



GLA Stage 1 - Response

DATE:	14 April 2023	CONFIDENTIALITY:	Restricted
SUBJECT:	Berol Quarter (Berol Yard) – GLA Stage 1 Response		
PROJECT:	70094918	AUTHOR:	Mark Cottray
CHECKED:	Sam Tearle	APPROVED:	Mark Cottray

INTRODUCTION AND BACKGROUND

Berol Quarter Limited have submitted a full planning application (HYG/2023/0261 & HGY/2023/0241) for permission for the refurbishment and extension of Berol House to include Use Class E floorspace and the redevelopment of 2 Berol Yard to provide new residential homes and Use Class E floorspace.

WSP UK Ltd was appointed by the Applicants to provide transport design and planning advice to support the planning application.

The purpose of this Technical Note is to respond to comments in the Greater London Authority (GLA) Stage 1 report, issued on 27th March 2023. On transport, feedback was provided by Transport for London (TfL) on the following topics:

- Healthy Streets TA and Active Travel Zone (ATZ) Assessment;
- Vehicle, Pedestrian and Cyclist Access;
- Trip Generation and Impact;
- Safeguarding and infrastructure protection;
- Car Parking;
- Cycle Parking;
- Travel Planning;
- Servicing; and
- Construction.

Healthy Streets TA and ATZ Assessment

TfL commented:

60. The applicant has provided a Healthy Streets TA and ATZ assessment as part of the submission document. The ATZ assessment has chosen several key routes from the site to an array of locations. However, it is recommended that amendments to the routes which should be carried out. This includes the inclusion of the nursery to the north of the site and exploring potential alternative routes to Cycleway 1.

WSP Response:

The Applicant would welcome clarification on:

- Whether TfL are referring to the Bright Gems Nursery to the north of Harris Academy on Ashley Road; and
- What alternative routes to Cycleway 1 TfL would like to see included in the ATZ Assessment.

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For the former, future residents would benefit from the significant highway improvements proposed on Ashely Road (detailed in the TA) up to the junction with Burdock Road. To the north of this junction, there are adequate footways either side of the carriageway with street lighting and safe crossing points provided.

For the latter, it should be noted that the ATZ assumes cyclists would use routes that form part of the London Cycle Network (LCN). This is a signed cycle route and is the most direct route to Cycleway 1, therefore considered to be the most likely route that would be used. Alternative routes would involve using e.g. Monument Way, which is a heavily trafficked A-road or travelling northbound via Watermead Way and then onto Dowsett Road, which is a significant detour when compared to the route that has been assessed.

TfL commented:

61. It is also noted that the ATZ assessment has been carried out as a desk-based assessment. This method is no longer accepted and it is requested that this is carried out on site as per TfL guidance.

62. Whilst the ATZ has highlighted some key improvements to the area, further scrutiny is required once the onsite assessment has been carried out. As part of the assessment, the applicant should consider routes to Cycleway 1 and assess whether it these meet the TfL Cycle Route Criteria and consider how the requirements could be met as a link.

63. Further discussions are required to consider the appropriate walking and cycling improvements that should be secured through legal agreement as necessary.

WSP Response:

The Applicant supports the principle to improve walking and cycling outside of the redline boundary, as demonstrated by existing commitments as part of the consented scheme (HGY/2017/2044), that includes:

- The public realm and cycle way improvements to Watermead Way which have been delivered and paid for by the Applicant at a cost of £534,000.
- In addition, the wider masterplan by the Applicant for the Ashley Road South area has delivered an improvement in public access to the Berol Yard and Ashley Gardens developments, including the public rights of access across the entire estate and the new Berol Link – which provides direct access from Ashley Road into Down Lane Park.
- HG/2017/2044 also delivered the adjacent “Gessner Gardens” which provides a public green space to dwell and has been highly commended by the Haringey Design Awards.

This Application will also contribute to nearly £4m CIL, some of which is envisaged to contribute towards highways and transport related improvements. Furthermore, this Application will provide a new public lift, bridgehead and staircase which will support the future active travel network linking the Paddock Community Nature Park, the Walthamstow Wetlands with Tottenham High Road. The costs of delivering these facilities has been detailed and provided to the Local Authority as £518,700.00 and will be secured through the Section

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106 agreement. This contribution sits alongside a further investment by the Applicant in the public realm to create a new public square, including a Section 106 commitment to provide space for public art.

The original planning application (HGY/2017/2044) considered the impact of the development on the active travel network and secured generous contributions from the Applicant, which have been paid in full.

Noting the above, the Applicant highlights that any requests for further contributions would be required to demonstrate that the contribution meets the relevant planning tests, namely:

- Is it necessary to make the development acceptable in planning terms;
- Is it directly related to the development; and
- Is it fair and reasonably related in scale and kind to the development.

The current package of planning obligations alongside the scheme's CIL contribution (elevated for BtR developments) are considerable. Any additional contributions sought would further challenge the viability of the scheme and are unlikely to meet these statutory tests of necessity, proportionality and reasonableness.

Vehicle, Pedestrian and Cyclist Access

TfL commented:

64. There are several proposed pedestrian access points to the site from Ashley Road and Watermead Way. The application site will link up with proposed Green Link and it will also provide a new access route through Berol House – referred to as Berol Passage. This should be secured with 24hr access via the appropriate mechanism. Vehicular access is gained from Gessner Lane, which is deemed acceptable, but TfL has concerns over the management of this space which is discussed further below.

65. TfL has concerns over cyclist access points and how the site integrates into the wider cycling network. This will be discussed further in the detailed comments to the London Borough of Haringey.

WSP Response:

The Applicant can confirm that it will provide a permissive path right of access for members of the public to pass and this has been provided for in the draft Section 106 heads of terms.

The comments on concerns over cyclist access points and how the site integrates into the wider cycling network are noted, albeit the Applicant notes that the comments received from the London Borough of Haringey (LBH) Highways does not make any references to such concerns.

The site benefits from a new cycleway on Watermead Way (to the east and paid for by the Applicant under the previous application) and a proposed new cycleway on Ashley Road (to the west) of the site, which is being funded by the Applicant as part of the original application (HGY/2017/2044). Such provision will help maximise the number of future residents / employees and visitors to cycle to and from the site.

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Trip Generation and Impact

TfL commented:

66. TfL requests that the applicant should conduct link load analysis of Tottenham Hale Station. The cumulative impact of all small-scale developments may cause major impact to the system. It is request that the applicant should provide the analysis based on NUMBAT 2019 data, with the scenarios of base, base + development and base + development + consented development.

WSP Response:

The Applicant highlights that the trip generation assessment estimates there would be an additional 68 and 57 trips in the AM and PM peak, respectively, via Tottenham Hale Station. Furthermore, when compared to the consented scheme, the Proposed Development results in a reduction in the number of people using Tottenham Hale Station. The trip generation assessment estimates that there would be 56 fewer trips in the AM peak and 48 fewer trips in the PM peak.

It is also important to note that the trip generation assessment assumes a worst-case scenario, in that the number of public transport trips related to commuting is likely to be significantly lower than what has been presented, due to a change in working patterns associated with Covid-19.

According to the Office for National Statistics (ONS) Labour Force Survey, working from home was a rising trend before the pandemic, but it amounted to less than 5% of working adults in 2019. During the pandemic, it was common for more than 40% of the population to have worked from home and having tasted the benefits of doing so, it is expected that spending two to three days at home will be the most common expected working pattern post Covid-19 and only one in seven expect to return to five days a week commuting.

Noting all of the above, a more detailed analysis of impact on Tottenham Hale Station is not deemed necessary to determine the application.

Safeguarding and Infrastructure Protection

TfL commented:

67. The applicant should demonstrate that the relevant consultation and safeguards have been put in place to safeguard adjacent London Underground, TfL Buses and rail infrastructure. It should be show that this is being considered during construction and following completion of the development.

WSP Response:

The Applicant confirms that relevant consultation and safeguards will be progressed by the appointed Principal Contractor prior, during and after construction, if planning consent is granted. The Applicant has already engaged with London Underground in respect of the proposed foundations and obtained conditional approval for the below ground works. Following completion, residents will be provided with details of the available public transport and the car free nature of the development promotes sustainable transport.



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Car Parking

TfL commented:

68. The applicant is proposing 7 blue badge parking spaces for 2 Berol Yard, which equates to 6 for the residential element and 1 for the retail element. This is London Plan compliant from the outset. However, the applicant has failed to identify potential future locations, should an additional 7% demand arise. The car parking for this element is located within an undercroft; TfL requests further information on how this is accessed, particularly for the residential space. For Berol House the applicant is proposing 1 blue badge space which is policy compliant.

WSP Response:

The Transport Assessment (TA) comments (Para 6.5.8) that whilst the provision of blue badge parking from the outset is expected to comfortably accommodate demand from residents of the scheme, the Design and Access Statement (DAS) provides further detail on how additional spaces can be provided within the public realm, in the unlikely scenario whereby further spaces are required. For ease of reference, an extract of relevant section of the DAS is provided overleaf.

The access to the car park is via the recently constructed estate road, via the north of Berol House and is opposite the existing parking area for Building 4 of the previous planning consent. All vehicle traffic is being excluded from the new Berol Square to support the pedestrian priority.

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Figure 1: Extract of DAS showing potential future additional blue badge parking location.



Illustrative plan of Berol Walk (North) with potential accessible parking bays

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TfL commented:

69. TfL also notes that there are interim parking arrangements as part of the proposal. TfL request further details on this element and in particular the retention of parking spaces. This should be provided via a Parking Design and Management Plan (PDMP) and this should be secured via condition.

Furthermore, all future occupants should be exempt from resident and business parking permits, and this should be secured via s106 agreement. Clarification is also sought on the levels of proposed Electric Vehicle Charging Points (EVCP's), which should be provided in accordance with the London Plan minimums.

WSP Response:

The Applicant confirms its intention to produce a Car and Cycle Parking Management Plan (CCPM), that would be secured via condition. This will include detail on the interim parking proposals that are informed by the obligations to the existing tenants in Berol House, which have been discussed with the Interim Head of Economic Development and Haringey Council.

In relation to EVCPs, the TA confirms that electric vehicle charging provision will be provided in-line with Building Regulations '*Infrastructure for the charging of electric vehicles*' which means all spaces will have access to an active charge point.

Cycle Parking

TfL commented:

70. TfL has concerns over the quantum and design of the cycle parking. The quantum on the plans appears to be below London Plan minimum requirements. In addition to this, design does not accord with the London Cycle Design Standards (LCDS). Further detailed will be within the borough comments.

WSP Response:

Table 6-1 and 6-2 of the TA confirms the number of cycle parking proposals exceed those required by the London Plan.

The Applicant notes comments from LBH Highways that the layout of cycle parking does not meet LCDS standards for aisle width adjacent to two-tiered cycle parking. The proposals currently assume an aisle width of 2.5m which is in excess of what is recommended by the cycle parking manufacturers (1.7m minimum and 2m recommended).

The wording set out in the LCDS indicates there is a degree of flexibility with regards to the aisle width, stating '*overall width of 3500mm should ideally be provided where there are racks on either side of the aisles, though this may limit the density advantages of two-tier stands*'.

Opportunities to further increase the aisle width compared to the recommendations from the cycle parking manufacturers were considered with the design team, albeit it was concluded that this would have a significant impact on:

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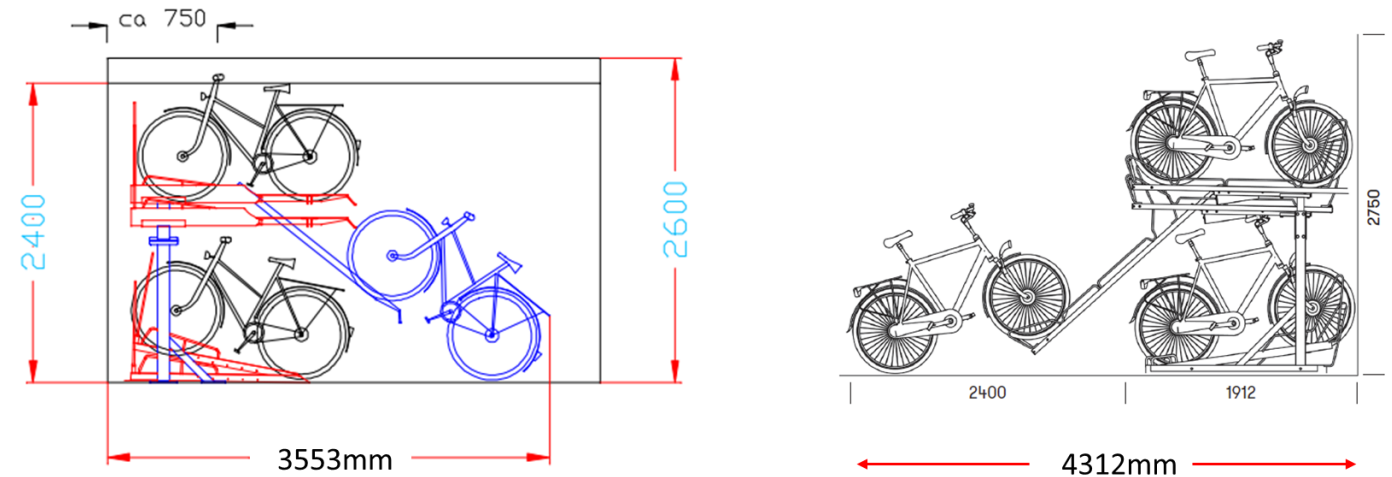
- The efficiency of the ground floor layout at 2 Berol Yard and/or the quantum of employment-generating commercial floorspace desired by LBH.
- The scheme's active frontages and associated loss of visual surveillance.
- Reduced opportunities to enhance the public realm to create a more attractive place for future residents, employees and visitors.
- The quantum of cycle parking spaces (including accessible spaces) that could be provided.
- Additional cycling storage space would have required the use of a basement, which would have created significant additional carbon, which was against the LBH policy for carbon reduction as well as financial pressure on the ability to deliver affordable homes.

The proposals assume the use of a Josta 2-tier cycle racks (or equivalent), which are considered an innovative solution to provide high quality cycle parking for sites with limited space. **Figure 2** below illustrates:

- The Josta 2-tier cycle rack that shows the rear of the bike extends out 3553mm from the wall when the rack is pulled down; and
- Another with a more standard 2-tier system that shows the rear of the bike extends out 4312mm from the wall when the rack is pulled down.

The image illustrates the advantages of the Josta 2-tier cycle rack system with its compact footprint, which is achieved by having the top rack sit higher off the floor than other more standard systems and hence needs less operating space than other systems. It highlights that not all 2-tier systems are the same and some will need a wider walkway.

Figure 2: Josta 2-Tier Cycle Rack (L) Vs Standard 2-Tier Cycle Rack (R)



Noting the above, the Applicant concludes that 2.5m aisle width can provide high quality cycle parking to encourage active travel, without it resulting in a detriment impact on the topics listed above.



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Travel planning

TfL commented:

71. The applicant has submitted an outline Framework Travel Plan for the site. Given the location of the site to public transport and potential links to the cycling network, it is considered that the targets should be increased to reflect this. The final travel plan should be secured within the s106 agreement in accordance with London Plan policy T4.

WSP Response:

The desire to increase the targets for public transport and cycling related trips is noted. As detailed in the Framework Travel Plan, the intention would be to revise the targets once Year 1 surveys are completed, and these would be agreed with LBH. This will be set out in the detailed Travel Plan, which will be secured via condition. Additionally, the Applicants' S106 Draft Heads of Terms includes a financial contribution for Travel Plan monitoring and evaluation.

Servicing

TfL commented:

72. The applicant has provided an outline Delivery and Servicing Plan (DSP) which shows all vehicles apart from refuse, servicing the site via two loading bays on Ashley Road and Watermead Way and swept path analysis has been provided.

73. It is noted that the application would result in the creation of a private road, referred to as Gessner Lane. Only refuse vehicles would be able to service the site using the road, however clarification is sought on the management of this space. The final DSP should be secured by planning condition.

WSP Response:

The above is noted and the Applicant confirms that details on the management of the private road (Gessner Lane) will be included in the detailed DSP, which will be secured via condition. The Gessner Lane has already been constructed by the Applicant and has been subject to a previous Public Access Plan Section 106 commitment for management.



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Construction

TfL commented:

74. The applicant has provided an Outline Construction Logistics Plan (CLP). The plan should provide construction details including the expected number of trips, vehicle routing, working hours and practices. The applicant should commit to out of peak hours deliveries, particularly given the proximity of the site to Tottenham Hale Station. The applicant should also confirm the nearby bus stop will not be affected and confirm any potential footway closures.

75. The document should be secured by planning condition and TfL and other key London Underground Infrastructure colleagues should be consulted prior to any commencement of works.

WSP Response:

The Applicant confirms that a detailed CLP will be produced, secured via condition. The production of this plan would take place upon appointment of a Principal Contractor and will follow TfL's CLP Guidance. The Applicant highlights that within this Plan, confirmation that the Contractor will participate in the local Construction Forum will be provided as well as a commitment to providing a financial contribution towards the Tottenham Hale Logistics Coordinator.

The Applicant can confirm that it is not expected that construction of the development would require the relocation or closure of any nearby bus stops. Any changes to the pedestrian network would be limited wherever possible and would be subject to obtaining relevant approvals and agreements from LBH.