

COMMENTOR	COMMENT	OFFICER RESPONSE
LBH Environmental Health (Pollution)	<p>The following comments are made with consideration of the additional environmental information that has been submitted together with apposite conditions.</p> <p>Air Quality:</p> <p>The London Plan, Policy 7.14 states that new development should:</p> <ul style="list-style-type: none"> <li>• minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans</li> <li>• promote sustainable design and construction to reduce emissions from the demolition and construction of buildings;</li> <li>• be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).</li> <li>• Ensure that where provision needs to be made to reduce emissions from a development, this is usually made on-site.</li> </ul> <p>An air quality assessment (Air Quality Consultants, July 2018, Chapter 9, Vol 1, ES) has been submitted along with the planning application to assess the air pollution impact of the proposed developments.</p> <p>The following comments can be made on the assessment.</p> <ul style="list-style-type: none"> <li>• The main air polluting operations associated with the entire site include 31no residential accessible car parking spaces and 11no on street car parking and associated traffic movements, proposed energy centres.</li> <li>• Air Quality Neutral Assessment demonstrated that the Development is air quality neutral in terms of both building and road traffic emissions.</li> <li>• A detailed dispersion modelling study of the potential impact of the development was undertaken, focussing on the effects of increased traffic on the local road network during operation and construction, and emissions from the proposed Energy Centre.</li> </ul>	Comment noted. Relevant conditions contained in Appendix 1.

- The assessment demonstrates that air quality will not present a significant constraint on the Development. No new exceedances of the UK's air quality objectives are predicted during either construction or operation. As such, the Development is not anticipated to result in significant health effects from increased exposure to air pollution.
- This CURED v3 a tool (Page 4) was set out by Air Quality Consultants, and Haringey Council will not normally accept this approach. However, where possible a realistic worst-case approach has been adopted during the modelling procedure. Therefore the findings of the assessment are acceptable.
- Traffic data for the assessment have been provided by Steer Davies Gleave, who have undertaken the Transport Assessment, Appendix 8.1, for the Development. Where necessary, this has been supplemented with traffic data from the London Atmospheric Emissions Inventory (LAEI).

Based on the findings of the assessment, air quality issues are not considered a constraint to the planning consent for the development. However, the assessment will need reviewing if the traffic data used in the modelling is not approved by TFL.

#### Contaminated Land:

Two reports were appended (Appendix 11) to the ES (Chapter 11).

1. Phase I Geoenvironmental Desk Study by BuroHappold Engineering, Tottenham Hale Masterplan referenced number 035543 dated August 2016.

The research revealed potential risks associated with the site(s) due to the former and current site activities (i.e. Made Ground [construction & demolition debris] for all the sites, depot for North island, water works / filter beds/ pumping station and petrol filling station, motor vehicle service & repair depot for Ferry Island, warehousing for Ashley Rd East and finally factories [braid & bootlace, printing ink & varnish] and petrol filling station for Ashley Road West respectively) in relation to the proposed site development. The surrounding area was also used for various industrial activities with potential sources of contamination. The risk assessment revealed low to high contamination risk to the following receptors; future site users, construction workers, site neighbours, surface water, groundwater and built environment; therefore further investigations and surveys was recommended as outlined below:

- It is recommended that a site investigation is completed on each of the sites. The aims

and objectives of the investigation will be to gain an understanding of:

- o The presence and nature of any Made Ground present at the site;
- o The presence and composition of any contamination including asbestos within site soils and groundwater;
- o The geological succession and ground characterisation; and
- o The ground gas and groundwater regime (in the body of the site).

o The data obtained from this ground investigation would be collated and assessed. This would inform any foundation solution and remediation that may be required on site.

- It is recommended a detailed archaeological survey is undertaken for North Island and Ferry Island, it is likely that some form of shallow trenches will be required prior to earthworks or a watching brief will be required during the works. For the remaining sites, Welbourne, Ashley Road West and Ashley Road East, further assessment should be considered if required to meet planning conditions.
- A detailed UXO survey is required prior to significant ground disturbance as part of development.

2. Geo-Environmental Interpretive Report for Tottenham Hale, London, United Kingdom by Langan International UK LTD number 841011101 dated July 2018. The report presents the results of an intrusive investigation undertaken on three out of the five plots (Welbourne, North Island and Ferry Island) at the Site. The investigation of the Ashley Road West plot has been delayed. A separate Addendum report will be produced to cover the interpretation of this outstanding work.

A brief summary of the findings/conclusions/recommendations for each site was provided in the conclusion of the report as follows.

a) Welbourne:

- o Welbourne is a former community centre that has been demolished to slab level. No buildings are present on site. Concentrations of contaminants of concern within acceptable limits for the proposed development. Single marginal exceedance of water quality standard with respect to copper.
- o No further investigation required but waste acceptance criteria testing likely to be required during the construction phase if surplus made ground arisings are to be disposed

to landfill.

b) North Island:

- o Asbestos fibres detected in made ground at trace concentrations (<0.001%).
- o Concentration of mercury above background concentrations but below GAC.
- o Concentrations of metals in groundwater above respective water quality standards.
- o Investigation limited to single exploratory hole with poor recovery.
- o Further investigation comprising minimum of 4No. Investigation points 2No of which to be cable Percussive (CP) boreholes. Additional investigation to provide coverage of the site and investigate variability of the made ground. CP boreholes to be drilled to prove the top of the London Clay.

c) Ferry Island:

- o Concentration of lead in made ground that exceeds GAC for public open space.
- o Concentrations of chlorinated hydrocarbons in groundwater that potentially present a risk to end users of the site and water resource receptors.
- o Concentrations of metals and ammonia in groundwater that potentially present a risk to water resource receptors.
- o Delineation of the chlorinated hydrocarbons using a Membrane Interface Probe (MIP) required.
- o Drilling of CP Boreholes to allow installation of four further monitoring wells at locations identified by the MIP results. The MIP results should also be used inform the screening of the monitoring wells. Given that the identified VOCs are dense nonaqueous phase liquids it is important that the MIP holes and monitoring wells are installed to the base of the Kempton Park Gravel which is anticipated at depths in the order of 5 to 6 mbgl.
- o The results of the additional investigation will determine whether a Detailed Quantified Risk Assessment (DQRA) and/or remediation is required.

d) Ashley Road West:

- o No investigation undertaken to date but from desk study information it is known that the groundwater has historically been impacted by leakage of the underground fuel tanks.
- o Given the site history, further boreholes will be needed site over and above the planned

borehole ARWBH04.

o In particular monitoring wells should be located down hydraulic gradient of the underground storage tanks and fuel distribution system. As the hydraulic gradient is not definitive additional boreholes should be located across the Ashley Road West Site. A minimum of 5 No. boreholes are recommended (unless existing monitoring points can be reused).

e) Ashley Road East:

o No investigation undertaken to date. Intrusive investigation comprising a minimum of 3 No. CP boreholes will need to be drilled to the top of London Clay and to allow for groundwater/gas. One day of Window sampling /trial pitting is recommended to give coverage to investigate suspected made ground.

Using the data obtained from the previous assessment, the planned additional intrusive works should be designed according to recommended guidance (i.e. CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination) and Good Practice.

I recommend the following conditions:

Diesel Generators:

- Generators shall be used solely on brief intermittent and exceptional occasions when required in response to an emergency and for the testing as necessary to meet that purpose and shall not be used at any other time. At all times the generators shall be operated to minimise noise impacts and emissions of air pollutants and a log of operational hours shall be maintained and be available for inspection by the Local Planning Authority.
- The emergency back-up diesel generators installed for use on the site shall comply with the EU Stage V Emission Standards for Generator Set Engines. Evidence of compliance shall be provided to the LPA for approval prior to installation.
- The diesel generators shall run on ultra low sulphur diesel (ULSD) meeting the fuel specification within EN590:2004.

• Unless otherwise agreed in writing by the Local planning authority all combustion flues must terminate at least 1 m above the highest roof in the development in order to ensure maximum dispersion of pollutants.

Combustion and Energy Plant:

• Prior to installation, details of the Ultra-Low NOx boilers for space heating and domestic hot water should be forwarded to the Local Planning Authority. The boilers to be provided for space heating and domestic hot water shall have dry NOx emissions not exceeding 20 mg/kWh.

Reason: To protect local air quality.

• Prior to installation details of all the chimney heights calculations, diameters and locations (5No. boilers and 3No. generators) will be required to be submitted for approval by the LPA prior to construction.

Reason: To protect local air quality and ensure effective dispersal of emissions.

• Prior to commencement of the development, details of the CHP must be submitted to evidence that the unit to be installed complies with the emissions standards as set out in the GLA SPG Sustainable Design and Construction for Band B. A CHP Information form must be submitted to and approved by the LPA.

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

Contaminated land: (CON1 & CON2)

CON1:

• Before development commences other than for investigative work:

a) Using the information obtained from the previous assessments, an additional site investigation, sampling and analysis shall be undertaken at each part of the site as appropriate. The investigation must be comprehensive enough to enable:-

- \_ a risk assessment to be undertaken,
- \_ refinement of the Conceptual Model, and
- \_ the development of a Method Statement detailing the remediation requirements.

The risk assessment and refined Conceptual Model shall be submitted, along with the

site investigation report, to the Local Planning Authority.  
The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority.

b) If the risk assessment and refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements, using the information obtained from the site investigation, and also detailing any post remedial monitoring shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.

And CON2:

- Where remediation of contamination on the site is required completion of the remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied.

Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.

Method of Piling

No phase of the development hereby approved (including the Site Preparation Works) shall commence until a Piling Impact Study has been undertaken including the method of piling foundations for that phase of development has been submitted to and approved in writing by the Local Planning Authority prior to any development commencing. Piling or any other foundation designs using penetrative methods shall not be permitted except for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: To prevent the contamination of the underlying groundwater / aquifer.

Management and Control of Dust:

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

	<p>the GLA SPG Dust and Emissions Control and shall also include a Dust Risk Assessment.</p> <p>Reason: To Comply with Policy 7.14 of the London Plan</p> <ul style="list-style-type: none"> <li>• Prior to the commencement of any works the site or Contractor Company is to register with the Considerate Constructors Scheme. Proof of registration must be sent to the LPA.</li> </ul> <p>Reason: To Comply with Policy 7.14 of the London Plan</p> <ul style="list-style-type: none"> <li>• No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases meets Stage IIIA of EU Directive 97/68/ EC for both NOx and PM and all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at <a href="http://nrmm.london/">http://nrmm.london/</a>. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.</li> </ul> <p>Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ.</p> <ul style="list-style-type: none"> <li>• An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.</li> </ul> <p>Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ.</p> <p>As an informative:</p> <p>Prior to demolition of existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.</p>	
LBH Waste Management	Further to your request concerning the above planning application I have the following comments to make:	Comments noted. Condition for a waste management plan

	<ul style="list-style-type: none"><li>• Wheelie bins or bulk waste containers must be provided for household collections. Wheelie bins must be located no further than 25 metres from the point of collection.</li><li>• Bulk waste containers must be located no further than 10 metres from the point of collection.</li><li>• Route from waste storage points to collection point must be as straight as possible with no kerbs or steps. Gradients should be no greater than 1:20 and surfaces should be smooth and sound, concrete rather than flexible. Dropped kerbs should be installed as necessary.</li><li>• If waste containers are housed, housings must be big enough to fit as many containers as are necessary to facilitate once per week collection and be high enough for lids to be open and closed where lidded containers are installed. Internal housing layouts must allow all containers to be accessed by users. Applicants can seek further advice about housings from Waste Management if required.</li><li>• Waste container housings may need to be lit so as to be safe for residents and collectors to use and service during darkness hours.</li><li>• All doors and pathways need to be 200mm wider than any bins that are required to pass through or over them.</li><li>• If access through security gates/doors is required for household waste collection, codes, keys, transponders or any other type of access equipment must be provided to the council. No charges will be accepted by the council for equipment required to gain access.</li><li>• Adequate waste storage arrangements must be made so that waste does not need to be placed on the public highway other than immediately before it is due to be collected.</li></ul> <p>There are no comments to provide on this application. Unable to provide comments as application form/plans were not enclosed with request for comments. Please provide further information so comments can be provided.</p> <p>It has been noted that a 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.</p>	contained in Appendix 1.
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Due to weights of food waste 360L storage units are no longer used in Haringey and advice is given to use 240L instead for the major developments.

Table 4.1: Residential Waste Storage Requirements

Building

Ferry Island Building 1: 375 units requires:

32 x 1100L Refuse, 19x 1100L Recycling, 8 x 240L food waste, 375 x Food waste kitchen caddies.

Ferry Island Building 2: 107 units requires:

9 x 1100L Refuse, 5 x 1100L recycling, 2 x 240L food waste, 107 x Food waste kitchen caddies.

North Island: 136 units requires:

11 x 1100L Refuse, 7 x 1100L Recycling, 3 x 240L food waste, 136 x Food waste kitchen caddies.

Ashley Road East: 183 units requires:

15 x 1100L Refuse, 9 x 1100L recycling, 4 x 240L food waste, 183 x Food waste kitchen caddies.

Ashley Road West: 98 units requires:

8 x 1100L Refuse, 5 x 1100L Recycling, 2 x 240L food waste, 98 x Food waste kitchen caddies

Welbourne: 137 units requires:

11 x 1100L Refuse, 7 x 1100L Recycling, 2 x 240L food waste, 137 x Food Waste kitchen caddies.

Some of the distances between waste storage areas and collection vehicles are further than the 10 metre distances. A management plan will need to be put in place to address this.

Dropped kerbs will need to be installed and gradients must be no greater than 1:20

A management plan will need to be with regards to suitable pest control of waste storage areas.

Commercial waste and residential waste must be stored and disposed of separately arrangements for a scheduled waste collection with a Commercial Waste Contractor will be required.

The business owner will need to ensure that they have a cleansing schedule in place

	<p>and that all waste is contained at all times. Commercial Business must ensure all waste produced on site are disposed of responsibly under their duty of care within Environmental Protection Act 1990. It is for the business to arrange a properly documented process for waste collection from a licensed contractor of their choice.</p> <p>Documentation must be kept by the business and be produced on request of an authorised Council Official under section 34 of the Act. Failure to do so may result in a fixed penalty fine or prosecution through the criminal Court system.</p> <p>The above planning application has been given a RAG traffic light status of AMBER for waste storage and collection to ensure that all guidance provided will be addressed.</p> <p>[BIN SIZE REQUIRMENTS]</p>	
<p>LBH Carbon Management</p>	<p>Updated Comments from Carbon Management Following Meeting with Argent on the 12/11/2018</p> <p>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.</p> <p><b>1) Sustainability Assessment</b></p> <p>1.1 <b>Previous recommended Action:</b> For the Applicant to commit to achieve BREEAM New Construction (2018) Very good for all non-dwelling units. And for this to be conditioned with a post construction certificate.</p> <div data-bbox="539 1211 1610 1378" style="border: 1px solid black; padding: 5px;"> <p>You must submit for our written approval a design stage accreditation certificate confirming that the non-dwelling part of the development will achieve a BREEAM “Very Good” outcome (BREEAM New Construction 2018 version) a minimum of 6 months prior to commencement on site.</p> </div>	<p>Comments noted. Relevant Conditions contained in Appendix 1. Relevant S106 obligations contained in Heads of Terms.</p>

The development shall then be constructed in strict accordance of the details so approved, and shall achieve the agreed rating and shall be maintained as such thereafter. A post construction certificate shall then be issued by the Building Research Establishment or other independent certification body, confirming this standard has been achieved. This must be submitted to the local authority at least 6 months of completion on site.

In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the local authority's approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.

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

**Update:** This action has been accepted and will be delivered through condition.

1.2 The applicant has proposed a range of sustainability measures that could be delivered, and some that are confirmed. As part of the planning process any issues that are confirmed will be expected to be delivered and therefore there is no need to condition these requirements.

1.3 The applicant also has suggested some measures, which the Council cannot support. These are:

- Low flow irrigation systems in landscaping. The Council cannot support a continuous watering system, and instead recommend that plants landscaping are used across the scheme are hardy plants that require no watering and could survive a drought season.

	<p><b>Update:</b> This has been accepted and landscaped irrigation systems will not be installed.</p> <p>1.4 We would recommend that instead of conditioning the above standard and targets that the applicant undertakes a Home Quality Mark Standard.</p> <p>1.5 <b>Previously requested Action:</b> To either update all sustainability standards for the development and condition, or agree a single condition on the Home Quality mark Standard.</p> <p><b>Update:</b> It has been put that there is no planning policy of this requirement and therefore it cannot be enforced. The Council has accepted this point.</p> <p><b>2) Energy Strategy</b></p> <p>2.1 The submitted Energy Strategies have followed the energy hierarchy. Information has been provided to understand the proposals as a whole. Further revisions and information are required before the proposals can be considered acceptable and the carbon dioxide savings verified.</p> <p><b>Update:</b> meetings have occurred and new information delivered.</p> <p><b>2.2 Be Lean</b></p> <p>2.2.1 Overall the developments are estimated to achieve a reduction of 174 tonnes per annum (12%) in regulated CO2 emissions compared to a 2013 Building Regulations compliant development through Lean measures. This is welcomed and the Council should expect confirmation of these standards post construction.</p> <p><b>Previous recommended Action:</b> To review the energy efficiency standard in the residential areas, and ensure that they are the same as the non-residential units.</p> <p><b>Update:</b> Due to architectural and design solutions justification for differing energy efficiency standards has been accepted.</p>	
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	<p><b>2.3 Be Clean</b></p> <p>2.3.1 Overall the developments are estimated to achieve a reduction of 461 tonnes per annum (32%) in regulated CO2 emissions compared to a 2013 Building Regulations compliant development through Clean measures. This is welcomed.</p> <p>2.3.2 Rather than delivering this 461tCO2pa saving from on-site infrastructure, there is an assumption within the application that the development will connect to the Tottenham Hale District Energy Network (DEN) and the offset payment has been reduced accordingly. For LBH to accept this energy strategy (and accompanying reduction in offset payments), it needs to be confident that the DEN will proceed.</p> <p>2.3.3 The applicant has supported the proposals for the Council to bring forward the DEN and is proposing to connect to the network. As the DEN is unlikely to be delivered prior to the completion of the plots, gas boilers will be installed as an interim solution. The submitted strategy offers “Best endeavours” to connect to the Tottenham Hale DEN over the next 10 years (Section 1.5.1.2 of Energy Strategy Part 1, page 26, 3<sup>rd</sup> from last para).</p> <p><b>Outstanding Action:</b> That the Council secures “best endeavours” from the applicant to connect all plots to connect to the Tottenham Hale DEN. As set out in the Strategies, the council should have 10 years to bring forward the scheme that the plot networks will connect to.</p> <p>2.3.4 The developer is proposing to pay a connection charge of £250,000 to connect to the DEN. If the development does not connect to the DEN within 10yrs, the payment will be made to the Carbon Offset Fund instead.</p> <p>2.3.5 It is noted that the £250,000 payment above i) does not reflect the full value of the connection to the developer and ii) the value of this payment could undermine the DEN’s commercial viability. The developer is assuming they can benefit from the DEN but is unable to pay a sufficient contribution to make the DEN viable. This issue has been considered by Senior Officers who are content that LBH remains committed to delivery of the DEN and that the reduced connection charges from this scheme will not affect its viability as LBH has several routes to find alternative</p>	
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funding to make up the shortfall (including the Heat Network Investment Project, a government grant scheme for DEN projects, and CIL). As such, the Carbon Management team are content that the DEN project remains likely and the proposed energy strategy is workable.

**Update:** This has been agreed and will be within legal documents. The Council will seek out funding to bring forward the Tottenham Hale DEN.

2.3.6 There is an expectation that schemes of the scale of this application would be set up in a way which is equivalent to a Heat Trust compliant scheme.

**Previous recommended Action:** Include an obligation for the heating arrangements on the scheme to meet the Heat Trust standard (or equivalent)

**Update:** This has been agreed and will be within legal documents.

2.3.7 The developer has designed Building 3 to connect to the DEN from the north (requiring the DEN to be routed through the red route) and proposes to install several portions of pipework that could be adopted by the DEN and left inactive including:

- a) Pipework in Station Road; and
- b) Pipework in Ferry Link

Building 3 should be redesigned to connect from the south in order to minimise costs to the DEN. The proposed pipework in Station Road should be redesigned to connect Building 3 to Buildings 1&2. This link should be owned by the developer rather than the DEN and be activated prior to occupation of the final building of Buildings 1, 2 and 3. The developer should provide details of the pipework they propose to install in Ferry Link and the proposed adoption process for approval.

**Updated Action:** The developer has agreed though obligated that prior to commencement of basement works in Buildings 1, 2 or 3, they will submit revised designs for connection of Building 3 and proposals for Ferry Link for approval by the Council.

2.3.8 There is a lack of detail on each Energy Centre in the submission.

**Previous recommended Action:** the details of each of the Energy Centres (taking account of the requirement for Ferry island Buildings 1-3 to have a single point of connection) should be secured through a condition for each site and each site plot should give more detail on the energy centres and future connectivity. Suggested Condition below:

Details of the boiler facilities and associated infrastructure, which will serve all the heat and hot water loads for all the units on the site. This shall be submitted to and approved in writing by the Local Planning Authority 3 months prior to any works commencing on site. The details shall include:

- a) location of the energy centre;
- b) specification of equipment and pipework;
- c) confirmation that the site wide heating and hot water network has been designed and shall be constructed following the CIBSE / ADE Heat Networks Code of Practise.
- d) flue arrangements;
- e) operation/management strategy;
- f) the method of how the facility and infrastructure shall be designed to allow for the future connection to any neighbouring heating network (including the proposed connectivity location, space for extra equipment, punch points and large enough route of the link); and
- g) the route from the Energy Centre to the red line boundary with installed pipe specification to serve all heat loads.

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

The boiler facility and infrastructure shall be carried out strictly in accordance with the details so approved, installed and operational prior to the first occupation of the development and shall be maintained as such thereafter. They will be

decommissioned upon connection the Tottenham Hal DEN.

**REASON:** To ensure the facility and associated infrastructure are provided and so that it is designed in a manner which allows for the future connection to a district system in line with London Plan policy 5.7 and local plan SP:04 and DM 22.

**Update:** This has been agreed and will be within legal documents.

## 2.4 Be Green

2.4.1 A reduction in regulated CO2 emissions of 37 tonnes per annum (3%) will be achieved through this third element of the energy hierarchy.

2.4.2 The plan is for the majority of the Proposed Development areas to be supplied by the DEN connection except for some of the non-domestic areas, which will be using an Air Source Heat Pump (ASHP) system in the form of a VRF. This goes against policy that expects that all of the development across the site should be heated through the community heating system. This approach should be reviewed.

2.4.4 **Previously Requested Action:** To remove the ASHPs on the site. And to commit that all non-dwelling development is connected to the community heating networks. Once this has been confirmed this should be conditioned to be delivered.

**Update:** The ASHP are only delivering a small heat load through a low carbon heat source. It has been agreed that efficient ASHP units are now accepted.

2.4.5 **Previously requested Action:** To increase the amount of Solar PV across the development and maximize opportunities throughout. Ensure that the Council policy SP:04 is delivered. Once this has been confirmed this should be conditioned to be delivered.

**Update:** It has been agreed that a report will be issued before each building commences to demonstrate maximum opportunities for Solar PV have been

delivered.

## 2.5 Offsetting

2.5.1 The domestic development does not achieve the required Zero Carbon Standard on site. It therefore should offset the remaining 525 tonnes of carbon

2.5.2 The non-domestic development does not achieve the 35% improvement over Building Regulation 2013. It should therefore offset the remaining 11 tonnes of carbon.

2.5.3 **Previously requested Action:** To offset the schemes carbon. At a cost of £1,800 per tonne (over 30 years).

**Update:** A contribution of £939,650 has been agreed and will be secured through legal documents.

## 3) Overheating Assessment

3.1 An Overheating Analysis using thermal dynamic modelling in line with CIBSE TM59 has been undertaken using London Weather Files (TM49) to assess the overheating risk within the conditioned areas of the building; its results demonstrate compliance under the DSY1 weather file for all plots. But all weather files should be used.

3.2 **Previously requested Action:** For the TM59 analysis to be redone and all weather files modelled, covering future years, and using high emissions scenarios for all sites. Appropriate mitigation should be designed in.

The developer will submit for approval an overheating model and report. The model will assess the overheating risk (using future weather temperature projections), and report will demonstrate how the risks have been mitigated and removed through design solutions. This assessment will use TM59 (for domestic) or TM52 (for non-domestic). Both models will be run using the

London Weather File TM49.

This should be submitted to and approved in writing by the Local Planning Authority prior to any works commencing on site and any measures shall be operational prior to the first occupation of the development hereby approved.

This report will include details of the design measures incorporated within the scheme (including details of the feasibility of using external solar shading and passive cooling and ventilation) to ensure adaptation to higher temperatures are addressed, and the units do not overheat. The report will include the following:

- Full listing (based on unit number relating to planning drawings) of units modelled and the overheating risk before measures are installed;
- The measures installed to reduce overheating risk:
  - the standard and the impact of the solar control glazing;
  - that all heating pipework is appropriately insulated
  - that passive cooling and ventilation features have been included
  - highlight the mitigation strategies to overcome any overheating risk
  - that there is space for pipe work and that this is designed in to the building to allow the retrofitting of cooling and ventilation equipment is needed.

Air Conditioning will not be supported unless exceptional justification is given.

Once approved the development shall be constructed in accordance with the details so approved, shall be maintained as such thereafter and no change there from shall take place without the prior written consent of the Local Planning Authority.

**REASON:** London Plan Policy 5.9 and local policy SP:04 and in the interest of adapting to climate change and to secure sustainable development.

**Update:** This has been agreed and will be within legal documents.

	<p><b>4) EIA</b></p> <p>4.1 The EIA is separated into chapters, some of which are commented on below:</p> <p><b>4.2 Ecology</b></p> <p>4.2.1 Tottenham Hale has been identified through this report as lacking in ecological value. Measures that could deliver increased ecological value have not been commented on. Design responses such as living walls and roofs have not be included. This is a missed opportunity.</p> <p>4.2.2 We believe that there is opportunity to incorporate a wider range of GI measures in addition to street trees and green roofs (together with ecological measures recommended within the Ecological report) reflecting the ambition of “greening the grey” of the Council. These include:</p> <ul style="list-style-type: none"> <li>- Working with areas of hard landscaping that could be redesigned into a greener courtyard or pocket parks;</li> <li>- where street trees are not feasible to install, consider creating rain gardens, planting shrubs and planters that provide forage for birds and insects as well as green walls and roofs;</li> <li>- elements of the SUDs system could be green engineered introducing water into the development; and</li> <li>- in some cases public access and biodiversity could be combined to allow for greater access to green spaces. Others should remain unlit and provide specific habitats to support biodiversity.</li> </ul> <p>4.2.3 Providing a high quality, natural greenspace that is linked to the development site by well-maintained green routes will allow for greater access to nature for the public, particularly beneficial for health and well-being as well as creating wildlife corridors.</p> <p>4.2.4 Hale Village (to the East of this site) has included living roofs on all its developments. This has brought a green link for insects and bird life into the area from the regional park. We should seek to continue this by the inclusion of living roofs and walls into this development. At present, the design of this scheme would</p>	
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create a barrier for ecological habits.

**4.2.5 Previous requested Action:** For the Applicant to review the opportunities for pocket parks, green planters, living walls and roofs on this scheme and include them through the design process. To enhance the benefits of the scheme and deliver a better Ecological outcome. Once this has been confirmed this should be conditioned to be delivered.

Update: This has been agreed and will be within legal documents.

4.2.6 The Ecological Appraisal makes several recommendations to improve and mitigate the developments impact on the local ecology. These include:

- The installation of bird brick boxes;
- Designing the lighting of the area to minimize the impact on the local bat population;
- Bat brick boxes to be installed; and
- Insect hotels and habitats to be designed into the scheme.

4.2.7 We welcome the more sustainable design of brick boxes over wooden boxes.

4.2.8 More information is needed so that this can be conditioned and delivered as at present there are no details on number location etc. Specifically:

- The number, and location of the bird brick boxes (or other) - including orientation and links to habitats that would be needed to support the bird species;
- Details on the bird brick box (or other) design and for what bird species would they serve;
- The lighting measures and ongoing management to reduce the impact on recorded bat populations;
- The number, and location of the bat brick boxes; and
- The number, and location of the insect hotels. Giving regard and access to the wider habits that would support this insect population.

**4.2.9 Previously requested Action:** For the applicant to address the issues set out in para. 4.2.8. Once this has been confirmed this should be conditioned to be delivered.

That prior to commencement on site details on the biodiversity benefits shall submitted to the local authority for approval. This will include the following:

- Details on the number, and location of the bird brick boxes (or other) - including orientation and links to habitats that would be needed to support the identified bird species;
- Details on the bird brick box (or other) design and for what bird species would they serve;
- The lighting measures and ongoing management to reduce the impact on recorded bat populations;
- The number, and location of the bat brick boxes;
- The location of native and natural green spaces designed for biodiversity benefit; and
- The number, and location of the insect hotels. Giving regard and access to the wider habits that would support this insect population.

This infrastructure should not be impacted by amenity uses and access will only be permitted for maintenance, repair or escape in an emergency.

This infrastructure shall then be carried out strictly in accordance with the details approved by the Council. And shall be maintained as such thereafter.

**Reason:** To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with regional policies 5.3, 5.9 and 5.11 of the London Plan (2011) and local policy SP:05 and SP:13.

Update: This has been agreed and will be within legal documents.

4.2.10 All the roof plans show that they include (Welbourne, the island sites, and Ashley Road West) or could include (Ashley Road East, the Island Sites) biodiverse roofs. We welcome the roofs that have them designed in on a lot of the roof space, and

ask the applicant to include Biodiverse Roofs on the buildings that currently do not. Alongside this the Council will need more details on the design of these roofs to ensure that maximize benefit is secured. This would include:

4.2.11 **Action:** The requirements in 4.2.10 should be conditioned.

That prior to commencement on site details on the living roof shall submitted to the local authority for approval. This will include the following:

- A roof(s) plan identifying where the living roofs will be located;
- Confirmation that the substrates depth range of between 100mm and 150mm across all the roof(s);
- Details on the diversity of substrate depths across the roof to provide contours of substrate. This could include substrate mounds in areas with the greatest structural support to provide a variation in habitat;
- Details on the diversity of substrate types and sizes;
- Details on bare areas of substrate to allow for self colonisation of local windblown seeds and invertebrates;
- Details on the range of native species of wildflowers and herbs planted to benefit native wildlife. The living roof will not rely on one species of plant life such as Sedum (which are not native);
- Details of the location of log piles / flat stones for invertebrates;

The living roof will not be used for amenity or sitting out space of any kind. Access will only be permitted for maintenance, repair or escape in an emergency.

The living roof (s) shall then be carried out strictly in accordance with the details approved by the Council. And shall be maintained as such thereafter.

**Reason:** To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with regional policies 5.3, 5.9 and 5.11 of the London Plan (2011) and local policy SP:05 and SP:13.

	<p>Update: This has been agreed and will be within legal documents.</p>																
<p>LBH Environmental Health (Noise)</p>	<p>I have read the Environmental Noise Survey (Ref. No: 18113-R02-C) and the Baseline Vibration Report (Ref. No: 18113-R03-B) dated 14th June 2018, authorised by Dilan Neumann and Andrew Long respectively of Sandy Consultants in Acoustics, Noise &amp; Vibration. Both reports along with the Noise ES - Chapter 10 of the Environmental examines and assesses the suitability of the site for residential use as well as the potential impact that noise and vibration will have on the existing sensitive receptors and future occupants of the proposed development.</p> <p>There are no adverse observation made in principle to this application however the following conditions shall apply;</p> <p>Internal Noise Levels within Residential Units</p> <p>All residential premises shall be designed in accordance with BS8233:2014 'Guidance on sound insulation and noise reduction for buildings' to meet the following noise levels;</p> <table border="0"> <tr> <td>Time</td> <td>Area</td> <td>Maximum Noise level</td> </tr> <tr> <td>Daytime Noise</td> <td>7am – 11pm</td> <td>Living rooms &amp; Bedrooms 35dB(A)</td> </tr> <tr> <td></td> <td>Dining Room/Area</td> <td>40dB(A)</td> </tr> <tr> <td></td> <td>Outdoor Amenity</td> <td>55dB(A)</td> </tr> <tr> <td>Night Time Noise</td> <td>11pm -7am</td> <td>Bedrooms 30dB(A)</td> </tr> </table> <p>With no individual events to exceed 45dB LAmax (measured with F time weighting) between 23.00hrs – 07.00hrs.</p> <p>A test shall be carried out prior to the discharge of this condition to show that the required noise levels have been met and the results submitted to the Local Planning Authority for approval.</p> <p>REASON: To ensure high quality residential development</p> <p>Building Services Plant Noise Condition</p>	Time	Area	Maximum Noise level	Daytime Noise	7am – 11pm	Living rooms & Bedrooms 35dB(A)		Dining Room/Area	40dB(A)		Outdoor Amenity	55dB(A)	Night Time Noise	11pm -7am	Bedrooms 30dB(A)	
Time	Area	Maximum Noise level															
Daytime Noise	7am – 11pm	Living rooms & Bedrooms 35dB(A)															
	Dining Room/Area	40dB(A)															
	Outdoor Amenity	55dB(A)															
Night Time Noise	11pm -7am	Bedrooms 30dB(A)															

Noise arising from the use of the building service plants and associated equipment shall;

- 1) Not increase the background noise level (LA90 15mins) when measured (LAeq 15mins) 1 metre external from the nearest residential receptor.
- 2) Not exceed the background noise level (LA90 15mins) when measured (LAeq 15mins) 1 metre external from the nearest commercial receptor.

All plant units shall be installed and maintained throughout the duration of their use in accordance to the above condition.

REASON: to ensure high quality residential development and protect the amenity of the locality

#### Vibration

Monitoring was undertaken in respect of potential vibration from the London Underground Victoria and the Northumberland Park Spur Lines. The results from the Baseline Vibration Report confirmed that the vibration dose value recorded, is below the low probability of adverse comment. Therefore with respect to this proposed development no mitigation measures are required for vibration.

#### Sound Insulation between Residential and Commercial Properties.

Prior to the commencement of the development, details of a sound insulation scheme to be installed between the commercial premises on the ground floor and residential premises on the first floor shall be submitted in writing to and for approval by the Local Planning Authority. The scheme shall be submitted following consultation with the Council's Noise Team about the end user. The scheme shall be installed as approved prior to any commercial occupation of the site and shall be maintained thereafter.

REASON: to protect the amenity of the locality.

#### Construction and Demolition

I have read the Framework Construction Environmental Management Plan produced by Quod, dated July 2018. Under section 8 - General Construction management there is

	<p>confirmation that noisy demolition and construction works will be undertaken within Haringey's permitted times as followings;</p> <p>Monday – Friday                      08.00 – 18.00hrs  Saturday                                      08.00 - 13.00hrs  Sundays &amp; Bank Holidays      No Noisy Works</p> <p>I am satisfied that the Environmental Control Measures documented under section 9.3 - Noise &amp; Vibration Measures will ensure that the best practical means as defined under section 72 of the Control of Pollution Act 1974 will be employed to minimise the emissions of noise and vibration generated on site.</p> <p>Advisory  To effectively protect the existing noise sensitive receptors from adverse levels of noise and vibration, the principal contractor shall be encouraged to apply for prior consent under section 61 of the Control of Pollution Act 1974 for this development.</p>	
<p>LBH  Transportation</p>	<p>The site consists of a number of development plots located in the Tottenham Hale Central area. These development plots are as follows:</p> <p>(1) Welbourne – this site is enclosed by Chesnut Road to its north, Monument Way to its south, Fairbanks Road to its west and Park View Road to its east. Monument Way forms part of the Transport for London Road Network (TLRN) whilst Park View Road and Chesnut Road are London Borough of Haringey (LBH) adopted highway. Fairbanks Road is a private road.</p> <p>(2) North Island – this site is bounded by The Hale, which forms its eastern and western boundaries, Station Road to its south and the existing Premier Inn Hotel on Station Road to its east. The Hale is part of the Transport for London Road Network (TLRN), whilst Station Road is LBH adopted highway.</p> <p>(3) Ferry Island – this site is bounded by Watermead Way to its north, Ferry Lane to its south, Station Road to its west and the existing Tottenham Bus Station to its east. Ferry Lane, Watermead Way and Station Road are LBH adopted highway.</p> <p>(4) Ashley Road West – the site is located at the corner of Hale Road (north side of Hale</p>	<p>Comments noted. Relevant conditions are contained in Appendix 1. Relevant S106 obligations noted in the Heads of Terms.</p>

Road) and Ashley Road (west side of Ashley Road).

(5) Ashley Road East – located on the east side of Ashley Road, with Watermead Way forming its southern and eastern boundaries. Ashley Road is LBH adopted highway.

#### Policy Context

The site sits within the Lee Valley Opportunity Area as defined in the London Plan. This area has the potential to deliver 21,000 new homes and 13,000 new jobs, in recognition of the transformative role of Crossrail 2 and other future transport interventions, in terms of improving connectivity and capacity to support the planned housing and employment growth.

#### London Plan Policies

##### Policy 2.13

The policy recognises the key role of an improved public transport offer, in terms of managing the increased travel demand generated by the intensification of an area. The policy identifies the need for improvements to the stations within the Lee Valley Opportunity Area. The Crossrail 2 proposal recognises Tottenham Hale as an important interchange station, providing connections to and from Central London, Stansted Airport and beyond, and identifies the need for new platform/s (at least one new platform) and station improvements to increase station capacity and enhance accessibility, and journey times.

##### Policy 6.1 & 6.2 – 6.14

The policy sets out the strategic approach to transport and encourages patterns of developments that reduce the need to travel, especially by private car; promotes improved capacity and accessibility of public transport, walking and cycling; promotes improvements to interchanges between different forms of transport, especially around rail and underground stations; supports measures that encourage a shift to sustainable modes and appropriate demand management; promotes greater use of low carbon technologies aimed at reducing carbon emissions from transport; and seek to promote walking through improving the public realm. Policies 6.2 to 6.14 sets out the Mayor's specific requirements for all modes and the approach that Local Authorities in London should take in assessing

major development proposals.

#### Haringey Local Policies

The Tottenham Hale Area Action Plan (AAP) 2017 identifies Tottenham Hale as an area for significant housing and employment growth and the area is expected to accommodate 5,000 new homes and 4,000 new jobs. This is a significant proportion of the overall growth for Tottenham as a whole. This housing and employment growth is predicated on the current and future access to public transport. The AAP identifies the role of Crossrail 2 in supporting this growth.

Policy AAP7 sets out the Council's approach to transport in the Tottenham growth areas. The policy identifies the need for improvements to pedestrian connectivity and permeability, improvements to the cycle network, road safety and highway network improvements, reduced car parking provision, and bus capacity and route enhancements. Essentially, the Tottenham AAP highlights the need for improvements and interventions covering all modes, including walking and cycling.

Policy DM31 promotes high-trip generating developments in areas of high public transport accessibility, where generated car travel can be minimised. The policy encourages walking and cycling and promotes improved pedestrian and cycle routes and links with public transport facilities.

Policy DM32 supports limited or no on-site car parking in areas of PTAL 4 and above, where a controlled parking zone (CPZ) exists or will be introduced prior to the occupation of the development.

#### Public Transport Access

All of the development plots within the masterplan site achieve a public transport accessibility level (PTAL) of 6a (with 0 being the worst and 6b being the best). There are some variances in the public transport options serving each development plot. Numerous bus routes serve the masterplan site. Access to bus services varies across the masterplan site but in general terms, the site has excellent access by bus. There are six (6) to 14 bus routes serving the individual development plots. The bus services in Tottenham Hale central include two (2) night buses, which run through Tottenham Hale Station. Thus, the site enjoys 24-hour access by bus.

All development plots are accessible from Tottenham Hale Station, which offers London Underground services via the Victoria Line, and national rail services. The Victoria Line provides London Underground services between Walthamstow Central and Brixton via Central London. Additionally, the Victoria Line is part of London's 24-hour tube network, which operates a 24-hour service on Friday and Saturday. The 24-hour tube network includes the Central Line, Jubilee Line, Northern Line and Piccadilly Line.

The Welbourne development plot benefits from access to two (2) rail/underground stations. The site is approximately 824m from Bruce Grove Station and approximately 345m from Tottenham Hale Station. Bruce Grove Station offers rail services between Cheshunt/Enfield Town and London Liverpool Street stations.

Existing Highway Network

The road network adjoining the site includes local and strategic roads. The responsibility for managing and maintaining these roads are detailed below:

- Monument Way – is part of the Transport for London Road Network (TLRN) (A10/A503) and is maintained by TfL;
- Chesnut Road – is part of the Local Road Network and is maintained by London Borough of Haringey (LBH);
- Park View Road – is part of the Local Road Network and is maintained by LBH;
- Hale Road – is part of the Local Road Network and is maintained by LBH;
- Ashley Road – is part of the Local Road Network and is maintained by LBH;
- The Hale – is part of the TLRN (A10/503) and is maintained by TfL;
- Station Road – is part of the Local Road Network and is maintained by LBH.

The above roads are subject to parking controls although they are not part of a unified Controlled Parking Zone (CPZ). Monument Way is subject to 'Red Route' restrictions in the form of double red lines, which prohibits parking at anytime. These double red lines continue into Park View Road where the parking restrictions change to double yellow lines, indicating a change in jurisdiction from TfL to LBH.

Park View Road is within a controlled parking Zone (CPZ) that operates Monday to Friday 8:30AM to 6:30PM and Event Days Monday to Friday 8AM to 8:30PM, Saturday, Sunday & Public Holidays Noon to 8PM.

Chesnut Road is not included in a CPZ and as such is unrestricted. Fairbanks Road is private and therefore does not form part of a Council-managed controlled parking zone (CPZ). However, parking restrictions are in place in Fairbanks Road, comprising of double yellow lines along the frontage of the Welbourne development plot. There are marked parking bays on the side opposite the site, which indicates that Fairbanks Road is part of an estate-parking scheme.

Ashley Road is not included in a CPZ but is subject to parking restrictions, consisting of double yellow and single yellow lines, which restricts parking and loading at certain times. There are no on-street parking spaces in Ashley Road, in the vicinity of the Ashley Road development plots.

Hale Road is not in a CPZ but is subject to parking restrictions, consisting mainly of double yellow lines prohibiting parking/loading at any time. There is an existing layby on the southern side of Hale Road, opposite the Ashley Road West site, which accommodates a limited number of parking spaces. Station Road is subject to double yellow lines, prohibiting parking at anytime.

The Hale is part of the TLRN and is subject to double red lines, which prohibits parking at anytime. East of its junction with Broad Lane, The Hale and Ferry Lane, become part of the local road network and are subject to double yellow lines, denoting no parking at anytime.

#### Cycle Network

The cycle network surrounding the masterplan site consists of a mixture of quiet cycle routes and routes on busy roads – both carriageway and off-carriageway routes. These are TfL-defined 'blue routes' that provide connections to Cycle Superhighway 1 (CS1) running north-south along the A10 (High Road). The CS1 route can be accessed to the west of the site.

The planned cycle route, which is one (1) of six (6) new cycle routes for London announced by the Mayor in January 2018, runs from Camden to Tottenham Hale. This route is due for completion by TfL in 2020/21. The Transport Assessment does not mention this future cycle infrastructure but it is understood that TfL is progressing the initial design of the scheme, in liaison with LBH highway officers. The final design will need to consider the

interface with the proposed Tottenham Hale Highway Improvement scheme.

It should be noted that the proposal seeks to deliver significant highway and public realm improvements through the Section 278 Agreement, including new routes through the site, which improves pedestrian and cycle permeability and improves linkages with the cycle routes on its periphery.

Additionally, the proposal will complement the cycle infrastructure improvements secured under recent planning consents such as, the extension of the contraflow cycle route in Ashley Road to Park View Road, and the introduction of a toucan crossing in Watermead Way to better align with the shared cycle and pedestrian space in Ferry Way.

#### Trip Generation and Impacts

The principles and methodologies applied for deriving the trip rates and assessing the residual impacts of the development on the highway network and public transport services were agreed with the Council as part of the pre-application process. This was presented in the Transport Assessment Scoping Report (TASR). 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.

There were initial concerns that the TRICS comparator sites used for deriving the trip rates are considerably smaller than the proposed residential component but having reviewed the selection criteria for TRICS sites, officers are satisfied with the trip generation methodology and its outcome. Moreover, the trip rates derived from the TRICS sites are broadly comparable with the typical trip rates for residential developments of the type proposed.

The trip generation is presented at Section 5 of the Transport Assessment. With the exception of the Ferry Island Retail Park, the extant uses are excluded from the baseline trip generation. The rationale for this exclusion is set out in the Transport Assessment. The rationale can be challenged but this exclusion does not seriously affect the reliability and the overall conclusions of the Transport Assessment. In fact, it adds to the robustness of the assessment and presents the worst-case residual impacts of the development.

The forecast trip generation and net trip generation of the proposed development are presented at Table 1 and Table 2 below.

Table 1: Proposed Development Trip Generation

Mode	AM Peak (0800 – 0900)			PM Peak (1700 – 1800)				Daily (0700 – 2200)		
	Arrive	Depart	Two-way	Arrive	Depart	Two-way		Arrive	Depart	Two-way
Car Driver	5	15	20	10	8	18	96	96	192	
Car Passenger		2	4	6	3	3	6	27	27	54
Bus/Coach	43	138	181	89	70	159	828	828	1,656	
National Rail	24	62	86	41	36	77	399	399	798	
London Underground	51	219	270	137	94	231	1,199	1,199	2,398	
Taxi	1	5	6	3	2	5	28	28	56	
Motorcycle	1	4	5	2	2	4	23	23	46	
Bicycle	7	22	29	14	11	25	131	131	262	
Walk	15	34	49	22	21	43	226	226	452	
Other	0	1	1	1	1	2	2	2	4	
<b>Total</b>	<b>149</b>	<b>504</b>	<b>653</b>	<b>322</b>	<b>248</b>	<b>570</b>	<b>2,959</b>	<b>2,959</b>	<b>5,918</b>	

Table 2: Forecast Development Net Trip Generation

Mode	AM Peak (0800 – 0900)			PM Peak (1700 – 1800)				Daily (0700 – 2200)		
	Arrive	Depart	Two-way	Arrive	Depart	Two-way		Arrive	Depart	Two-way
Car Driver	-8	-1	-9	-81	-70	-151	-770	-764	-1,534	
Car Passenger		2	4	6	3	3	6	27	27	54
Bus/Coach	43	138	181	89	70	159	828	828	1,656	
National Rail	24	62	86	41	36	77	399	399	798	
London Underground	51	219	270	137	94	231	1,199	1,199	2,398	
Taxi	1	5	6	3	2	5	28	28	56	
Motorcycle	1	4	5	2	2	4	23	23	46	
Bicycle	7	22	29	14	11	25	131	131	262	
Walk	15	34	49	22	21	43	226	226	452	
Other	0	1	1	1	1	2	2	2	4	
<b>Total</b>	<b>136</b>	<b>488</b>	<b>624</b>	<b>231</b>	<b>170</b>	<b>401</b>	<b>2,093</b>	<b>2,099</b>	<b>4,192</b>	

Additional to the trip generation and net trip generation for the proposed development, it was agreed that the Transport Assessment should include a cumulative impact assessment, which includes the following recent planning consents. The results of the cumulative assessment is presented at Table 3.

1. 1 Station Square (HYG/2016/3932);
2. Tottenham Hale Bus Station (HGY/2017/3649);
3. SW Plot Hale Village (HGY/2017/2005);
4. Cannon Factory and Ashley House (HGY/2016/4165);
5. Berol Yard (HGY/2017/2044);
6. Ashely Gardens (HGY/2017/2045);
7. Harris Gardens (HGY/2015/3096);
8. Hale Wharf (HGY/2016/1719);
9. Unit 10 (B&Q) (HGY/2013/1897);
10. Land North of Monument Way and South of Fairbanks Road (HGY/2016/2184);
11. Tottenham Hale Station (HGY/2013/2610);
12. Apex House (HGY/2015/2915).

#### Cumulative Impacts

The cumulative net trip generation presented at Table 3 shows an increase of 53 two-way and 21 two-way vehicle trips in the AM and PM peak periods, respectively. The net cumulative vehicle trip generation appears to be small but this is consistent with the type of developments that are coming forward in the area i.e. car-free developments. An uplift of 502 two-way trips in the AM and 428 two-way trips in the PM peak period is anticipated on London Underground services at Tottenham Hale Station. The anticipated cumulative impact for rail is 177 two-way AM and 156 two-way peak period trips. An additional demand of 642 two-way trips in the AM peak period and 314 two-way trips in the PM peak period is anticipated.

The additional rail and underground trips can be accommodated within the capacity of services through Tottenham Hale Station. The cumulative uplift in bus demand is likely to impact capacity on the bus routes with the heaviest demand.

Table 3: Cumulative Net Trip Generation

Mode	AM Peak (0800 – 0900)			PM Peak (1700 – 1800)			
	Arrive	Depart	Two-way	Arrive	Depart	Two-way	
Car Driver	-6	59	53	13	8	21	
Car Passenger		-16	1	-15	-6	-19	-15

Bus/Coach	365	277	642	168	146	314	
National Rail	57	119	177	91	66	156	
London Underground	122	379	502	265	164	428	
Taxi	25	16	41	8	7	15	
Motorcycle	2	4	6	3	2	5	
Bicycle	53	43	96	27	50	77	
Walk	577	309	886	206	227	433	
Other	2	6	8	4	2	6	
Total	1,181	1,214	2,395	778	652	1,425	

#### Highway Impacts

In terms of the trips on the highway network, the forecast trip generation for vehicles (car driver) is 20 (5 arrivals and 15 departures) two-way trips in the AM peak period and 18 (10 arrivals and 8 departures) two-way trips in PM peak period. The assessment finds that the proposal will reduce trips by car, with a forecasted reduction of 9 and 70 two-way vehicle trips in the AM and PM peak periods, respectively. This suggests that the residual effects of the development on the highway network will be minimal. Given the car-free nature of the site, this conclusion is accepted. It should be noted that the mode share for cars have been readjusted from 30% (Census 2011) to 5%, for the purpose of the assessment. Accordingly, the mode share for public transport and other modes were readjusted. In the case of buses, rail and underground the mode shares were increased.

#### Public Transport Impacts

The Transport Assessment considered the impact of the development on local public transport services, including bus services, London Underground and national rail. The public transport impact assessment takes a similar approach to the highway impact assessment i.e. 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.

The assessment looks at the impacts of the development on the Victoria Line services operating at Tottenham Hale Station. The anticipated additional trips on the Victoria Line services is 270 (51 arrivals and 219 departures) two-way trips in the AM peak period and 231 (137 arrivals and 94 departures) two-way trips during the PM peak period. In terms of the line capacity analysis, the findings show that the development will marginally increase

passenger demand at Tottenham Hale Station. The assessment shows that there is considerable capacity on the Victoria Line, on both the northbound and southbound services assessed. It should be noted that the assessment does not extend beyond Blackhorse Road and Seven Sisters stations where line capacities are likely to be significantly constrained during peak periods.

The assessment looked at gate capacity and predicts a small increase in passenger flows through the gates at Tottenham Hale Station. The predicted increase is insignificant and gives no cause for concern. There are planned changes for Tottenham Hale Station that will improve gate capacity. The assessment has not factored in these planned changes, which are expected to be implemented prior to operation of the development.

Turning to rail, the predicted development trips for national rail services are 86 (24 arrivals and 62 departures) two-way trips in the AM peak period and 77 (41 arrivals and 36 departures) two-way trips in the PM peak periods. The assessment shows that these additional trips would have minimal impacts on national rail services operating at Tottenham Hale Station. It is noted that Bruce Grove Station was not included in the public transport impact assessment. However, this exclusion does not affect the general conclusions of the assessment. Bruce Grove Station is expected to attract trips associated with the Welbourne site only and as such the additional trips through the station would be minimal.

The bus impact assessment shows that the development will generate an increased demand of 181 passengers (43 arrivals and 138 departures) and 159 (89 arrivals and 70 departures) in the AM and PM peaks, respectively. Upon querying the initial assessment, which apportioned the development bus trips equally across the bus routes, the applicant undertook a further bus patronage analysis. The results are presented at Table 4 below.

Table 4: Bus Patronage Analysis (Peak Hour Assessment)

Bus Route	AM		PM		TOTAL	TOTAL
	IN	OUT	IN	OUT		
230	2.6	8.2	10.8	5.3	4.2	9.5
192	9.3	28.3	37.6	18.4	14.9	33.2
76	13.1	45.9	59.0	29.3	22.0	51.4
123	5.8	13.4	19.2	9.0	8.4	17.4

149	2.3	8.2	10.5	5.2	3.9	9.1
279	2.0	6.1	8.1	4.0	3.2	7.2
349	2.3	8.2	10.5	5.2	3.9	9.1
W4	2.2	8.1	10.4	5.2	3.8	9.0
41	3.3	11.6	14.9	7.4	5.6	13.0
Total			181			159

The greatest impact of the development is on Bus Route 76, which attracts 59 additional two-way trips in the AM peak and 51 two-way trips in the PM peak period. Bus route 76 has a frequency of 8 buses per hour during peak periods and therefore it is not expected that the additional demand would greatly affect capacity on this route. Notwithstanding, TfL's response to the bus impact assessment is awaited.

The conclusions of the Transport Assessment are accepted i.e. the development will not create a significant level of additional public transport trips that will major consequences for local public transport services.

#### Access and Parking

##### Access

The proposal includes three (3) vehicle access points, which provides access to the proposed on-site Accessible car parking for the Welbourne site, Ashley Road East and Ashley Road West sites. The proposed access point for the Welbourne Centre site is located in Fairbanks Road. This access is acceptable in principle but the applicant should note that Fairbanks Road is not LBH adopted highway and therefore will require the approval of the owner of this road (Homes for Haringey).

The proposed access points for Ashley Road East and Ashley Road West are acceptable in principle but the details will need to be submitted to the Council for closer inspection and approval prior to implementation. The access points in Ashley Road will form part of the Section 278 agreement that encompasses a comprehensive package of highway improvements across the masterplan site. There are no vehicle accesses provided for the Ferry Island and North Island sites.

##### Car Parking

The development is essentially car-free with the exception of accessible car parking. This

approach is compliant with London Plan (policy 6.13) and Haringey local policies (DM32), which presumes in favour of such developments in highly accessible locations. In terms of the quantum of accessible parking, the development includes a total of 31 spaces for residential use and 2 no. for visitors to Welbourne. These spaces are distributed across the site.

- 10 no. accessible parking spaces are provided within the courtyard of the Welbourne site.
- 8 no. accessible courtyard spaces are provided on The Ashley Road West site and;
- 11 no. courtyard spaces are provided on the Ashley Road East site. This totals 29 no. courtyard Accessible car parking spaces.
- 2 no. Accessible parking spaces are provided on Station Road, for the use by occupiers of the North Island and Ferry Island sites.
- 2 no. Accessible parking spaces are provided in Chesnut Road for visitors to the Welbourne site.

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”.

It is assumed that the proposed Accessible parking is the maximum that can be accommodated on the site. The Transport Assessment does not explain the rationale for the level of Accessible parking provided but the constraints of the site are such that it precludes a greater number of Accessible parking spaces. The Council would welcome a greater number of Accessible parking spaces, in line the London Plan but accept that this is unviable. The Council has taken a pragmatic view and accepted a similar level of provision under recent planning consents in the area.

So taking into account recent planning consents, which establishes the principle for a lower provision than the London Plan, and the constraints of the site, the level of Accessible car parking is considered acceptable.

Car Club

The proposal includes on-street car club parking bays. The indicative locations of these spaces are shown on the accompanying Highways Layout Plan. Provision for car clubs are supported and will form a key element of travel planning for the proposed uses. The proposed locations are acceptable in principle but the final locations will be determined as part of the review of the existing CPZs.

#### Cycle Parking

The development includes 1,817 long-stay cycle parking spaces. These spaces are distributed across the masterplan, with each development site incorporating the required cycle provision. The Welbourne Centre includes 250 cycle parking spaces at the ground floor, for residential use, with access via the courtyard and the residential entrance on Chesnut Road.

813 long-stay cycle spaces are provided at shared basement level for Ferry Island Buildings 1 and 2. I note that the submission includes two options for the basement (Option A and Option B) but it appears that the total cycle parking provision for Ferry Buildings 1 and 2 will be included under either option. Access via the lifts in the residential cores of each building.

The long-stay cycle parking provision of 235 spaces for Ferry Island Building 3 (North Island) are provided at floors 2 to 5. These cycle parking spaces are not shown on the submitted plans. The applicant is therefore required to submit a plan showing the details of cycle parking spaces.

321 long-stay cycle parking spaces for Ashley Road East are provided on the ground floor and mezzanine levels. The long-stay cycle parking for Ashley Road West is located on the ground floor.

The Transport Assessment states that long-stay cycle parking will be provided for non-residential use but the details such as quantum and location have not been included as part of the submission. The applicant is therefore required to submit further details of the cycle parking for the non-residential uses, for approval prior to implementation of development.

Short-stay cycle parking of 182 spaces is provided for visitors, in the form of Sheffield stands. These cycle spaces are located within the public realm, in publicly accessible areas on the frontages of each of the development plots. The locations shown on the submitted documents are acceptable but details will need to be submitted for approval by the Council.

Supporting facilities such as lockers, showers and changing rooms for long-stay cyclists associated with the commercial use is encouraged. Consideration should be given to providing spaces for less conventional bicycle types, such as tricycles, cargo bicycles and bicycles with trailers.

Section 278, Section 247 and Section 38  
Section 278 & Section 38 Highways Act

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 improvement works was the subject of extensive engagement between the applicant and the Council and elements of these works are essential to enable the development; and therefore will need to be delivered in advance of the development. 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;
- 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;

The highway works described above will be delivered in seven (7) phases. Phases 1, 2 and 3 consists of enabling/ temporary works and has been secured by a Section 278 Agreement, which is to be signed imminently by both parties. The remaining phases (Phase 4, 5, 6 and 7) comprises the permanent highway works and will be secured by a separate Section 278 Agreement, which is to be agreed with the applicant following the grant of planning consent.

In accordance with the Highways Layout Plan there are areas of private land included as part of the proposed highway. As such, all areas of private land included as public highway will need to be dedicated through an agreement pursuant to Section 38 Highways Act 1990 or other appropriate legal provision. This generally relates to Station Road and Ashley Road.

#### Section 247 TCPA 1990

The proposal involves some sections of public highway that will need to be stopped-up pursuant to Section 247 of TCPA 1990 in order to include these areas within the development and to enable the realignment of Station Road as proposed. The principle of stopping-up the land and a plan of the indicative areas have been agreed with the Council. The applicant is aware that they will need to formally submit stopping-up applications to the Council. Additionally, there is land to be stopped-up in accordance with the Bus Station Planning Application (HGY/2017/3649). This land is within the demise of the bus station application site. Accordingly, a formal stopping-up application in relation to land identified for stopping-up as part of the Bus Station Planning Application will need to be submitted to the Council.

#### Delivery and Servicing

Delivery and servicing for the development consists of kerbside provisions only. A total of eight (8) no. on-street loading bays, each with the capacity to accommodate 1 or 2 HGVs at a time, will be provided across the site. The indicative locations for these loading bays are shown on the Highways Layout Plan. Two (2) no. loading bays are proposed for the Welbourne site. One (1) loading bay is located on Chesnut Road. A second loading bay is proposed in Fairbanks Road. As stated earlier, Fairbanks Road is a private road and as such, any modifications will require approval by the party responsible for its maintenance (Homes for Haringey).

Inset loading bays are provided in Ashley Road, on the frontages of the Ashley Road West and Ashley Road East sites. The loading bays form part of the Section 278 agreement. As these loading bays are within the scope of the Section 278, the details will need to be approved by the Council via the S.278 process.

The delivery and servicing provision for Ferry Island consists of a loading bay with capacity for two (2) HGVs, on Station Road. Additionally, two (2) inset loading bays are provided in the shared space in Ferry Way. The nature of a shared space for pedestrians and cyclists would suggest that vehicle access on Ferry Way will be controlled and limited to delivery and waste collection vehicles only. The details of these arrangements will need to be set out in a Delivery and Servicing Plan.

The North Island site will be serviced from an inset loading bay, to be situated on The Hale frontage of the development. The Hale is part of the TLRN and therefore the proposed layby requires TfL's approval.

An assessment of the delivery and servicing trips was undertaken. The forecast servicing and delivery trip generation is 179 vehicles daily (07:00-18:00). The forecasted trip generation for the AM and PM peak periods are 14 and 7, respectively. 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. The assessment looks at 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.

It is noted that the proposed inset loading bays in Ashley Road and The Hale will take up part of the existing footway. The proposal compensates for this by creating additional footway space at the back of the inset loading bays. This is welcomed, providing that the footway space at the back of the loading bays will be offered up for adoption pursuant to Section 38 of Highways Act of 1980.

A draft Delivery and Servicing Plan is also included in the Transport Assessment. This document outlines some of the measures that the applicant intends to deploy to minimise the impacts of delivery and servicing activities on the adjoining network. The final targets

and measures will be developed when the occupiers of the commercial uses are known. The Council therefore requires that a full Delivery and Servicing Plan that formalises the arrangements for delivery and servicing be secured by Section 106 agreement.

#### Construction Logistics Plan (CLP)

The application is accompanied by an Outline Construction Logistics Plan (CLP), which is appended to the Transport Assessment. The Outline CLP sets out the measures that the applicant intends to deploy to minimise the traffic and environmental impacts of construction activities. A 4-year (49 months) construction programme is assumed. The applicant states that this is the worst-case scenario for construction of the development. Completion is anticipated for the first quarter of 2023.

The CLP should be secured for the site by condition and should include measures to limit the impact of the development during the construction period, and include information on i) booking systems; ii) consolidated or re-timed trips iii) secure off-street loading and drop off facilities. Further, the applicant should note that the Council is progressing a Construction Logistics Plan for the Tottenham Area, with the expectation that the CLP for development in the area will adopt the measures contained therein.

#### Travel Plan

The submission includes two separate Travel Plans for the residential and commercial elements of the proposed development. The measures included in these Travel Plans are aimed at promoting the use of sustainable modes of transport over the use of private cars, in order to minimise the generated car trips and resulting congestion on the adjoining highway network. The following measures are set out in the Travel Plans:

#### Travel Plan Measures:

1. Appointment of a Travel Plan Coordinator.
2. Provision of Travel Pack including pre-loaded Oyster Card.
3. Provision of Travel Awareness Initiatives such as Personalised Travel Plan for new household, cycle training, community website, free or discounted cycle equipment and community travel events.

4. Provision of public transport information
5. Liaison on public transport improvements
6. Introduction of a car club (number of spaces and scheme to be agreed as part of the travel plan);
7. Provision of cycle stands for larger bicycles.

The measures contained in the Travel Plans are generally acceptable but will need to be tailored to the occupiers of the development, and submitted to the Council for approval within six (6) months of first occupation of the development. The travel plans should be secured and monitored through a Section 106 agreement.

#### Summary

The site is in a highly accessible location and lends itself to car-free development, as promoted by London Plan Policy 6.13 and Haringey Local Policy DM32. The level of car parking reflects the excellent access to public transport. The level of Accessible car parking is acceptable, taking into consideration the constraints of the site and similar planning consents in the area. The level of cycle parking accords with the London Plan but the details of location and how these are allocated to the proposed uses will need to be submitted for approval prior to implementation of development.

The highway and public transport impact assessments, including the cumulative assessment, concludes that the residual public transportation and highway effects of the development will not be severe.

The Council welcomes the pedestrian, cycle permeability improvements, and the improved linkages with the wider networks. Additionally, the applicant is committed to delivering a comprehensive package of highway improvements, secured by two separate Section 278 Agreements. The first Section 278 Agreement concerns Phase 1, 2 and 3, comprising of the enabling works package. The remaining phases consisting of the permanent works will be implemented as part of Phases 4, 5, 6 and 7, which will be secured through a second Section 278 Agreement.

The proposal is considered to be acceptable in transport terms, subject to the planning obligations below:

Section 106 Obligations

	<p>1. <b>Car-free Development</b> The owner is required to enter into a Section 106 Agreement to ensure that the residential units are defined as “car-free” and therefore no residents therein will be entitled to apply for a residents parking permit under the terms of the relevant Traffic Management Order (TMO), controlling on-street parking in the vicinity of the development. The applicant is required to contribute the sum of £4,000 (four thousand pounds) towards the amendment of the Traffic Management Order for this purpose.</p> <p>2. <b>Controlled Parking Zone Consultation</b> The owner is required to contribute by way of a Section 106 agreement a sum of £40,000 (forty thousand pounds) towards the 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, which are currently not covered by a control parking zone or currently included in a CPZ but would be impacted unduly by the potential parking demand generated by the development.</p> <p>REASON: To mitigate the impact of the residual parking demand generated by the proposed development on the adjoining road.</p> <p>3. <b>Car Park Management Plan (CPMP)</b> Prior to first occupation of the development the owner is required to submit a Car Park Management Plan (CPMP) to the Local Authority for approval in writing. The plan shall describe how parking will be allocated for the proposed uses and distributed and managed on the site, and the location of electric vehicle charging points. Parking is to be allocated in accordance with the following priority:</p> <ol style="list-style-type: none"><li>1. 29 no. Accessible (courtyard) parking spaces for the wheelchair accessible residential units, equating to 3% of the total number of units proposed.</li><li>2. A minimum of 4 no. Accessible (on-street) car parking spaces for use by occupiers/visitors of the residential and non-residential uses.</li></ol> <p>REASON: To ensure suitable arrangements for car parking as part of the development in accordance with London Plan requirements.</p>	
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	<p>4. Car Club  Prior to first occupation of the development hereby approved the provision of designated parking spaces for a car club shall be made in accordance with detailed drawings to be submitted to and approved in writing by the Local Planning Authority and such drawings to show the size, position, method of delineation and signing of such spaces.  REASON: To reduce the demand for private car ownership, protect residents amenity and minimise traffic congestion and air pollution.</p> <p>5. Car Club Membership  The developer is required to offer one (1) eligible resident of each household two (2) years free member to local Car Club. Evidence of this must be submitted to the Local Planning Authority.  REASON: To reduce the demand for private car ownership.</p> <p>6. Travel Plan (Residential)  Within six (6) months of first occupation of the proposed new residential development a Travel Plan for the approved residential uses shall have been submitted to and approved by the Local Planning Authority detailing means of conveying information for new occupiers and techniques for advising residents of sustainable travel options. The Travel Plan shall then be implemented in accordance with a timetable of implementation, monitoring and review to be agreed in writing by the Local Planning Authority, we will require the following measure to be included as part of the travel plan in order to maximise the use of public transport:</p> <ul style="list-style-type: none"> <li>a) The developer must appoint a Travel Plan Co-ordinator, working in collaboration with the Estate Management Team, to monitor the travel plan initiatives annually for a minimum period of 10 years.</li> <li>b) Provision of welcome induction packs containing public transport and cycling/walking information such as available bus/rail/tube services, map and time-tables, to every new resident.</li> <li>c) Establish or operate a car club scheme, which includes the provision of 3 car club bays, two years' free membership for all residents and £50.00 (fifty pounds in credit) per year for the first 2 years.</li> <li>d) We will also like to see Travel Information Terminals erected at strategic points within the development, which provides real time travel information</li> <li>e) The travel plan must include specific measures to achieve the mode share targets</li> </ul>	
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by the 10th year.

f) The applicants are required to pay a sum of, £2,000 (two thousand pounds) per year per travel plan for monitoring of the travel plan initiatives.

REASON: To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements.

#### 7. Travel Plan (Workplace)

A Workplace Travel Plan must be secured by S.106 Agreement. The Travel Plan will need to include the following measures, in order to maximise the use of sustainable transport:

a. The applicant submits a Works place Travel Plan for the commercial aspect of the Development and appoints a travel plan coordinator who must work in collaboration with the Facility Management Team to monitor the travel plan initiatives annually for a period of 10 years and must include the following measures:

b. Provision of welcome residential induction packs containing public transport and cycling/walking information, available bus/rail/tube services, map and timetables to all new residents, travel pack to be approved by the Councils transportation planning team.

c. The applicant will be required to provide, showers lockers and changing room facility for the work place element of the development.

d. Establishment or operate a car club scheme, which includes the provision of 3 car club bays with two (2) years' free membership for all commercial units.

e. The developer is required to pay a sum of £2,000 (two thousand pounds) per year per travel plan for monitoring of the travel plan for a period of 10 years. This must be secured by S.106 agreement.

REASON: To promote travel by sustainable modes of transport in line with the London Plan, Local Plan Policy SP7 and the Development Management DMPD Policy DM 32.

#### 8. Construction Management Plan/Construction Logistics Plan

The applicant/ Developer is required to submit a Construction Management Plan (CMP) and Construction Logistics Plan (CLP) for the local authority's approval 3 months (three months) prior to construction work commencing on site. The Plans should provide details on how construction work (Inc. demolition) would be undertaken in a manner that disruption to traffic and pedestrians on Monument Way, Hale Road, Watermead Way, The Hale, Ferry Road and the roads surrounding the site is minimised. It is also requested that construction vehicle movements should be carefully planned and coordinated to avoid the AM and PM peak periods, the plans must take into consideration other sites that are being developed locally and where possible coordinate movements to and implement also measures to safeguard and maintain the operation of the local highway network. A contribution of £40,000 (forty thousand pounds) towards the cost of coordinating and monitoring CLPs in the area is sought.

REASON: To ensure that the impacts of the development proposal on the local highways network are minimised during construction.

9. Section 278 Highways Act 1980

The owner shall be required to enter into agreement with the Highway Authority under Section 278 of the Highways Act to pay for the highway works defined as Phases 4, 5, 6 and 7, which includes if required, but not limited to, footway improvement works, access to the Highway, measures for street furniture relocation, carriageway markings, and access and visibility safety requirements. Unavoidable works required to be undertaken by Statutory Services will not be included in the Highway Works Estimate or Payment.

REASON: To implement the proposed highways works to facilitate future access to the development site.

10. Stopping Up under Section 247 TCPA 1990

The owner is required to submit an application to the Local Authority, for a Stopping Order under Section 247 of the Town and Country Planning Act 1990, in regards to those areas of highway identified as necessary to be stopped up, in order to enable implementation of the development in accordance with the planning permission.

REASON: To ensure development in accordance with the planning permission and to ensure that suitable alternative highway is provided for public use.

Planning Conditions

	<p>11. Accessible Parking</p> <p>Before the use hereby permitted first commences, all car parking spaces for use by the vehicle of a Accessible holder shall be marked and retained permanently. REASON: In order to ensure that a reasonable number of parking spaces are located conveniently for use by people with disabilities.</p> <p>12. Electric Charging Points</p> <p>The applicant is required to provide a total of 20% of the total number of car parking spaces with active electric charging points, with a further 20% passive provision for future conversion. REASON: To comply with the Further Alteration to the London Plan and the London, and reduce carbon emission in line with the Council's Local Plan Policy SP4.</p> <p>13. Cycle Parking</p> <p>Prior to implementation, full details of the cycle (including the type, dimensions and method of security and access), in line with the London Cycle Design Standards (LCDS) shall be submitted in writing to and approved by the Local Planning Authority. REASON: To promote sustainable transport.</p> <p>14. Construction Worker Travel Plan (CWTP)</p> <p>The applicant is required to submit a Construction Worker Travel Plan for the Local Authorities approval prior to the commencement of construction. The CWTP shall detail the measures to encourage sustainable travel to the site during the construction phase, including but the provision of cycle parking and measures to increase workers' and visitors' awareness of alternatives travel options. The CWTP will require the introduction of a Travel Co-ordinator who will oversee the plan, including travel surveys, reviews and monitoring, to ensure that targets and measures achieved. REASON: In the interest of minimising the impacts of car travel during the construction phase of the development.</p> <p>15. Delivery and Servicing Plan</p> <p>The applicant/operator is required to submit a Service and Delivery Plan (SDP) for the local authority's approval prior to occupancy of the proposed development. The Plans should</p>	
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	<p>provide details on how servicing and deliveries will take place. It is also requested that servicing and deliveries should be carefully planned and co-ordinated to avoid the AM and PM peak periods.</p> <p>REASON: To reduce traffic and congestion on the transportation and highways network.</p>	
<p>LBH Local Lead Flood Authority (LLFA)</p>	<p>I've met with Andrew Prior, of Whitby Wood, on 2 occasions to discuss the proposed drainage for the development at Tottenham Hale (Argent) sites.</p> <p>Infiltration across the proposed developments is not feasible, the proposal is to discharge to public sewer which is the least favoured option in the SuDS hierarchy, discharge will be at a restricted rate through a control device, this needs to be confirmed.</p> <p>The main area of concern is the site constraints which has an impact on the discharge rates, the existing sewer is shallow, this restricts the level of underground storage available to work with.</p> <p>The proposed discharge rates are based on 3 x Greenfield as per our guidance and was agreed in principal.</p> <p>The proposed SuDS to be included across the developments include Blue &amp; 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. It was noted at our meeting that further investigation could be undertaken to include rain gardens this needs to be progressed and where feasible should be included.</p> <p>At this stage rainwater re-use is proposed as irrigation to the tree pits, this could include rain gardens if they can be included in the schemes.</p> <p>Further discussion with the Highway's team will need to be undertaken as there is potential that surface water runoff due to site levels will drain to the Highway which in itself may not be acceptable.</p> <p>As this develops a detailed management maintenance plan will need to be in place for the</p>	<p>Comments noted. Relevant conditions contained in Appendix 1.</p>

	lifetime of the SuDS development to ensure they remain functioning.	
LBH Nature Conservation Officer	<p>Please see some comments below in regards to major application HGY/2018/2223.</p> <p>Soft landscaping</p> <p>Although the designs have an increase in the number of trees (from the removal of 59 during construction), opportunities seem to have been missed for wider enhancement of the public realm with green features. I would like to see an increase in the planting scheme that would reflect the opportunities for enhancing biodiversity through features such as increased shrubs, hedges and green walls, along with the potential for ecological SUDS features. The design is predominantly hard landscaping. The opportunity should be taken to provide a more green approach to the public spaces, particularly considering the close proximity of Down Lane Park.</p> <p>Green Roofs</p> <p>I don't think the Pavilion has been designed with a green roof in mind? I think this would provide a good opportunity to enhance the site</p> <p>Conditions would need to be set around areas including:</p> <ul style="list-style-type: none"> <li>• Biodiversity Enhancement Plan detailing how soft landscaping, green roofs and other features will be incorporated into the development to enhance biodiversity</li> <li>• Green Roof design and management plan</li> <li>• Additional ecological survey of area of the College that has not been covered</li> <li>• Demolition Management Plan that details timing of vegetation removal (outside of bird nesting season), situation if bats are found roosting on site and invasive species treatment and removal (e.g. Japanese Knotweed)</li> <li>• Lighting strategy particularly for areas associated with potential bat activity</li> </ul>	Comment noted. Relevant conditions contained in Appendix 1.
LBH Tree Officer	Condition 4 (Soft landscaping) for tree planting should refer to the following;	Comment noted. Relevant conditions contained in

	<p>All trees to be supplied for this contract must be produced in accordance with the following Industry best practice:</p> <ul style="list-style-type: none"> <li>• BS 8545:2014 Trees: from nursery to independence in the landscape (Sec 8: Nursery production &amp; procurement, Sec 9: handling &amp; storage and Annex D &amp; E.</li> </ul> <p>All trees to be supplied for this contract must be produced by working in accordance with UK plant bio security policies, to minimise the introduction of harmful pests and diseases through imported tree stock.</p> <p>I have included email correspondence with argent on this previously:</p> <p>No objection to the proposed removal of the 10 trees on LBH land. The new planting plan will provide more than adequate replacement tree cover.</p> <p>However, I have two points to make, firstly, please revise the planting strategy to include alternative species to Corylus colurna and Tilia Cordata, there are already enough of these in the area.</p> <p>Secondly, can you please confirm if the proposed locations for new trees as shown on drawing TH-IS-PR-001-LA-TOT494-(90)-5001-P, have been identified after reviewing existing stat plans and surveying the existing underground services. I ask this because when the gyratory (Broad Lane section) was changed, the original planting proposals showed many more trees than were actually planted.</p>	Appendix 1.
LBH Conservation Officer	<p>Sites:</p> <p>Land comprising 5 plots located respectively at Welbourne, North Island, Ferry Island, Ashley Road West and Ashley Road East along Monument Way, Ferry Lane, Hale Road, The Hale, Station Road, Ashley Road, Park View Road and Watermead Way in Tottenham Hale District Centre:</p> <p>There are no designated heritage assets within the development sites.  The development sites at Ashley Road east and Ashley Road West are adjacent to locally listed building at No. 25 Ashley Road (Berol House) (former Eagle Pencil Works).  The North Island site includes the former White Hart public house, which is identified in the applicants Heritage Statement as a non-designated heritage asset.</p>	Comments noted. Assessment of Heritage impacts are contained in Section 6.9.

The development sites are gathered at the very heart of a low-rise industrial area, which was, originally a substantial development of Victorian terraced housing erected with the arrival of the railway and the laying out of new roads. Historic OS map regression shows that the area was partially transformed into industrial sites from the turn of the century onwards thus losing its original consistency with the urban grain and residential uses of the adjoining residential areas which survive to the east side of the High Road. Extensive bomb damage from the WW period further contributed to the erosion of the original residential character of the area which was redeveloped from the post war period onwards largely in the form of housing blocks near the Welbourne plot and to the southeast of the plots.

The development sites are located in the settings of a number of Conservation Areas along Tottenham High Road as well as being in the setting of a number of statutorily listed buildings.

Policy:

The proposed application should be assessed according to the NPPF (especially paragraphs 184, 192, 194, 197, 199, 200), according to the London Plan and Haringey Development Plan policies SP11, SP12, DM1, DM5, DM7 and DM9. Urban design; strategic views; historic environment policies are relevant to this application.

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 comprising residential units, retail space, health centre, office space, leisure, 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.

Comments:

When considering this proposal in isolation, the proposed buildings appear incongruous

with the existing urban grain, form, scale, massing, height and architectural language of the surrounding area and not respond well to the characteristic urban and architectural features of the adjacent conservation areas. However, one should also consider the changing context of the area (including all the allocated sites within the District centre framework – DCF) many of which already have planning permission, and include 20+ storey buildings. The proposed development would better integrate with this emerging context.

Within the existing context, the proposed 15 storey high Ashley Road West building to be erected just beside the locally listed, 3 storey high Berol House, and the proposed 19 and 13 storey buildings on the neighbouring Ashley Road West site would dominate the small scale locally listed building with their mass, bulk and height and would obscure it. 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. The development proposals should be considered within this high-rise emerging context, where the impact of the proposed development would not be so pronounced.

As per Historic England's advice, the exceptional heights of the proposed building, with a 38-storey tower and with an average height of 16 storeys, creates a zone of visual influence that is very wide and will reach across neighbourhood and borough boundaries. These visual impacts should be comprehensively assessed through AVR assessment of views into and out of the affected Conservation Areas and I am aware the applicants AVR has been considered by QRP.

The potential cross - borough impact of the proposed developments on the setting of a number of heritage assets should be thoroughly assessed.

Taking into account all of the above, the 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.