

Development, Enterprise and Environment

Robbie McNaugher

Haringey Council

Planning and Building Control

6th Floor, River Park House

225 High Road

Wood Green

London N22 8HQ

Our ref: D&P/1239a/01/MJ

Your ref: HGY/2016/1719

Date: 18 August 2016

Dear Mr McNaugher

**Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008
Hale Wharf, Ferry Lane N17
Local planning authority reference: HGY/2016/1719**

I refer to the copy of the above planning application, which was received from you on 21 June 2016. On 18 August 2016, the Mayor considered a report on this proposal, reference D&P/1239a/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 88 of the above-mentioned report; but that the possible remedies set out in that paragraph could address these deficiencies.

The Mayor added that he is fully supportive of the proposal for a scheme of at least this density in an Opportunity Area, a Housing Zone, and in close proximity to Tottenham Hale Station, which is expected to form part of the Crossrail 2 route. However, the Mayor considers that the level of affordable housing should be substantially increased from that currently proposed.

The application represents EIA development for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The environmental information made available to date has been taken into consideration in formulating these comments.

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 and any connected 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 Rob Goodall, RobGoodall1@tfl.gov.uk, 020 3054 3680.

Yours sincerely,

Colin Wilson

Senior Manager – Development & Projects

cc Joanne McCartney, London Assembly Constituency Member
Tony Devenish, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Lucinda Turner, TfL
Sean Bashforth, Quod, Ingeni Building, London W1F 0AX

Hale Wharf, Hale Village

in the London Borough of Haringey

planning application no. HGY/2016/1719

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 hybrid application including up to 505 residential units and up to 1,607sqm (GIA) of non-residential floorspace, comprising retail (A1-A5) and office (B1) use. The detailed application includes buildings from 16 to 21 storeys, 249 residential units, 307 sq.m. (GIA) of flexible retail or business uses, access, landscaping and public realm works. The outline application includes buildings of up to 9 storeys, up to 256 residential units, up to 1,300 sq.m. of flexible retail or business uses, pedestrian/cycle footbridges, access, landscaping and public realm works.

The applicant

The applicants are **Muse Developments Ltd** and the **Canal and River Trust**, the architect is **Allies and Morrison**, and the agent is **Quod**.

Key dates

The GLA was involved in a number of pre-application meetings between Jan 2015 and Feb 2016.

Strategic issues summary

Affordable housing: 9% (by habitable room) affordable rent (34 units). This restricted island site surrounded by water is likely to result in increased development costs. Options for increased density and height are limited in an ecologically sensitive area. Increased affordable housing was considered on the neighbouring garage site; however it was excluded as it is currently designated as Green Belt. The scheme would benefit from significant public funding, including a GLA grant of £11.95M towards infrastructure. On balance, the level of affordable housing should be increased and a portion of these affordable homes should be delivered in phase 1. Discussions should continue to examine a more varied mix of tenures and units sizes to achieve an increased level of affordable housing. (Paras 31-34).

Urban design and tall buildings: The site is identified as suitable for tall buildings, and the tallest blocks are appropriately located nearer to the existing and forthcoming tall buildings in Hale Village, and the public transport links at Tottenham Hale. The height and massing of the proposals appropriately respond to the sensitivities of the site and are supported. The layout, architecture and materials of the proposals are of a high quality (Paras 49-56).

Natural environment: The proposals are shielded from the Green Belt and ecological areas by the garage site, Ferry Lane, and the lower rise buildings proposed to the north and are not considered to cause any harm to the Green Belt. Subject to the views of Natural England, no significant impacts are expected on designated nature areas or birds. The proposals are considered to be beneficial to the Blue Ribbon Network (Paras 42-48).

Recommendation

That Haringey Council be advised that the application does not yet comply with the London Plan, for the reasons set out in paragraph 88 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 8 June 2016, 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. Under the provisions of The Town & Country Planning (Mayor of London) 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 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 and 1C(c) of the Schedule to the 2008 Order:

- *1A "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."*
- *1B "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings (c) outside Central London and with a total floorspace of more than 15,000 square metres."*
- *1C(c) "Development which comprises or includes the erection of a building that is more than 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 2011 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 site covers 2.28 ha., 1.78ha of which comprises previously developed land, with the remainder being within the water networks. The site is approximately 300 metres long, ranging from 25 to 60 metres in width, accessed via Ferry Lane to the south and bounded by the River Lea Navigation Channel to the west and the River Lea Diversion to the east, both forming part of the Blue Ribbon Network. The site extends across the River Lea Navigation Channel and Pymmes Brook (further to the west). The site contains single storey warehouse buildings, with a five storey office building at the southern end of the site. The remainder of the site comprises car parking running along the western boundary, areas of hardstanding, storage areas and porta-cabins associated with industrial uses. Shrubbery and trees run along the eastern and northern boundaries. The site is connected to a strip of land with a footpath and moorings that extends northwards between the two watercourses. The site boundary includes three permanent commercial barge moorings and an access pontoon, located on the River Lea Navigation.

7 To the west of the southern end of the site is Tottenham Lock, and the associated lock keepers cottage. The site lies within the boundary of the Lee Valley Regional Park. 'The Paddock' Community Nature Park to the east of the site is within the Green Belt, including a garage in its south-west corner.

8 The wider southern and eastern areas are dominated by residential uses of two to five storeys. The area around Tottenham Hale station to the west is undergoing significant development and regeneration, with recent developments including a mix of residential and commercial uses, student housing, small scale retail, hotel, and community buildings up to 10 storeys in height, with planning permission for an 18 storey building.

9 The site lies within the Tottenham Housing Zone and the Upper Lee Valley Opportunity Area.

10 The nearest station to the site is Tottenham Hale, which provides National Rail services to central London (Liverpool Street), Cambridge and Stansted Airport; and the Victoria Line. The Station is heavily used by passengers interchanging between National Rail and Victoria Line services. There are planned improvements for Tottenham Hale Station, which will be brought forward through Growth Area funding, which will improve the interchange by relocating the Greater Anglia and underground gate lines. In the longer term, Tottenham Hale is likely to form part of the core Crossrail 2 route, where services could be operating into central London from the early 2030s. Numerous buses pass by the site on Ferry Lane and many more are provided from the newly upgraded Tottenham Hale bus station. The closest stop to the site is at Bream Close, located south-east of the site, which provides access to routes 123 (Ilford to Wood Green), 230 (Walthamstow to Wood Green) and the N73. As such, the site records an excellent public transport accessibility level (PTAL) of 6a at the southern end of the site, on a scale of 1 to 6, where 1 is classed as very poor and 6 excellent. The PTAL decreases to 5 and then 4 towards the north of the site.

Details of the proposal

11 The application seeks permission for the demolition of existing buildings, and redevelopment to provide a residential-led mixed use development of up to 505 residential units, employment uses (Use Classes A1-A5 and B1), together with pedestrian footbridges, landscaping and public open space, and car/cycle parking. It is anticipated that the scheme will be connected to off-site combined heat and power (CHP) facilities, subject to this being practical and viable, however an alternative option is proposed for on-site CHP provision in the basement of block A.

12 The application is a 'hybrid' planning application, comprising a detailed application for Phase 1 and an outline planning application for the remainder of the site (Phases 2 and 3), with matters of access, appearance, landscaping, layout and scale being reserved for approval under subsequent reserved matters applications.

13 The site is divided into 11 blocks which will be advanced in three phases. Blocks A (up to 21 storeys) and B (up to 16 storeys) will be developed within Phase 1 as part of the detailed application, including 249 residential units and 307sq.m. (GIA) of flexible retail or business uses. A new public space will be created at the entrance to the site, adjacent to the lock, connecting to a central landscaped courtyard including the primary pedestrian and vehicular access to the site.

14 Within the outline application, blocks C to G are proposed within Phase 2, and Blocks H to K within Phase 3. Phases 2 and 3, with buildings ranging from 4 to 9 storeys, may be advanced simultaneously or separately. The outline application provides up to 256 units and up to 1,300 sq.m. of flexible retail or business uses. Block K is proposed to provide up to 1,100 sq.m. (GIA) of flexible B1 or C3 uses in order to provide flexibility to respond to market conditions at the time of the delivery. Two pedestrian bridges are proposed within the outline

application, along with the landing plot for a third link. A bridge is proposed over the Pymmes Brook and River Lea Navigation, providing pedestrian access between Millmead Road and Tottenham Marshes footpath, and Hale Wharf. The second bridge is proposed over Pymmes Brook, providing pedestrian and cycle access between Tottenham Marshes footpath and the River Lea Navigation towpath. In addition, a future bridge landing point has been safeguarded between proposed Blocks I and J in order to allow a future connection to The Paddock. The outline application is accompanied by Parameter Plans covering site levels, ground and upper level development zones, building heights, access and public realm, car parking, and phasing. Parameter plans also cover the design of both bridges. The outline application also includes Design Codes within the Design and Access Statement, covering use, typology, roofs, gaps between buildings, appearance, parking, courtyards and waterside, refuse, services.

15 The proposed buildings are arranged in a linear format with two parallel lines of buildings running the length of the middle and northern extents of the site, with two single blocks at the southern extent of the site. The primary vehicular access will run through the central spine of the site from south to north, with small parking and servicing accesses branching off. Areas of open space/public realm will run through the central spine and around each block, with biodiverse zones and no public access along the western and eastern boundaries.

Case history

16 The Greater London Authority and Haringey Council undertook a number of joint pre-application meetings between January 2015 and January 2016. On 22 January 2016, a pre-planning application meeting was held at City Hall focussing on strategic level London Plan issues for a hybrid application, including demolition of existing buildings and redevelopment with buildings of up to 21 storeys for mixed residential and commercial uses, comprising approximately 505 residential units.

17 The GLA's pre-application advice report of 8 February 2016 noted that no information on affordable housing was available at the time, and concluded that the principle of the proposal was supported; however issues relating to employment floorspace, housing, affordable housing, urban design, inclusive design, and climate change should be addressed in any application.

Strategic planning issues and relevant policies and guidance

18 The relevant issues and corresponding policies are as follows:

- Employment *London Plan*
- Housing *London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG*
- Green Belt *London Plan*
- Biodiversity *London Plan; the Mayor's Biodiversity Strategy; Preparing Borough Tree and Woodland Strategies*
- Blue Ribbon Network *London Plan*
- Affordable housing *London Plan; Housing SPG; Housing Strategy*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Tall buildings *London Plan*
- Density *London Plan; Housing SPG*

- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG*
- Transport *London Plan; the Mayor's Transport Strategy*
- Parking *London Plan; the Mayor's Transport Strategy*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy; Use of planning obligations in the funding of Crossrail and the Mayoral Community infrastructure levy SPG*
- Climate change *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*

19 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), the Saved Policies within the Unitary Development Plan (2013), and the 2016 London Plan (Consolidated with Alterations since 2011).

- 20 The following are also relevant material considerations:
- National Planning Policy Framework, Technical Guide to the National Planning Policy Framework and National Planning Practice Guidance.
 - Upper Lee Valley Opportunity Area Planning Framework (ULV OAPF) (July 2013).
 - Tottenham Area Action Plan (Pre-Submission Version, January 2016).
 - Haringey Site Allocations DPD (Pre-Submission Version, January 2016).
 - Haringey Development Management DPD (Pre-Submission Version, January 2016).
 - Haringey Alterations to Strategic Policies (Pre-Submission Version, January 2016).
 - Tottenham Urban Centre Masterplan SPD (2006)

Principle of development

21 The site lies within the Upper Lee Valley Opportunity Area, the Tottenham Housing Zone, the London Stanstead Cambridge growth corridor, and the Crossrail 2 growth corridor, with a Crossrail 2 station proposed at Tottenham Hale. In this context, a dense mixed-use development is fully supported.

Residential development

22 The site lies within the boundary of the Upper Lee Valley Opportunity Area, as identified in London Plan Policy 2.13 and Table A1.1, which states that the Opportunity Area is capable of accommodating at least 20,100 homes up to 2031. Haringey's Tottenham Area Action Plan (Pre-Submission Version, January 2016) identifies the site (including 'The Paddock' to the east), for comprehensive redevelopment to provide a mix of uses, with replacement employment, new residential, and leisure linked to the Lee Valley Regional Park.

23 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. The site is also located within the Tottenham Housing Zone, which has a target for approximately 2,000 new homes.

24 The residential units proposed would meet London Plan policy aims and the principle of residential use is supported.

Employment floorspace

25 The site currently includes low density commercial and industrial buildings extending to a total of around 6,589 sq.m. (GIA) of floorspace, supporting approximately 116 jobs ranging from workshops, restaurant, warehouses, storage, studios, showrooms and offices. Some of the space is vacant and a number of the buildings are in a poor condition. Three permanent commercial barge moorings are located on the River Lea Navigation, accessed from the site via Ferry Lane, two of which are currently vacant, with one used as office space. The barges are to be retained whilst the pontoon will be modified.

26 The site is located in the Upper Lee Valley Opportunity Area, which has an indicative employment capacity of 15,000. London Plan Policy 4.4 'Managing Industrial Land and Premises' provides a strategic aim for boroughs to adopt a rigorous approach to industrial land management, but recognises that managed release may be required to provide other uses in appropriate locations. Policy 4.1 'Developing London's Economy' provides strategic support for the provision of employment floorspace and Policy 4.2 'Offices' supports mixed use development with office provision to improve London's competitiveness. The site is not identified as Strategic Industrial Land (SIL) or as locally significant industrial land and is identified in the Area Action Plan for mixed uses including residential, with replacement employment.

27 The proposals include the following floorspace:

	Detailed (sq.m.)	Outline (sq.m.)
Retail (A1/A2/A3/A4/A5)	170 (Block A)	Up to 200 (Block C)
Office (B1)	137 (Block B)	Up to 1,100 (Block K)

28 In total this equates to up to 1,607sq.m. of floorspace, including the provision of Block K as commercial floorspace, in addition to the existing 465 sq.m. in the retained barges. The space would be located in blocks A, B, C and K, which are located in the south of the site, nearest to Ferry Lane, and around the public space at the foot of the new pedestrian bridge linking to Hale Village. This would generate approximately 119 full time employment jobs (FTE). As previously noted, Block K is subject to marketing and if omitted, the non-residential floorspace would generate approximately 41 FTE. Block K will be marketed as office floorspace for a period of time, to be controlled via a condition or section 106 obligation, and should it not be taken up, the building will be constructed for residential purposes, within the maximum of 505 units. It is understood that the commercial space will be let at market rates. Notwithstanding the challenges of providing affordable housing for the site, as discussed below, the applicant and the Council should clarify the position on affordable workspace provision.

29 The loss of the existing poor quality employment floorspace is acceptable, and the re-provision of an element of employment floorspace is supported. Although much of the employment space will be of a different nature to that existing, it is recognised that the proposed uses are more compatible with residential uses and no local or strategic protections are in place for the current use.

Housing

30 The proposal will provide up to 505 residential units, broken down as follows:

	Market	Private rented (PRS)	Affordable rent	Total
Studio	10	0	0	10 (2%)
One-bed	142	50	0	192 (38%)
Two-bed	164	51	17	232 (46%)
Three-bed	47	7	17	71 (14%)
Total	363 (72%)	108 (21%)	34 (9% by habitable room)	505
Detailed	141	108	0	249
Outline	222	0	34	256

Affordable housing

31 London Plan Policy 3.9 'Mixed and Balanced Communities' seeks to promote mixed and balanced communities by tenure and household income. Policy 3.12 'Negotiating Affordable Housing' seeks to secure the maximum reasonable amount of affordable housing. The need to maximise affordable housing is particularly important considering the location of the site within a Housing Zone. London Plan Policy 3.11 'Affordable Housing Targets' requires that 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale, with priority given to affordable family housing. The Council has an affordable housing target of 50%, and a tenure split of 70%:30%, although its emerging policy reduces this to 40%, with a 40%:60% split for the Tottenham AAP area.

32 The application is supported by an Affordable Housing Statement, which proposes up to 34 affordable units in the form of affordable rented units, equating to 9% on a habitable room basis, to be provided in blocks H and J as part of Phases 2 and 3. The Statement notes that the Council has advised that the 2 bedroom units should be let at 65% of market rent and 3 bedroom rented units at 55%, subject to local housing allowance caps, which would be secured in the section 106 agreement. The Statement notes that the Council has identified the site as being one of the few in the Housing Zone appropriate for larger family units, and that the majority of units coming forward in Tottenham Hale will be 1 and 2 bed units, therefore an emphasis on the provision of larger units has been adopted at the subject scheme. The Statement also notes that the Council has advised that a significant amount of shared ownership units are expected elsewhere in Tottenham Hale, and the site has therefore been identified as being suitable for affordable rent. The applicant has therefore placed an emphasis on the provision of larger sized, affordable rented accommodation on the site, with the provision of 50% family sized units, which it states is significantly less financially viable than the provision of shared ownership units.

33 The proposals have been in pre-application discussions for more than 18 months prior to submission, and the level of affordable housing has been a key concern. GLA officers recognise that this restricted island site surrounded by water is likely to result in increased development costs, which pose challenges for affordable housing. The proposal for increased density and taller buildings is one response to this; however it is recognised that there are some limitations to this in an ecologically sensitive area and consequently the heights were reduced during pre-application discussions to those currently proposed. During pre-application discussions, inclusion of the neighbouring garage site was also considered; however the site is currently designated as Green Belt land, and on those grounds it was excluded from the application. Notwithstanding this, the proposal would benefit from a GLA grant of £11.95M towards infrastructure, which together with Council funding, means that the bridges would be fully funded, providing significant public funding to the scheme. Considering this, and the comparatively low level of affordable housing proposed, GLA officers consider that the level of affordable housing should be increased, and a portion of these affordable homes should be

delivered in phase 1. Some discussions have taken place with the Council and GLA officers to examine a more varied mix of tenures and units sizes, which would help to achieve an increased level of affordable housing. This is welcomed, and the applicant's viability assessment should consider a range of affordable housing options, which should be reviewed by the Council's independent advisers. GLA officers should be included in discussions as the affordable housing offer develops.

34 The Council should provide GLA officers with their independent assessment of viability prior to the referral of any Stage Two application, in order to confirm that the proposal will provide the maximum reasonable amount of affordable housing, in accordance with London Plan Policy 3.12. GLA officers will update the Mayor on the findings of the assessment, and of further negotiations, at the Stage Two decision making process. Any departure from Policy 3.11 must be fully justified.

Housing Choice

35 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 3.8 also provides specific support for PRS units in addressing housing needs and increasing housing delivery. Policy 3.11 also states that priority should be accorded to the provision of affordable family housing.

36 The proposal includes private rented sector (PRS) tenure, which is supported by London Plan Policy 3.8 'Housing Choice'. The application does not detail the terms of the PRS tenure; however the applicant and the Council should note paragraph 3.3.5 of the Housing SPG, which states that PRS should be subject to "*a covenant, a Section 106 agreement or other legal agreement typically for 15 years or more and are retained in single ownership*"; however if a build to rent scheme delivers the same level of affordable housing as a market sale scheme, generally there would be no requirement for a covenant. Furthermore, the Housing SPG states that viability testing should include a 'for sale' viability appraisal alongside the appraisal for the covenanted build to rent scheme, and where viability testing of covenanted schemes demonstrates that affordable housing contributions at the level supported by private sale are unviable, 'clawback' mechanisms should be included as part of the planning permission to recoup this loss of affordable housing if the market homes are sold out of the long term PRS market and to ensure schemes deliver the maximum reasonable level of affordable housing in line with Policy 3.12. The clawback period should run with the covenant but should not be less than 15 years. Therefore, if the covenant period is shorter than 15 years, the clawback period will run beyond the covenant. The applicant should respond to these points prior to determination. Other guidance on PRS is contained in paragraphs 3.3.1-3.3.14 of the Housing SPG.

37 The proposals include 14% family sized units, although it is noted that 50% of the affordable units are family-sized. It is recognised that one and two bed units are more suitable for flatted development, and the 3 bed units are proposed to be located largely at ground and first floor levels (duplex units) in low rise blocks, which are more suitable for family dwellings. A large proportion of one and two bed units are considered appropriate in this highly accessible location, and smaller units are particularly suitable for PRS use. Subject to the views of the Council and the outcome of viability assessment, the mix is supported.

Density

38 London Plan Policy 3.4 'Optimising Housing Potential' states that taking into account local context and character, the design principles in Chapter 7 and public transport capacity,

development should optimise housing output within the relevant density range shown in Table 3.2. Taking account of the existing and forthcoming development at Hale Village, and the expected designation of Tottenham Hale as a District town centre, as identified in Table A2.2 of the London Plan, the site is considered to be within an 'urban' setting, where the density matrix sets a guideline of 45-260 units or 200-700 habitable rooms per hectare with a PTAL of 4-6.

39 The density proposed is approximately 284 units or 772 habitable units per hectare, which is slightly above the relevant density range. Considering the accessibility of the site, its tightly constrained nature surrounded by large areas of public open space, its location within an Opportunity Area, a Council Growth Area, and a Housing Zone, this density is supported.

Children's play space

40 Policy 3.6 of the London Plan seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor's supplementary planning guidance 'Shaping Neighbourhoods: Play and Informal Recreation', which sets a benchmark of 10 sq.m. of useable child play space to be provided per child, with under-fives play space provided on-site as a minimum.

41 The proposal requires 880 sq.m. of play space, with 400 sq.m. for under-fives as a minimum. The proposal includes 440 sq.m. of play space for under-fives, with 100 sq.m. coming forward in Phase 1, adjacent to block B; and 350 sq.m. in Phase 2, within the central courtyard. Provision for 5-11 year olds is proposed in an existing playspace within Hale Village, within 400m. of the site; and a number of play spaces are identified for over-twelves within 800m. of the site. Due to the highly constrained nature of the site and the availability of play space and other open space within the vicinity of the site, this is considered acceptable.

Natural environment

42 London Plan Policy 7.16 'Green Belt' gives the strongest protection to the Green Belt; Policy 7.19 'Biodiversity and Access to Nature' gives the highest protection to international and national nature designated areas; and Policies 7.24 to 7.28 provide support and protection for the Blue Ribbon Network.

43 No areas of the site fall within the Green Belt, although The Paddock and areas to the east are within the Green Belt, as are the allotments to the north-west. Although the development will clearly be visible from the Green Belt, it should be noted that the NPPF only states that the construction of buildings *within* the Green Belt is usually inappropriate. Notwithstanding this, the proposals will clearly be visible from the Green Belt and will have some impact; however the majority of the buildings proposed are 6 storeys or less, relating well to the adjacent Green Belt and sensitive ecological areas. The blocks of up to 21 storeys are located further to the south of the site; and are shielded to a certain degree from the Green Belt and ecological areas by the adjacent garage site, Ferry Lane, and the lower rise buildings proposed on the site to the north. The height and massing of the proposals appropriately respond to the sensitivities of the site and are supported, with no harm caused to the Green Belt.

44 The application includes an Environmental Statement, which examines the ecology of the site. The site lies within the boundary of the Lee Valley Regional Park. Parts of the site, the Paddock and the River Lee channels to the east and west of the application site form part of a metropolitan Site of Importance for Nature Conservation (SINC). Walthamstow Marshes and the Reservoirs to the east form part of the Lee Valley Special Protection Area (SPA), a Ramsar site, an Important Bird Area and the Walthamstow Reservoirs Site of Special Scientific Interest (SSSI). SPA and Ramsar are international designations.

45 The site partially lies within the metropolitan SINC, specifically the landings and span for the proposed Hale Village Green Link Bridge adjacent to Pymme's Brook; a narrow strip of the landscaped eastern edge of the site; and the northern tip of the site. Policy 7.19 gives 'strong' protection to sites of metropolitan importance. The northern tip of the site extends by approximately 19 metres into the SINC, with an area of approximately 500 sq.m. It is predominantly hardstanding (approximately 400 sq.m.) used by an operational pallet business, with limited scrub and trees in two narrow strips to the east and west. The loss of the hardstanding is not considered to compromise the structure or function of the SINC, and approximately 90 sq.m. of native wildflower, grassland and reinforced grass surface will be planted. On the north-eastern edge, the site will retain the existing trees and planting, and introduce a number of mature and semi-mature trees, hedging and shrub planting. Compared to the existing 100 sq.m. of vegetation, the proposed development will result in 135 sq.m. of retained and extended soft landscaping and potential habitat. In addition, invasive non-native species will be removed. The bridge landing will involve the removal or modification of approximately 0.03ha. of vegetation, which is not considered to alter the character of the SINC to a significant degree or remove any habitat type completely. Additionally, the trees that would be lost are considered to be of limited ecological potential. Outside of the SINC area, the proposals include landscape planting, with an area of tree planting greater than that which will be affected, and ecological enhancements such as bird nest boxes and bat roosting. The Environmental Statement concludes that the impact on habitats important at a metropolitan scale is not significant. Areas of international designation are of greater distance from the site and no significant impacts are expected.

46 The Environmental Statement also considered the impact on local bird populations and other protected species. Mitigation measures are proposed during construction in the form of acoustic hoarding, security hoarding, and best practice methods of selecting quiet plant. Following this, the noise and visual disturbances during construction are considered to have a minor extent and severity. The impact on connectivity caused by tall structures is also considered, finding that the site is offset from the wider network of waterbodies to the north, and covers a small extent relative to the corridor available to wetland birds, and therefore any impact is assessed as unlikely. Additionally, the birds present in the reservoirs are considered to be tolerant of built landscapes, and the conclusion is that any adverse effect of loss of connectivity to birds of importance at the national scale is not significant. Subject to the views of Natural England, GLA officers accept the conclusions of the Environmental Statement.

47 The waterways also form part of the Blue Ribbon Network. In terms of London Plan policies, the proposals are considered to be beneficial to Blue Ribbon Network policies, with improved public access to the waterways via the wharfside open space and the new pedestrian bridges, enhancement of the existing moorings, and improvements to the biodiversity and landscape quality of the water's edge, which is welcomed. Away from the wharfside open space, all other waterside banks will have 3.8m. planted edges. Floating reed bed rafts are proposed in the Lee Navigation.

48 In summary, the proposals are considered to provide suitable protection and enhancement of the natural environment, in line with London Plan policies.

Urban design and tall buildings

49 The site poses considerable challenges in terms of layout due to its narrowness and being largely surrounded by watercourses and Green Belt/SINC. The response to align buildings around the edges of the site, creating a central courtyard is supported. The relocation of block B from the western side at pre-application stage, to the eastern side in the application is

strongly supported, since this creates a generous 'wharfside' open space at the entrance to the site, off Ferry Lane. This also allows clear views from Ferry Lane of the lock operation and of the proposed new pedestrian bridge, and clear sight lines for vehicles entering the site. The space includes a landing area for the new pedestrian bridge, which is much improved compared to an earlier pre-application version with a lengthy ramp. The space is proposed to be hard landscaped, which is considered an appropriate response to the historic wharf uses of the site, and allows public uses such as markets. The limited depth and footprint of the blocks, and the need to provide some animation to the water-side of the blocks, entails a greater degree of cycle storage and servicing frontage than would normally be expected; however the space is activated to an acceptable extent by commercial uses and residential access.

50 The introduction of softer landscaping in the interior courtyard will help to mitigate against any noise impacts in this relatively enclosed space, as well as linking to the surrounding natural environment, which is welcomed. The use of car parking courts accessed from the courtyard raises some concerns about the security of these areas due to a lack of overlooking and passive surveillance, and the applicant should provide clarification as to how this will be achieved. It is recognised that the restricted nature of the site limits car parking options, and that the level of parking has been minimised.

51 Other than beside the wharfside open space, the waterside banks will have 3.8 metre planted edges, with access restricted for maintenance only. This responds to concerns raised at pre-application stage, when the delineation between public and private access in these areas was unclear. Detailed landscape design should ensure that these areas are clearly not for public access.

52 The need for new bridge connections has been identified through the Upper Lee Valley OAPF, Haringey's Tottenham Hale and Green and Open Spaces Strategy, and the District Centre Framework, as a means to link new and existing communities, provide access to public transport and nature, and reinforce the distinctiveness of place. Improving the connectivity of the site, particularly later phases towards the north, will be crucial to the success of the scheme. The River Lee Navigation Bridge and the Pymmes Brook Bridge are included in the outline planning application, and are subject to parameter plans. A series of detailed design principles including access, materials, ecological impact, lighting and public realm are contained within the Design and Access Statement; however these are not expressed as Design Codes and the applicant should clarify how these will be secured. The Paddock Bridge towards the north of the site is not included in the application; however its location and landing are secured.

53 The outline application is subject to a detailed collection of Design Codes within the Design and Access Statement, covering use, typology, roofs, gaps between buildings, appearance, parking, courtyards and waterside, refuse, services. These are suitably rigorous to ensure that a high quality scheme is delivered, which is welcomed, and should be appropriately secured as part of any permission.

54 London Plan Policy 3.5 'Quality and Design of Housing Developments' promotes quality in new housing provision, with further guidance provided by the Mayor's Housing SPG. The detailed application confirms that London Plan space standards will be met; internal areas generally achieve 2.5 metre floor to ceiling heights; all units have private outdoor amenity in the form of gardens, terraces, or projecting balconies; dual aspect units have been maximised; and where single aspect units are required, the Daylight and Sunlight Assessment demonstrates adequate levels of lighting and ventilation. The number of units accessed per core on each floor does not exceed 9, which is considered acceptable in this context. The Design Codes generally secure an appropriate level of residential quality in the outline application; however due to the constrained nature of the site, some blocks across the courtyard will be 12 metres apart, which is

less than the 18-21 metres usually required between living spaces. It is suggested that an additional design code secures that the layout of units and windows will ensure privacy.

55 A full summary of representations to the Council and the Mayor will be provided at Stage II; however the Mayor has already received four objections from Councillor Lorna Reith; a local residents group; Tottenham Civic Society; and the local Friends of the Earth group. These objections focus on the heights of the proposed buildings and their impact on local residents, nature and green space, and the local context. The site is identified as a suitable location for tall buildings within the Upper Lee Valley OAPF, and the emerging Development Management DPD. The Tottenham Hale Urban Characterisation Study recommends 3-6 storeys for the majority of the site, with 6-11 storeys towards Ferry Lane. The majority of the application proposals are in line with this, with 6 storeys or less, relating well to the adjacent Green Belt and sensitive ecological areas. Towards Ferry Lane, block C rises to 9 storeys, block B to 16 storeys and block A to 21 storeys, which are nearer to the tall buildings existing and forthcoming in Hale Village, and the public transport links at Tottenham Hale, and shielded to a certain degree from the Green Belt and ecological areas by the adjacent garage site, Ferry Lane, and the lower rise buildings proposed on the site to the north. The height and massing of the proposals appropriately respond to the sensitivities of the site and are supported. Although blocks A and B are taller than that recommended in the Urban Characterisation Study, it is recognised that the challenges of this highly restricted site, and the need to provide affordable housing, require a scheme of some density. The Parameter Plans for the outline application appropriately secure maximum building heights and gaps between buildings to break up the massing.

56 The architecture and use of materials are characterised as 'robust historic waterside buildings', using stock brick and incorporating a varied pitched roofline with gabled ends. This responds well to the historic wharf uses of the site, resulting in a simple yet distinctive appearance of a high quality, which is strongly supported.

Inclusive design

57 The aim of London Plan Policy 7.2 'An Inclusive Environment' is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum).

58 The site has a level change of over 1 metre, mostly at the south end of the site, which has gently sloping footpaths not exceeding 1:21 gradient, with level landings for every 500mm. rise. The proposed Lee Navigation bridge with access via lifts at each end is much improved compared to earlier versions, which included a lengthy ramp; however the applicant should confirm the proposed maintenance arrangements for the access lifts and how these will be secured.

59 Policy 3.8 'Housing Choice' requires that ninety percent of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and ten per cent of new housing meets Building Regulation requirement M4(3) 'wheelchair user dwellings', that is, designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. The application confirms that all of the units have been designed to meet Building Regulation requirement M4(2) and 10% will meet Building Regulation M4(3), which are spread across units sizes and includes affordable and market tenures. The Council should secure M4(2) and M4(3) requirements for both the detailed and the outline applications by condition.

Transport

61 Haringey's Tottenham AAP (Pre-Submission Version January 2016) development guidelines state that access into the Hale Wharf site should be improved. The Upper Lee Valley OAPF stresses the need for improved connectivity. It also forms part of the Tottenham Hale

Growth Area and the Tottenham Housing Zone. Funding from the Housing Zone allocation is being used to improve connectivity in the area and contribute towards the pedestrian and cycle bridges forming part of the outline planning application.

62 The methodology and approach to the highway impact assessment is broadly acceptable; however further information should be provided on delivery and servicing vehicular generation and how junction capacity and safety will be affected by the significant queuing that is currently experienced along Ferry Lane.

63 As requested at pre-application stage, the applicant has undertaken an impact assessment on the bus network, which shows that there is estimated to be a significant mode share of residents and employees from the development using the bus network. The numbers provided by the applicant have been analysed by TfL Bus Network Development and it is considered there will be a significant impact as a result of the development. As such, contributions are requested to help mitigate this impact and ensure that adequate bus capacity is provided prior to the full build out of the scheme. An additional single journey on all weekdays would be needed to provide sufficient capacity on route 123, which costs £375,000 over five years (£75,000 per year). Additionally, route 192 is at capacity arriving at Tottenham Hale in the AM peak and departing from Tottenham Hale in the PM peak. Low capacity single-deck buses are used on this route, and the numbers forecast from this development mean that an additional return journey is required to provide sufficient capacity to satisfy the additional demand. The cost is £475,000 over five years (£95,000 per year). Contributions of £850,000 are therefore requested to mitigate the impact of the development on the bus network over the next 5 years.

64 The applicant has followed TfL guidance and assessed the impact of the proposed and cumulative development on the operation of the Underground network, which is accessed via Tottenham Hale Station. The applicant's assessment shows that this number of trips is very small in comparison with the peak hour flows boarding and alighting at Tottenham Hale, and it is considered that the proposed development is unlikely to have significant impact upon the capacity of the Underground network.

65 Whilst the overall principle of the site layout is broadly acceptable, there are concerns over the width of the pedestrian footways through the site, which should be widened. TfL's Manual for Streets states that pedestrian footways should be no narrower than 2 metres unobstructed width. The principle of the shared use carriageway has been reviewed and it is considered that this will provide an acceptable level of service for both cyclists and vehicles.

66 Phase 1 can be delivered relying only on access via Ferry Lane, as this part of the site has a higher PTAL; however later phases will require the improved connections brought about by the bridges. It is therefore suggested that any permission for the outline application should be subject to Grampian conditions to the effect that the applicant should not commence development of any plot within the second phase of development until reserved matters approval has been given for the design of both bridges, all other necessary consents, and a funding/delivery timescale is in place. Subsequently, there should be a further condition that ensures that no part of the second phase should be occupied until the bridges have been constructed and are open for use.

67 The assessment of the predicted number of short-distance trips and the quality of the pedestrian and cycling environment is welcomed. The PERS audit highlights some problem areas, and the applicant should discuss with the Council how the pedestrian areas, crossings and public transport waiting areas identified as 'amber' could be improved.

68 Pre-application discussions focused on how cyclists may cross Ferry Lane during highway peaks, whether it is practical to use the recently upgraded Mill Lane crossing, and whether there should be protection afforded to cyclist's turning movements at the site access junction. The Council may wish to request contributions towards improving the local infrastructure to link to improvements at Tottenham Hale to the west, and the Waltham Forrest Mini-Holland to the east, which would be supported.

69 Given the proximity of Tottenham Hale Station and how well the site is served by public transport, an essentially car-free residential development is appropriate in this location and is supported. The Transport Assessment proposes to provide 50 Blue Badge spaces (10% of units), and 2 spaces for a Car Club. The 6 spaces provided for the commercial barges is considered an overprovision for the amount of commercial space and should be reduced. The applicant states that a Car Parking Management Plan (CMP) will be produced, which should be conditioned to be submitted and agreed prior to occupation of the site. The CMP should clearly set out how the monitoring of Blue Badge spaces will be undertaken and the mechanism for providing Blue Badge spaces to qualifying residents. The applicant should confirm that these spaces, including any temporary spaces provided during phasing, meet the Blue Badge spatial dimensions as set out in the London Plan.

70 The introduction of car club spaces on the site is welcomed; however the applicant should identify where these spaces will be located. Car Club memberships are requested for all residents of the development for the first two years of occupation and this contribution should be included in the section 106 agreement.

71 The applicant should confirm that electric vehicle charging point (EVCP) provision for the site will be in line with London Plan Policy 6.13, which requires 20% of all residential car parking to be provided with active charging points and 20% with passive provision that can be easily converted in future.

72 The applicant is proposing cycle parking in line with London Plan Policy 6.9; however the calculations should be clarified. The location and type of cycle parking spaces should be carefully considered and should follow guidance provided in the London Cycle Design Standards. Furthermore, non-residential elements of the development will require ancillary facilities to promote cycling, such as lockers and changing facilities. Further detail should be provided regarding the proposed layout, location, and access to cycle parking in order to determine whether the cycle parking is compliant with the London Plan Policy 6.9.

73 The applicant's Travel Plan should be reviewed using TfL's ATTrBuTE and the Delivery and Servicing Plan (DSP), should include a plan outlining the specific locations where delivery and loading should be occurring. The Travel Plan should be secured, enforced, monitored and reviewed as part of the section 106 legal agreement and the DSP should be secured by a condition.

74 Construction information, such as the routing, expected number of vehicles generated by the site and the impact on the highway network should be provided. A Construction Logistics Plan should be secured by condition.

Community infrastructure levy

75 The Mayor has introduced a London-wide community infrastructure levy (CIL) to help implement the London Plan, particularly Policies 6.5 and 8.3. The rate for Haringey is £35 per square metre. The required CIL should be confirmed by the applicant and Council once the components of the development have been finalised.

Climate change

Energy

76 The applicant has undertaken dynamic modelling following CIBSE TM52 methodology to assess the risk of overheating and develop passive design measures to meet the requirements. Glazing with low g-values and internal blinds is proposed. There is an inconsistency between the g-values in the overheating (0.40) and energy strategies (0.48); however the applicant should commit to installing glazing in line with the overheating assessment and update the energy modelling accordingly. The top floor apartments have larger windows and no shading from balconies, in comparison to lower floors. The applicant should investigate further passive design measures, for example external shading, to reduce the risk of overheating.

77 The development is estimated to achieve a reduction of 45 tonnes per annum (8%) in regulated CO₂ emissions from the first stage of the energy hierarchy ('Be Lean'), compared to a 2013 Building Regulations compliant development.

78 The Hale Village heat network is within the vicinity of the development and the applicant has contacted the operator and determined that the heat network could be extended to the development. The applicant has also confirmed that the existing heat network is supplied by gas and biomass boilers, with the potential for combined heat and power (CHP) to be incorporated at a future date. However, at this stage there is no agreement with the network operator and the applicant is proposing to pursue both a connection to the heat network and a standalone option should connection not be possible. The applicant should prioritise connection to the heat network over a standalone solution. Further information on the heat network should be obtained from the network operator, including confirmation that the network has the capacity to serve the new development, together with supporting estimates of installation cost and timescales for connection. The applicant should also provide further information on expansion plans for the network, including timescales for connection to the Newlon and Lockkeeper's cottage sites and proposed upgrade plans to the plant within the energy centre. Evidence of correspondence with the network operator should be provided.

79 The applicant should confirm that all apartments and non-domestic building uses will be connected to the site heat network. A drawing showing the route of the heat network linking all buildings on the site should be provided. Connection to an external heat network should be prioritised; however, if this is not possible the applicant is proposing to install three 60 kW_e/120kW_{th} gas fired CHP units as the lead heat source for the site heat. Should the on-site CHP option be progressed, the applicant should investigate how the number of CHPs can be minimised, for example using temporary boilers for Phase 1, in order to increase plant efficiency.

80 A reduction in regulated CO₂ emissions of 175 tonnes per annum (28%) will be achieved through this second part of the energy hierarchy ('Be Clean').

81 The applicant has investigated the feasibility of a range of renewable energy technologies and has identified photovoltaics (PV) as the most suitable renewable technology; however it is not proposing to install PV as the Policy 5.2 target is met through CHP. The installation of PV is strongly encouraged to maximise carbon savings and comply with Policy 5.7.

82 Based on the energy assessment submitted, a reduction of 224 tonnes of CO₂ per year in regulated emissions is expected, compared to a 2013 Building Regulations compliant development, equivalent to an overall saving of 36%. The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan; however, the comments above should be addressed before compliance with London Plan energy policy can be verified.

Climate change adaptation

83 The Flood Risk Assessment (FRA) confirms that the site is located within Flood Zone 2, with existing ground levels above the 1-in-1000 year flood level. The site is also at low risk of significant surface water flooding and the proposed development complies with London Plan Policy 5.12.

84 The FRA proposes to continue surface water discharge to the River Lee Flood Relief Channel and proposes to restrict peak surface water flows for the 1 in 100 year event (plus climate change) to 50% of existing rates, via filter drains, porous paving and underground storage tanks. This complies with London Plan Policy 5.13; however, the use of green roofs is strongly encouraged, for example in combination with blue roof technology, as these contribute towards multiple London Plan policies. Any attenuation tanks proposed should be designed to provide benefit during lower order storm events by utilising the Method 2 tank design taken from the CIRIA Susdrain website:
http://www.susdrain.org/files/resources/fact_sheets/01_15_fact_sheet_attenuation_for_redeveloped.pdf

Local planning authority's position

85 Haringey Council has been engaged in pre-application discussions with the applicant for more than 18 months and officers are generally supportive of the scheme.

Legal considerations

86 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

87 As discussed above, a GLA infrastructure grant of £11.95M is proposed.

Conclusion

88 London Plan policies on employment floorspace, natural environment, housing, affordable housing, urban design and tall buildings, inclusive design, transport and climate change are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Employment floorspace:** The loss of the existing poor quality employment floorspace is acceptable, and the re-provision of an element of employment floorspace is supported.
- **Housing:** The principle of residential use is supported. Private rented sector (PRS) tenure is supported; however these units should be subject to a covenant, a Section 106

agreement or other legal agreement typically for 15 years or more, retained in single ownership, and be subject to a 'clawback'. A large proportion of one and two bed units are considered appropriate in this highly accessible location, and smaller units are particularly suitable for PRS use; however the Council should confirm that this responds appropriately to housing needs in the area. Taking account of the accessibility of the site, its tightly constrained nature surrounded by large areas of public open space, its location within an Opportunity Area, a Council Growth Area, and a Housing Zone, the density is supported. The provision of play space is acceptable.

- **Affordable housing:** The level of affordable housing should be increased and a portion of these affordable homes should be delivered in phase 1. Discussions to examine a more varied mix of tenures and units sizes to achieve an increased level of affordable housing should continue. Consideration should also be given to the inclusion of affordable housing in phase 1. The Council should provide GLA officers with their independent assessment of viability prior to the referral of any Stage Two application, in order to confirm that the proposal will provide the maximum reasonable amount of affordable housing, in accordance with London Plan Policy 3.12. GLA officers will update the Mayor on the findings of the assessment, and of further negotiations, at the Stage Two decision making process. Any departure from Policy 3.11 must be fully justified.
- **Natural environment:** The proposals are not considered to cause any harm to the Green Belt. Subject to the views of Natural England, no significant impacts are expected on designated nature areas and no significant adverse effects to birds of importance at the national scale are expected. The proposals are considered to be beneficial to Blue Ribbon Network.
- **Urban design and tall buildings:** The site is identified as a suitable location for tall buildings, and the tallest blocks are appropriately located nearer to the existing and forthcoming tall buildings in Hale Village, and the public transport links at Tottenham Hale. The height and massing of the proposals appropriately respond to the sensitivities of the site and are supported. The layout, architecture and materials of the proposals are generally considered to be of a high quality. The use of car parking courts raises some concerns about the security of these areas and the applicant should provide clarification as to how this will be achieved. The applicant should clarify how the design principles for the bridges will be secured. It is suggested that an additional design code secures that the layout of units and windows ensures privacy within the courtyard spaces.
- **Inclusive design:** The proposed Lea Navigation bridge is much improved compared to earlier versions; however the applicant should confirm the proposed maintenance arrangements for the access lifts and how this will be secured. The Council should secure M4(2) and M4(3) requirements for both the detailed and the outline applications by condition.
- **Transport:** There are a number of issues to be addressed before the application can be considered to comply with the London Plan Policies 6.1 'Strategic approach', 6.3 'Assessing effects of development on transport capacity', 6.9 'Cycling', 6.13 'Parking' and 6.14 'Freight'. Section 106 contributions are requested to mitigate the impact on the bus network in the vicinity of the site as a result of the development. The section 106 agreement should secure the Travel Plan and car club membership. Conditions should be secured for Blue Badge parking and EVCP provision; cycle parking and facilities; Delivery and Servicing Plan; and Construction Logistics Plan.
- **Climate change:** Based on the energy assessment submitted, a reduction of 224 tonnes of CO₂ per year in regulated emissions is expected, compared to a 2013 Building Regulations compliant development, equivalent to an overall saving of 36%. The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan; however, further

information should be provided before compliance with London Plan energy policy can be verified. The proposed development complies with London Plan Policies 5.12 and 5.13; however, the use of green roofs is strongly encouraged.

89 On balance, the application does not yet comply with the London Plan; however the possible remedies set out above could address these deficiencies.

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