

COMMENTOR	COMMENT	OFFICER RESPONSE
<p>Rt Hon. David Lammy, MP Tottemham</p>	<p>I am writing in regards to an application submitted by TH DM Limited on 30 July 2018 for a mixed-use development comprising of 1036 residential units. I was extremely concerned to hear that a high rise development was proposed for the Tottenham Hale area, which has no provision for social rent. A shared ownership scheme is not sufficient to make this development genuinely affordable for the people of Tottenham. I have received a number of complaints from local residents, expressing their objections to the project based on the lack of affordability, air quality issues and the development's effect on ethnic minorities. Overall, I am concerned about the sustainability of the project and the fact that it will not help local residents requiring social housing.</p> <p>I understand the project's proposals include tenures for studio and 1- 3 bedroom flats, which will no doubt attract an affluent demographic. At this time, however, genuinely affordable housing should be the priority. As you know there are currently 8,500 households on the housing list with an average waiting time in excess of 8 years. The reality is that Haringey residents on the list have limited prospects of being rehoused in the near future due to the short supply of decent affordable homes - particularly homes accommodating larger households. Over the years and to date, I continue to see too many families who are forced to wait for suitable accommodation - far beyond what is acceptable, and far beyond the average waiting time. Therefore, the Council's priority should be to deliver quality and truly affordable housing, which allows greater access to all tenures.</p> <p>In addition to this, I am concerned that regeneration projects such as Argent will further entrench social inequality. Tottenham is one of the most ethnically diverse constituencies with high levels of deprivation. As the population in the local community continues to rise, the level of housing need increases. In 2017, median weekly earnings for full-time employees who were resident in the constituency of Tottenham were £560 per week. Coupled with an unemployment rate of 4.0% for the population aged 16-64, this scheme will be unaffordable for the average resident – who has a low income, insufficient savings and often spiralling debts.</p> <p>Only 25% of the homes on this scheme would be deemed 'affordable' through shared ownership. If these plans are approved by the local authority, it will have failed to recognise the real needs of those living in Tottenham. At a minimum, the Council's own target of a 40% provision of affordable homes should be achieved. Many constituents will be priced out of the area they have lived in all of their lives. A project of this design will not be in line with the Council's manifesto which promises to shape the "<i>borough's future</i>" and "<i>listen to the many diverse voices within Haringey</i>".</p> <p>With regards to fire safety regulations, it was brought to my attention that the project will only</p>	<ul style="list-style-type: none"> • Objection noted. • The applicant has added Council homes to the scheme to be occupied by nominated occupiers. The number of family sized homes has been increased. Issues of Affordable Housing (including affordable housing size) are set out in Section 6.5 of the report. • Issues of equalities are set out in Section 6.20. • The London Fire Brigade is satisfied with the proposals in fire safety terms. Issues of Fire Safety are set out in Section 6.19 of the report. • Issues of townscape impact are set out in Section 6.5 and daylight/sunlight in Section 6.10. • The applicant has undertaken non-statutory consultation prior to the submission of the application as set out at paragraph 4.6 of the report.

	<p>include a single escape stairway. The London Fire Brigade has expressed its objection to the proposals and believes there is insufficient information on access and facilities for fire fighters. In the wake of Grenfell, I believe it is wholly inappropriate to ignore these warnings. Furthermore, under the Town and Country Planning Act 1990, the local authority must ensure buildings are fully compliant with fire safety requirements. Another concern is the height of the development and the impact this will have on natural light levels. I understand the design will be split across 6 buildings up to 38 storeys in height, heavily dominating the North London Skyline.</p> <p>I am therefore writing to express my objections. I am also disappointed at the failure of the property developer, Argent to properly consult the public over its plans, ensuring that the project is viable and will not have an unacceptable impact on the local community. I look forward to you placing my comments on record and providing me with substantive replies to each of my points.</p>	
<p>Cllr Zena Brabazon. Haringey Ward</p>	<p>The absence of any social housing within the build of 1,036 homes is unacceptable. The fact that £44m of taxpayers money is being invested in Tottenham Hale is not reflected in the housing mix. People/families on low incomes who have no prospect of buying a home, renting at full market cost, or entering into shared ownership, are taxpayers. Yet, they are singularly excluded in the housing mix.</p> <p>The tenure mix of market sale (76%) and shared ownership (24%) excludes the average resident from access to these homes it will only serve to increase inequality within Haringey and also within Tottenham.</p> <p>The Council's most recent Strategic Housing Market Assessment shows some 50% of households have incomes of below £30,000, with 65% having incomes of less than £40,000. The same survey shows that 48% of households have no savings or are in debt. This figure rises to 69% among black households and 74% of Asian households, compared with 37% of white households. Since this development has no social housing within it, and relatively few family homes of 3 bedrooms it is likely to increase inequality, contravening guidance on Equalities Impact.</p> <p>The proposal to provide up to 25% shared ownership tenures will not provide housing for the thousands of people on the housing waiting list. Quoted suggested prices in the viability assessment are simply unaffordable for the overwhelming</p>	<ul style="list-style-type: none"> • Objection noted. • The applicant has added Council homes to the scheme to be occupied by nominated occupiers. • The issue of Dwelling unit mix is set out in Section 6.3 • Issues of Affordable Housing are set out in Section 6.4 • The application is not a contravention of equalities legislation or guidance. Equalities issues are set out in Section 6.20. • The applicant has added Council homes to the scheme to be occupied by nominated occupiers. • The proposed tenure split is set out in Section 6.4 of the report. • Issues of land ownership are not

number of Haringey residents. The only conclusion which can be drawn is that this development is part of a wider plan to draw in buyers from elsewhere and will not support – in any way - the housing needs of current residents and families. In this application, public land contributing to this development will not provide public housing.

The viability assessment refers to the Development Management Development Plan Document (DM DPD). It states that in para 4.26 LBH will typically seek an affordable housing tenure split of 60% affordable rent (including social rent) and 40% intermediate housing. It goes on to state that this split has been reversed for Tottenham Hale by policy DM13A(c) in the Development Management Development Plan Document (the 'DM DPD') (adopted in July 2017) and the Tottenham Area Action Plan (see policy AAP3) which state that the split should be reversed in Tottenham to rebalance the historically high levels of social rented accommodation. This is not a requirement, and the Council can choose whether or not to follow this approach. The next paragraph makes that clear quoting Policy DM13A(c) which states. The Council may seek to alter the tenure and/or mix of affordable provision to be secured on a case-by-case basis to avoid affordable housing of a certain tenure or size being over or under represented in an area, or to assist in improving development viability (e.g. through provision of a greater ratio of intermediate housing). In other words this is a choice and not a requirement. In deciding to follow this course of action, low income families are being excluded from the proposed new homes in Tottenham Hale through the proposed housing mix. I strongly object to this, especially since public land and large amounts of public money are involved.

The massing of huge tower blocks rising to 38-storeys is out of keeping with surrounding housing and has no place in Tottenham Hale where current housing goes no higher than 9 storeys (Warren Court). The Committee may wish to look at, or visit, Lewisham Gateway to get some idea of what the massing of tower blocks in a traffic gyratory looks like! This development will change the character of

material to planning.

- Issues of townscape impact are set out in Section 6.5 and daylight/sunlight issues are set out in Section 6.10.
- The amenity impacts to adjoining occupiers, and issues of overshadowing impacts to Down Lane Park are set out in Section 6.10
- The applicant has submitted a full transportation assessment. Transportation issues are set out in Section 6.11.
- Issues of Air Quality (including impacts to local schools) are set out in Section 6.10.

	<p>Tottenham Hale which is a significantly residential area.</p> <p>The tower of 16 storeys on the Welbourne site will overshadow neighbouring homes on Fairbanks and Chesnut Roads and as such will be out of step with the character of the area. This tower will dwarf the surrounding housing. Down Lane Park will be surrounded by high rise developments and this local amenity will be severely affected.</p> <p>The impact of these developments on traffic, air quality, noise pollution and other environmental issues are material considerations.</p> <p>The development of the Spurs stadium is likely to lead to a huge increase in traffic in Watermead Way and Monument Way when the team play at home or when planned events take place. The traffic will be displaced from Tottenham High Road. Has any consideration been given to the impact this will have when it is compounded by these huge developments in Tottenham Hale. What arrangements will be in place for emergency vehicles.</p> <p>Two local schools - Welbourne and Holy Trinity - are named in the top 50 of schools most affected by air pollution. That is before these developments and all the associated disruption. It is inconceivable that there will be no impact on air quality which,as we know from the gyratory is already appalling.</p>	
<p>Cllr Daniel Stone. Stroud Green Ward</p>	<p>As a Haringey councillor I wish to object to the planning application on the following grounds.</p> <p>The number of 'affordable' homes amounts to just 24% of a proposed total of 1,036 homes across this multi-site portfolio. This is not at an acceptable level for affordable homes given the council's target of 50% affordable within residential developments delivering ten or more units. It is also unacceptable that the affordable component of these homes consists only of shared ownership, which will not be affordable for most Tottenham residents.</p>	<ul style="list-style-type: none"> • Objection noted. • The applicant has added Council homes to the scheme to be occupied by nominated occupiers. Issues of Affordable Housing (including affordable housing size) are set out in Section 6.4 of the report. • The Council's target for affordable homes is 40%

	<p>There are no social units within the proposed development. It is completely unacceptable that a development of this scale can go ahead without providing homes at social rents. The council's objective is that social housing should constitute 70% of the 50% affordable housing within developments of ten or more units.</p> <p>I also object to the height of the tallest tower within the proposals and am very worried this only has a single escape stairway. This is not adequate for a building of this height in the event of a fire. At 38 storeys this would be the tallest building in Haringey and would dwarf adjacent housing.</p> <p>Furthermore, I am concerned that the building programme will increase pollution in Tottenham Hale and that there are insufficient mitigation measures adopted to address this within the proposals.</p>	<p>borough-wide.</p> <ul style="list-style-type: none"> • The London Fire Brigade is satisfied with the proposals in fire safety terms. Issues of Fire Safety are set out in Section 6.19 of the report. • Issues of Townscape and an assessment of building height are set out in Section 6.5 • An assessment of impacts to adjoining occupiers (including pollution impacts) are set out in Section 6.10.
<p>Cllr Ruth Gordon. Tottenham Hale Ward</p>	<p>I object to the Planning Application HGY/2018/2223 on the following grounds:</p> <ol style="list-style-type: none"> 1. The absence of any social housing within the build of 1,036 homes is unacceptable. 2. The tenure mix of market sale (76%) and shared ownership (24%) excludes the average resident from access to these homes and will serve to increase inequality within Haringey. The current Council's Strategic Housing Market Assessment shows around 50% of households have incomes of below £30,000 and 65% have incomes of less than £40,000. The same survey shows that 48% of households have no savings or are in debt. This figure rises to 69% among black households and 74% of Asian households, compared with 37% of white households. In other words this large development is likely to increase inequality within the borough and thereby contravene guidance on Equalities Impact. 3. The plans have arrived at a level of affordability by means of shared ownership 	<ul style="list-style-type: none"> • Objection noted. • The applicant has added Council homes to the scheme to be occupied by nominated occupiers. Issues of Affordable Housing (including affordable housing size) are set out in Section 6.4 of the report. • Issues of Townscape and an assessment of building height are set out in Section 6.5 • An assessment of master planning in relation to AAP site allocations (including on the Welbourne Site) is set out in Section 6.3 • Issues of Townscape and an

	<p>tenures, an intermediate product that is not affordable for the overwhelming number of Haringey residents and is therefore aimed at attracting buyers from outside of the borough and therefore is not answering the housing need of residents.</p> <p>4. The massing of huge tower blocks rising to 38-storeys is out of step with surrounding housing at threetimes the height of the tallest buildings at Hale Village.</p> <p>5. The tower of 16 storeys on the Welbourne site will overshadow neighbouring homes on Fairbanks and Chesnut Roads and as such will be out of step with the character of the area.</p> <p>(Duplicate Objection received following receipt of initial objection)</p> <p>Updated Objection:</p> <p>1. The affordability offered by the developer is only 25% and not 40%. The upper figure only being reached through the Council purchasing social rent homes and LLR homes on its own land using the land receipts, profits and overage anticipated to come from the Strategic Development Partnership with Argent. The developer Argent is offering well below its obligation of a 40% contribution to 'affordable' units.</p> <p>2. On height and massing. The Tottenham Hale Development plan had in its original intent much lower heights for tower blocks and consultations with residents show that locals do not want to be surrounded by huge towers up to 38-storeys high. The height and massing of the proposed towers is out of context with the surrounding buildings.</p> <p>3. In Haringey's Tottenham Area Action Plan it specifically calls for a green buffer to be provided on the Welbourne site to protect the local existing amenities and no such buffer is included in the plans. In fact existing mature trees will be felled under the plans.</p>	<p>assessment of building height are set out in Section 6.5</p> <ul style="list-style-type: none"> • A table of building heights is at Paragraph 6.5.13 • The amenity impacts to adjoining occupiers, and issues of overshadowing impacts to Down Lane Park are set out in Section 6.10 • Issues of Child Playspace are set out in Section 6.8. • Issues of Tree removal and replacement (including an assessment of the Green Buffer at the Welbourne Site) is set out in Section 6.14. • Issues of Air Quality (including impacts to local schools) and noise impacts are set out in Section 6.10.
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<p>Cllr Mahir Demir. West Green Ward.</p>	<p>I object to the Planning Application HGY/2018/2223 on the following grounds: Of the 1,036 homes proposed to be built, there is no social housing within the plans. This is entirely unacceptable given that portion of the new development will be built on council land. Furthermore, it is also unacceptable that there are no social housing within the mix of new properties given the significant (£44m) of public money being invested in Tottenham Hale. From the proposals, it's clear that the majority of the residents in Tottenham will be unable to afford any of these properties.</p>	<ul style="list-style-type: none"> • Objection noted. • The applicant has added Council homes to the scheme to be occupied by nominated occupiers. Issues of Affordable Housing are set out in Section 6.4 of the report. • The London Fire Brigade is satisfied with the proposals in

	<p>I also object to this planning application due to the height of the tallest tower within the proposed development which only has a single escape stairway. A building of this size should have more adequate exits in case of a fire.</p> <p>With the number of affordable units at just 24%, I believe this to be too low given the number of homes that are to be built on these sites.</p>	<p>fire safety terms. Issues of Fire Safety are set out in Section 6.19 of the report.</p> <ul style="list-style-type: none"> • Issues of townscape impact and building heights are set out in Section 6.5.
<p>Cllr Matt White. Bruce Grove Ward.</p>	<p>My first and primary objection to this proposal is that it makes nothing like the kind of contribution that a development of this size should make to the provision of homes that local residents can afford to live in.</p> <p>Policy 3.8 of the London Plan, as quoted in paragraph 4.17 of this application's Affordable Housing Statement, states that 'Londoners should have a genuine choice of homes that they can afford'. This proposal will not provide the majority of local people with any homes they can afford.</p> <p>Council policy is to provide 40% affordable housing in developments, but the plans in this application provide only 25% affordable, all of which is shared ownership. The Council's current Strategic Housing Market Assessment shows that around half of the borough's households have incomes below £30,000, and 65% have incomes below £40,000, while 48% have no savings or are in debt. Such households would not qualify for the 'shared ownership' option, meaning that the so-called 'affordable' element of this plan is in fact unaffordable for the majority of Haringey residents.</p> <p>Additionally, the number of households in with no savings or in debt is far higher among BAME residents, with 69% of black households and 74% of Asian households in this category, compared with 37% of white households. A development of this size and type will therefore increase inequality in the borough and is thereby likely to contravene Equalities Impact guidance.</p> <p>My second objection is that this development will not contribute to the local</p>	<ul style="list-style-type: none"> • Objection noted. • The applicant has added Council homes to the scheme to be occupied by nominated occupiers. Issues of Affordable Housing are set out in Section 6.4 of the report. • The application is not a contravention of equalities legislation or guidance. Equalities issues are set out in Section 6.20. • The proposal will add jobs and employment floorspace. The principle of the provision of non-residential floorspace in relation to adopted policy is set out in Section 6.3 of the report. • The applicant has met validation requirements and a single submission to cover all plots is supported by Officers. The definition of the red line area is a decision for the applicant.

economy in the way that providing council homes on a large scale for people already living locally would. The majority of people living in the proposed development will not spend their money in Haringey, but will likely work and spend their leisure time in central London, using this development as a dormitory. In contrast, providing council homes at scale would boost the local economy in the long term by preventing people who are already rooted in the borough, and who thus spend a large part of their time and money here, being priced out of the borough.

My third objection to this application is on the grounds of local democracy, as the documents that constitute this application are far too numerous and lengthy for local residents to scrutinise effectively. Each development should be submitted separately, rather than as a hybrid application, in order that local residents can contribute effectively to the planning process.

<p>Joanne McCartney London Assembly Member</p>	<p>I am writing to set out my concerns regarding the above planning application, which have also been conveyed to me by a number of local residents.</p> <p>The proposed development is for 1036 units, yet only 247 of these will be affordable on a shared ownership basis. Tottenham is an area where there is a real need for homes at genuinely affordable rents at social rent and London living rent levels, and where there are over 8,000 families currently waiting for a property on Haringey Council's list. The proposal is also not in keeping with Haringey Council's policy of 40% affordable housing on new developments.</p> <p>Tottenham is an ethnically diverse area with area high levels of deprivation and there are concerns that the scheme, will not benefit local residents, especially those from a BAME background. This development must address these concerns and create homes for local families that are genuinely affordable for rent.</p> <p>Concerns have also been expressed about the height of the proposed development. The tallest tower, at 38 stories it is not in keeping with the surrounding buildings and there is concern that these buildings will overshadow the area, especially those homes nearby, as well as spoiling the views from nearby parks.</p> <p>Concerns have also been raised about fire safety in the tower. In particular, there is only one staircase providing an escape route in the 38-story tower. If this scheme proceeds, there must be sufficient fire protection for such a tall building. Indeed, my colleague Navin Shah AM released a report in March 2018* calling for: "The Government [to] amend Building Regulations to make installing Automatic Fire Suppression Systems in all new-build residential developments above 18 metres in height mandatory." I hope the scheme will ensure that adequate fire protection is included, and I would ask the planning committee to make this a condition of any permission granted. I note that the submission from the London Fire Brigade dated 22nd August states that they are "not satisfied" with the proposals due to "Insufficient information provided in relation to access and facilities for firefighters".</p> <p>The environmental impact of the scheme is also concerning. Residents are worried about the local primary schools in the area and the effect that the construction pollution will have on them. Indeed, the proposal for 15 years of construction could have long term health implications on residents. If this scheme is approved I would ask the planning committee to place strict conditions to mitigate any potential environmental impact of the construction.</p>	<ul style="list-style-type: none"> • Objection noted. • The applicant has added Council homes to the scheme to be occupied by nominated occupiers. Issues of Affordable Housing are set out in Section 6.4 of the report. • The proposal will add jobs and employment floorspace. The principle of the provision of non-residential floorspace in relation to adopted policy is set out in Section 6.3 of the report. • The issue of construction amenity impacts are set out in Section 6.10. The applicant will be subject to conditions and obligations to mitigate the impacts if permission is granted. • The London Fire Brigade is satisfied with the proposals in fire safety terms. Issues of Fire Safety are set out in Section 6.19 of the report. • Issues of townscape impact and building heights are set out in Section 6.5. • The applicant has committed to a Skill and Employment Plan by way of the S106 agreement. The S106 Heads of Terms of set out in at Paragraph 2.4 of the report.
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	<p>If this application is granted it must also lead to job creation and opportunities for local people, and targets around training and job creation should be required.</p> <p>There is a growing concern of public access to so-called public spaces, which are in fact privately owned. I would want to see a condition that any newly created public space is genuinely accessible and open to all local residents.</p> <p>I look forward to hearing your response on this important matter.</p>	
<p>London Borough of Hackney</p>	<p>Hackney Council have concerns about the height of the tallest element of the proposed development (38 storeys) which would have a harmful impact to the townscape when viewed from Springfield Park and various other locations within the London Borough of Hackney.</p> <p>A reduction in height of the tallest element so that it is in keeping with the other elements of the proposal (which are 19-20 storeys) would remove this harm although its appreciated that this could impact the scheme's viability. In this case the townscape harm should be balanced against the benefits of the whole scheme, including the need for housing, in particular affordable housing.</p>	<ul style="list-style-type: none"> • Comments noted. The view from Springfield Park to the application site is not protected strategic or local view (in either Hackney or Haringey). • Historic England raises no objection to the proposal related to any view from Springfield Park. Springfield Parking is a Grade II listed park (List Entry Number: 1000839).
<p>London Borough of Waltham Forest</p>	<p>I refer to your consultation under Article 16/17 of the Development Management Procedure (England) Order 2010. This Council has the following comments in respect of the application.</p> <p>Impact on views from LBWF</p> <p>LBWF offer their support to the application and consider that the level and height of built development proposed would be seen in the context of other approved tall buildings in this location and as such is considered acceptable. There would be no adverse impact on LBWF noting in particular our approved and built developments</p>	<ul style="list-style-type: none"> • Support of level and height of development noted. • Cycle comments noted. Officers will continue to engage with LBWF Officers to ensure cycle connectivity. • Comments concerning obligations noted. Haringey Officers will continue to engage with LBWF Officers concerning

	<p>and those coming forward shortly in the Blackhorse Lane Growth Area.</p> <p>Highways</p> <p>LBWF are investing in significant cycling and walking improvements through the Enjoy Waltham Forest scheme. This will include fully segregated cycle lanes along Forest Road. We are keen to work with Haringey to continue high quality cycling and walking provision beyond LBWF, and we were pleased to see high aspirations in the Haringey Transport Strategy. This development is a huge opportunity to deliver on this. We would like to work with you to ensure that that the highways plans accord with these aspirations and to support the provision of the 2000 cycle spaces proposed on-site. As such we would like to understand the wider improvements to the cycling and walking network that you are securing as part of this development and how we can work together to align our own proposals.</p> <p>The Wetlands and potential Section 106 Agreement contributions</p> <p>The site is in close proximity to the regionally-significant 200-ha urban nature reserve at Walthamstow Wetlands which opened to the public in October 2017. Waltham Forest worked closely with Haringey Council in the lead-up to the site's opening, including setting out the ambition for the Wetlands to remain free-to-access for visitors, most particularly the local communities in the surrounding boroughs, including existing and new communities at Tottenham Hale. To support this objective, Waltham Forest Council has secured contributions from planned and under-construction developments in Blackhorse Lane and Walthamstow towards the long-term management and maintenance of the Wetlands which is undertaken on a not-for-profit basis working with London Wildlife Trust. As the proposed development for up to 1,030 residential units at Tottenham Hale will result in an increase in the local population and residents and businesses will benefit from access to the Wetlands – and new development is likely to be marketed highlighting that local benefit. As such LBWF is seeking a contribution towards the continued funding of the reserve's management and maintenance of course</p>	<p>access to the wetlands.</p>
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	<p>recognising that viability issues may affect the level of contribution that can be secured. The Council has developed both an upfront lump sum and a multi-year phased approach to securing contributions towards the Wetlands and can provide further detail on how these could be applied to your development.</p> <p>Please accept the above comments as the formal response from LBWF. We trust that you will take the above into account when determining this application and I look forward to receiving a copy of the decision notice.</p>	
<p>London Borough of Enfield</p>	<p>Thank you for your notification of the above development which was registered in this office on 6th August 2018.</p> <p>I have reviewed the information provided on your website and consider that the proposals would not have any strategic implications for this Borough. However, we do have concerns that the cumulative schemes do not take account of the impact of the proposed Meridian Water development, or the developments at Tottenham Hotspur or Northumberland Park, especially with regards to the future capacity at Tottenham Hale. We also have concerns that it does not appear that the calculations relating to the Victoria Line capacity allow for growth further along the line. It would be appreciated if you could advise if TfL have noted this.</p>	<ul style="list-style-type: none"> • Comments noted. • Transportation issues, including Victoria line capacity and station capacity at Tottenham Hale, are set out in Section 6.11. • Transport for London raise no objection to the proposal in capacity terms.