

GREATER LONDON AUTHORITY
Development, Enterprise and Environment

James Hughes
Principal Planning Officer - Development Management
Haringey Council
River Park House
255 High Road
Wood Green
London N22 8HQ

Our ref: GLA/4442/01/MJ
Your ref: HGY/2018/2223
Date: 5 November 2018

Dear Mr Hughes

**Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008
Tottenham Hale Centre
Local Planning Authority reference: HGY/2018/2223**

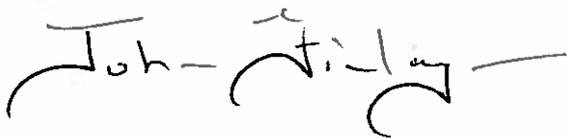
I refer to the copy of the above planning application, which was received from you on 30 July 2018. On 5 November 2018, the Mayor considered a report on this proposal, reference GLA/4442/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that the application does not yet comply with the London Plan, for the reasons set out in paragraph 101 of the above-mentioned report; however, the possible remedies set out in that paragraph could address these deficiencies.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Alex Lloyd,
Tel: 020 3054 6706, Email: alexlloyd@tfl.gov.uk.

Yours sincerely,

A handwritten signature in black ink that reads "John Finlayson". The signature is written in a cursive style with a horizontal line extending to the right.

John Finlayson
Head of Development Management

cc Joanna McCartney, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Lucinda Turner, TfL
Matthew Sherwood, Quod, Ingeni Building, 17 Broadwick Street, London W1F 0DE

Tottenham Hale Centre

in the London Borough of Haringey

planning application no. HGY/2018/2223

Strategic planning application stage 1 referral

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

The proposal

A full application for a mixed-use development in buildings of up to 37 storeys, with 1,030 residential units, up to 4,306 sq.m. of retail, up to 2,288 sq.m. of leisure, up to 5,137 sq.m. of office, a 1,643 sq.m. health centre, new public spaces, and highways works.

The applicant

The applicant is **TH DM Limited**, and the architects are **AHMM, Alison Brooks, Pollard Thomas Edwards, Ruff, Grant Associates**, and **Adams & Sutherland**.

Strategic issues

Principle of development: The principle of residential, town centre uses, and a health centre, as part of a high density mixed-use development on this under-utilised site is strongly supported in line with the London Plan, the Upper Lee Valley OAPF, and the draft London Plan. Further details on the relocation/retention strategy for existing occupiers should be provided.

Affordable housing: 25%, made up of 35% social rent and 65% intermediate (London Living Rent and shared ownership), (improved from 100% shared ownership at submission) together with a new health centre, public realm, and infrastructure relocation. This would contribute to 40% affordable housing as part of a portfolio approach for Tottenham Hale. Financial viability is undergoing robust assessment to ensure that the maximum contribution is secured in accordance with the London Plan, the Mayor's Affordable Housing and Viability SPG, and the draft London Plan. As the development will be built out over some years, updated early stage reviews and mid-term reviews are likely to be required. The applicant's position that no late stage review should be required due to the 25% 'betterment' offer requires further discussion.

Urban design: The proposals are of a high quality, with negligible impacts on strategic views, and no harm to designated heritage assets.

Transport: Further information is required, including trip generation; Blue Badge parking; and shared surfaces. Bus route mitigation may be required.

Climate change: Further information on the energy strategy and surface water drainage.

Recommendation

That Haringey Council be advised that the application does not yet comply with the London Plan and the draft London Plan, for the reasons set out in paragraph 101 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 30 July 2018, the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. On 19 October 2018, the Mayor of London received further documents from Haringey Council proposing amendments to the submitted scheme. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 (“the Order 2008”), the Mayor has to provide the Council with a statement setting out whether he considers that the application complies with the London Plan and the draft London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.

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

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

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

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.

5 The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

6 The 2.17 hectare site comprises land to the west of Tottenham Hale rail and underground station. In April 2017, the Council formed a Strategic Development Partnership (SDP) with the applicant to progress the development, which includes the following five plots:

- Welbourne. This plot is currently vacant and hoarded, having previously been occupied by the Welbourne Community Centre, which was demolished some years ago. It is located on the western side of Tottenham Hale, bounded by Chesnut Road to the north; Park View Road to the east, with Down Lane Park beyond; Monument Way to the south; and Fairbanks Road to the west. Two storey residential development is located to the west and four/five storey residential development to the north and south, including a public house to the north. A public green space lies to the west, across Fairbanks Road, with Down Lane Park to the east across Park View Road. The site to the west on Monument Way has planning consent (LPA Ref: HGY/2016/2184, not referable to the Mayor) for 54 affordable rent residential units in 4-5 storey blocks.
- Ferry Island. This plot comprises a single large building split into 3 retail units, surrounded by car parking and landscaping, with vehicular access from Station Road. The plot also incorporates part of the existing Tottenham Hale bus station. A planning application

(submitted by the applicant) for the reconfiguration of the bus station was approved in May 2018 (GLA ref: D&P/4533/02; LPA ref: HGY/2017/3649), which will reduce the footprint of the existing bus station, allowing this development to come forward. The plot is bounded by the 9 storey Premier Inn hotel, the consented 22 storey One Station Square development (GLA Ref: D&P/4063/02; LPA ref. HGY/2016/3932) and Hale Road to the north; The Hale and Ferry Lane to the west/south; and the remainder of the bus station to the east. Beyond Ferry Lane to the south is the existing Tottenham Hale Retail Park.

- North Island. This plot is occupied by a 3 storey former public house in office/residential use, and a small built structure and hardstanding in use as a car wash. This plot is bound by The Hale to the south and west, beyond which is four storey residential development; an existing retail use to the north; and the Premier Inn hotel to the east. Station Road forms the south-eastern side of the plot.
- Ashley Road West. A petrol station currently occupies the plot, with a row of 2 storey terraced houses to the west; Ashley House service yard to the north; the One Station Square site to the south, beyond Hale Road; and the Ashley Road East plot to the east, beyond Ashley Road.
- Ashley Road East. This plot is occupied by a private college in a 3 storey building; a warehouse with first floor office accommodation; former warehouses in use as Styx bar and music venue; and parking and open storage areas. To the north of the plot lies Berol House and its associated yard to the rear, which has consent for the National College of Digital Skills (NCDS) and commercial and residential uses in buildings of up to 14 storeys (GLA Ref: D&P/4336/02; LPA Ref: HGY/2017/2044); to the west is Ashley Road, beyond which is the Ashley Road West plot; and to the west and south is Watermead Way, beyond which is Tottenham Hale bus station.

7 The site lies within a potential District Centre, as identified in the Tottenham Area Action Plan (July 2017). The site is also within the Tottenham Housing Zone and the Upper Lee Valley Opportunity Area.

8 The nearest sections of Transport for London Road Network (TLRN) are Monument Way and The Hale, which are adjacent to the site. The nearest section of the Strategic Road Network (SRN) is the A1010 High Road, which is approximately 1 kilometre to the north-west of the site. The site is located to the west of Tottenham Hale interchange, which includes the bus station (7 routes) and the rail/underground station, providing access to services between London Liverpool Street and Essex/Hertfordshire, as well as the Lea Valley line to Stratford and the Victoria line. A taxi rank is also located to the north-west of the station entrance. Due to the aforementioned public transport connections, the site achieves an excellent public transport accessibility level (PTAL) of 6a, (where 1 represents the lowest accessibility level and 6b the highest).

Details of the proposal

9 In April 2017, Haringey Council formed a Strategic Development Partnership (SDP) with the applicant to progress the development of these five plots. Both parties hold key landholdings and the SDP facilitates a joined-up approach to the design and delivery of homes, town centre uses, and new public realm.

10 As described above, the existing Tottenham Hale bus station will be reconfigured as part of a separate planning permission, which will include a reduction in its footprint.

11 All existing buildings and structures will be demolished, and new buildings constructed comprising up to 104,053 sq.m. of floorspace. The application allows for the space within the

Ferry Island plot basement to be used as either ancillary residential/storage/plant floorspace (Option A), or a cinema/flexible retail floorspace (Option B), therefore two floorspace scenarios are proposed. In Option B, the overall basement area and therefore the total floorspace is larger. Two sets of application drawings are provided for Ferry Island to show the alternative options.

12 Within Options A and B, it is proposed that flexible uses of non-residential floorspace are applied for in order to give flexibility for future letting of the floorspace, as set out below:

Option A Land Use	Min Area (sq.m. GIA)	Max Area (sq.m. GIA)
Residential (Use Class C3)	97,645 (1,030 units)	
Retail (Use Class A1 – A4)	Up to 3,505	
Leisure (Use Class D2)	Up to 1,167	
Office (Use Class B1(a))	831	4,336
Health Centre (Use Class D1)	1,643	
Total	103,623	

Option B Land Use	Min Area (sq.m. GIA)	Max Area (sq.m. GIA)
Residential (Use Class C3)	97,274 (1,030 units)	
Retail (Use Class A1 – A4)	Up to 4,306	
Leisure (Use Class D2)	Up to 2,288	
Office (Use Class B1(a))	831	5,137
Health Centre (Use Class D1)	1,643	
Total	104,053	

13 The location and massing of the proposals is shown below. On the Welbourne plot (Pollard Thomas Edwards), a mixed-use building is proposed comprising 131 residential units (51 social rent and 80 London Living Rent) and 265 sq.m. of flexible retail (Use Class A1-A4)/office (Use Class B1(a)) accommodation, alongside a 1,643 sq.m. health centre. The building comprises of a 16 storey block on Park View Road, a 7 storey wing on Monument Way, a 6 storey wing on Chesnut Road, and a 4 storey element facing Fairbanks Road, set around a landscaped podium providing residents’ shared amenity and play space.

14 On the Ferry Island plot (AHMM), Building 1 (37 and 19 storeys, with a 7 storey link) and Building 2 (13 and 7 storeys) are mixed-use, providing 482 residential units (market) and flexible retail (Use Class A1-A4), office (Use Class B1(a)) and leisure (Use Class D2) accommodation. As explained above, floorspace Option B for Ferry Island incorporates a cinema in the basement shared between both buildings, with associated facilities at ground and mezzanine level. In floorspace Option A, 615 sq.m. of flexible retail/office floorspace is proposed in Building 1; and 136 sq.m. of flexible retail/office floorspace and 332 sq.m. of flexible retail/office/leisure in Building 2. In floorspace Option B, 295 sq.m. of flexible retail/office floorspace and 1,002 sq.m. of flexible retail/office/leisure floorspace is proposed in Building 1; and 136 sq.m. of flexible retail/office floorspace and 450 sq.m. of flexible retail/office/leisure in Building 2. Building 1 incorporates a double height link providing a

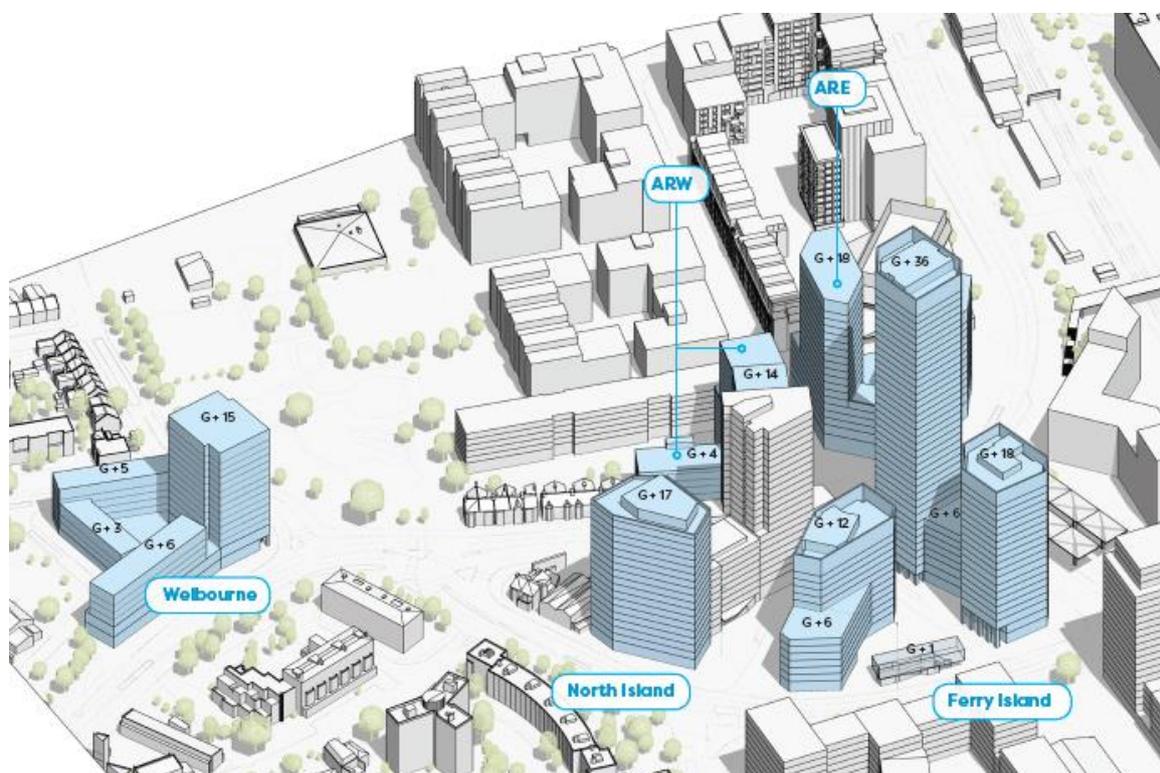
pedestrian connection between the bus station and the proposed Ferry Square; and Building 2 has a single storey route through the building to Station Road. A two storey pavilion building is proposed on the southern side of the proposed Ferry Square, comprising 249 sq.m. of flexible retail/office floorspace.

15 On the North Island plot (AHMM), Building 3 (18 storeys) is mixed-use, providing 136 residential units (80 shared ownership and 56 market) and 317 sq.m. of flexible retail (Use Class A1-A4), office (Use Class B1(a)) and leisure (Use Class D2) accommodation. A ground level external amenity space, incorporating children’s playspace, is located to the north of the building.

16 The Ashley Road West plot (Pollard Thomas Edwards) comprises a mixed-use building (15, 7 and 5 storeys) providing 98 residential units (70 market and 28 shared ownership) and 522 sq.m. of flexible retail (Use Class A1-A4)/office (Use Class B1(a)) accommodation.

17 The Ashley Road East plot (Allison Brooks) comprises a mixed-use building (19 and 13 storeys, with a 5 storey link, around a landscaped podium providing residents’ shared amenity space) providing 183 residential units (all market) and flexible retail (Use Class A1-A4)/office (Use Class B1(a))/leisure (Use Class D2), with 551 sq.m. of flexible retail/office, 519 sq.m. of flexible retail/office/leisure floorspace, and 831 sq.m. of dedicated office floorspace. The building fronts a new public open space on the corner of Watermead Way and Ashley Road (Watermead Place), with flexible use units on the northern side of the building fronting the NCDS site.

18 Within the site, Station Road will be realigned so that its intersection with The Hale is moved to the south-east. Works to the public highway will come forward via a Section 278 Agreement.



Case history

19 A number of pre-application meetings have been held with the applicant and Council officers to discuss the proposals. The proposals have generally been supported as of a high design quality, subject to confirmation of affordable housing.

Strategic planning issues and relevant policies and guidance

20 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is made up of Haringey's Strategic Policies DPD (2013, with alterations 2017), the Development Management DPD (2017), the Site Allocations DPD (2017), the Tottenham Area Action Plan (July 2017) and the 2016 London Plan (Consolidated with Alterations since 2011).

21 The following are also relevant material considerations:

- The National Planning Policy Framework 2018 and National Planning Practice Guidance.
- The draft London Plan 2017 and the Mayor's Minor Suggested Changes (August 2018), which should be taken into account on the basis explained in the NPPF.
- In August 2017, the Mayor published his Affordable Housing and Viability Supplementary Planning Guidance. This must now be read subject to the decision in *R(McCarthy & Stone) v. Mayor of London*.
- Upper Lee Valley Opportunity Area Planning Framework (ULV OAPF) (July 2013).
- Tottenham District Centre Framework (DCF, December 2015).

22 The relevant issues and corresponding policies are as follows:

- Opportunity Areas *London Plan; draft London Plan*
- Employment *London Plan; draft London Plan*
- Housing *London Plan; draft London Plan; Housing SPG; Housing Strategy*
- Affordable housing *London Plan; draft London Plan; Housing SPG; Housing Strategy; Affordable Housing and Viability SPG*
- Urban design *London Plan; draft London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Strategic views *London Plan; draft London Plan; London View Management Framework SPG*
- Historic environment *London Plan; draft London Plan*
- Inclusive design *London Plan; draft London Plan; Accessible London: achieving an inclusive environment SPG*
- Transport *London Plan; draft London Plan; Transport Strategy; Land for Transport & Industry SPG*
- Climate change *London Plan; draft London Plan; Sustainable Design and Construction SPG; Environment Strategy*

Principle of development

Residential

23 The site lies within the Upper Lee Valley Opportunity Area, as identified in London Plan Policy 2.13 and Table A1.1, and the Upper Lee Valley Opportunity Area Planning Framework

(OAPF), which states that the Opportunity Area is capable of accommodating at least 20,100 homes. The draft London Plan identifies the Opportunity Area for 21,000 new homes.

24 London Plan Policy 3.3 'Increasing Housing Supply' recognises the pressing need for new homes in London and Table 3.1 gives an annual monitoring target of 1,502 new homes per year in Haringey between 2015 and 2025. Policy H1 'Increasing Housing Supply' and Table 4.1 of the draft London Plan sets Haringey an increased annualised average housing completion target of 1,958 units per year between 2019/20 and 2028/29. The site is also located within the Tottenham Housing Zone, which has a target for approximately 2,000 new homes.

25 The Tottenham Area Action Plan identifies the Ferry Island and North Island plots as part of site TH4 Station Square West, including 297 residential units; the Ashley Road West and Ashley Road East plots as part of TH5 Station Square North, including 213 residential units; and the Welbourne plot as part of TH10 Welbourne Centre and Monument Way, including 298 residential units.

26 The provision of 1,030 residential units as part of a mixed-use scheme is strongly supported in line with these policies.

Employment, town centre uses, and social infrastructure

27 London Plan Policy 2.13 and Table A1.1, and the Upper Lee Valley OAPF, identify that the Opportunity Area has an indicative employment capacity of 15,000 up to 2031. The draft London Plan identifies the Opportunity Area for 13,000 new jobs.

28 London Plan Policies 2.15 'Town Centres', 4.7 'Retail and town centres', 4.8 'Supporting a successful and diverse retail sector' and supplementary planning guidance 'Town Centres' support town centres as the main focus for commercial development and intensification, including residential development, which is reflected in draft London Plan Policies SD6, SD7, SD8, SD9 and E9. Policy HC6 of the draft London Plan also seeks to support the growth and diversification of the night-time economy. London Plan Policies 3.16 and 3.17, and draft London Plan Policies S1 and S2, support the provision of health infrastructure.

29 The Tottenham AAP identifies the site as within a potential District Centre, with new District Centre uses at ground/first floor, and residential and employment uses above. The Tottenham AAP also identifies the Ferry Island and North Island plots as part of site allocation TH4 Station Square West, including 5,200 sq.m. of town centre uses; the Ashley Road West and Ashley Road East plots as part of TH5 Station Square North, including 7,300 sq.m. of town centre uses; and the Welbourne plot as part of TH10 Welbourne Centre and Monument Way, including 2,300 sq.m. of 'other' uses.

30 The existing site is currently occupied by approximately 3,500 sq.m. of non-residential floorspace, with some yard and car parking space. Within this, retail space occupies 952 sq.m.; the private college 872 sq.m.; and 575 sq.m. as the Styx music venue, which is a meanwhile use with temporary permission granted for 2 years to November 2018. The applicant should provide detailed information on the business occupiers of all existing floorspace, and a relocation/retention strategy.

31 The application proposes 5,978-6,780 sq.m. of town centre uses, depending on whether Option A or B is implemented. As set out under 'details of proposal' above, much of the space proposed is flexible in response to a rapidly changing and challenging retail market, but also in recognition of the challenges of creating a new town centre. The proposals include up to 4,306

sq.m. of retail space; up to 2,288 sq.m. of leisure space (potentially including a cinema); up to 5,137 sq.m. of office space; and the 1,643 sq.m. health centre.

32 The application is accompanied by a Retail Strategy, which takes account of the Tottenham AAP and the Tottenham DCF objectives, as well as existing and proposed non-residential uses in the vicinity and more widely. The applicant’s aspiration is for a range of uses, from national multiple convenience stores, local cafes, creative arts facilities, all-day restaurant operators, amenity uses, and has demonstrable experience of successfully achieving this elsewhere. Food and beverage and leisure users are targeted for the Ferry and North Island plots, focused around a new civic space (Ferry Square) at the centre of the new district town centre. The office space is targeted at creative/SME-type occupiers, and it is recognised that market rates in this location are relatively affordable.

33 The applicants’ Environmental Statement identifies a need for additional GP services as a result of the proposals, with no surplus capacity currently existing locally. The proposal includes provision of a new 1,643 sq.m. health centre on the Welbourne plot with capacity to accommodate up to 10 GPs, and other additional healthcare services, which has been developed in consultation with Public Health England. The proposed health centre would therefore meet the demand generated by the development as well as providing significant additional capacity for the local area, which is supported. This health centre provision should be appropriately secured as part of any planning permission.

34 In terms of quantum, the AAP site allocations TH4, TH5, and TH10 give an indicative capacity of 14,800 sq.m. of town centre and non-residential uses. Taking account of the existing hotel of 3,730 sq.m. and 420 sq.m. of town centre uses consented on the One Station Square site, and noting that further areas of land in the site allocations fall outside of the application site, the proposals for 5,978-6,780 sq.m. of town centre uses are broadly in line.

35 The proposals potentially include a good spread of non-residential uses, which will provide good levels of active use to the public realm; and while the drivers for flexible uses in the application are recognised, the Council may wish to secure minimum and maximum requirements on each use class, in particular for retail and office uses.

Summary

36 The principle to include residential, town centre uses, and a health centre, as part of a high density mixed-use development on this under-utilised Opportunity Area site is strongly supported in line with the London Plan, the Upper Lee Valley OAPF, and the draft London Plan.

Housing

37 The table below shows the current proposed residential mix and tenures:

	Social Rent	London Living Rent	Shared ownership	Market	Total
Studio	0	0	16	60	76
1bed	10	26	34	350	420
2bed	20	53	50	330	453
3bed	21	1	8	51	81
Total	51	80	108	791	1,030
25% (hab rm)					

Affordable housing

38 London Plan Policy 3.12 'Negotiating Affordable Housing' seeks to secure the maximum reasonable amount of affordable housing. Policy H5 'Delivering affordable housing' of the draft London Plan and the Mayor's Affordable Housing and Viability SPG set a strategic target of 50% affordable housing. Policy H6 'Threshold approach to applications' identifies a minimum threshold of 35% (by habitable room) affordable housing, whereby applications providing that level of affordable housing, with an appropriate tenure split, without public subsidy, meeting other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor, as well as investigating grant funding, can follow the 'fast track route' set out in the SPG. This states that applicants are not required to submit a viability assessment or be subject to a late stage viability review, but would be subject to an early stage viability review if an agreed level of progress on implementation has not been reached after two years of permission being granted. For phased developments that are likely to be built out over some years, the SPG and the draft London Plan indicate early, mid-term, and late stage review mechanisms are appropriate. In any event, the use of late stage review is consistent with the London Plan and is required under draft London Plan Policy H6.

39 The Mayor's Affordable Housing and Viability SPG and the draft London Plan identify a threshold for the fast track route of 50% affordable housing for schemes on public land, which is also included in the draft London Plan. This recognises the potential for development on surplus public sector land to make a higher contribution to affordable housing delivery than private land. This threshold applies to the Welbourne plot.

40 Policy H7 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG sets out a preferred tenure split of at least 30% low cost rent, with London Affordable Rent as the default level of rent, at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined in partnership with the local planning authority and the GLA.

41 The applicant states that the residential units on the Ferry Island plot could come forward as either market sale or market rent units. Policy H13 'Build to Rent' of the draft London Plan (and Policy 3.8 of the London Plan) recognises the contribution of Build to Rent in addressing housing needs and increasing delivery, as well as the distinct economics of this tenure. The draft London Plan and the Mayor's Affordable Housing and Viability SPG set out the requirements for this tenure, which would need to be secured in a section 106 agreement, including a robust covenant of 15 years (apart from any affordable units, which are secured in perpetuity), and a clawback mechanism. Incorporation of Build to Rent would offer an alternative tenure appropriate to this location and would be supported, subject to viability considerations.

42 The scheme proposes 25% affordable housing in the form of social rent, London Living Rent, and shared ownership units, which are spread across the site on the Welbourne, Ashley Road West, and North Island plots. The proposal does not therefore meet the requirements for the fast track route. It is noted that 100% of the Welbourne plot units will be affordable, reflecting that the plot is public land. Overall, this represents an affordable tenure split of 35% low cost rent, 65% intermediate (by habitable room), which meets the tenure requirements of the draft London Plan and the Mayor's Affordable Housing and Viability SPG. It is also noted that the Tottenham AAP identifies intermediate tenure as the priority in this location, due to the existing concentration of social housing. At submission of the application, the affordable units were proposed to be shared ownership only; however, the applicant has subsequently submitted a revised mix to introduce a range of affordable tenures, including social rent units, which is welcomed. Under the amended proposals, the Council would retain ownership of all 131 homes

on the Welbourne site, 51 of which would be for social rent and 80 at London Living Rent levels. It is also noted the proposals also include a health centre, as well as new public spaces and routes, and the applicant is also delivering the amendments to the bus station, road infrastructure and services relocation.

43 The applicant's Financial Viability Assessment (FVA) is undergoing robust assessment working in partnership with the applicant, the Council and its independent assessors, to ensure that the maximum contribution is secured in accordance with Policies 3.11 and 3.12 of the London Plan, the Mayor's Affordable Housing and Viability SPG, and Policies H5 and H6 of the draft London Plan. The FVA concludes that no affordable housing could be viably supported; however, the applicant states that the 25% offer is premised on a reasonable level of value growth that it considers to be achievable, taking account of the target of 40% (by unit) across Tottenham Hale through a portfolio approach, which is proposed in the Tottenham AAP and is supported by the Council. This means that a group of sites can work together to meet the overall objectives of the AAP, with different sites delivering different mixes or tenures of units, community uses and other infrastructure, which together make a policy compliant outcome in the area, with 40% affordable housing across all sites. The sites included in the portfolio approach, and their contribution to the 40% affordable housing requirement, are set out below:

Site	Market	S/O	LLR	DMR	Afford' Rent	Total	Portfolio approach running total (% units)
Sites with planning permission							
Cannon Factory, Notting Hill Genesis (Ref: D&P/4177/02)	113	119	0	0	33	265	38%
One Station Square, Berkeley Square (Ref: D&P/4063/02)	11	117	0	0	0	128	
Hale Wharf, Muse (Ref: D&P/1239a/03)	328	143	0	0	34	505	
Ashley Gardens & Berol Yard, Berkeley Square (Ref: D&P/4335 & 4336/02)	419	101	0	8	33	561	
Hale Tower, Anthology (Ref: D&P/4180/02)	236	43	0	0	0	279	
Monument Way, Newlon (not referable)	0	0	0	0	54	54	
This application							
Tottenham Hale Centre	791	108	80	0	51(social)	1030	33%
Forthcoming applications							
Additional affordable housing on Ashley Gardens (GLA Ref: D&P/4335/02) arising from Argent Related receipts to the Council	-113	53	60	0	0	0	37%
Ashley Park, Notting Hill Genesis application	53	22	0	0	14	89	37%
Ashley Road North Depot site	90			90		180	40%

44 It is noted that the achievement of 40% across Tottenham Hale would rely on future undetermined applications. The Council states that Ashley Park is expected to be submitted in early 2019, and an early feasibility report for Ashley Road North Depot indicates 50% affordable housing is deliverable, with plans underway to relocate the current depot, with costs for depot relocation borne elsewhere, which significantly benefits the viability for this scheme.

45 The affordability of intermediate units must be in accordance with the Mayor's qualifying income levels, as set out in the Mayor's Affordable Housing and Viability SPG, and the London Plan Annual Monitoring Report, including a range of income thresholds. The applicant states that it is in early discussion with a Registered Provider (RP), which will identify affordability requirements, including a range of household incomes below the GLA maximum income cap. Affordability thresholds for all tenures must be secured in the section 106 agreement attached to any permission. A draft of the section 106 agreement should be agreed with GLA officers prior to any Stage II referral.

46 The requirement for an early stage viability review will be triggered if an agreed level of progress on implementation is not made within two years of any permission being granted, in accordance with Policy H6 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG. The applicant states that the 25% 'betterment' affordable housing offer, above that supported in the FVA, justifies its position that no late stage review should be required; however, this requires further discussion. As the development is likely to be built out over some years, updated early stage reviews and mid-term reviews are likely to be required.

Housing choice

47 London Plan Policy 3.8 'Housing Choice' encourages a choice of housing based on local needs, while affordable family housing is stated as a strategic priority. Policy H12 'Housing size mix' of the draft London Plan states that boroughs should not set prescriptive dwelling size mix requirements for market and intermediate homes; and for low cost rent, boroughs should provide guidance on the size of units required to ensure housing meets identified needs.

48 The Mayor's Housing SPG states that town centre housing at higher densities close to public transport facilities is especially suitable for one and two person households. The Tottenham AAP states that *"the delivery of one and two bed units will be prioritised within close proximity to the Station, to support the developing District Centre"* and *"higher levels of family housing will be concentrated on sites less proximate to the centre, in areas with good access to open space and social infrastructure provision."*

49 The proposed market units provide mainly one and two bed units; however, the post-submission changes to mix and tenure include a reconfiguration of the internal layouts to create more family-sized, three-bed units, and fewer one-bed units. Over 40% of the social rent units will be provided as family-sized units, and the smaller unit proportions in the social rent and intermediate tenures are aligned with the Council's Housing Strategy targets. The choice of units is supported, subject to the conclusion of viability discussions.

Children's play space

50 London Plan Policy 3.6 and Policy S4 of the draft London Plan seek to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child, with further detail in the Mayor's 'Shaping Neighbourhoods: Play and Informal Recreation' SPG.

51 The GLA child yield calculator provides an estimate of 133 children, requiring 1,330 sq.m, of play space. Each plot provides all under-fives playspace on site within podium/terraced

levels, with some over-provision compared to the GLA calculator requirement for 700 sq.m. of under-fives space. Although Down Lane Park, with extensive facilities for younger and older children, is in close proximity, given the need to cross busy roads to reach these facilities, 100 sq.m. of the 380 sq.m. of 5–11 year old playspace required is proposed as part of the Ferry Island and North Island buildings, with incidental playspace in Ferry Square through playable landscape features. The remaining 280 sq.m. of 5–11 year olds playspace, plus 250 sq.m. of over-twelves child's playspace will be accommodated within existing play facilities in the area, with financial contributions proposed for improvements to existing provision. The application documents provide indicative designs and facilities for on-site provision. The play space strategy represents a reasonable offer given the location of the site and is supported, subject to confirmation of financial contributions.

Urban design

52 The applicant has engaged extensively on design matters in pre-application discussions, and has responded positively to officers' comments, which is welcomed. The post-submission amendments to the scheme are also positive in terms of urban design. The strategy of engaging a team of high quality architects, working together to deliver distinct buildings and spaces that relate well to each other as part of a coherent masterplan, is strongly supported.

Site layout

53 The proposals represent a radical improvement to the current site condition, which is dominated by road traffic and large retail sheds with surface-level car parking, a poor pedestrian and cycling environment, and difficult connections. Reflecting the aspirations of the Tottenham AAP and DCF, the proposals will create the heart of the new town centre. The proposals also respond to the challenging restrictions of underground services, including Victoria line tunnels, which have informed the location of open spaces, as well as building massing. A new well-defined north-south route will be established through the Ferry Island plot, linking to adjacent plots and providing a focus for commercial and retail uses, with a new civic space (Ferry Square) at the intersection with a new east-west route connecting to the bus station.

54 The east-west route passes through Buildings 1 and 2 on the Ferry Island site, linking to the bus station with areas to the west. The link through Building 1 is double height, with a mezzanine bridge link passing over it, and is of generous width, although it is proposed to be accessed by automatic glazed doors as a result of wind modelling that identified unacceptable impacts with an open route. While this is accepted, and the fully glazed route allows a clear visual connection to the bus station, public access will need to be appropriately secured, and detailed design will need to ensure the route has sufficient prominence.

55 Further public spaces will be created at the corner of Ashley Road and Watermead Way (Watermead Place), at the northern boundary of the site adjacent to the proposed College (College Square), and at the south end of Station Road (Station Place). The provision of landscaped public space, mostly south-facing, is important in responding to the heavily trafficked surrounding roads, helping to mitigate impacts. Ferry Square is protected to a certain degree from these impacts by the inclusion of a two storey pavilion on the south side, while allowing good levels of sunlight to reach the Square.

56 These public spaces and routes are well-activated (with improved levels of active use through post-submission amendments) with a variety of non-residential uses, a good spread of residential entrances, including maisonettes on the Welbourne plot, and with blank servicing frontages minimised. Considering the proposed flexible use of much of the non-residential use, it is recommended that the Council secures control over the extent of opaque glazing

treatments. While the inclusion of basements is challenging due to underground services, the introduction of a basement to the Ferry Island plot during pre-application discussions has much improved the level of active ground floor uses, and in particular the relationship with the bus station.

Residential quality

57 London Plan Policy 3.5, and Policy D4 of the draft London Plan set out housing quality, space, and amenity standards, with further detail provided in the Mayor's Housing SPG. The application documents include a schedule to audit the scheme against the quality and design standards as set out in the SPG, which is welcomed. The proposals generally comply with these requirements, which is welcomed, with some areas of partial compliance, as discussed below.

58 The environmental impacts of surrounding busy roads and the bus station raise some air quality and noise challenges; however, this is not unusual in a central urban location, and it is noted that the proposed changes to the bus station layout, and the removal of existing drive-through food retail outlets with significant car parking, will reduce traffic impacts on the local area. Furthermore, the most sensitive residential uses are located above ground floor level, apart from duplex units on the Welbourne plot that are away from these roads. The applicant's noise study finds that the specification of facade sound insulation, including double/triple glazing, would result in negligible effects for the proposed residences, which should be appropriately secured through detailed design. The air quality study finds that the development will be air quality neutral and suitable for residential use. The public realm and landscape strategy also seeks to mitigate against traffic impacts through planting.

59 The residents' private amenity strategy has been influenced by daylight/sunlight and wind studies; as well as air quality and noise impacts arising from roads and the bus station. Residential dwellings have been located above ground floor where adjacent to busy roads and above first floor level in some cases. The general approach is to use either recessed balconies due to proximity to roads or the bus station, or provide 'oversized' apartments for those units with no (or limited) external amenity space. This approach is supplemented through a balustrade strategy, including solid and perforated balustrades, and railings, in response to environmental impacts and privacy considerations. The use of oversized units is supported, in line with the Housing SPG, which states that in exceptional circumstances, where site constraints make it impossible to provide private open space for all dwellings, a proportion of dwellings may be provided with additional internal living space equivalent to the area of the private open space requirement. It is also recognised that all residents have access to shared external amenity spaces within their building.

60 Six floors of Building 2 on Ferry Island have 11 units per core and three floors of the eastern block of Ashley Road East have 9 units per core. The Mayor's Housing SPG states that each core should be accessible to generally no more than 8 units on each floor. However, Building 2 provides natural light to these corridors, which are also a generous 2 metres wide, and the core is placed centrally, with 5/6 units either side. It is noted that all other floors have less than 8 units per core, and as the proposals otherwise provide good residential quality, this is accepted in this case.

61 The number of single aspect units have been minimised to 35%, with none that are directly north-facing. Some units have an orientation slightly less than 45 degrees of north; however, these represent less than 5% of the total units, and all have two-beds or less, which is acceptable considering that overall this represent a marginal departure from the standard.

62 The applicant's daylight and sunlight analysis finds that the vast majority of the new units within the proposal will receive very good levels of daylight, achieving an overall average daylight factor (ADF) compliance of 88% in the baseline scenario, and 83% in a cumulative context.

63 Separation distances between habitable rooms in residential units generally achieve a minimum of 18 metres, as suggested by the Housing SPG. Some units facing into the podium courtyard of the Ashley Road East building have lesser distances; however, layouts and window openings are positioned to allow an acceptable level of privacy to be achieved.

64 Overall, the residential quality achieved by the scheme is good.

Density

65 London Plan Policy 3.4 and draft London Plan Policy D6 'Optimising housing density' seek to optimise the potential of sites, having regard to local context, design principles, public transport accessibility, and capacity of existing and future transport services. The higher the density of a development, the greater the level of design scrutiny that is required, particularly qualitative aspects of the development design, as described in draft London Plan Policies D4 'Housing quality and standards' and D2 'Delivering good design'.

66 The proposal would have a density of approximately 1,490 habitable rooms, or 590 units, per hectare. This is above the guidance ranges in Table 3.2 of the London Plan (up to 1,100 habitable rooms or 405 units per hectare, based on the site's PTAL of 6a in a 'central' setting) and above the thresholds set out within Policy D6 of the draft London Plan, and therefore requires a greater level of design scrutiny. This has taken place through the Council's Quality Review Panel, which has considered the scheme on a number of occasions during pre-application development, and a series of pre-application meetings with GLA design officers. Furthermore, the location in an emerging town centre adjacent to excellent transport connections, within an Opportunity Area and a Housing Zone, supports higher densities. The proposals are of a high design quality, with good residential quality, and provide an essential 'critical mass' in place-making terms for the new town centre. The proposed density is therefore supported in this case.

Height, massing and appearance

67 London Plan Policy 7.7, and draft London Plan D8 'Tall buildings' set out the Mayor's requirements for tall buildings. The Upper Lee Valley OAPF and the Tottenham AAP identify the site as a suitable location for tall buildings as part of an emerging town centre.

68 The proposals include 37, 19, and 13 storey blocks on the Ferry Island plot; 19 and 13 storey blocks on the Ashley Road East plot; a 19 storey block on the North Island plot; a 16 storey block on the Welbourne plot; and a 15 storey block on the Ashley Road West plot. The tall buildings are generally of a slender form, with appropriate separation distances, allowing sunlight to reach key spaces. The strategy to locate the three tallest buildings adjacent to the station, and stepping down towards the west and the north, is supported. The relocation of the tallest building further north during pre-application discussions relates better to the emerging context, and allows greater levels of sunlight to reach Ferry Square. The heights and massing relate well to recently permitted nearby schemes in Tottenham Hale, including the adjacent 22 storey One Station Square; buildings of up to 16 storeys as part of the Ashley Road South Masterplan site to the north; and the 33 storey Gateway Tower to the east.

69 More widely, the applicant has provided a robust Townscape and Visual Impact Assessment (TVIA), which demonstrates how the proposals will be visible from surrounding

areas. The buildings generally appear as slender and distinct elements, and sit well within the consented schemes in Tottenham Hale.

70 The Ashley Road West plot is adjacent to potential future development sites to the north and west, which results in blank elevations on these boundaries. The proposal to enhance these blank elevations with temporary artwork is strongly supported.

71 The applicant's wind testing indicates that during the windiest season, wind effects would range from negligible to moderate beneficial at all locations across the site due to the implementation of landscaping and wind mitigation measures designed into the scheme. In terms of pedestrian comfort, wind conditions are expected to be suitable for pedestrians walking through and around the site.

72 Considering the high design quality of the proposals, and the location of the site in an emerging town centre adjacent to excellent transport connections, within an Opportunity Area and a Housing Zone, the height and massing of the proposals is supported.

73 The use of brick as the main material provides a robust and contextual appearance, while different tones introduce a suitable degree of variation. The architectural appearance of the proposal is supported. The final appearance will be subject to the quality of the materials and detailing, which should be appropriately secured by the Council. The Council should consider architect retention clauses as supported by draft London Plan Policy D2.

Strategic views

74 London Plan Policy 7.12 and Policy HC4 of the draft London Plan state that development should not harm strategic views, with further detail provided in the Mayor's London View Management Framework (LVMF) SPG.

75 The applicant's Townscape and Visual Impact Assessment (TVIA) includes an accurate visual representation of the potential impact on view 'London Panorama: Alexandra Palace' from Assessment Point 1A.2. While visible in the view, the proposal sits some distance east of the 'Landmark Viewing Corridor' and 'Wider Setting Consultation Area', well away from the Protected Vista of St. Paul's Cathedral. The proposals will form part of the emerging cluster of tall buildings at Tottenham Hale, and the impact would be negligible, with no harm to the setting of St. Paul's Cathedral.

Historic environment

76 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "*have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*" and in relation to conservation areas, special attention must be paid to "*the desirability of preserving or enhancing the character or appearance of that area*". London Plan Policy 7.8 'Heritage assets and archaeology' states that development should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate, which is reflected in Policy HC1 'Heritage conservation and growth' of the draft London Plan. These policies apply to both designated and non-designated heritage assets.

77 The NPPF states that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be. Significance is the value of the

heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

78 The applicant's TVIA and Heritage Statement explore the potential impact of the development on designated and non-designated heritage assets, including listed buildings and conservation areas. There are no designated heritage assets within or near to the site; however, there are a number of non-designated assets within or adjacent to the plot boundaries. The majority of the designated heritage assets are associated with the historic route of Tottenham High Road, including the following conservation areas, which are more than 400 metres to the west of the Welbourne plot:

- Tottenham Green Conservation Area;
- Seven Sisters/Page Green Conservation Area;
- Clyde Circus Conservation Area;
- Bruce Grove Conservation Area;
- Scotland Green Conservation Area;
- Bruce Castle Conservation Area; and
- North Tottenham High Road Conservation Area.

79 The TVIA identifies Grade II* listed buildings at 583 and 585 High Road and a further 35 Grade II listed buildings, structures and monuments along the High Road, with the Grade II listed Ferry Boat Inn to the east and the Pumping Station Building to the south. These designated heritage assets have been considered with the representative views in the TVIA.

80 Given the scale of the proposed buildings, they will be visible in the settings of many of the heritage assets identified. However, distance and intervening built environment will provide a degree of layering and screening, and they are unlikely to be a dominant feature in the settings of heritage assets. Furthermore, consent has already been granted for a number of tall buildings in Tottenham Hale. As concluded by the applicant's Heritage Statement, GLA officers consider that no harm will be caused to designated heritage assets.

81 The proposals include the demolition of the former White Hart Public House, now in office and residential use. Although demolition will amount to a total loss of this non-designated asset, its low significance does not merit retention when weighed against the benefits of the scheme. The proposals will impact the setting of other non-designated heritage assets near to the site; however, this is not considered to cause any harm to these assets, which are also of low significance. The public benefits of the scheme are considerable, including new and affordable homes, commercial space, a new health centre, and public open space, as part of the creation of a new town centre; and bringing an under-used site in an Opportunity Area into more intensive and appropriate use.

82 Overall, the application is therefore consistent with London Plan Policy 7.8 and draft London Plan Policy HC1.

Inclusive design

83 London Plan Policy 7.2 and Policy D3 of the draft London Plan seek to ensure that proposals achieve the highest standards of accessible and inclusive design (not just the minimum). Policy 3.8 of the London Plan and Policy D5 require that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

84 The application materials demonstrate that the proposals will meet these requirements, with 11% of units provided as wheelchair accessible, spread across all tenures and with at least 10% in each building. Plans of wheelchair accessible units are provided for a range of unit sizes. The Council should secure M4(2) and M4(3) requirements by condition as part of any permission.

Transport

85 The applicant's trip generation forecast requires further work before the impact on the transport network can be confirmed. In particular, further justification is required for residential walking and cycling trip forecasts, and for employment trip generation. Clarification is also required with respect to the status of other schemes included in the cumulative assessment.

86 The development will be car free, save for Blue Badge provision, which is welcomed in view of the highly accessible location and in line with London Plan and draft London Plan standards. A total of 31 Blue Badge bays are proposed from the outset, which equates to one accessible bay for 3% of dwellings. However, the applicant should demonstrate how Blue Badge space could be provided for 10% of the units, if required, through a car parking management plan. The electric vehicle charging provision is also London Plan and draft London Plan compliant at 20% active, with the remainder passive.

87 A total of 1,817 long-stay cycle parking spaces are proposed for the residential element, with an additional 182 short-stay cycle parking spaces located within the public realm. The flexible commercial space is to be provided as shell and core, capable of accommodating draft London Plan compliant cycle parking quantities. The cycle parking quantity provision is London Plan and draft London Plan compliant. The cycle parking should be secure, well-located, and designed and laid out in accordance with London Cycling Design Standards (LCDS). At least 5% of the stands should be able to accommodate larger cycles, including adapted cycles used by people with mobility impairments.

88 TfL's Cycle Future Route 2 from Camden to Tottenham Hale is due to be constructed by 2020/21, with the route beginning on Ferry Lane at the junction with Mill Mead Road, proceeding to Broad Lane and the A10. The applicant should work with TfL to ensure that the proposals are coordinated with Cycle Future Route 2 in terms of construction and wayfinding.

89 The proposals include shared space with un-delineated level surfaces, which may not be suitable for visually impaired pedestrians. The applicant should consider the use of street furniture and other physical or tactile features to define a clear 'pedestrian only' space that cannot be entered by vehicles. Flush kerbs are proposed on Station Road and the inclusion of at least one controlled pedestrian crossing, rather than two uncontrolled crossing-points, is recommended. The use of 'corduroy' tactile paving on cycle routes through the development is not appropriate, and given the high cycle flows expected at the intersection of Station Road and Hale Road, the creation of a 'two-way cycle route' on this corner is not recommended. Alternatives should be discussed with TfL. Cycle facilities, with-flow and contraflow, should be provided on the carriageway of Station Road.

90 The development is forecast to generate 181 bus trips in the morning peak hour and 159 in the evening peak hour. Depending on distribution across the network, additional bus capacity may be required via a section 106 contribution. Currently, the assessment splits bus demand by frequency of buses only; however, the applicant should provide a more detailed bus demand assessment taking account of peak directions and popular destinations, rather than splitting demand evenly across buses. In the absence of a satisfactory forecast, it may be assumed that bus trips will increase demand on the busiest routes and mitigation may be requested accordingly.

91 The development site is adjacent to the 2015 Crossrail 2 Limits of Safeguarding and Area of Surface Interest required for the potential future delivery of Crossrail 2. Determination of the extent of the works that may be required at Tottenham Hale is ongoing; however, the flexible retail/office/leisure uses on the ground and mezzanine levels within the Ferry Island plot buildings are supported as they will assist in reducing the impacts on future residential occupants from potential Crossrail 2 works. Building materials and soundproofing measures should take account of this. Details of foundation design, ground condition and bore-hole information should also be shared with the TfL/Crossrail 2 Integrated Project Team. Further discussions are required to ensure that the proposals take account of increased pedestrian movement that may result from Crossrail 2.

92 A full delivery and servicing plan should be secured by condition, and a detailed construction logistics plan should be secured by pre-commencement condition. A full travel plan should be secured and monitored through the section 106 agreement.

Climate change

Energy

93 Based on the energy assessment submitted, compared to a 2013 Building Regulations compliant development, an on-site reduction equivalent to an overall saving of 51% of CO₂ per year in regulated emissions is expected for the domestic element; and 33% for the non-domestic element. Further information has been requested on fabric thermal performance, cooling/overheating, worksheet calculations, the district energy network (DEN), the site heat network, combined heat and power, air source heat pump, and photovoltaics, which must be provided before the proposals can be considered acceptable in accordance with Policy 5.2 of the London Plan and Policy SI2 of the draft London Plan, and the carbon dioxide savings verified. Full details have been provided to the applicant and the Council.

94 The applicant states that if the DEN is not installed within 10 years, boilers will continue to operate; however, this approach is not acceptable, as discussed during pre-application meetings, and the applicant is required to investigate and present an alternative on-site low carbon generation heat source. The number of plant rooms also requires further consideration.

Sustainable drainage and flood risk

95 The approach to flood risk management complies with London Plan Policy 5.12, and draft London Plan Policy SI.12. The Flood Risk Assessment proposes the use of a flood response plan and setting out flood warning and response procedures, which should be secured by appropriate condition.

96 The surface water drainage strategy does not yet comply with London Plan Policy 5.13 and draft London Plan Policy SI.13, as it does not give appropriate regard to the drainage

hierarchy and greenfield runoff rate. Further details should be provided on the sizing and capacity of proposed SuDS measures, how SuDS measures at the top of the drainage hierarchy will be included, and how greenfield runoff rate will be achieved. Additional attenuation storage volume calculations, and attenuation tank dimensions should also be provided.

97 The proposals generally meet the requirements of London Plan Policy 5.15 and draft London Plan Policy SI.5; however, the applicant should also consider water harvesting and reuse to reduce consumption of wholesome water. This can be integrated with the surface water drainage system to provide a dual benefit.

Local planning authority's position

98 Haringey Council officers have engaged in pre-application discussions with the applicant and are generally supportive. The application is expected to be considered by Committee in December 2018.

Legal considerations

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

Financial considerations

100 There are no financial considerations at this stage.

Conclusion

101 London Plan and draft London Plan policies on Opportunity Areas; employment; town centre uses; social infrastructure; housing; affordable housing; urban design; strategic views; historic environment; inclusive design; transport; and climate change are relevant to this application. The application does not yet comply with the London Plan and the draft London Plan, for the reasons set out below; however, the possible remedies stated could address these deficiencies:

- **Principle of development:** The principle of residential, town centre uses, and a health centre, as part of a high density mixed-use development on this under-utilised site is strongly supported in line with the London Plan, the Upper Lee Valley OAPF, and the draft London Plan. Further details on the relocation/retention strategy for existing occupiers should be provided.
- **Affordable housing:** 25%, made up of 35% social rent and 65% intermediate (London Living Rent and shared ownership), (improved from 100% shared ownership at submission) together with a new health centre, public realm and infrastructure relocation. This would contribute to 40% affordable housing as part of a portfolio approach for Tottenham Hale. Financial viability is undergoing robust assessment to

ensure that the maximum contribution is secured in accordance with the London Plan, the Mayor's Affordable Housing and Viability SPG, and the draft London Plan. As the development will be built out over some years, updated early stage reviews and mid-term reviews are likely to be required. The applicant's position that no late stage review should be required due to the 25% 'betterment' offer requires further discussion.

- **Urban design:** The proposals are of a high quality, with negligible impacts on strategic views, and no harm to designated heritage assets.
- **Transport:** Further information is required, including trip generation; Blue Badge parking; and shared surfaces. Bus route mitigation may be required.
- **Climate change:** Further information on the energy strategy and surface water drainage.

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