units by Building		Total Units by building
Ferry Island 1	Market	375	375
	Affordable	0	
Ferry Island 2	Market	107	107
	Affordable	0	
North Island	Market	56	136
	Affordable	80	
Ashley Road East	Market	183	183
	Affordable	0	
Ashley Roast West	Market	70	98
	Affordable	28	
Welborne	Market	0	131
	Affordable	131	
ALL	TOTAL	1030	1030
	MARKET TOTAL	791	
	AFFORDABLE TOTAL	239	

Affordable House Unit Sizes

6.4.14 The breakdown of the proposed affordable housing by unit size is set out in the table below. As noted above, the proportion of family-sized affordable housing has been increased following discussions with the developer.

Tenure	Studio	1 bed	2 bed	3 bed	Total (Tenure)	Percentage (Tenure by unit)
Market	60	350	330	51	791	77%
Shared Ownership	16	34	50	8	108	10%
London	0	26	53	1	80	8%

Living Rent						
Social Rent	0	10	20	21	51	5%
Total (Mix)	76	420	453	81	1,030	100%
Percentage (Mix)	7%	41%	44%	8%	-	100%

6.4.15 12% of the overall affordable offer is comprised three-bedrooms units. The increased proportion of family-size affordable units (including 21 social rented three-bedroom units on the Welbourne site) is welcomed by officers and the provision is in line with the objectives of Haringey's Housing Strategy. The location of these family units in a lower rise setting on the Welbourne plot is also supported.

6.4.16 Officers also note the Portfolio Approach to affordable housing seeks to ensure flexibility, with each site contributing based on its characteristics. The provision of family housing on the Monument Way site and other sites in the portfolio have allowed for higher density, smaller homes on the SDP sites.

Portfolio Approach

6.4.17 The site is located within the boundaries of a Housing Zone. The Housing Zone programme is explicitly designed to encourage developers, boroughs and other key partners to consider innovative and flexible approaches to accelerate sustainable development and increase housing delivery.

6.4.18 The Housing Zone and Tottenham AAP3 policy also seeks a portfolio approach to housing delivery to better align public sector resources. This approach also balances housing tenures and dwelling mixtures across Housing Zone areas. The Housing Zone programme is explicitly designed to encourage developers, boroughs and other key partners to consider innovative and flexible approaches to accelerate sustainable development and increase housing delivery.

6.4.19 This approach sets out that various sites may each contribute a higher or lower proportion of affordable housing in line with an overall Zone-wide target. The contribution will depend on individual site characteristics and viability.

6.4.20 Land receipts and overage from this scheme has already been committed to provide an additional 113 units (60 London Living Rent and 53 Shared Ownership) on the Canon Factory and Ashley House site which has recently been granted approval at Reserved Matters Stage HGY/2018/2353. This increases the number of affordable units provided in, or facilitated by, this application to 352, which would be equivalent to 34% affordable housing.

6.4.21 The current level of affordable housing expected to be delivered through the portfolio approach is set out in the table below. This demonstrates that the 40% area-wide target is expected to be achieved.

Site	Total Units	Affordable	Percentage AH by unit	Percentage by Hab Room
Cannon Factory (ARS), Notting Hill	265	152	57%	50%
One Station Square, Berkeley Square	128	117	91%	91%
Hale Wharf	505	177	35%	30%
Ashley Gardens & Berol Yard, Berkeley Square	561	134	24%	35%
Hale SW Plot	279	43	15%	15%
Monument Way	54	54	100%	100%
SDP Site / Current Application	1030	239	23%	25%
Sub-total				33%
Uplift on Cannon factory from SDP land receipts				
Cannon Factory (ARS), Notting Hill		+113	+100%	+100%
Current-total				37%
Forthcoming applications (est. subject to planning)				
Ashley Park, Notting Hill	97	38	39%	40%
Ashley Road Depot	180	90	50%	50%
Final Portfolio Total				40%

Change from Consulted Scheme

6.4.22 As noted above, following discussions with Argent and in response to consultation, Haringey Council is minded to proceed with an option to

purchase the proposed building on the Welbourne plot, including the health centre, retail unit and the residential housing.

6.4.23 This proposed acquisition is in part a response to the lifting of the Housing Revenue Account (HRA) borrowing cap and would allow for all 131 homes on the site to be delivered as Council homes with social rents. This decision is pending Cabinet approval and relevant funding.

6.4.24 Therefore an option to further amend the proposed tenure for the Welbourne site to provided 131 social homes (owned by Haringey and managed by Homes for Haringey (Hf), the Council's Arms Length Management Organisation) is secured as an option by way of a S106 Obligation, as set out in the Heads of Terms above.

6.4.25 This tenure change would result in a higher child yield as the number of social units on the site would increase, however this is addressed by way of an additional child playspace contribution secured by a S106 obligation should this option be exercised.

Shared Ownership Affordability

6.4.26 While the final income limits will be determined by negotiation in the S106 process, the Mayor's draft Affordable Housing and Viability SPG sets the income cap for all intermediate products at £90,000 per household per annum. The eligibility criteria for the remaining shared ownership units on the Ashley Road West and North Island buildings will be in line with GLA guidance and confirmed during the S106 negotiation process.

Viability Assessment

6.4.27 The applicant has submitted a Financial Viability Assessment (FVA) to support their affordable housing position. This FVA was updated following the changes to the affordable housing proposed. The Council instructed BNP Paribas to undertake a review of the applicant's updated FVA. BNPP's assessment of the applicant's affordable housing position is **Appendix 15**.

Third Party Assessment – Methodology

6.4.28 The applicant's viability assessment uses a conventional model to consider if the affordable housing proposed is the maximum reasonable amount possible.

- Firstly, the value of the completed development is assessed.
- Secondly, the development costs are calculated, using either the profit margin required or land costs.

- 6.4.29 The difference between the total development value and total costs equates to either the profit (if the land cost has already been established and inputted as a cost) or the Residual Land Value ('RLV'). The output of the appraisal is a RLV, which is then compared to an appropriate benchmark, often considered to be the Current Use Value ('CUV') of the site plus, where appropriate, a landowner's premium.
- 6.4.30 Development convention and planning guidance indicates that where a development proposal generates a RLV that is higher than the benchmark, it can be assessed as financially viable and likely to proceed. If the RLV generated by a development is lower than the benchmark, it is assumed that a landowner would sell the site for existing or alternative use or might delay development until the RLV improves.

Applicant Viability Conclusion

- 6.4.31 The applicant notes in the application submission the extensive site constraints that exist in Tottenham Hale which make development here more expensive than on more conventional sites these include underground utilities and transportation tunnels, land fragmentation, the layout of the existing road network and an infrastructure deficit.
- 6.4.32 These factors all contribute to development costs, impacting viability. Officers accept these constraints are key viability challenges and point to the historic and repeated stalling of development in Tottenham Hale over many years. These factors are in part why a development partnership with the applicant has been agreed and why a portfolio approach to affordable housing is set out in policy and why the infrastructure to support development is being provided through the designation by the Mayor of a Housing Zone in the area.
- 6.4.33 The applicant's FVA notes that the 25% affordable housing offer proposed is not currently viable but is premised on a reasonable level of value growth secured by the development partnership taking account of the target of 40% across Tottenham Hale via the portfolio approach.
- 6.4.34 BNPP has reviewed the applicant's position and their appraisal indicates that the applicant's development would generate a deficit of £1.25 million below benchmark land value. BNPP's review therefore supports the applicant's conclusion that the level of affordable housing proposed is above the maximum reasonable amount.
- 6.4.35 The applicants affordable housing position is therefore a combination of the onsite 25% provision (in excess of what is viable), ring fenced SDP receipts and GLA Housing Zone funding that sees the level of affordable housing across the Tottenham Hale area achieve a 40% zone-wide level, contingent on the deliverability assumptions of other portfolio sites noted above.

- 6.4.32 The applicant is therefore considered to be delivering the maximum reasonable amount of affordable housing pursuant to London Plan and local planning policy.
- 6.4.33 The applicant's amended tenure split is also supported by officers as it will prioritise Council owned social rented homes and deliver against the Council's 1000 council homes target.

Early and Late Stage Viability Reviews

- 6.4.34 Early and Late Stage Viability reviews will be secured by S106 agreement, as per the Heads of Terms above. The need for the viability review accords with BNPP's and the GLA viability officer conclusion in reviewing the viability documentation.

Affordable Housing – Summary

- 6.4.35 The scheme delivers more than the maximum reasonable amount of affordable housing, which is London Plan and Local Plan compliant. The current development will yield 239 Affordable Homes. Of these units, 131 will be on the Wellbourne site, with 108 shared ownership units on other plots.
- 6.4.36 Options presented above set out various tenure and acquisition possibilities for Haringey and the Council's preferences are dependent on funding and cabinet approval. However in any scenario, save the fall back position, the amount of social housing has been substantially increased during the application process, and the level of affordable housing is judged to be above the maximum reasonable amount and of an acceptable tenure split. The scheme is judged to offer an acceptable mix of unit sizes in the context of the Portfolio Approach.
- 6.4.37 The Council's third party consultant BNPP has assessed the applicant's viability position and concludes that the affordable housing proposed is above the maximum reasonable amount.
- 6.4.38 Early and late stage viability review mechanisms that will capture any uplift in land value during the development process will be included in the Section 106 agreement.
- 6.4.39 The level and type of affordable housing is compliant with the London Plan Policy and is strongly supported by officers. The scheme is considered to deliver a very high number of Council Homes given the site constraints. The developer has worked with the Council following submission to improve opportunities to deliver social homes on the site.

6.5 Development Design

- 6.5.1 DM Policy (2015) DM1 'Delivering High Quality Design' states that development proposals should relate positively to their locality, having regard to, building heights, form, scale & massing prevailing around the site, urban grain, sense of enclosure and, where appropriate, following existing building lines, rhythm of any neighbouring or local regular plot and building widths, active, lively frontages to the public realm, and distinctive local architectural styles, detailing and materials.
- 6.5.2 Policy SP11 states that all new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use. Development shall be of the highest standard of design that respects its local context and character and historic significance, to contribute to the creation and enhancement of Haringey's sense of place and identity which is supported by London Plan (2016) Policies 7.4 and 7.6.
- 6.5.3 Officers consider that the scheme provides an exceptionally high standard of design that will create a new piece of public realm in Tottenham Hale. As per the assessment below, Haringey's independent Quality Review Panel concurs with this assessment. The applicant's strategy of engaging different architect teams for different parts of the site has yielded a varied and attractive development that is comprehensive and takes account of its surroundings. This section of the report will consider the scale, massing layout and height of the various buildings on the site and the landscaping and public realm proposed across the plots.

Quality Review Panel

- 6.5.4 As noted above Haringey's Quality Review Panel (QRP) has assessed various parts of the scheme on eight separate occasions. The final two reviews were at application stage. These two reviews (on 17 September and 14 November 2018) considered the final scheme in the round.
- 6.5.5 As per the tabulated summary below, the QRP has offered full and robust support for each element of the application in design terms. Officers consider this is a reflection of both the number of reviews at pre-application and application stage, and Argent's engagement with the Panel's critiques and willingness to undertake comprehensive design alterations to address the Panel's concerns. Minor issues where the Panel is of the view conditions are necessary have been included in **Appendix 1**.
- 6.5.6 The final Chair's review and the applicant's response with Officer comments is set out in the table below.

Quality Review Panel – Comment	Officer Response
Island Sites	
<p>The panel is fully satisfied with the Island sites proposals. This has a very challenging context to respond to, and the high quality of the buildings and public realm proposed promise to create a successful place, changing wider perceptions of Tottenham Hale as a whole.</p>	Noted
<p>The panel is happy with the massing and expression of the buildings on the Island sites, and feels that the architecture is distinguished.</p>	Noted. Standard materials conditions requiring samples of materials for the Island sites is contained in Appendix 1.
<p>The quality of the public realm proposed demonstrates careful thought about how people move through – and occupy – space.</p>	Noted. Conditions around public access and management of public space are contained in Appendix 1.
<p>The arcade is a very important architectural feature of the development; the panel supports the approach taken to ensure that it works well as a route from the station, through careful management and detailed design.</p>	Noted
<p>The panel welcomes the significant work that has been undertaken in order to reduce the numbers of single aspect units, and increase the quality of the accommodation that fronts onto the noisier environments.</p>	Noted. Conditions regarding noise insulation are contained in Appendix 1.
<p>The panel also welcomes the approach to explore mixed mode ventilation that strikes a good balance between natural and mechanical ventilation, whilst mitigating noise from busy roads, especially for the units in Building 3.</p>	Noted.
Ferry Island Pavilion	
<p>Whilst the Ferry Island Pavilion is the smallest building within the masterplan, it is actually very important and presents the opportunity to create an edge to the public square, provide a buffer to the noise and nuisance of the traffic, bringing delight and fine detail into the proposals.</p>	Noted

<p>The panel is very pleased with the final design of the pavilion, and feels that it successfully fulfils all of the above aspirations. It welcomes the careful thought that has been given to the use and functionality of the building, the materiality of the roof, the lighting and signage.</p>	<p>Noted.</p>
<p>The panel also welcomes the intention to establish clear signage zones and guidelines, in order to ensure that the signage is light and elegant, and carefully integrated.</p> <p>Whilst the scheme still retains its quiriness, it also has a refined simplicity, and addresses both the square and the road very well. The texture, colour and materiality of the pavilion allows it to serve a function as a welcome foil to the development surrounding it.</p>	<p>Noted Conditions around a signage strategy for the pavilion and a site-wide lighting strategy are contained in Appendix 1.</p>
<p>The panel also welcomes the inclusion of the 'veil' element, and would like to see the quality and detail of the pavilion as a whole safeguarded through the onward technical design and construction process.</p>	<p>Noted.</p>
<p>Ashley Road East</p>	
<p>The panel offers enthusiastic support overall for the development at Ashley Road East. It feels that it represents a great asset on a prominent site.</p>	<p>Noted.</p>
<p>It notes that the internal planning of the scheme is very efficient, and it welcomes the work that has been undertaken to minimise the number of single aspect units – and maximise the quality of accommodation – within the building.</p>	<p>Noted.</p>
<p>In terms of the communal circulation spaces within the building, the panel feels that the generosity and quality of the circulation at first floor level offsets the reduction in daylight within the corridors at upper levels.</p>	<p>Noted. An officer assessment of unit aspect is contained in the section below.</p>
<p>Ashley Road West</p>	

<p>The panel is happy with how the scheme at Ashley Road West has evolved during the design process, and feels that the quality and liveability of the accommodation designed within this part of the development will be very high.</p> <p>The architectural expression of the proposals is elegant, and turns the corner well, as well as relating successfully to the building adjacent at Ashley Road East.</p>	<p>Noted</p>
<p>The panel understands that the intention is for the façade onto Ashley Road South to visually 'read' as three separate buildings, and it supports the approach to enhance this visual differential through planning conditions. It feels that reinforcing the vertical shadow gap between the tallest 'buildings' with a strip of darker brickwork, in addition to dropping / notching the parapet at the junction with the shadow gap as proposed by the design team will provide a good visual 'break'.</p>	<p>Noted. A planning condition to address the visual separation of the Ashley Road West building is contained in Appendix 1.</p>
<p>The quality of the materials and construction details will be extremely important, with particular reference to the quality and texture of the brickwork, and it will be important to safeguard these through the planning process.</p>	<p>Noted. Standard materials conditions requiring samples of materials for the ARW site is contained in Appendix 1.</p>
<p>Welbourne Plot</p>	
<p>The panel supports the proposals for the Welbourne centre site. It considers that although the density of the proposal is at the limit of what is appropriate for the site, the design team has succeeded in optimising the density whilst also achieving a well-mannered and carefully conceived piece of architecture.</p> <p>It is located away from the central area of the masterplan, but it sits at a very important corner, and responds creatively to the different challenges that the site brings.</p>	<p>Noted</p>
<p>The design of the health centre and the housing is well-considered, and promises high quality accommodation alongside much-</p>	<p>Noted</p>

<p>needed local healthcare facilities. The planning, layout and circulation of the accommodation is very successful; the deck access to the residential units works well.</p>	
<p>The approach taken to communal and private open spaces is successful; the central space and landscaped seating terraces will contribute to the creation of a high-quality external environment.</p>	<p>Noted.</p>
<p>The panel welcomes the approach to architectural expression, and feels that the material palette will bring a warmth to the elevations. The area of green glazed brick at ground level will bring a level of richness and dynamism to the street frontage; the panel supports the intention to further enhance the detail, variety and colour of this glazed brick panel through a planning condition.</p>	<p>Noted. Standard materials conditions requiring samples of materials for the Welbourne site is contained in Appendix 1. Officers support the glazed brick proposed.</p>
<p>Public Realm, Landscape and Infrastructure</p>	
<p>The panel welcomes the unified approach to the distribution and layout of the different hard landscape materials, especially adjacent to the station, and feels that overall, the proposals for the public realm within the masterplan area promise a very high quality environment.</p>	<p>Noted</p>
<p>The proposals strike a successful balance between the level of hard- and softlandscape elements. The masterplan area is a very urban environment with potentially very high levels of activity, so the panel feels that an appropriate strategy for this location is for a predominantly hard landscape with a good level of carefully chosen trees. It notes that the proposals include the planting of 74 trees with an additional three in pots.</p>	<p>Noted. Standard conditions related to relevant British Standards for tree installation are contained Appendix 1.</p>
<p>The panel understands that the 'red line' for the development no longer extends to reach the proposed National College for Digital Skills to the north. In this context it welcomes the intention for the applicant and design team to collaborate with their counterparts for this adjacent site, to ensure that there is continuity</p>	<p>Noted. Officers also support this approach to the red line area and the public realm.</p>

and coherence within the design of the public realm to the north of the masterplan area.	
There is an intended hierarchy for the different spaces within the masterplan site; as Station Road is an adopted highway the material palette will need to conform to Council guidelines. The panel has confidence that the applicant and design team can ensure that this part of the public realm is well considered and integrates well with the hard landscaping used elsewhere within the masterplan.	Noted. Hard and soft landscaping details will be subject to condition as per Appendix 1.
<p>The panel is happy with the provision of play space, and feels that they will meet the needs of families living within – and visiting - the area.</p> <p>There are appropriate levels of play space provision for 0-5 year olds within each plot, as part of communal gardens, large terraces, shared podiums and private amenity spaces.</p> <p>With regard to provision for older children (age 5-11), the panel understands that there is a good level of provision within the site, in addition to Down Lane Park to the north, which again meets the required standard.</p>	Noted. Play space details will be required by condition as per Appendix 1.
Summary	
The panel offers warm support for the planning application. It has every confidence in the commitment and aspirations of the applicant and design team, and considers that the proposals will have a dramatically transformative effect on Tottenham Hale as a whole.	

6.5.7 The sections following consider the detailed design elements of the various parts of the scheme against adopted policy and guidance.

Site Layout

6.5.8 The site layout and placement of building footprints is considered to respond well to the constraints of the area. The density of the development is focused on the centre of the site in close proximity to public transportation. The proposal also responds to the challenging restrictions of underground services, including Victoria line tunnels, which have informed the location of open spaces, as well as building massing. The layout is also considered to

respond well to other consented development in the Tottenham Hale district centre.

6.5.9 A new well-defined north-south route will be established through the Ferry Island plot, linking to adjacent plots and providing a focus for commercial and retail uses, with a new civic space (Ferry Square) at the intersection with a new east-west route connecting to the bus station. The layout of the Welbourne site also focuses density towards the proposed district centre with a more low rise built form adjoining the existing Chesnut Estate.

6.5.10 The layout of the development is considered to optimise an underutilised site with excellent public transportation links, effectively enclosing and framing public spaces with tall buildings to protect them from a high volume of road traffic and prioritising pedestrian links. The layout of the development is acceptable and accords with the AAP vision to change the character of Tottenham Hale to a pedestrian oriented, mixed use destination.

Building Height, Scale and Massing

6.5.11 London Plan Policy 7.7 requires that tall buildings generally be limited to sites in opportunity areas, areas of intensification or town centres that have good access to public transport. Draft London Plan D8 continues this plan-led approach and states that the visual, functional and environmental elements of tall buildings should be considered in planning decisions.

6.5.12 The Upper Lee Valley Opportunity Area Framework proposes that future tall buildings will generally be in well-defined clusters in identified urban growth centres. Strategic Policy SP11 requires all new development to ‘enhance and enrich Haringey’s built environment and create places and buildings of high quality’. Policy AAP6 states that, in line with DM6, Tottenham Hale and North Tottenham as growth areas have been identified as being potentially suitable for the delivery of tall buildings.

6.5.13 The applicant proposes buildings of the heights in the table set out below. All of the proposed buildings on the site (except the pavilion) meet the policy definition of tall buildings.

BUILDING	Maximum Storeys Height	AOD Height
Ferry Island – Building 1	38*	138.35m
Ferry Island – Building 2	14*	56.30m
North Island – Building 3	19*	71.60m
Ashley Road East	19	75.325m
Ashely Road West	15	60.40m
Welbourne	16	60.90m

*Denotes a building where the number of storeys includes a floor of non-habitable plant

6.5.14 There is clear and specific policy support for the principle of tall buildings in Tottenham Hale. The applicant must therefore justify the specific proposals against relevant policy criteria. Historic England Advice Note 4 (which supersedes the document 'Guidance on Tall Buildings' produced by English Heritage and CABE in 2007 as referenced in Policy DM6) provides a list of criteria that should be satisfied when considering the merit of tall buildings.

6.5.15 The criteria includes:

- Architectural quality
- Sustainable design and construction
- Credibility of the design
- Contribution to public space and facilities
- Consideration of the impact on the local environment
- Provision of a well-designed inclusive environment

6.5.16 Policy DM6 also sets a list of policy criteria that must be met to ensure acceptability of tall buildings. The criteria includes a high level of architectural quality providing elegant urban forms and landmark structures as well as protection of local and strategic views and heritage assets.

6.5.17 An assessment of the development against the above criteria is undertaken. As noted above, the design is considered to be high quality and comprehensive. The scheme will knit together a fragmented urban fabric and allow increased connectivity and permeability. As per the QRP assessment above, officers agree the design of the various building is "dramatically transformative" and makes use of unique and varied architectural styles across the various plots.

6.5.18 The heights and massing of the 6 tall buildings are considered to relate well to recently permitted nearby schemes in Tottenham Hale, including the adjacent 22 storey One Station Square, the Ashley Road South Masterplan site to the north and the 33 storey Gateway Tower to the east.

6.5.19 The applicant achieves a consistent visual cluster of tall buildings, which will mitigate their appearance and prevent any one building appearing stark in isolation. The buildings themselves also have a broken and tiered form to lessen their massing. The buildings are all judged to be visually elegant and of a high quality design.

6.5.20 As per the sections below, the development is considered to be sustainable and incorporates district energy and renewables. New high quality public space is incorporated into the scheme, yielding a well-considered and

inclusive public environment that will be centrally and comprehensively managed by the applicant. As per the assessment below, the micro-climate impacts arising from the development are acceptable.

- 6.5.21 The scheme protects strategic and local views and heritage assets, as set out in the sections following. Building 1, the tallest building at 38 storeys is also considered to achieve a distinctive and unique form that will allow for wayfinding to Tottenham Hale Station and present as a local landmark in Tottenham Hale. The buildings two towers are considered to achieve a slender and elegant built form. The QRP states "the panel is happy with the massing and expression of the buildings on the Island sites, and feels that the architecture is distinguished."
- 6.5.22 The cluster of tall buildings will positively engage with the surrounding built environment and make a significant contribution to the redevelopment of Tottenham Hale. Haringey Officers note the support of the QRP for the building heights at all locations in the scheme, and that GLA Officers also support the heights proposed in the Growth Area. Officers therefore consider the criteria in Policy DM6 and Historic England's guidance around Tall Buildings is met and the tall buildings proposed are acceptable.

Strategic and Local Views

- 6.5.23 London Plan Policy 7.12 and Policy HC4 of the draft London Plan state that development should not harm strategic views, with further detail provided in the Mayor's London View Management Framework (LVMF) SPG. At the local level, Policy DM5 designates local views and the criteria for development impacting local view corridors.
- 6.5.24 The applicant's Townscape and Visual Impact Assessment (TVIA) includes an accurate visual representation of the potential impact on view 'London Panorama: Alexandra Palace' from Assessment Point 1A.2. While visible in the view, the proposal sits some distance east of the 'Landmark Viewing Corridor' and 'Wider Setting Consultation Area', well away from the Protected Vista of St. Paul's Cathedral. The proposals will form part of the emerging cluster of tall buildings at Tottenham Hale, and the impact would be negligible, with no harm to the setting of St. Paul's Cathedral.
- 6.5.25 The southern portion of the Ferry Island plot is crossed by a local view - Reference View 15 in the DPD, which notes a linear assessment point from the junction of Quernmore Road and Stapleton Hall Road. The cluster of high quality tall buildings at Tottenham Hale, if discernible on the edge of the view, will enhance the viewers' ability to recognise Tottenham Hale from the view point and are therefore judged to make a positive contribution to the characteristics and composition of the local view.

6.5.26 Officers note the consented Hale Village Tower would have a more prominent impact on Reference View 15, but both schemes are cumulatively acceptable. The impact to the designated local views are considered to be acceptable and in accordance with the London Plan and local policy

Wider Townscape Impacts

6.5.27 The applicant has undertaken an assessment of the likely wider effects of the development on townscape character. The TVIA considers the scheme from various viewpoints in the locality and in other boroughs. Indicative images of the scheme from the TVIA assessment points are set out in **Appendix 16** for member's reference.

6.5.28 It is acknowledged that the development will result in notable changes to the wider townscape. The proposed massing would create a varied alteration to the skyline and Building 1 would act as a landmark denoting the centre of Tottenham Hale. The Townscape changes are considered to meet the AAP policy objectives of establishing a new urban character to the Growth Area and optimising the site potential.

6.5.29 The massing strategy employed by the applicant is also judged to meet with policy objectives to effectively transition between higher elements within the scheme and consented/emerging schemes and the surrounding suburban fabric. The applicant has used appropriate transition/scaling of heights and several of the buildings have a tiered appearance to mitigate the visual appearance to the Townscape and achieve a cluster effect as envisaged by the District Centre Framework and the AAP. As noted above the QRP supports the massing strategy.

6.5.30 Given the applicant's engagement with policy and in light of the quality of the buildings as set out above, Officers concur with the applicant's conclusion that the significance of effects on the wider townscape is acceptable and is considered to be in line with Local Plan policy, in particular this being a growth area, an area suitable for tall buildings and design quality policies

Building Materials and Appearance

6.5.31 The scheme is brick built and Haringey and GLA officers consider the use of brick as the main material provides a robust and contextual appearance, while different tones introduce a suitable degree of variation. The Welbourne building is considered to accord with the existing built context and will visually integrate with surrounding homes. The architectural appearance of the proposal is supported and the material will ensure a high standard of design.

6.5.32 Samples of all building materials will be required by condition for each plot before installation. An architect retention clause is contained in the S106

Heads of Terms above, which will ensure any change of architect will be subject to the approval of the Local Planning Authority.

Public Realm and Pavilion

- 6.5.33 London Plan Policy 7.5 indicates that landscape treatment, street furniture and infrastructure of public spaces should be of the highest quality, have a clear purpose, maintain uncluttered spaces and contribute to the easy movement of people. Policies DM2 and DM3 reflect this approach at the local level.
- 6.5.34 The proposal envisages the creation of new high quality public spaces and a pavilion within Tottenham Hale. Public spaces will be created at the corner of Ashley Road and Watermead Way (Watermead Place), at the northern boundary of the site adjacent to the proposed College (College Square), and at the south end of Station Road (Station Place). The provision of landscaped public space, mostly south-facing, responds to surrounding roads and maximises sun exposure.
- 6.5.35 Officers consider that the new public spaces are proportional and will be well framed by mixed use development to enclose and activate the public realm. Officers share the QRP's view that the proposals strike a successful balance between the level of hard and soft landscaped elements and creates a successful hierarchy of well delineated spaces.
- 6.5.36 The Metropolitan Police Secured By Design Officer has reviewed the proposal and considers the scheme to positively seek engagement with Secured by Design principles to ensure that the current Police accredited standards are met. A Secured by Design accreditation condition is recommended in Appendix 1.
- 6.5.37 The overall design quality of the public spaces is considered to be high and will reduce the dominance of traffic in Tottenham Hale and create new opportunities for existing and future residents to interact. As per the Heads of Terms, the S106 agreement will secure public access to the spaces created and a planning condition requiring a management plan for the public space is contained in Appendix 1.
- 6.5.38 The pavilion building is considered to be a strong feature of the development. The roof of the pavilion is publically accessible, incorporating both internal and external areas. Officers consider the high quality design of the pavilion will enhance Ferry Square as a public space and add to the vitality and viability of the future district centre. The QRP strongly supports the pavilion subject to conditions around signage and lighting.

Landscaping

- 6.5.39 The applicant has submitted a Design and Access Statement addressing landscaping. The applicant's approach is considered to be master planned and comprehensive and will allow for landscaping that connects approved schemes in the vicinity of the site to the urban fabric created by the development.
- 6.5.40 Given the urban location, the planting of street trees is utilised across the site having regard to the location of underground utilities which run along main thoroughfares. Trees are used to create 'human scaled' spaces within areas of tall buildings to give legibility to the public realm. Trees line streets and highlight key routes. The overall approach to landscaping is judged to yield a high quality urban realm. The balance toward hardscape is considered acceptable given the designation of Tottenham Hale as a future District Centre and its future commercial character and the level of traffic which is expected through the space.
- 6.5.41 The Council's Nature Conservation Officer and Tree Officer have both reviewed the scheme and raise no objection in landscape terms. An assessment of ecology and tree removal and replacement are in the sections below. The details of landscaping, including specific planting schedules and species will be subject to the conditions contained in Appendix 1.

Development Design – Summary

- 6.5.42 The scheme provides an exceptionally high standard of design that will create a new piece of public realm in Tottenham Hale. Haringey's independent Quality Review Panel concurs with this assessment. The QPR support for the scheme is reflection of detailed engagement with the Panel's views.
- 6.5.43 The layout of the development is considered to optimise an underutilised site with excellent public transportation links. The layout of the development accords with the vision to change the character of Tottenham Hale to a pedestrian oriented, mixed use destination.
- 6.5.44 There is clear and specific policy support for the principle of tall buildings in Tottenham Hale. A cluster of tall buildings will positively engage with the surrounding built environment.
- 6.5.45 Building 1, the tallest building at 38 storeys is considered to achieve a distinctive and unique form that will allow for wayfinding to Tottenham Hale Station and present as a local landmark in Tottenham Hale. All of the buildings are of an excellent design quality.
- 6.5.46 The heights in the proposal are supported by the Quality Review Panel and the tall buildings are considered to meet relevant policy criteria. They are judged key to delivering a viable and comprehensive scheme.

6.5.47 The impacts to strategic and local view are acceptable. The significance of effects on the wider townscape is acceptable and is considered to be in line with Local Plan policy, in particular this being a growth area.

6.5.48 The use of brick as the main material provides a robust and contextual appearance, while different tones introduce a suitable degree of variation. The overall design quality of the public spaces and landscaping is considered to be very high and the pavilion building is considered to be a strong feature of the development.

6.5.49 The development is considered to represent exemplary design and the final development will be a key element in achieving the Council's vision to transform Tottenham Hale.

6.6 Residential Quality

6.6.1 London Plan Policy 3.5 sets out housing quality, space, and amenity standards, with further detail provided in the Mayor's Housing SPG. This approach is continued in the draft London Plan by Policy D4. Strategic Policy SP2 and Policy DM12 reinforce this approach at the local level.

6.6.2 The scheme is considered to offer a very level high of quality in terms of residential accommodation. All of the units in the scheme either meet or exceed the London Plan space standards in the Mayor's Housing SPG. This includes the proposed Council-owned homes. Officers consider the applicant has sought to address the amenity impacts arising in an urban location (including traffic levels and noise) with a well-considered and detailed design.

Location of Residential

6.6.3 The most sensitive residential uses are located above ground floor level (apart from duplex units on the Welbourne plot that are away from arterial roads) and the applicant's noise study indicates that the specification of facade sound insulation, including double/triple glazing, would result in negligible effects for the proposed residences. Noise control conditions in Appendix 1 will also mitigate noise transmission and ensure sufficient separation between residential and commercial uses.

Unit Aspect

6.6.4 The number of single aspect units have been minimised to 35%, with none that are directly north-facing. Some units have an orientation slightly less than 45 degrees of north; however, these represent less than 5% of the total units, and all have two-bedrooms or less, which is judged acceptable given the site context. Officers consider the overall unit aspect to be acceptable given the

site constraints and the overall high standard of accommodation, as noted below.

External Amenity Areas

- 6.6.5 The applicant has submitted a private amenity strategy with the Design and Access Statement for each plot that has considered daylight/sunlight and wind impacts in relation to private external amenity areas. The applicant's approach to private amenity (where there may be constraints due to proximity to roads or the bus station) is to use either recessed balconies or provide 'oversized' dwellings for units with no (or limited) external amenity space. With regard to private amenity space, 21% of the residential units have been provided with additional internal living space equivalent to the area of the private amenity space requirement, generally in locations adjoining the bus station or roadways.
- 6.6.6 The use of oversized units is supported in line with the Housing SPG, which allows for overprovision in exceptional circumstances where site constraints make it impossible to provide private open space for all dwellings. Guidance sets out that a proportion of dwellings may be provided with additional internal living space equivalent to the area of the private open space requirement. It is also important to note that all residents will have access to shared external amenity spaces within their buildings.

Dwellings Per Core

- 6.6.7 Standard 12 of the Mayor's SPG Housing seeks accessible cores of generally no more than eight units on each floor per core. The scheme incorporates less than 8 units per core on every floor of each building, excepting six floors of Building 2 (11 units per core) and three floors of the eastern block of Ashley Road East (9 units per core). However, Building 2 provides natural light to the subject corridors, which are also an oversized width. The stair core is placed centrally, with 5/6 units either side. The design constraints of the Ashley Road East site have resulted in a slight exceedance on three floors.
- 6.6.8 The QRP considered the areas within the development where a high number of units per core were proposed, and concluded the applicant's bespoke design solutions, noted above, mitigated the planning impacts.
- 6.6.9 Officers also note the exceedances are both in buildings with market units only, and there is no non-compliance for affordable units. Haringey and GLA officers therefore consider the scheme delivers good residential quality with an acceptable number of units per core on each building floor.

Daylight/Sunlight – Future Occupiers

6.6.10 The applicant's daylight and sunlight analysis concludes that the vast majority of the new units within the proposal will receive very good levels of daylight, achieving an overall average daylight factor (ADF) compliance of 88% in the baseline scenario, and 83% with other consented and emerging development considered.

6.6.11 The separation distances between habitable rooms in residential units generally achieve a minimum of 18 metres, as suggested by the Housing SPG, although it does note that in an urban high density context this cannot always be achieved. Some units facing into the podium courtyard of the Ashley Road East building have lesser distances; however, layouts and window openings are positioned to allow an acceptable level of privacy to be achieved. Officers consider this layout responds well to specific site constraints. The scheme is considered to provide a high level of daylight/sunlight and privacy for future occupiers.

Inclusive Access

6.6.12 Local Plan Policy SP2 and Policy 3.8 of the London Plan require that all housing units are built with a minimum of 10% wheelchair accessible housing or easily adaptable for wheelchair users.

6.6.13 The proposed development provides 10% wheelchair adaptable units which meets the 10% requirement in planning policy and the layouts are considered acceptable. As per the Design and Access Statements all wheelchair units which the scheme have lift provision and are appropriately sized.

6.6.14 The wheelchair units are required to be fully compliant with Building Regulations Approved Document M4(3) and all other units are fully compliant with Approved Document M4(2). These requirements are the subject of planning conditions contained in Appendix 1.

Residential Quality – Summary

6.6.15 The scheme overall delivers very high quality residential housing in all buildings that responds well to a challenging context. The location of residential units on upper floors separated from traffic impacts is supported. There are no north facing single aspect units in the scheme, and the total number of north facing single aspect units has been minimized to 35%, which is acceptable.

6.6.16 The design of amenity areas responds to the site context and oversized units in place of external amenity space in some units is acceptable. The scheme will deliver good daylight and sunlight to future occupiers and the number of dwellings per core is acceptable. The development will deliver a policy compliant level of wheelchair accessible and adaptable units in line with

London Plan policy. The quality of residential housing accords with the London Plan and local policy cited above and is acceptable.

6.7.1 Social and Community Infrastructure

- 6.7.2 London Plan 3.16 states adequate provision for social infrastructure is important in areas of major new development and regeneration. This policy is supported by a number of London Plan infrastructure related-policies concerning health, education and open space.
- 6.7.3 The applicant has undertaken an assessment within the Environmental Statement (ES) as to the socio-economic impacts of the development and the social infrastructure that is required to meet the needs of additional residents. This assessment has been updated following alterations to the scheme increasing the number of affordable homes.
- 6.7.4 The Greater London Authority Model has been used to calculate the number of children expected to live in the development, with age brackets adjusted to align with primary and secondary school years. The capacity of local GPs has been assessed using the HUDU32 benchmark of 1,800 registered patients per NHS GP. A child play space assessment has also been undertaken.
- 6.7.5 The applicant's updated assessment (taking account of the increased number of social and London Living Rent homes on the Welbourne site) indicates a demand of 38 primary school places and 25 secondary school places. The assessment concludes there is sufficient surplus educational capacity available within both primary and secondary schools locally, and the level of demand generated by the development will not place significant additional pressure on school places. The scheme will deliver a significant CIL contribution as noted below which would be expected to cover any shortfall in educational capacity.
- 6.7.6 As is set out in detail above, a new health centre with capacity to accommodate up to 10 GPs would address the increased demand created by the development and add substantial much needed new health care capacity in the local area. The design details of health centre and its operation are also set out in the sections below.
- 6.7.7 The scale and location of the proposed development within a new district centre does not allow for large amounts of new open-space to be incorporated within the scheme but the scheme benefits from close proximity to existing strategic open space provision.
- 6.7.8 The development would over-provide in terms of doorstep play space for children under 5 years according to the GLA standards, with the remaining provision for other age groups mostly met off-site. The layout and general

design of this play space is set out in the sections below. The additional contribution which arises from the proposed change from London Living Rent to Social Rent on the Welbourne site will be secured by way of a S106 obligation, as set out above.

- 6.7.9 The development is considered to provide suitable community infrastructure or will make a contribution via CIL or the S106 agreement to existing infrastructure with capacity to absorb the new residents. The proposal is considered to accord with London Plan 3.16 and local policy addressing community infrastructure.

Employment, Skills and Training

- 6.7.10 The NPPF is concerned with supporting the economy and creating jobs. Policy 4.12 of the London Plan (2016) requires development to support local employment, skills development and training. The Haringey Planning Obligations SPD seeks to ensure that jobs are provided for local people, both in the construction phase of development and, where appropriate, by the end-users. To enable local people to benefit from development growth, the Council, with partners, has introduced a number of programmes to support job brokerage, employer-led training, construction skill training and apprenticeships and work experience placements.

- 6.7.11 To this end, the applicant has agreed to develop a Skills and Training Plan, which will be secured by S106 and agreed in consultation with the Haringey Construction Partnership (formerly known as 'HERP'). This will include a commitment to ensure that not less than 20% of those employed during construction are residents of the borough. A financial contribution, which will be used to support apprenticeships and opportunities for employment for local people in the completed development is also secured as per the S106 heads of terms above.

- 6.7.12 The measures above are considered to enable local people to benefit from the investment and development proposed, and support the local economy. The proposal is considered to be in accordance with the above policies.

6.8 Child Playspace

- 6.8.1 Policy 3.6 of the London Plan seeks to ensure that development proposals include suitable provision for play and recreation. Policy S4 of the draft London Plan continues this approach. Local Plan Policy SP2 requires residential development proposals to adopt the GLA Child Play Space Standards and Policy SP13 underlines the need to make provision for children's informal or formal play space. The Mayor's SPG indicates at least 10 square metres per child should be provided subject to detailed policy guidance.

- 6.8.2 The GLA child yield calculator provides an estimate of 133 children, requiring 1,330m² of play space. Each plot provides all under-fives playspace on site within podium/terraced levels, with some over-provision compared to the GLA calculator requirement of 700m² for under-5 provision.
- 6.8.3 Although Down Lane Park, with extensive facilities for younger and older children, is in close proximity, given the slightly removed nature of the Island sites from the entrance to the park, 100m² of the 380m² of 5–11 year old playspace required is proposed as part of the Ferry Island and North Island buildings, with incidental playspace in Ferry Square through playable landscape features.
- 6.8.4 The remaining 280m² of 5-11 provision, plus 250m² of 12+ provision will be accommodated within existing play facilities in the area, with financial contributions proposed for improvements to existing provision. As per the Heads of Terms above, the off-site contribution from the developer is £50,350. The additional contribution due if the Wellbourne units are delivered as 151 SR units has been secured in the section 106 agreement.
- 6.8.5 Given the financial contribution to mitigate the impact of increased usage of existing facilities and on site provision catering to under-5's and 5-11s, the child play space proposals for the scheme are acceptable. Officers note the QRP support of the proposed playspaces as per the table above. Subject to the planning condition in Appendix 1 to provide layout details by way of a child playspace strategy, the proposal is considered to meet with London Plan and local policy objectives to provide inclusive, accessible and safe play spaces.

6.9 Heritage Conservation

- 6.9.1 The NPPF states that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be.
- 6.9.2 London Plan Policy 7.8 is clear that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. The draft London Plan Policy HC1 continues this approach.
- 6.9.3 Policy SP12 of the Local Plan seeks to maintain the status and character of the borough's conservation areas. Policy DM6 reflects this approach and requires proposals affecting conservation areas and statutory listed buildings, to preserve or enhance their historic qualities, recognise and respect their character and appearance and protect their special interest.

- 6.9.4 Policy AAP5 speaks to an approach to Heritage Conservation that delivers “well managed change”, balancing continuity and the preservation of local distinctiveness and character, with the need for historic environments to be active living spaces, which can respond to the needs of local communities.

Legal Context

- 6.9.5 The Legal Position on the impact of heritage assets is as follows. Section 72(1) of the Listed Buildings and Conservation Areas Act 1990 provides: “In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.” Among the provisions referred to in subsection (2) are “the planning Acts”.
- 6.9.6 Section 66 of the Act contains a general duty as respects listed buildings in exercise of planning functions. Section 66 (1) provides: “In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”
- 6.9.7 The Barnwell Manor Wind Farm Energy Limited v East Northamptonshire District Council case tells us that “Parliament in enacting section 66(1) intended that the desirability of preserving listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given “considerable importance and weight” when the decision-maker carries out the balancing exercise.”
- 6.9.8 The judgment in the case of the Queen (on the application of The Forge Field Society) v Sevenoaks District Council says that the duties in Sections 66 and 72 of the Listed Buildings Act do not allow a Local Planning Authority to treat the desirability of preserving listed buildings and the character and appearance of conservation areas as mere material considerations to which it can simply attach such weight as it sees fit. If there was any doubt about this before the decision in Barnwell, it has now been firmly dispelled. When an authority finds that a proposed development would harm the setting of a listed building or the character or appearance of a conservation area or a Historic Park, it must give that harm considerable importance and weight.
- 6.9.9 The authority’s assessment of likely harm to the setting of a listed building or to a conservation area remains a matter for its own planning judgment but subject to giving such harm the appropriate level of weight and consideration. As the Court of Appeal emphasized in Barnwell, a finding of harm to the

setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted.

- 6.9.10 The presumption is a statutory one, but it is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. An authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the strong statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering.
- 6.9.11 In short, there is a requirement that the impact of the proposal on the heritage assets be very carefully considered, that is to say that any harm or benefit needs to be assessed individually in order to assess and come to a conclusion on the overall heritage position. If the overall heritage assessment concludes that the proposal is harmful then that should be given "considerable importance and weight" in the final balancing exercise having regard to other material considerations which would need to carry greater weight in order to prevail.

Assessment of Significance

- 6.9.12 The applicant's TVIA and Heritage Statement explore the potential impact of the development on designated and non-designated heritage assets, including listed buildings and conservation areas. There are no designated heritage assets within or adjacent to the site; however, there are a number of non-designated assets within or adjacent to the site boundaries.
- 6.9.13 The majority of the designated heritage assets are associated with the Tottenham High Road Historic Corridor, including the following conservation areas, which are more than 400 metres to the west of the Welbourne plot.
- Tottenham Green Conservation Area;
 - Seven Sisters/Page Green Conservation Area;
 - Clyde Circus Conservation Area;
 - Bruce Grove Conservation Area;
 - Scotland Green Conservation Area;
 - Bruce Castle Conservation Area; and
 - North Tottenham High Road Conservation Area.
- 6.9.14 The TVIA identifies Grade II* listed buildings at 583 and 585 High Road and a further Grade II listed buildings, structures and monuments along the High Road, with the Grade II listed Ferry Boat Inn to the east and the Pumping Station Building to the south. These designated heritage assets have been considered with the representative views in the TVIA.

Impact on Assets

- 6.9.15 Given the scale and height of the proposed buildings, they will be visible in the settings of many of the heritage assets identified. However, distance and intervening built environment will provide a degree of layering and screening, and they are unlikely to be a dominant feature in the settings of heritage assets. Furthermore, consent has already been granted for a number of tall buildings in Tottenham Hale and these will appear as a cluster. GLA officers consider that no harm will be caused to designated heritage assets.
- 6.9.16 Haringey's Principal Conservation Officer sets out that when considering the proposal in isolation the proposed buildings appear incongruous with the existing urban grain, form, scale, massing, height and architectural language of the surrounding area however the proposals need to be seen in the changing context of the area including all the allocated sites and consented schemes, including a number of tall buildings. She considered that the proposed development better integrates with the emerging context than the existing context. She also sets out that the proposals will create a zone of visual influence that is very wide and will reach across neighbourhood and borough boundaries. Overall she concludes that the proposals will result in less than substantial harm.
- 6.9.17 The proposals include the demolition of the former White Hart Public House, now in office and residential use. Although demolition will amount to a total loss of this non-designated asset, its low significance means that it does not merit retention when weighed against the benefits of the scheme. Haringey Officers also note the AAP Site Allocation TH4 was found sound at the plan-making stage by an independent Planning Inspector, and the AAP does not call for the retention of the former public house. The building itself has not been used as public house for many years. The removal of this building from the land with redevelopment is therefore in compliance with the Local Plan.
- 6.9.18 Officers have considered the views of Historic England and confirm the proposal is in accordance with the Local Plan, and accords with Policies DM6 and DM9 and Policy AAP6. The District Centre framework set out one way that the development of the District Centre could take place. It informed the quantum set out in the AAP site allocations which are minimums. As the proposals in the area have come forward they have all refined the DCF proposals and for the most part have delivered larger quantum of development. These schemes have all be assessed both individually and cumulatively and have all been judged to be in accordance with local plan policy.
- 6.9.19 Officers have also had regard to the comments of the London Borough of Hackney regarding the impacts of Building 1 on Springfield Park. Haringey Officers note that Hackney has declined to designate a locally protected view from Springfield Park and that developments within Hackney appear in views from the park.

- 6.9.20 Haringey Officers do not consider the scheme will harm the setting of Springfield Park due to the intervening distance and the high quality of design of Building 1. The proposals will impact the setting of other non-designated heritage assets near to the site; however, this is not considered to cause any harm to these assets, which are also of low significance.
- 6.9.21 Haringey's Principal Conservation Officer considers that the proposal causes less than substantial harm. Officers have given considerable weight to this harm, however officers conclude that the public benefits of the scheme are considerable, including new and affordable homes, commercial space, a new health centre, and public open space as part of the creation of a new town centre; and bringing an under-used site in an Opportunity Area into more intensive and appropriate use. These benefits are considered to clearly outweigh the harm.

6.10 Impact on the Amenity of Adjoining Occupiers

- 6.10.1 The London Plan (2016) Policy 7.6 Architecture states that development must not cause unacceptable harm to the amenity of surrounding land and buildings. DM Policy (2017) DM1 'Delivering High Quality Design' states that development proposals must ensure a high standard of privacy and amenity for the development's users and neighbours.
- 6.10.2 Excepting the Welbourne Plot, the site is comparatively isolated from existing residential development, and would be anticipated to give rise to fewer and less intensive amenity impacts than may be expected from other large infill locations in London. This section considers issues of wind and micro-climate, daylight/sunlight, privacy, noise (including construction noise) and privacy on adjoining occupiers. An assessment of air quality is located in the section following.

Daylight/Sunlight – Methodology

- 6.10.3 The Mayor's SPG Housing indicates that BRE guidelines on assessing daylight and sunlight should be applied sensitively to higher density development in London, particularly in Opportunity Areas, central and urban settings, recognising the London Plan's strategic approach to optimise housing output (Policy 3.4) and the need to accommodate additional housing supply in locations with good accessibility suitable for higher density development (Policy 3.3). Quantitative standards on daylight and sunlight should not be applied rigidly, without carefully considering the location and context and standards experienced in broadly comparable housing typologies in London.
- 6.10.4 BRE Guidance provides two different methods for assessing daylight for existing residential accommodation: Vertical Sky Component ('VSC') and No

Sky Line ('NSL') methods. With regard to assessing sunlight, annual probably sunlight hours (APSH) is a measure of sunlight that a given window may expect over a year period.

- 6.10.5 The BRE Guide recommends that a room with 27% VSC will usually be adequately lit without any special measures, based on a low density suburban model. This may not be appropriate for higher density, urban London locations and the Mayor's Housing SPD notes that guidance should not be applied rigidly to proposals in urban areas for this very reason in that developments in urban areas are of much higher density than developments in more suburban areas.
- 6.10.6 It is considered that VSC values in excess of 20% are considered as reasonably good and that VSC values in the mid-teens are deemed acceptable within a high density urban location. Paragraph 2.3.47 of the Mayor's Housing SPD supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city.

Vertical Sky Component (VSC)

- 6.10.7 The applicant's assessment undertakes an assessment of the levels of existing and expected levels of daylight, sunlight and overshadowing of neighbouring properties. This assessment considered 524 existing windows adjoining the proposed development.
- 6.10.8 The VSC results for the completed development demonstrate that 62% of the surrounding building windows will fully comply with the VSC criteria, and therefore experience a negligible effect. For the windows that were below VSC criteria: 83 windows will experience a 'minor' effect, 67 windows will experience a 'moderate' effect, and 51 windows will experience a 'major' effect. (The effects are in reference to BRE guidance and do not denote unacceptable impacts in and of themselves.)
- 6.10.9 The majority (73%) of windows that will experience a moderate effect will retain reasonable levels of VSC, which is considered to be acceptable in an urban site within an Opportunity Area. Of the 51 windows that will experience a major effect, 10 will achieve what is considered to be reasonable levels of VSC. This is again acceptable given the site's location within an Opportunity Area.
- 6.10.10 The 18 windows that experience major impacts are at 32-86 Hale Gardens. 17 of these windows are located on the first floor beneath an overhanging balcony walkway, on the second floor. This limits their availability to achieve higher levels of daylight and they already receive very low levels of daylight and the proposal will not significantly alter the already established position.

- 6.10.11 Overall, the significant majority (85%) of windows either meet BRE Guidelines or will retain reasonable levels of VSC, while there are localised impacts arising from the scheme, the flexible application of BRE criteria indicates the overall level of VSC compliance in the cumulative scenario is acceptable.

No Sky Line (NSL)

- 6.10.12 The NSL results demonstrate that 89% of tested window will fully comply with the NSL criteria and experience a negligible effect. For the 23 windows that were below NSL criteria: 21 rooms will experience a 'moderate' effect and 2 rooms will experience a 'major' effect. The two windows in question are in 32-86 Hale Gardens, out of the 104 windows assessed in this block. However, the NSL results show that while a small number of exceedances of BRE criteria are noted, the scheme will generally have a negligible effect overall on the surrounding residential properties in terms of NSL.
- 6.10.13 Given the sites location in an Opportunity Area, the localised non-compliance is judged acceptable in the context of the high level of overall compliance and the NLS results are acceptable.

Annual Probable Sunlight Hours (APSH) Results

- 6.10.14 The APSH results demonstrate that of the 371 rooms assessed, 78% will fully comply with the APSH criteria and will result in a negligible in effect. For the rooms that are below APSH criteria: 13 rooms will experience a minor effect and 20 rooms will experience a moderate effect and 49 rooms will experience major effects.
- 6.10.15 The results demonstrate that the majority of rooms within the surrounding residential properties will experience a negligible effect with many rooms retaining reasonable levels of sunlight in APSH terms.
- 6.10.16 The assessment sets out that of the 82 rooms that fall short of the numeric targets, 31 rooms will achieve annual levels of sunlight between 20% and 24% APSH. A further 14 rooms which fall short of the guidelines will achieve annual levels of sunlight between 12% and 19%, demonstrating that they will receive reasonable levels of annual sunlight for an urban area.
- 6.10.17 All of the proposed amenity areas assessed will receive a reasonable level of sunlight, and the scheme will not reduce the amount of direct sunlight that these existing areas experience beyond a negligible degree; this includes down Lane Park. Overall, the APSH results to demonstrate an acceptable level of sunlight to adjoining properties is retained. While there are localised non-compliances with BRE criteria, the site location indicates the results are acceptable.

Daylight/Sunlight – Summary

- 6.10.18 Overall, whilst there will be some impacts to existing properties (largely confined to Hale Gardens) the proposed development performs well in respect of daylight and sunlight to proposed units, surrounding development and amenity spaces. Officers and the GLA are satisfied with the daylight and sunlight issues with the GLA stating the overall residential as being good.

Wind and Micro-climate

- 6.10.19 London Plan Policy 7.6 and 7.7 state that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to wind and microclimate. This approach is continued in Policy D8 of the draft London Plan. Policy DM6 states that proposals for tall buildings should consider the impact on microclimate. Policy AAP6 requires high quality public spaces. Chapter 13 of the applicant's Environmental Statement sets out the micro-climate impacts of the proposal. An addendum has also been submitted with the updated scheme.
- 6.10.20 The applicant notes a 3-dimensional model of the scheme was constructed to test the wind impacts in a wind tunnel facility in order to predict the comfort and safety of pedestrians in and around the site. The surrounding area was also represented up to a radius of approximately 360m. Measurements were taken at 309 locations in and around the site, focussing on sensitive receptor locations including footpaths, potential amenity areas, roof terraces and entrances. The modelling has taken into account potential cumulative impacts from the proposed and other recently approved developments.
- 6.10.21 Measurements were assessed against the Lawson comfort criteria which allows wind conditions to be considered unacceptable, tolerable or acceptable, for activities of high, medium or low sensitivity. Higher sensitivity locations such as long-term sitting areas or development entrances have a lower unacceptable threshold than lower sensitivity areas such as those used for "business walking" (i.e. fast and direct walking between two specific locations such as a transport hub and residential property or place of work). To ensure a vibrant and comfortable public realm around the site the wind conditions must be suitable for pedestrian strolling and sitting.
- 6.10.22 These results have been tested by the Council's third party consultant, Urban Microclimate. Urban Microclimate's review is Appendix 17. The applicant's consultant also responded to the review clarifying several issues - this response is Appendix 18. The applicant has clarified the use of several spaces within the scheme in the context of the wind assessment.

- 6.10.23 The applicant's assessment notes that with the proposed development in place, the site conditions generally get windier as a result of the introduction of the tall buildings. However, during the windiest season (Winter) the wind effects range from negligible to moderate beneficial at all locations across the site due to the implementation of landscaping and wind mitigation measures designed into the scheme. The Council's third party consultant considers the impacts will be negligible, but considers the applicant's assessment to be sound subject to clarifications provided by the applicant.
- 6.10.24 Where required, notably on some balconies and thoroughfares around North Island and Ferry Island, landscaping and design measures have been introduced to reduce potentially adverse wind effects to suitable levels for intended uses. These measures will be secured by way of a planning condition (as part of hard and soft landscaping measures) as contained in Appendix 1.
- 6.10.25 In terms of the public realm, the applicant's results show that pedestrian level wind conditions would be safe for all users and the effects on pedestrian safety from the development overall would be negligible. In terms of pedestrian comfort, wind conditions are expected to be suitable for pedestrians walking through and around the proposed development. Entrances to the scheme are also expected to be suitable for pedestrian ingress/egress.
- 6.10.26 Public and communal amenity spaces are expected to enjoy suitable conditions for associated recreational activities with the 'strolling' comfort levels achieved at all locations in the winter scenario and 'standing' achieved in the summer scenario. The public realm areas around the commercial uses would all achieve 'standing' conditions in winter and 'sitting' in summer'.

Noise

- 6.10.27 London Plan Policy 7.15 requires new development to reduce existing and potential adverse impacts from noise on, from, within, or in the vicinity of, development proposals. Policy DM23 seeks to improve or mitigate impacts and locate noise sensitive development away from existing or planned sources of noise pollution.
- 6.10.28 The applicant's Environmental Statement (ES) assesses the noise effects associated with the proposed development. The applicant's baseline noise surveys indicate the site to be subject to relatively high existing levels of noise, associated with road traffic.
- 6.10.29 The applicant's consultant concludes the most sensitive adjoining occupiers to the scheme are residential properties located on nearby roads including Hale Road, The Hale, Monument Way, Cheshunt Road and Fairbanks Road. The

applicant's assessment considered noise impacts from building services plant, and noise from traffic once the proposed development is operational. As per the air quality section below, the development will result in less traffic on local roads as it will remove car-centric uses from the area.

- 6.10.30 The Council's Environmental Health Officer (Noise) has reviewed the applicant's assessment that there will be a negligible operational impact on all noise receptors (including from road traffic and building plant). The EHO raises no objection with respect to the operational noise impacts of the development, however several standard conditions are recommended for imposition, as set out in Appendix 1. These conditions relate to future building plant installations, window testing as well as requirements for details of noise separation between commercial and residential occupiers.
- 6.10.31 The impacts of construction noise are temporary and will be managed on a site-wide, comprehensive basis in Tottenham Hale alongside other developments coming forward. The EHO raises no objection with respect to construction noise. A condition around a local liaison group (as part of a Construction Environmental Management Plan – CEMP) to keep local residents informed of construction impacts is also contained in Appendix 1. The noise impacts to adjoining occupiers are considered to be acceptable and in accordance with the London Plan and local policy cited above.

Air Quality

- 6.10.32 The revised NPPF states that opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision.
- 6.10.33 London Plan Policy 7.14 seeks to 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)). Haringey is an Air Quality Management Area (AQMA). Draft London Plan Policy SI1 builds on this approach and states that London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced. London Plan SPGs around dust control and sustainable design and construction supports adopted policy.
- 6.10.34 Policy DM4 and DM23 indicate that development proposals should consider air quality and be designed to improve or mitigate the impact on air quality in the Borough and improve or mitigate the impact on air quality for the occupiers of the building or users of development.
- 6.10.35 The applicant's Environmental Statement (Chapter 9) considers the issue of Air Quality. The Council's Environmental Health Officer (EHO) has assessed

the proposal. The applicant has also provided a further submission with respect to air quality and local schools.

Air Quality Impacts to Future Occupiers

- 6.10.36 The environmental impacts of surrounding busy roads and the bus station raise some air quality and noise challenges; however, this is not unusual in an urban location, and it is noted that the proposed changes to the bus station layout, and the removal of existing drive-through food retail outlets with significant car parking, will reduce traffic and air quality impacts on the local area.
- 6.10.37 The scheme has also designed such that residential uses on core sites are located above the ground-floor furthest away from the existing road network, which represents the main source of air quality impacts to future occupiers.
- 6.10.38 The applicant's Environmental Statement indicates the development will be Air Quality Neutral. The completed development is predicted to have negligible impact on NO₂ and PM₁₀ concentrations. The ES sets out that that future occupiers will experience acceptable air quality levels, with pollutant concentrations below the relevant air quality objectives.
- 6.10.39 The public realm and landscape strategy also seek to mitigate against air quality impacts through planting. The Council's Environmental Health Officer has reviewed the scheme and concurs with the applicant's assessment that the development will be Air Quality Natural. The site is suitable for future residential development.

Air Quality Impacts to Existing Occupiers

- 6.10.40 As noted above, it has been demonstrated that the Development is Air Quality Neutral in terms of both building and road traffic emissions and the air quality impacts to existing occupiers would be negligible. The assessment demonstrated that the emissions from the energy plant within the scheme will have a negligible effect on air quality at existing nearby properties and cumulative developments.

Air Quality Impacts – Demolition and Construction Phase

- 6.10.41 The air quality impacts arising from construction and demolition are temporary and will be closely monitored by the Local Authority. The applicant has committed to a S106 obligation towards the costs of centrally managed construction logistics in Tottenham Hale, and will be a member of the London-wide Considerate Constructors scheme.
- 6.10.42 A Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP) will be required to be submitted and approved by the Local

Planning Authority before works proceed by plot. Non-Road Mobile Machinery (NRMM) will also be required to be registered and operated to EU standards during the construction phase of development.

- 6.10.43 Officers agree with the applicant's assessment that the residual effects of dust and particulate matter generated by construction and demolition activities on air quality would be negligible with imposition of conditions. The Council's EHO raises no objection the construction related air quality impacts provided they are mitigated by the planning conditions and obligations noted above.

Applicant's Methodology and Impacts to Schools

- 6.10.44 Officers have had regard for comments from adjoining occupiers regarding the accuracy of the applicant's air quality data and the impacts of the scheme on local schools. The applicant has responded further to consultation responses, submitting a letter from Dr Jousha Nunn, the applicant's air quality consultant. This letter is attached as **Appendix 19**.

- 6.10.45 Dr Nunn's submission concludes that the dispersion modelling results presented within the ES are significantly more robust than those in the London Atmospheric Emissions Inventory (LAEI) concentration maps for 2013 (as referenced by objectors) and it is his professional view the results within ES may be relied upon by officers. He also notes the 2017 data shows improvements in air quality which is likely to improve further over time, so the data used is not only accurate but is a worse case than currently improving trajectory for local air quality.

- 6.10.46 As noted above, the EHO raises no objection with respect the applicant's modelling or methodology and concludes that the applicant's submission demonstrates the scheme will be Air Quality Neutral. Officers are therefore satisfied the applicant's submission is sound and the impacts to current and future occupiers (including school users) are acceptable.

Future Air Quality Improvements

- 6.10.47 Members should also notes that strategic measures to reduce pollutant emissions from road traffic will principally be delivered in the longer term by the introduction of more stringent emissions standards. The local air quality plan that the GLA is required to produce will help to improve air quality and the implementation of Clean Air Zones (CAZs) can be expected to lead to significant improvements in the future.

Air Quality - Summary

- 6.10.48 The air quality impacts to current and future occupiers are acceptable. The applicant's methodology in reaching a conclusion of Air Quality Neutral is

sound. The construction phase impacts to air quality are temporary and will be monitored by the Local Authority. Subject to the conditions and obligations noted above, the impacts will be negligible. The proposed development is therefore acceptable in air quality terms and complies with London Plan policy 7.14 and Policies DM 4 and DM 23.

Impacts to Amenity - Summary

- 6.10.49 The site is comparatively isolated from existing residential development (except the Welbourne Plot), and would be anticipated to give rise to fewer and less intensive amenity impacts than may be expected from other large infill locations in London.
- 6.10.50 While there will be some impacts to existing properties (largely confined to Hale Gardens) the proposed development performs well in respect of daylight and sunlight to proposed units, surrounding development and amenity spaces.
- 6.10.51 Within the surrounding area, wind conditions remain suitable for existing activities and the proposal is therefore considered to have a negligible effect on the wind conditions on adjoining occupiers. The construction and operational noise impacts arising from the scheme are acceptable.
- 6.10.52 The air quality impacts to current and future occupiers are acceptable. The applicant's methodology in reaching a conclusion of Air Quality Neutral is sound. The operational air quality impacts of the development are therefore acceptable. The construction phase impacts to air quality are temporary and will be monitored by the Local Authority. The scheme is well designed and the impacts to adjoining occupiers are considered acceptable.

6.11 Parking and Highway Safety

- 6.11.1 Policy SP7 Transport states that the Council aims to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by promoting public transport, walking and cycling and seeking to locate major trip generating developments in locations with good access to public transport. This is supported by DM Policy (2017) DM31 'Sustainable Transport'.
- 6.11.2 DM Policy (2017) DM32 'Parking' states that the Council will support proposals for new development with limited or no on-site parking where there are alternative and accessible means of transport available, public transport accessibility is at least 4 as defined in the Public Transport Accessibility Index, a Controlled Parking Zone (CPZ) exists or will be provided prior to the occupation of the development parking is provided for disabled people; and parking is designated for occupiers of developments specified as car capped.

- 6.11.3 The applicant has submitted a full Transport Assessment prepared by Steer Davies Gleave. The Council's Principal Transport Planner and Transport for London Officers have reviewed the application.

Trip Generation

- 6.11.4 Officers are satisfied that the trip generation follows best practice guidance and uses the industry standard empirical data sources, such as suitable TRICS sites and census data. The applicant has undertaken an assessment of trip generation across modes for both the application site and cumulatively in the area, including other existing and consented development.
- 6.11.5 In terms of vehicle trips, the applicant's analysis indicates that the residual effects of the proposed development on the highway network will be positive i.e. a significant reduction in vehicle trips at peak times is anticipated. Haringey Officers and TfL accept this conclusion.
- 6.11.6 The assessment considers the net public transport trip generation and compares this with the baseline to determine the residual trip generation and its impacts on public transport services. In terms of both north and southbound Victoria line services and gate capacity at Tottenham Hale station, TfL and Haringey Officers are satisfied the proposed development's increase in journeys are able to be absorbed by the existing network.
- 6.11.7 The assessment also shows that the additional trips generated by the development would have minimal impacts on national rail services operating at Tottenham Hale Station. Following discussion with the applicant, a revised trip generation model for bus usage was provided. The applicant's analysis indicates that the impact to the bus network are acceptable.
- 6.11.8 Officers have had regard for comments from adjoining occupiers, consultees (including Enfield Council) regarding the impacts of the development on the capacity of public transportation. In terms of overall public transport capacity, the 14 bus routes operating in the vicinity of the site (including six (6) bus routes through Tottenham Station) provides a combined frequency of 108.5 buses per hour at peak periods.
- 6.11.9 The Victoria Line offers a frequency of 36 trains per hour at peak times, following the recent upgrade of the line and improvements to Tottenham Hale Station and other stations. Officers are satisfied in recommending approval that the development will not create a significant level of additional public transport trips that will have major consequences for local public transport services.

Access and Parking

6.11.10 Haringey officers consider the proposed vehicle access points to the Welbourne, Ashley Road East and Ashley Road West buildings are suitable subject to the provision of details pursuant to a highways agreement. There are no vehicle accesses provided for the Ferry Island and North Island sites.

6.11.11 The development is car-free with the exception of accessible Blue Badge car parking. This approach is compliant with London Plan (policy 6.13) and Haringey local policies (DM32). Officers strongly support car free development in this location as it will remove traffic from local roads and improve air quality.

6.11.12 In terms of the quantum of accessible parking, the development includes a total of 31 spaces. These disabled spaces are distributed across the site:

- 10 Welbourne
- 8 Ashley Road West
- 11 Ashley Road East

Total: 29 - Accessible car parking spaces.

- 2 accessible parking spaces are provided on Station Road, for the use by occupiers of the North Island and Ferry Island sites.

6.11.13 The level of accessible car parking equates to 3% of the overall quantum of residential units. The current London Plan requires 10% accessible car parking. The Draft London Plan requires one space per dwelling for 3% of dwellings, to be provided from the outset. However, the policy provides that, “the applicant is required to demonstrate on plan and as part of a Car Parking Management Plan, how the remaining requirement of 1 space per dwelling, for up to 10% of dwellings can be accommodated.

6.11.14 Taking into account recent planning consents, which establishes the principle for a lower provision than the current, London Plan, and the constraints of the site and the fact that the Victoria Line entrance to the station is accessible, the level of Accessible car parking is considered acceptable. In coming to this view officers have had regard for the views of Transport for London, the Greater London Authority and statutory and non-statutory consultees.

Car Club

6.11.15 The proposal includes car club parking bays. Provision for car clubs are supported and will form a key element of travel planning for the proposed uses given the car free nature of the scheme. The proposed locations are acceptable in principle but the final locations will be confirmed as part of the review of the existing CPZs. The applicant has agreed a S106 obligation to deliver the Car Clubs as per the head of this report.

Cycle Parking

- 6.11.16 The development includes 1,817 cycle parking spaces across the site including short and long stay spaces for residential and commercial users. These spaces are distributed across the masterplan, with each development site incorporating the required London Plan cycle provision.
- 6.11.17 The applicant will be required to submit further details of short and long stay cycle parking as per the conditions for each plot contained in Appendix 1. The details will require provision in line with the London Cycle Design Guide (LCDG) Subject to the provision of details, cycle parking provision is acceptable.

Cycle Routes

- 6.11.18 TfL's Cycle Future Route 2 from Camden to Tottenham Hale is due to be constructed by 2020/21, with the route beginning on Ferry Lane at the junction with Mill Mead Road, proceeding to Broad Lane and the A10.
- 6.11.19 Proposed enhancements to local cycle routes and infrastructure respond to DCF and AAP policy. These include opportunities for new cycle routes on quieter roads, including Ashley Road which will become more cycle friendly and provide a legible route through the new District Centre.
- 6.11.20 The applicant proposes also the continuation of the contraflow cycle connection on Ashley Road to Watermead Way where a relocated toucan crossing will be provided to respond to the desire lines of cyclists and pedestrians heading to/ from the Island sites. To the south of Watermead Way, the cycle route will continue via the shared pedestrian and cycle area on Ferry Way and connect to the existing cycle infrastructure on Ferry Lane.
- 6.11.21 The proposal is considered to prioritise cycle connections and integrate with exiting routes. Transport for London and Haringey Transportation Officers raise no objection in terms of cycling routing and the proposed cycle routes are considered acceptable.

Legal Agreements - Section 278, Section 247 and Section 38

- 6.11.22 The proposal will deliver significant highway and public realm benefits through the Highway Improvement Works package, which is secured through a Section 278 Agreement between the Council and the applicant. The highway improvements works encompasses the following:
- Widening of Hale Road to provide two eastbound traffic lanes on the approach to the junction with Ashley Road;

- Installation of traffic signal controls at the Watermead Way junction with Ashley Road and Station Road, which incorporates a relocated toucan crossing across Watermead Way;
- Reconfigured bus station layout and creation of signalised junction at the northern end of the bus station;
- New signalised pedestrian crossing on Watermead Way, to the north of Cygnet Way junction;
- The provision of bus standing space on Watermead Way, to the north of the Cygnet Way junction;
- Realignment of Station Road;

6.11.23 There are areas of private land included as part of the proposed highway. As such, all areas of private included as public highway will be dedicated as such through an agreement pursuant to Section 38 Highways Act 1990. This generally relates to Station Road and Ashley Road.

6.11.24 The securing of the highways works by way of a S278 agreement and a S38 agreement is required to make the scheme acceptable as per the Heads of Terms at the top of this report.

Delivery and Servicing

6.11.25 Delivery and servicing consists of kerbside provisions only. A total of eight on-street loading bays, each with the capacity to accommodate 1 or 2 Heavy Goods Vehicles (HGVs) at a time, will be provided across the site. Fairbanks Road is a private road and as such, any modifications will require approval by the party responsible for its maintenance (Homes for Haringey). This is proposed to be secured by legal agreement as the Heads of Terms above.

6.11.26 It is anticipated that delivery and servicing during the peak traffic periods will be mainly by cars and vans. Larger vehicles are anticipated to be an infrequent occurrence, and these vehicles are expected to arrive/depart outside of peak traffic periods.

6.11.27 Haringey's Principal Transport Officer considers that the forecast delivery and servicing trip generation for each site and demonstrates that the proposed loading bays offer adequate capacity to meet the requirements of the development in serving terms.

6.11.28 Details of serving arrangements will need to be set out in a Delivery and Servicing Plan. A planning condition requiring such a plan is contained in Appendix 1. Subject to condition, the delivery and serving proposals are therefore acceptable.

Transportation – Summary

- 6.11.29 In terms of vehicle trips, the the residual effects of the proposed development on the highway network will be positive (i.e. a significant reduction in vehicle trips at peak times is anticipated).
- 6.11.30 The development will not create a significant level of additional public transport trips that will have major consequences for local public transport services. This is sufficient public transport capacity to support the increased population.
- 6.11.31 A Car free development and the provision of a car club are both supported by officers. Blue Badge Parking provision is in line with the draft London Plan. Cycle provision is acceptable subject to the provision of additional details. The details of cycle lane layouts are acceptable subject to finalisation by way of a S278 Highways agreement. The forecast delivery and servicing trip generation for each site and demonstrates that the proposed loading bays offer adequate capacity to meet the requirements of the development in serving terms.
- 6.11.32 The development will allow for a shift to sustainable travel in Tottenham Hale and for improved pedestrians and cycling journeys. The development is acceptable in transport planning terms.

6.12 Energy and Climate Change

- 6.12.1 The revised NPPF and London Plan Policies 5.1-5.3 and 5.7-5.11, and Local Plan Policy SP4 sets out the approach to climate change and require developments to meet the highest standards of sustainable design, including the conservation of energy and water; ensuring designs make the most of natural systems and the conserving and enhancing the natural environment. The London Plan requires all new homes to achieve a zero carbon target beyond Part L 2013 of the Building Regulations.
- 6.12.2 The London Plan also sets a target of 25% of the heat and power used in London to be generated through the use of localised decentralised energy systems by 2025. Where an identified future decentralised energy network exists in close proximity to a site it will be expected that the site is designed so that is can easily be connected to the future network when it is delivered. The Council's Planning Obligations SPD (October 2014) requires obligations to futureproof a potential connection to the district energy network by way of a S106 agreement.
- 6.12.3 The applicant has submitted an Energy Assessment that applies the Mayor's Energy Hierarchy. Greater London Authority Officers and Haringey's Carbon Management Team have assessed the proposal in sustainability terms. The scheme exceeds the national target of reduction of carbon emissions against Part L 2013 (35%).

- 6.12.4 With regard to the 'Be Lean' part of the Energy Hierarchy, the characteristics for U-values and air permeability for the scheme show improvements over the minimum standards as set out by Part L1A 2013. Overall the development is estimated to achieve a reduction of 174 tonnes of carbon per annum (12%) in regulated emissions compared to 2013 Building Regulations and is compliant development through Lean measures.
- 6.12.5 With regard to 'Be Clean', the applicant has committed to connect to the future Tottenham Hale District Energy Network (DEN) in accordance with Policy DM22. This is supported by Officers. All residential buildings will be connected to the DEN with some commercial elements of the scheme supplied by Air Source Heat Pumps (ASHP). Officers have had regard to the comments of Friends of the Earth regarding the reversibility of Air Source Heat Pumps to provide comfort cooling, however the applicant has confirmed it does not propose to reverse the proposed pumps and the objection has therefore been addressed.
- 6.12.6 Overall the development is estimated to achieve a reduction of 461 tonnes per annum (32%) in regulated CO2 emissions compared to a 2013 Building Regulations through 'Clean' measures. This level of savings is supported by LBH Carbon Management.
- 6.12.7 Rather than delivering this level of saving from on-site infrastructure there is an assumption that the development will connect to the Tottenham District Energy Network (DEN). This strategy is supported by the Council. As the DEN is unlikely to be delivered prior to the completion of the development, gas boilers will be installed as an interim solution. The applicant will be committed to connect to the DEN when it comes on-line within 10 years. A £250,000 connection fee to the DEN together with pipework delivered in kind or an additional contribution of £400,000 will be secured in the section 106 agreement.
- 6.12.8 It is acknowledged that there is a shortfall in the connection fees collected from this development, together with other developments that rely on connection to the DEN, that are needed to make the DEN viable and the Council is confident that it can find alternative funding to make up this shortfall (including the Heat Network Investment project and Community Infrastructure Levy).
- 6.12.9 In the event that the DEN does not go ahead the applicant will consider alternative low carbon options for alternative long term replacements for the interim boilers. At this point the £400,000, which in the scenario of connection to the DEN would have been used for pipework, will be used towards the alternative low carbon option. This option will be need to be agreed with the

Council at this point via the submission of an alternative energy strategy for approval.

- 6.12.10 With regard to 'Be Green' a range of low and zero carbon technologies were evaluated and roof mounted solar photovoltaic panels have been proposed for the suitable available roof areas on each plot. The photovoltaic panels are subject to details (on a plot-by-plot basis) by way of a planning condition contained in Appendix 1.
- 6.12.11 The applicant has committed to a BREEAM Very Good standard (2018) for the commercial element of the proposal. A condition for an overheating strategy (using current London Plan methodology for modelling) is contained in Appendix 1.
- 6.12.12 The Development as a whole does not achieve the Zero Carbon standard on site, with 536 tonnes of carbon, assuming the DEN is connected to, remaining to be offset, however in line with Local Plan policy the applicant has agreed to a carbon offsetting contribution of £939,650 which will be secured in the Section 106 agreement.
- 6.12.13 Should the development not connect to the DEN within ten years then at that point the applicant will need to submit a revised energy strategy for approval by the Council together with a revised carbon emissions figure. At that point an additional carbon offsetting contribution may become payable, subject to viability.
- 6.12.14 *Energy and Climate Change – Summary*
- 6.12.15 The proposed development exceeds the level of carbon emissions savings set out in Part L 2013. The development proposes to connect to the Tottenham Hale DEN and in the interim gas boilers are proposed. A carbon offsetting contribution of £939,650 will be secured in the Section 106 agreement together with a DEN connection fee of £250,000 and delivery of pipework or an additional £400,000 contribution.
- 6.12.16 Any additional funding needed to make the DEN viable will be secured by Haringey through external funding or Community Infrastructure Levy. Should the DEN not come forward the applicant will be required to submit an alternative energy strategy and the £400,000 will go towards an alternative low carbon solution, to be agreed by the Council. At that point any additional carbon offsetting contribution will need to be calculated and paid subject to viability. This strategy is in line with Haringey Council policy and is supported.

6.13 Flood Risk and Drainage

- 6.13.1 Policy also requires drainage to be designed and implemented in ways that deliver other policy objectives, including water use efficiency and quality, biodiversity, amenity and recreation. Further guidance on implementing Policy 5.13 is provided in the Mayor's Sustainable Design and Construction SPG (2014) including the design of a suitable SUDS scheme.
- 6.13.2 Policy also requires drainage to be designed and implemented in ways that deliver other policy objectives, including water use efficiency and quality, biodiversity, amenity and recreation. Further guidance on implementing Policy 5.13 is provided in the Mayor's Sustainable Design and Construction SPG (2014) including the design of a suitable SUDS scheme.
- 6.13.3 The Local Plan (2017) sets out that the sites within the Tottenham Hale Growth Area have undergone the Sequential Test (and where necessary the Exception Test) in accordance with the National Planning Policy Framework (NPPF). This has ensured that there are no alternative sites of lower flood risk where the development can be located (see the Sequential Test report for Tottenham Hale).
- 6.13.4 The site is located primarily within Flood Risk Zone 2 with some of the site falling in Flood Risk Zone 1. The applicant has submitted a Flood Risk Assessment (FRA). The Environment Agency and Haringey's Local Lead Flood Authority (LLFA) raise no objection in flood risk terms. The proposals for each plot are considered "appropriate uses". Officers note that no habitable spaces are proposed to be located on the ground floor within Flood Risk Zone 2. Officers have had regard to comments from adjoining occupiers concerning the unsuitability of Tottenham Hale for residential redevelopment, however the site allocations have been found sound at the plan making stage following an assessment of flood risk.
- 6.13.5 The applicant notes the development has the potential to increase the risk of surface flooding. A number of measures are recommended to mitigate potential impacts including a programme of sewer diversion in liaison with Thames Water. The LLFA and Thames Water have reviewed the scheme and raise no objection subject to conditions regarding flood risk associated with sewer flows and basement development. These conditions are contained in Appendix 1.
- 6.13.6 The applicant incorporates Sustainable Urban Drainage Systems within the scheme (SuDS) to provide attenuation of surface water. The applicant's FRA notes that a SuDS review for the whole site was undertaken. Given the site conditions and space constraints, infiltration devices such as soakaways were not expected to be viable. However SuDS features such as blue roofs, porous paving (treatment), rainwater harvesting, below ground storage and flow control devices are proposed to provide the necessary attenuation volumes and flow rates. These SUDS features are proposed to be secured by

condition. Subject to the imposition of the conditions noted above, the development is acceptable in flood risk and drainage terms.

6.14 Trees and Ecology

Tree Removal and Replacement

- 6.14.1 Policy 7.21 of the London Plan states that any tree lost as the result of development should be replaced and wherever appropriate and the planting of additional trees should be included in new developments. This approach is reflected at the local level.
- 6.14.2 An Arboriculture Impact Assessment and Method Statement has been submitted with the applicant. There are a total of 59 existing trees on the site and 2 small groups of trees. 50 of the individual trees and the 2 small groups of trees are considered to be low quality (Category C) trees. The remaining 9 of the trees have been assessed to be of moderate quality. All trees on the site are proposed to be removed and replaced with better quality mature trees as part of a comprehensive landscaping scheme to allow for redevelopment.
- 6.14.3 The Council's Tree Officer has reviewed the proposed tree removals and considers the removal of current trees on the site to be acceptable, subject to the details of re-provision and re-planted as noted below.
- 6.14.4 As part of re-development it is proposed to plant 14 'signature' trees (larger sized and in key locations), 62 street trees and 3 planter trees, totalling 79 trees across the site. As such there will be a net gain in trees resulting from the redevelopment and an improvement in the quality and maturity of the trees across the sites.
- 6.14.5 The Council's Tree Officer supports this level of provision, subject to conditions with replanting being in accordance with relevant British Standards. Officers are in agreement with the applicant's assessment that the proposals will enhance the area in terms of its public space and trees will be a significant part of this by ensuring an uplift in tree numbers and quality and providing better structural diversity and species of interest.
- 6.14.6 Officers have had regard for the comments concerning the loss of trees on the Welbourne plot, including the potential loss of a 'green buffer' A line of immature existing street trees (elms) sit alongside the southern site boundary. Whilst it is proposed to remove these trees, they are proposed to be re-planted with a more robust choice of species likely a small leaved Lime. Detail will be provided by the applicant at condition stage. Officers consider the 'green buffer' noted in the site allocation will be retained with redevelopment.

- 6.14.7 The tree removal and replacement is acceptable and in accordance with the policy above.

Ecology

- 6.14.8 London Plan Policy 7.19 indicates that whenever possible development should make a positive contribution to protection enhancement creation and management of biodiversity. Priority is given to sites with ecological designations. Local Plan Policy SP13 states that all development must protect and improve site of biodiversity and nature conservation.
- 6.14.9 An Ecological Appraisal has been submitted and notes the site is not subject to any statutory or non-statutory ecological designations. The nearest designations are five statutory and two non-statutory designated sites approximately 400m to 1.9km away from the application site and are separated by urban development.
- 6.14.10 Potential ecological enhancement measures are set out in the Ecological Appraisal to improve the site for wildlife and to ensure the proposed development is ecologically friendly. Measures include the landscaping design using both native and non-native planting to provide high quality landscaping and to promote nature conservation by attracting local wildlife.
- 6.14.11 The new landscaping aims to enhance the area for wildlife by providing new habitats and foraging areas in this urbanised location. Bat and bird boxes have also been incorporated into the design to provide new roosting and nesting opportunities for local wildlife. These are proposed to be secured by the conditions in Appendix 1.
- 6.14.12 The Council's Nature Conservation Officer and Natural England have reviewed the enhancements and raise no objection subject to condition. An additional condition concerning bat surveying of the Stratford College Building is also required. Subject to these conditions, the development is accords with London Plan policy 7.19 and Policy SP3 and is acceptable in ecological terms.

Habitats Regulation

- 6.14.13 Policy AAP6 states that where proposals fall within 500m of a Special Protection Area (SPA)/Ramsar areas, specific measures should be set out to ensure there is no adverse effect on ecological integrity.
- 6.14.14 Given the proximity of the application site to two designed European sites of nature conservation, it is necessary for Haringey as the competent authority to consider whether there are any likely significant effects on relevant sites pursuant to Section 63(1) of the Conservation of Habitats and Species Regulations 2017 ('the Habitats Regulations').

- 6.14.15 The application site lies 0.5 km west of the Lea Valley SPA at its closest point. The Lea Valley area qualifies as a SPA under Article 4.1 of the Birds Directive on account of supporting nationally important numbers of species. This area is also a Ramsar site. The Lee Valley SPA / Ramsar comprises four underpinning Sites of Special Scientific Interest (SSSIs).
- 6.14.16 The application site lies 4.5 km west of the Epping Forrest Special Area of Conservation (SAC) at its closest point. The site is within the Zone of Influence (ZOI) of the SAC as defined by Natural England in their Interim Guidance. The Epping Forest SAC is one of only a few remaining large-scale examples of ancient wood-pasture in lowland Britain and has retained habitats of high nature conservation value. Epping Forest SAC is also underpinned by a SSSI designation.
- 6.14.17 A map of the application site in relation to designated EU ecological areas is **Appendix 20** for member's reference. The applicant has submitted a Habitats Regulation Screening Assessment to accompany the application that undertakes an assessment of the impacts of the development on the conservation objectives of both Lee Valley SPA and the Epping Forest SAC. Natural England has reviewed the application.
- 6.14.18 Given the distance of the Site from the Lea Valley SPA site, the applicant considers that there would be no significant effects from lighting or noise impacts during the construction or operational phases of the proposal. The applicant also undertakes an assessment of disturbance impacts, hydrological impacts and air quality impacts against the site's conservation objectives.
- 6.14.19 The applicant's assessment considers the possible impact of the new residents in the development on the Lee Valley and Epping Forest. The Assessment explains that they would have use of available and much closer green spaces such as Down Lane Park (amongst others), thereby reducing any potential increased pressure on the Lee Valley SPA. The applicant's conclusion (including in-combination effects) accords with the views of Natural England that the development would not give rise to any likely significant effect on the integrity of the Lee Valley SPA / Ramsar site and that therefore no mitigation is necessary. Officers note this position was taken at application stage and following the CJEU's ruling in the 'People Over Wind' judgement.
- 6.14.20 The applicant undertakes a similar assessment in relation to the conservation objectives of the Epping Forest SAC, however the issue of recreational pressure is also considered in more detail due to the location of the scheme within the SAC's Zone of Influence (ZOI) and Natural England's interim advice relating to residential planning applications within the ZOI.

- 6.14.21 The Site is beyond 4.5km from Epping Forest SAC and falls within the defined ZOI of 6.2km. The fact that the Development would also have a limited vehicle ownership would limit recreation trips to the SAC. The site is removed from the core 3km recreational catchment area of the SAC.
- 6.14.22 The applicant's concludes that there would not be any likely significant effects on the Epping Forest SAC when the development is considered, either alone or in combination with other plans/projects. The applicant also concludes that no additional impacts have been identified in relation to Walthamstow Reservoirs SSSI or Epping Forest SSSI and no mitigation measures are therefore considered necessary.
- 6.14.23 Officers therefore consider the development would not give rise to likely significant effects on European designated sites (Lee Valley SPA and Epping Forest SAC) pursuant to Section 63(1) of the Conservation of Habitats and Species Regulations 2017 ('the Habitats Regulations'). An integrity test is therefore not required. The proposal is in accordance with Policy AAP6.

6.15 Waste and Recycling

- 6.15.1 London Plan Policy 5.16 indicates the Mayor is committed to reducing waste and facilitating a step change in the way in which waste is managed. Policy SP6 Waste and Recycling require development proposals make adequate provision for waste and recycling storage and collection. The approach is reflected in Policy DM4. The applicant has submitted a Delivery and Serving Plan.
- 6.15.2 A total of eight loading bays are proposed across the scheme provided at key locations to ensure refuse collection can be conducted in the immediate vicinity of each plot. The waste storage areas within each building have been designed to incorporate space for both recyclable and non-recyclable waste and are based on the guidelines set out within the LBH Sustainable Design and Construction SPD.
- 6.15.3 The Council's Waste Management Team have assessed the proposal and raise no objection to the proposal subject to the provision of a site-wide waste management plan. The collection points are judged acceptable. The applicant will be required to ensure a commercial contract for commercial waste collection on the site.

6.16 Land Contamination

- 6.16.1 London Plan Policy 5.21 and Policy DM32 require development proposals on potentially contaminated land to follow a risk management based protocol to ensure contamination is properly addressed and carry out investigations to

remove or mitigate any risks to local receptors. The applicant has submitted a Geo-environmental Desk Study for the site.

- 6.16.2 The applicant's submission notes that all five plots that make up the site are previously developed land and have been identified as being potentially affected by contamination arising from on-site previous land use/and or current land uses.
- 6.16.3 The applicant notes the development proposes to cover the site with hard surfaces and landscaping (with an appropriate thickness of clean material and soils), removing the pathways between the end user and contamination with the exception of potential pathways for ground gas. The risk from contamination following the completion of the site is judged to be negligible as the clean layer topsoil will prevent the risks of people being exposed to contamination and prevent other risks to the environment.
- 6.16.4 The Council's Environmental Health Officer (Pollution) and the Environment Agency have assessed the proposal and raise no objections subject to the imposition of standard conditions around land remediation on any grant of planning permission. These standard conditions are contained in Appendix 1. A condition requiring an unexploded ordnance survey is also recommended for imposition.
- 6.16.5 Subject to these conditions, the proposal is considered to accord with London Plan Policy 5.21 and Policy DM32 as appropriate measures will be taken to ensure that the impacts of land contamination are mitigated.

6.17 Basement Development

- 6.17.1 Policy DM18 relates to new Basement development and sets out criteria for where basements can be permitted. Basement development must be addressed through a Basement Impact Assessment (BIA). The applicant proposes a shared basement between Buildings 1 and 2 in Ferry Square. The applicant has submitted a Basement Impact Assessment.
- 6.17.2 The applicant's assessment confirms the proposal will not adversely affect the structural stability of the application building, neighbouring buildings and other infrastructure and does not increase flood risk to the property. The applicant has satisfied the other policy criteria in DM18 with respect to basement development.
- 6.17.3 The applicant will be required to confirm the inclusion of a basement cinema (Option B) within a specified period as per the S106 agreement. The basement development is acceptable and in accordance with relevant policy.

6.18 Archaeology

- 6.18.1 The revised NPPF states that applicants should submit desk-based assessments, and where appropriate undertake field evaluation, to describe the significance of heritage assets and how they would be affected by the proposed development. London Policy 7.8 states that development should incorporate measures that identify record, interpret, protect and, where appropriate, preserve a site's archaeology. This approach is reflected at the local level.
- 6.18.2 Part of the site lies in an area of archaeological interest. The Greater London Archaeological Advisory Service (GLAAS) has assessed the proposal and indicates the need for field evaluation to determine appropriate mitigation. GLASS note a two stage process of archaeological investigation comprising evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.
- 6.18.3 Subject to a two-part condition regarding the undertaking of a Written Scheme of Investigation (WSI) the impacts of the development in archaeological terms are judged acceptable and in accordance with the policy cited above.

6.19 Fire safety and Security

- 6.19.1 Fire safety is not a planning matter and is addressed by the Building Regulations. However, in light of the Grenfell Tower tragedy and committee's concern around this matter, the applicant has been asked to provide information regarding its plans for fire safety in the development, and in particular the 38-storey element.
- 6.19.2 High rise residential blocks are constructed in many different ways and the varying combinations of design and materials mean that all proposals have to be considered individually.
- 6.19.3 The applicant has submitted detailed Fire Strategy sections in the Design and Access Statement for each plot. Details concerning Fire Fighting Access (Regulation B5) - the access provisions that satisfy the functional requirements of the Building Regulations – are provided.

Building Regulations

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

- 6.19.5 The development will be required to meet the Building Regulations in force at the time of its construction. The applicant has confirmed that all buildings will use Local Authority Building Control as opposed to Approved Inspectors. The Council's Building Control Team will carry out an examination of drawings for the proposed works and carry out site inspections during the course of the work to ensure they are carried out correctly as far as can be ascertained. The Council's Building Control Team has held significant pre application meetings with the applicants and their consultants including their fire engineers.
- 6.19.6 As part of the plan checking process a consultation with the London Fire Brigade would also be carried out. On completion of work, the Local Authority Building Control Team will issue a Completion Certificate to confirm that the works comply with the requirement of the Building Regulations. The Council's Building Control Team has facilitated a meeting between the applicants, their fire engineers and the London Fire Brigade, to ensure that their proposals are in line with the Building Regulations and the relevant codes of practice.

Fire Safety Provisions

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

Provision of smoke detectors

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

Provision of Sprinklers

- 6.19.12 New blocks of flats over 30m in height (approximately 10 stories) or more would require installation of domestic sprinklers and those with a floor more than 50m above ground level would require a wet riser under the Building Regulations since 2006. The applicant has confirmed that these will be provided in the various blocks to Building Regulations Standards, and that increased pump and tank capacities will be provided to support non-residential areas.
- 6.19.13 In general, sprinklers operate when a fire is developing and aim to keep the fire under control, to prevent further spread and aid the fire fighters to tackle the fire more effectively.

Materials

- 6.19.14 The applicant has confirmed that no Aluminium Composite Cladding of the type identified as problematic in Grenfell Tower is proposed. The applicant has confirmed that the specification of cladding materials for all buildings is fully aligned to or exceeding the latest guidance from central government and current best practice.

Adjoining Occupier Response

- 6.19.15 Officers have had regard for the comments of adjoining occupiers regarding fire safety. In so far as these are a material planning consideration, Officers note the London Fire Brigade's (LFB's) initial concerns with the proposal not meeting Building Regulation requirements have now been resolved following discussions between the LFB, the applicant (and their fire engineers) and the Councils Building Control Team.
- 6.19.16 The applicant confirms that the use of residential blocks containing single stair core is in line with Building Regulations and associated design guidance. This design is supported by the fire safety measures noted above. Each tower is to be provided with a firefighting shaft that serves all levels. These firefighting shafts are to be enclosed in 120 minutes fire resisting construction, and be provided with:
- A firefighting stair with a minimum clear width of 1,100mm,
 - A firefighting lift, designed and installed in accordance with BS EN 81-72:2015, and
 - A wet or dry rising fire main (depending on building height), with outlets at each upper level and located within the enclosure of the firefighting stair.

- 6.19.17 Each plot will have sufficient vehicle access, and allowance for suitable hard standings has been provided for each plot. Sufficient hydrant provision will be provided for each plot.
- 6.19.18 Following provision of the fire safety details as set above, the LFB has confirmed that it has no objection to the fire fighting access for the planning application, including a design including a single stair core.

6.20 Equalities

- 6.20.1 In determining this planning application the Council is required to have regard to its obligations under equalities legislation including obligations under the Equality Act 2010. In carrying out the Council's functions due regard must be had, firstly to the need to eliminate unlawful discrimination, and secondly to the need to promote equality of opportunity and to foster good relations between persons who share a protected characteristic and persons who do not share it. Members must have regard to these duties in taking a decision on this application.
- 6.20.2 As noted in the various sections in this report, the proposed development provides a range of socio-economic and regeneration outcomes for the Tottenham Hale area including the provision of new housing, with a substantial amount affordable housing, a proportion of which will be Council homes at social rents. This overall provision will add to Haringey's stock of market and affordable homes. The new health centre included in the proposal will increase primary care provision and GP capacity in the local area.
- 6.20.3 Officers note the applicant has committed to the submission of an employment skills and training plan as a S106 obligation, which will ensure a target percentage of local labour is utilised during construction. This will benefit priority groups that experience difficulties in accessing employment. Assistance will also be provided for local tenders and employment skills and training. A financial contribution regarding apprenticeships is also secured by a S106 obligation, as per the Heads of Terms above. The proposal will result in positive local employment impacts, including a net increase in jobs.
- 6.20.4 The proposed development will engage with people with protected characteristics around physical access, and would add to the stock of wheelchair accessible and adaptable dwellings in the locality, in accordance with London Plan and local planning policy requirements.

Consultation Responses - Equalities Impact Assessment (EqIA)

- 6.20.5 Officers have had regard to the views of some consultees that the development proposal is a breach of the Equalities Act and in particular the public sector equalities duty in s.149 of the Act. Some consultees have noted

an Equalities Impact Assessment (EqIA) does not accompany the application itself.

- 6.20.6 The Tottenham Area Action Plan considered the issues of equality and a Sustainability Appraisal (SA) (which included both an integrated Equalities Impact Assessment (EqIA)) was submitted to the Planning Inspector in support of the Plan during the plan-making process at 'Regulation 22 Stage'. This followed modification of the SA in response to consultation.
- 6.20.7 The submitted SA concluded in respect of equalities that the Tottenham Area Action Plan performs well, with 'significant' positive effects identified as likely in terms of health, housing, community cohesion, accessibility, town centres and economic growth. The Planning Inspector found the Tottenham AAP sound.
- 6.20.8 Officers have considered the equalities impacts of the development proposal in the light of the Tottenham AAP and the consultation responses. As is explained above there are very considerable local benefits. The planning application is judged in accordance with the Local Plan, including the Tottenham AAP.
- 6.20.9 In recommending the scheme for approval to Planning Sub-Committee, Officers are satisfied there will be no adverse equalities impact within the meaning of the EA, and there is no requirement to undertake a further EqIA.

6.21 Conclusion

- 6.21.1 The Strategic Development Partnership (SDP) proposal will play a highly significant role in delivering the strategic vision for Tottenham Hale.
- 6.21.2 The substantial quantum of residential development proposed (1030 homes) meets with Haringey's aspirations to deliver the regeneration and re-vitalisation of Tottenham Hale. These homes would make a significant contribution to meeting Haringey's targeted housing requirements.
- 6.21.3 The provision of a new health centre on the Welbourne site is vital to allow expansion and improvement of health care services to local residents. The NHS strongly supports the development proposal. The health centre would provide a permanent, fit-for-purpose facility in an accessible location. Funding to deliver the health centre is contingent on the planning permission being granted.
- 6.21.4 The level and type of affordable housing is compliant with London Plan and Local Plan policy and is above the maximum reasonable amount. The scheme is scheduled to deliver more than 10% of the Council's 1000 Council Homes

target in the draft Borough Plan, subject to Cabinet's decision to purchase the units.

- 6.21.5 The proposed mix of flexible Town Centre uses is supported and judged key to delivering the vision for Tottenham Hale and the new District Centre. The development will enable a comprehensive mix of community, commercial and leisure uses set within new streets and spaces. The developer has an established track record of high quality delivery of urban commercial space.
- 6.21.6 The density of the scheme within an Opportunity Area will optimise the potential of a site with excellent public transport links. The scheme is comprehensively master planned across all relevant site allocations in the Tottenham Area Action Plan and would not prejudice the Council's future planning objectives.
- 6.21.7 A Skills and Training Plan will be secured by S106 obligation. This will include a commitment to ensure that not less than 20% of those employed during construction are residents of the borough. A financial contribution to support apprenticeships and opportunities for local people is also secured.
- 6.21.8 The scheme provides very high quality residential accommodation that meets with London Plan space standards. There are no north facing single aspect units in the scheme and all units will receive good levels of daylight and sunlight. The proposal incorporates a policy compliant level of accessible and adaptable wheelchair units and a suitable number of units per core. The residential units will be protected from noise impacts and will have adequate ventilation.
- 6.21.9 There is clear and specific policy support for the principle of tall buildings in Tottenham Hale. A cluster of tall buildings will positively engage with the surrounding built environment. Building 1, the tallest building at 38 storeys, is considered to achieve a distinctive and unique form that will allow for wayfinding to Tottenham Hale Station and present as a local landmark. All of the buildings proposed are of an excellent design quality.
- 6.21.10 The building heights proposed are fully and robustly supported by the independent Quality Review Panel and the tall buildings are considered to meet relevant planning policy criteria in terms of design and sustainability. The tall buildings are judged key to delivering a viable and comprehensive scheme.
- 6.21.11 The impacts of the proposal to strategic and local views are acceptable. The effects of the cluster of buildings on wider townscape views are also acceptable. The overall design quality of the public spaces and landscaping is considered to be very high.

- 6.21.12 The layout of the development is considered to optimise an underutilised site with excellent public transportation links. The layout of the development accords with the vision to change the character of Tottenham Hale to a pedestrian oriented, mixed-use destination. The Pavillion Building is a strong feature of the development that will provide a focal point for Ferry Square.
- 6.21.13 The proposed development will result in a significant reduction in vehicle trips at peak times. The development will not have undue impacts on local public transport services.
- 6.21.14 Car free development and the provision of a car club will support sustainable travel. The scheme will ensure cycle connectivity to future routes and incorporates a compliant level of cycle parking. The development is acceptable in transportation terms.
- 6.21.15 There is a surplus of available school places to address the increased population created by the scheme and the proposal will add GP capacity. The applicant's playspace proposals are high quality and offset contributions will mitigate impacts to existing local playspaces. The development provides suitable community infrastructure or will make a contribution via CIL or the S106 agreement to existing infrastructure with capacity to absorb the new residents.
- 6.21.16 The site is comparatively isolated from existing residential development (except the Welbourne Plot), and would be anticipated to give rise to fewer and less intensive amenity impacts than may be expected from other large infill locations in London.
- 6.21.17 While there will be some localised daylight/sunlight impacts to existing properties (largely confined to Hale Gardens) the development overall performs well in respect of daylight and sunlight impacts to surrounding development and amenity spaces. The proposal will have a negligible effect on the wind conditions on adjoining occupiers. The construction and operational noise impacts arising from the scheme are acceptable.
- 6.21.18 The air quality impacts to current and future occupiers are acceptable. The applicant's methodology in reaching a conclusion of Air Quality Neutral is sound. The construction phase impacts to air quality are temporary and will be monitored by the Local Authority. The scheme is well designed and the impacts to adjoining occupiers are considered acceptable.

- 6.21.19 Haringey's Principal Conservation Officer considers that the proposal causes less than substantial harm to heritage assets. Officers have given considerable weight to this harm, however the public benefits of the scheme are substantial, including new and affordable homes, commercial space, a new health centre, and public open space as part of the creation of a new town centre; and bringing an under-used site in an Opportunity Area into more intensive and appropriate use. These benefits are considered to clearly outweigh the harm and the heritage planning impacts are acceptable.
- 6.21.20 The scheme is highly sustainable. The proposed development exceeds the level of carbon emissions savings set out in Part L 2013. The development proposes to connect to the Tottenham Hale District Energy Network (DEN) and in the interim gas boilers are proposed. A carbon offsetting contribution of £939,650 will be secured in the Section 106 agreement together with a DEN connection fee of £250,000 and delivery of pipework or an additional £400,000 contribution. There will be a net gain in trees in the area resulting from the redevelopment.
- 6.21.21 The issues of ecology, flood risk, waste and servicing, basement development, land contamination and archaeology are adequately addressed by the development proposal and where required will be mitigated by planning conditions.
- 6.21.22 The scheme makes a significant contribution to the delivery of the Local Plan and the allocated sites TH2, TH4, TH5 and TH10, which seek to meet Haringey's strategic aspirations for the revitalisation of Tottenham Hale and the wider regeneration of the borough.
- 6.21.23 In making a recommendation to grant permission, the Local Authority has considered the significant environmental effects of the proposed development as set out in the Environmental Statement and addendum, and taken into account the responses to consultation and other relevant information in accordance with EIA Regulations, and other relevant legislation and guidance including Section 63(1) of the Conservation of Habitats and Species Regulations 2017.
- 6.21.24 Planning permission should be granted subject to the conditions set out in Appendix 1 and subject to the signing of a S106 agreement for the reasons set out above. The details of the decision are set out in the RECOMMENDATION

6.22 Community Infrastructure Levy (CIL)

- 6.22.1 Based on the information given on the plans, the Mayoral CIL charge will be £3,836,762 and the Haringey CIL charge will be £1,441,501. The indexation figures used are based on an assumption of planning permission being issued in Q1 2019, and therefore MCIL Index = 1.41 and LBH CIL Index = 1.32.
- 6.22.2 The CIL will be collected by Haringey after/should the scheme is/be implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the construction costs index. An informative will be attached advising the applicant of this charge and advising the scheme is not judged to be phased for CIL purposes.