

Planning Sub Committee

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1 APPLICATION DETAILS

Reference Nos: HGY/2023/3078

Ward: Tottenham Hale

Address: Tottenham Hale Station, London Underground Ltd, Station Road, Tottenham, London, N17 9LR

Proposal: Section 73 application to vary Conditions 1 and 11 of the approved development (application ref. HGY/2018/1897 which amended the original permission HGY/2013/2610 for changes to the works to extend the operational railway station at Tottenham Hale). The variations are to replace the requirement of providing a new station entrance and footbridge from Hale Village to Tottenham Hale Station, to instead requiring pedestrian and cycle network improvements on Ferry Lane and accessory works.

Applicant: London Underground Limited

Ownership: Public

Case Officer Contact: Robbie McNaugher

Date received: 15/11/2023

Plans and Document: See Appendix 3 to this report.

- 1.1 The application has been referred to the Planning Sub-Committee for decision as the planning application is a major application.

SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposal is for amendments to the Tottenham Hale Station extension, approved originally under permission HGY/2013/2610.
- The proposed amendments will remove the requirement to construct a pedestrian link bridge to Hale Village, and replace this with significant improvements to Ferry Lane through a section 278 ("s278") highways agreement with the Council.
- The works to be provided under the s278 agreement will improve existing pedestrian and cycling infrastructure on Ferry Lane and access to the Station, in addition to wider walking and cycling benefits which will provide comparable enhancements to the approved link bridge.

2 RECOMMENDATION

- 2.1 That the Committee authorise the Head of Development Management or the Assistant Director of Planning, Building Standards & Sustainability to GRANT planning permission subject to the conditions and informatives set out below.
- 2.2 That delegated authority be granted to the Head of Development Management or the Assistant Director of Planning, Building Standards & Sustainability to make any alterations, additions or deletions to the recommended conditions (planning permission) as set out in this report and to further delegate this power provided this

authority shall be exercised in consultation with the Chair (or in their absence the Vice Chair) of the Sub-Committee.

2.3 Conditions Summary (Full text of recommended conditions is contained in Appendix 01 of this report. Conditions are replicated and amended where necessary from the extant permission HGY/2018/1897).

- 1) Approved plans
- 2) Sample of materials (discharged in part)
- 3) Refuse and waste storage (discharged)
- 4) Archaeology (discharged in part)
- 5) Station management (discharged)
- 6) Signage strategy (discharged)
- 7) Demolition and construction (discharged in part)
- 8) Waste management plan (discharged)
- 9) Ecological receptors mitigation and enhancement strategy
- 10) Consideration constructors (discharged in part)
- 11) Section 278 agreement
- 12) Outline construction programme for Link Corridor.
- 13) Demolition and construction waste (discharged)
- 14) Arboricultural statement
- 15) Local labour (discharged)
- 16) Heating and hot water
- 17) Liaison group

2.4 Informatives Summary – (the full text of Informatives is contained in Appendix 01 to this report).

- 1) Waste management
- 2) Surface water drainage
- 3) Thames Water
- 4) Oil discharges
- 5) Archaeology
- 6) Watching brief
- 7) Consultation heritage
- 8) Network Rail procedure
- 9) Network Rail asset protection
- 10) Asbestos
- 11) CIL
- 12) Section 61 Agreement under Control of Pollution Act 1974

2.5 In the event that members choose to make a resolution contrary to officers' recommendation, members will need to state their reasons.

CONTENTS

3.0 PROPOSED DEVELOPMENT AND LOCATION DETAIL

4.0 CONSULTATION RESPONSE

5.0 LOCAL REPRESENTATIONS

6.0 MATERIAL PLANNING CONSIDERATIONS

7.0 COMMUNITY INFRASTRUCTURE LEVY

8.0 RECOMMENDATIONS

APPENDICES:

APPENDIX 1: PLANNING CONDITIONS & INFORMATIVES

APPENDIX 2: INTERNAL AND EXTERNAL CONSULTEE RESPONSES

APPENDIX 3: PLANS

APPENDIX 4: TFL RESPONSE TO FORMAL PUBLIC CONSULTATION

APPENDIX 5: TFL COMMUNICATIONS AND ENGAGEMENT STRATEGY

3.0 PROPOSED DEVELOPMENT AND LOCATION DETAIL

Background

- 3.1. The Planning permission to extend the operational railway station at Tottenham Hale involved the creation of a new station entrance, enlarged station concourse, improved access and a new pedestrian bridge with lifts to improve accessibility (reference HGY/2013/2610 (granted 2014)). The existing footbridge (in exclusive use by users of the Rail services) within the Station was also to be extended to form a new station entrance from Hale Village known as the Hale Village Link Bridge (HVLB), and involved the closure of the existing Ferry Lane subway.
- 3.2. The extension provided under the approved development would take the footbridge out of 'station operation' and allow the public to enter the station from Hale Village/ Daneland Walk, and then proceed to the respective gates for either Underground or Network Rail/ Greater Anglia services within the Station. A lift was required to be installed to provide step-free access to the HVLB, however due to uncertainty at the time regarding positioning of a 3rd and 4th platform TfL agreed to the imposition of a condition requiring further details of the proposed lift, its exact location and timetable for its installation prior to the completion of the works. A 3rd platform has since been installed.
- 3.3. A variation to the original planning permission (HGY/2018/1897) was approved in 2019 to facilitate changes to the 'access for all bridge' and to provide a link corridor between the ticket hall and the access for all bridge. No change to the requirement for the HVLB was sought.
- 3.4. Changes to design and circumstance since the original application have led to the Hale Village entrance not being delivered. The applicant's submissions outline how revised modelling from Network Rail and Greater Anglia show that unless the existing footbridge remained in use for rail passengers, there would be overcrowding on the platform (the next train would arrive before all passengers from the previous train had been able to exit). This now means that the link bridge would need to stay in operation serving the rail line, and require ongoing staffing and revenue protection measures – in other words, the Hale Village link bridge (HVLB) would become a paid rather than unpaid link.
- 3.5. Furthermore, due to updated regulations on clearance between the tracks and overhead cables, the level of any new bridge/ footbridge would also need to be raised in order to conform to the new standards.
- 3.6. All these changes have resulted in a stated substantial increase in estimated costs for delivering the link bridge. The estimated cost given within the Design and Access statement is £9m at 2019 prices (likely now more than £10m in 2023 prices).

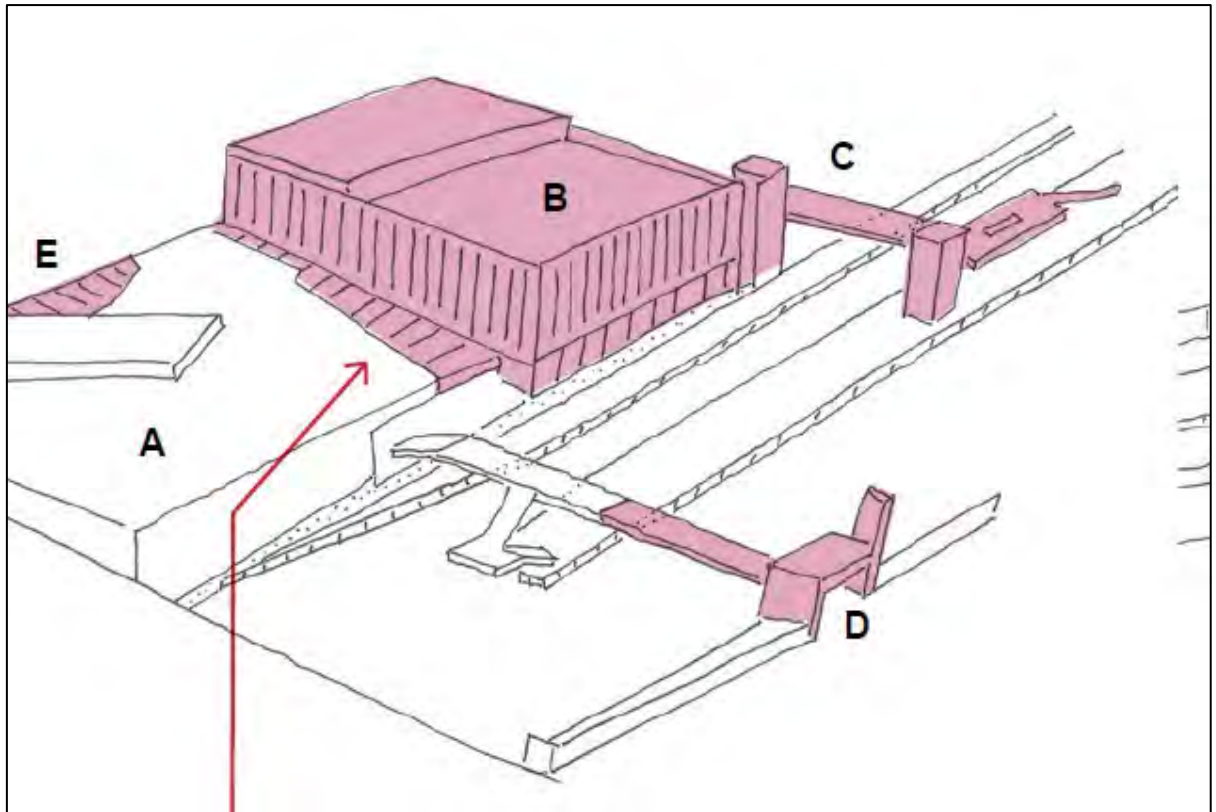


Figure 1 Pedestrian link bridge extension shown (D), pink being the area required to be constructed, the other annotations being: the modification of the existing concourse ('A'), construction of a new concourse structure ('B'), the access for all structures ('C') and infilling of the inset area of brick frontage ('E'). (Source: Design and Access Statement submitted with application HGY/2013/2610)

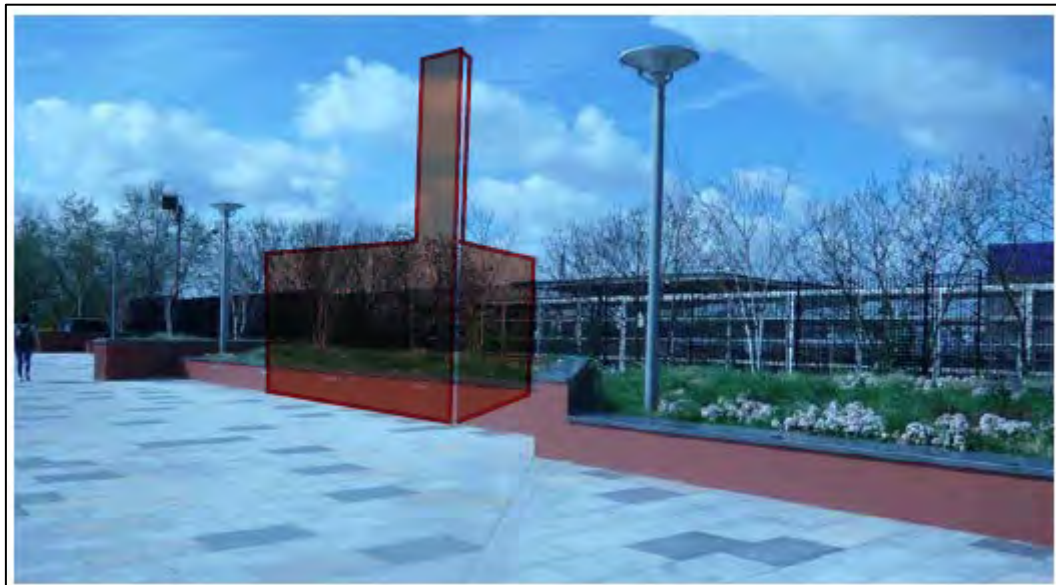


Figure 2 Public realm area on Hale Village illustrating the proposed location of the link gateway. (Source: Design and Access Statement submitted with application HGY/2013/2610)

- 3.7. The applicant has outlined the efforts undertaken to-date to secure the additional funding necessary to construct the HVLB. This has included, in 2019, the development of a longlist of 18 different options, with 4 of these then further developed and presented to the Deputy Mayor of London (Transport), and senior TfL & DfT officers. A request was then made to National Rail and DfT seeking to match TfL's 50% funding offer, however this request was unable to be met.
- 3.8. Therefore, in an effort to deliver compensatory improvements to east-west access to the station instead of the HVLB, the current proposal has been developed and put forward.
- 3.9. Notwithstanding this, TfL have advised that the Ferry Lane proposal was acknowledged as being the most pragmatic way forward at this time, as long as there remains a concerted commitment from all parties to securing the delivery of additional, and more significant, connections across the railway at a later point, and when funding can be identified. Were funding to become available, TfL remain committed to collaborate on a plan with the borough, Network Rail, the rail operator and landowners to deliver the Link Bridge of a suitable alternative.

Proposed Development

- 3.10. The application seeks planning permission to vary conditions 1 (approved plans) and 11 (Hale Village Link Bridge) of the approved development (application ref. HGY/2018/1897 which amended the original permission HGY/2013/2610 for changes to the works to extend the operational railway station at Tottenham Hale).
- 3.11. The variations are to replace the requirement of providing a new station entrance and footbridge from Hale Village to Tottenham Hale Station, to TfL instead providing funding of £4 million to enact a broad range of improvements to cycle and pedestrian infrastructure within the Ferry Lane and Tottenham Hale Station area secured through a s278 highways agreement with The Council.
- 3.12. The improvement works to be provided would be, but are not limited to:
- Restructuring the existing bridge at Ferry Lane, to:
 - o Provide a segregated footpath/ cycle path, by moving the kerb and barrier further into the highway.
 - o Increase the northern footpath from 2.08m in width to 2.50m in width.
 - o Raise the existing segregated East Bound cycle path and increase its width from 1.17m to 1.50m.
 - o Raise the existing West Bound cycle path and increase its width from 1.10m to 1.50m.
 - o Reduce the width of the southern footpath from 2.17m to 1.95m.
 - Removing the central (0.70m) hatching in the road, to provide two uni-direction lanes of 3.50m in width.
 - Segregated cycle lanes extended east along Ferry Lane and a floating bus stop.
 - Upgrading the existing pedestrian crossing south west of the Tottenham Hale Bus Station interchange to a toucan crossing.
 - Providing a new pedestrian crossing west of the Ferry Lane Bridge.
 - Providing Street Art and wayfinding improvements around Tottenham Hale Station.

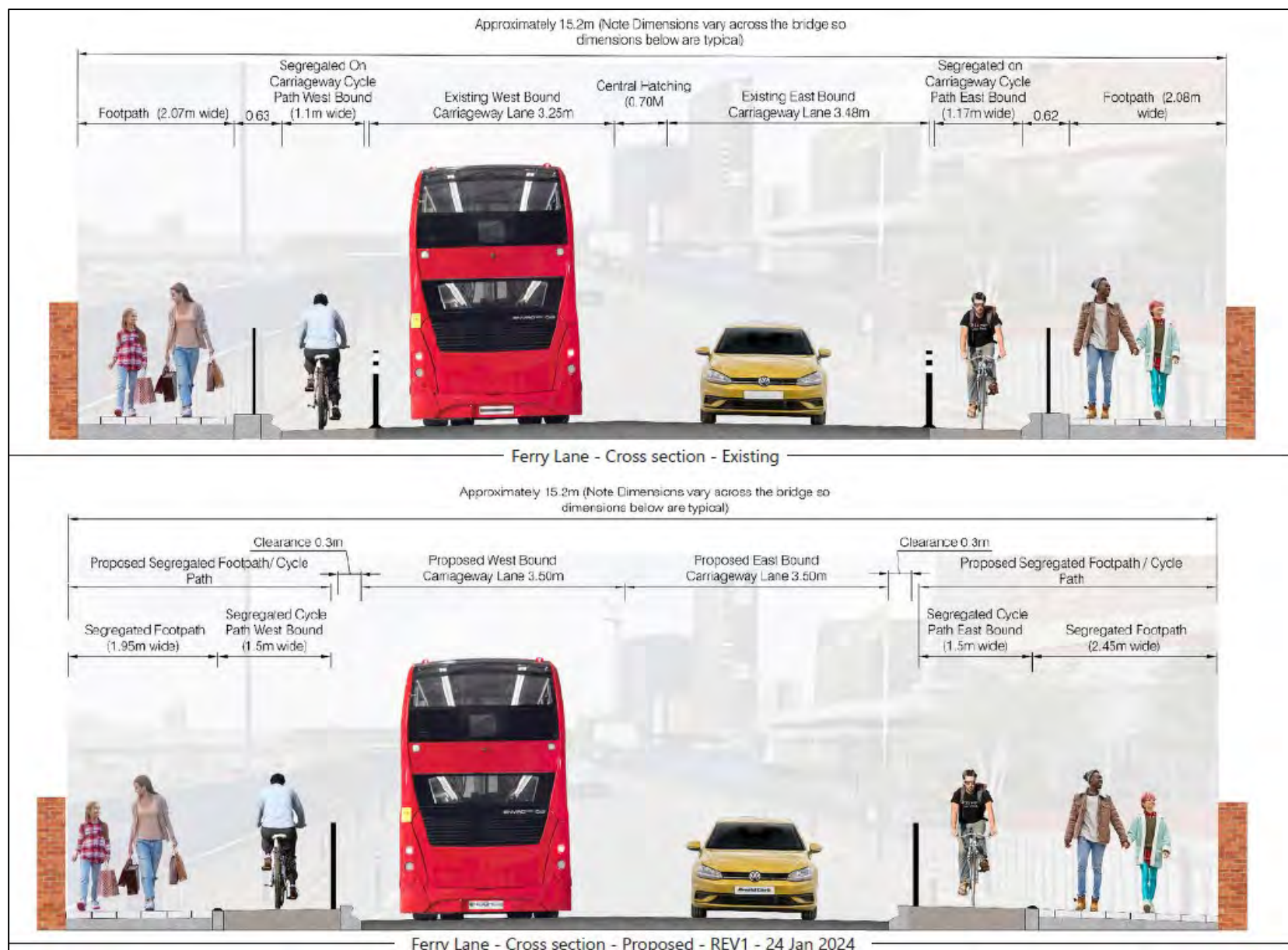


Figure 3 Existing and Proposed Indicative Ferry Lane Cross Section. (Source: Design and Access Statement).

3.13. The majority of works associated with the original planning permission (HGY/2013/2610) as varied by planning permission HGY/2018/1897 have been implemented. Works remaining to be implemented relate to the corridor linking the ticketing hall and the Access for All bridge, and the Hale Village Link Bridge.

3.14. Conditions 1 and 11 of HGY/2018/1897 are proposed to be varied to remove the requirement for the Hale Village Link Bridge, and the lift that was to be associated with this. Instead Condition 11 will be varied to refer to a s278 agreement with Council. The application will also result in reference to the Hale Village Link Bridge being removed from the remaining conditions, e.g. condition 2 (samples).

3.15. Condition 1 reads

The development hereby authorised shall be carried out in accordance with the following approved plans:

128008-ATK-DRG-EAR-002100 Rev 06, 002102, Rev 07, 002104 Rev P07, 002105 Rev P07, 002016 Rev P07, 002107 Rev P06, 002121 Rev P07, 002132 Rev P07, 002133 Rev P07, 002134 Rev P02 Tottenham Hale Station upgrade plan

Reason: In order to avoid doubt and in the interests of good planning.

3.16. Condition 11 reads:

No later than 6 months from the date of this permission details of the location and size of the lift linking the western extreme of the Hale Village footbridge to the ticket hall and the phasing and implementation of these works shall be submitted to and approved in writing by the Local Planning Authority, thereafter the works shall be carried out in accordance with the approved details and shall commence no later than 3 year from the date of this permission. The lift works should be fully implemented unless otherwise agreed in writing with the Local Planning Authority.

Reason: In order to ensure ease of access for the less mobile members of the community.

The Site and Surroundings

3.17. The application site is Tottenham Hale Station. The Station consists of the London Underground concourse that provides access to the Victoria Line with services south to Brixton and north to Walthamstow Central. National rail tracks are immediately to the east. Greater Anglia staff and passenger facilities at surface platform level are accessed from the station, with northbound services towards Cambridge and southbound trains towards Liverpool Street. The Stansted Express service also stops at this station. Two footbridges span the tracks, providing access to the east-west rail line by passengers, including the recently constructed 'Access for All' bridge to the north.

3.18. The Station is bound by the major east-west road artery of Ferry Lane (A503) to the south, with Watermead Way to the north and the Tottenham Hale Bus Station to the west. Buses enter and exit the Tottenham Hale Bus Station from Ferry Lane and Watermead Way with right/ left turns in and right/ left turns out.

- 3.19. The Ferry Lane Bridge, located to the south of the Station, consists of two general traffic lanes with central hatching. On-street east/west cycle lanes are provided with flexible bollards providing partial separation with the traffic lanes. The pedestrian footpaths are separated from the cycle lanes by a fixed fence that runs the length of the bridge.
- 3.20. The surrounding environment to the east, north and west consists of high density housing, of relevance to this application being Hale Village, and Hale Warf developments. To the southeast is the Ferry Lane Estate, and to the southwest is the Tottenham Hale Retail Park.
- 3.21. The site lies in Flood Risk Zone 2 and to the east of the Station is an Archaeological Priority Area. The Station itself forms part of the Tottenham Hale District Centre.



Figure 4 Tottenham Hale Station and its surrounds

Relevant Planning and Enforcement History

Planning Applications

- 3.22. There have been a number of applications for the station and its surroundings as part of improvements to the area:
- HGY/1996/0230 - Improvements to station forecourt including pedestrian access routes, new canopies, paving, planting, formation and landmark beacon. Granted 23/04/1996
 - HGY/2011/1587 - Erection of canopies over proposed Bus Station, Erection of bus drivers building, Erection of public realm canopy, Erection of Taxi Queue Canopy. Granted 30/01/2012
 - HGY/2011/1594 - New and realigned public and private highway, pedestrian and cycle links, taxi, bus, drop off/collection and servicing facilities and including new altered surfaces, lighting, drainage and other infrastructure. New and relocated public

realm with associated seats, lighting, bins, cycle parking, and infrastructure and planting. New and relocated bus stops and stands including shelters, posts, signs, barriers, lighting and other apparatus. Planning permission not required. 21/12/2011

- HGY/2013/2610 - Works to extend the operational railway station at Tottenham Hale. Creation of a new station entrance, enlarged station concourse, improved access and a new access for all bridge. Extension of the existing footbridge to form a new station entrance from Hale Village, relocation of the station vent shaft and provision of a new station control facility, provision of retail units and associated works. Development involves the closure of the existing Ferry Lane subway. Approve with conditions 27/03/2014
- HGY/2017/3649 - Reconfiguration of Tottenham Hale Bus Station to provide a new access onto Watermead Way, removal and replacement of fences, bus shelters and external lighting and other associated works. Grant permission- 02/05/2018
- HGY/2018/0663 - Erection (temporary) of four retail units outside Tottenham Hale Station. Associated relocation of bicycle parking racks. For a period of five years. Grant permission 21/06/2018
- HGY/2018/1897 - Variation of condition 2 (plans and specification) attached to planning permission HGY/2013/2610 amending the drawings listed under Condition 2 to facilitate the following changes: 1. Re-location of the AFA bridge circa 50m further north. 2. AFA bridge no longer ties in with the LU ticket hall at mezzanine deck level. 3. Inclusion of a link corridor on the west side of the railway to provide a covered walkway, at ground level, between the LU ticket hall and NR AFA bridge. 4. Access/egress to the AFA bridge deck from the island platform is provided via a lift, stairs, or escalator. 5. Access/egress from the AFA bridge deck to the link corridor on the west side of the railway is provided via stairs, or a lift. Approve with conditions 29/03/2019.
- HGY/2020/1765 - Non-material amendments to the approved development (application ref. HGY/2018/1897 which amended the original permission HGY/2013/2610) for changes to internal layout and glass façade. Granted 03/11/2020
- HGY/2022/0284 - Installation of two air conditioning condenser units fitted to the roof in the dedicated plant area. Approve with conditions 25/04/2022.
- HGY/2022/2165 - Application for Prior Approval under Part 18 of the Town and Country Planning (General Permitted Development) (England) Order (As Amended) 2018. The project is for the installation of an Maintenance Depot Unit (MDU) extension and office building, to improve railway services in Tottenham and London. The MDU proposed works are as follows: • Installation of a 9m x 9.8m extension of existing MDU modular building - Installation of a 30m x 9.6m modular office building; - The proposed colour is grey, which is a traditional colour for railway buildings across the network, and in keeping with existing MDU buildings; and - Comprising 3 and 10 No. 3m wide modules for a new MDU facilities at Tottenham Hale, London. Not required.
- HGY/2023/3164 - Non-material amendment of planning permission ref. HGY/2018/1897 (which amended the original permission HGY/2013/2610 for changes to the works to extend the operational railway station at Tottenham Hale), to amend the 'Description of Development' so as to remove reference to a new station entrance from Hale Village. Granted 21/12/2023.

Enforcement Cases

- CON/2022/00511 – Complaint in progress – Breach of conditions relating to the HVLB, lift, and Link Corridor (conditions 1, 11, 12 of HGY/2018/1897).

4. CONSULTATION RESPONSE

4.1. The following were consulted regarding the application:

Internal

- LBH Transportation – No objections, subject to s278 agreement and further detailed development of alternative proposals to be undertaken as part of those works.
- LBH Design Officer – No comment/ objection.

External

- Met Police
 - o Would object to any loss of the bollards at the top of stairs leading to the Station from the Ferry Lane Bridge.
 - o In principle no objections to the proposed development from a designing out crime perspective, though some matters to be considered at detail design stage. However, these are stated as able to be easily mitigated provided ongoing dialogue is maintained with Police throughout the design and build process.

[Officer comment: The bollards have been confirmed as to be retained. The Police and relevant stakeholders will be involved and fully engaged throughout the detailed design stage.]

- Disability Haringey – no response
- Greater London Authority

...given the scale and nature of the proposals, conclude that the amendments do not give rise to any new strategic planning issues. Therefore, under article 5(2) of the above Order [Town and Country Planning (Mayor of London) Order 2008] the Mayor of London does not need to be consulted further on this application. Your Council may, therefore, proceed to determine the application without further reference to the GLA. I will be grateful, however, if you would send me a copy of any decision notice and Section 106 agreement.

- The Greater London Archaeology Advisory Service

Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest. The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified in the Local Plan: [78468] Tottenham Hale. However, the proposals covered by this variation are unlikely

to affect archaeological remains. No further assessment or conditions are therefore necessary. This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

- Ferry Lane Action Group

FLAG is the recognised resident's association for the Ferry Lane estate. We object to the proposal to narrow the footpath on the south side of Ferry Lane as it is already fairly narrow. We strongly object to removing the physical barrier between pedestrians and cyclists on both sides of Ferry Lane. There has been a substantial increase in the number of electric cycles and scooters using the cycle lane and these are much heavier and go faster than traditional cycles. In addition, many are delivery bikes and therefore in a hurry to meet targets. We feel it is safer for both pedestrians and cyclists to maintain physical separation. We would also want to maintain a separation between cyclists and motor vehicles. We do welcome the proposal to make the first set of traffic lights into a pelican crossing and believe this will make access to the station much safer for Ferry Lane estate residents. We would like to see better lighting on the bridge and some signage at the station - currently there isn't any. If visitors to the Wetlands were encouraged to cross the road via the new pelican crossing and use the Ferry Lane southside footpath this would help relieve overcrowding on the Hale Village (north side). We would also like to see better joined up cycle lanes throughout the Tottenham Hale area (Broad Lane, Ferry Lane etc) and for the 20mph limit to be extended to the borough boundary. Our overall concern is that none of the proposals will properly deal with the level of overcrowding on the north side of the bridge. The original plans for a direct link between Hale village and the station remain the only viable way of alleviating this.

- 4.2. [Officer response: These points are addressed in the 'Material Planning Considerations' assessment at Section 6 of this Report, as well as in the 'Pedestrian and Cycling Improvements to Ferry Lane – Briefing Note' provided by TfL dated 22 January 2024 (Appendix 4). With regard to wayfinding signage, this is anticipated to be delivered as part of the highways works s278 agreement.]

- Haringey Cycling Campaign

HCC welcomes the proposed improvement of cycle provision at the Ferry Lane railway bridge; however we are concerned the present design may increase and will certainly not mitigate the present level of cycle/ pedestrian conflict. Presently cycle users approaching from the 2-way pavement track at Broad Lane have no convenient way of crossing to the with-flow eastbound cycle lane. The existing staggered toucan crossing is woefully inadequate, and they habitually continue on the pavement. There is no signage to indicate the end of eastbound shared use, so they may not even realise they are not meant to do this. The present design proposals will effectively encourage this, with the with flow track being used as 2-way, spilling over to the pedestrian area. Our detailed comments are listed below and are also noted to the attached drawing. Looking at the broader picture, it is regrettable that key features of the Tottenham Hale Masterplan have not been implemented, in particular Cycle Hub adjacent to the Station and the additional railway bridge, which would have mitigated overcrowding on the existing bridge. We urge the London Underground and National Rail to jointly provide secure cycle parking, similar to that provided at Richmond Station, which has London Underground and National Rail services. We also urge TfL

to monitor traffic on the bridge as new housing developments are completed and plan for reinstatement of plans for an additional bridge.

Detailed Comments

1. Suggest extend 20mph limit to bridge E approach
2. Tighten kerb radii and form Copenhagen crossing at retail park entrance (NB the Broad Lane entrance is suitable for HGV access)
3. Cycles from Broad Lane tend to continue E on S side of bridge- resulting in pedestrian conflict. Signpost and provide straight-across crossing to N side, to facilitate changeover.
4. Pavement too narrow for shared use, move westbound cycle access adjacent to toucan
5. Please confirm protection of cycle lane at westbound approach to Toucan crossing
6. Please confirm reason for proposed drop kerb for vehicle access [a drawing was provided associated with this].
7. LTN1/20 compliance requires increased cycle lane width adjacent to vertical barrier. Suggest increase lane width (presently 1.5m) or remove barrier.
8. Chamfer edge raised strip, or other feature needed to assist visually impaired and emphasise pedestrian separation at pavement (effect on drainage needs consideration)

[Officer comment: The Applicant has provided a response to the 8 points listed above /outlined on the HCC response diagram, as follows:

1. *The speed limit has been agreed in principle by Haringey Traffic Engineers to be reduced to 20mph between Broad Lane through to the boundary with Walthamstow Forest – refer to section 5.2 of the TfL Briefing Note dated 22 January 2024.*
 2. *The changes requested to the kerb is stated as being outside the scope of the works proposed.*
 3. *A straight across crossing is stated as not being possible due to signal staging. The staggered crossing width is 3m. Signage will be considered during detailed design.*
 4. *Moving the westbound cycle access adjacent to the toucan crossing is agreed and would be actioned during the detailed design stage.*
 5. *Protection of the cycle lane at westbound approach to the toucan crossing will be further developed at detailed design stage, where raised kerb detail will be investigated.*
 6. *The dropped kerb reference in the HCC consultation response was to maintain access to an existing development site, however TfL have confirmed that the drop kerb will not be installed as part of the s278 works, and that any future access to this site will be considered at that time.*
 7. *Due to site constraints and safety requirements for the barrier proposed between the carriageway and path, it is not possible to increase the cycle lane width further.*
 8. *A raised line delineator (trapezoid in shape) will be installed between the footway and cycle lane to provide tactile segregation to further reinforce the difference surface finishes/ colour.*
- London Underground:

I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application as submitted. This is a TfL project, and any issues will be resolved internally. This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management

Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

- Network Rail (East of Borough) – No objections.
- Tottenham CAAC – No response.
- Tottenham Civic Society – No response.

- 4.3. Furthermore, it is understood that TfL have been undertaking additional engagement with the local community and stakeholders regarding publicity of the proposed Ferry Lane Upgrades. Local Engagement that had taken place prior to submission of the current application was outlined in Section 3 of the submitted Design and Access Statement.
- 4.4. More recently, a 'pop-up' engagement event was held on Monday 23 September within Tottenham Hale. TFL's Communications & Engagement Strategy, including a summary of feedback provided, is set out in Appendix 5.

5. LOCAL REPRESENTATIONS

- 5.1. The application has been publicised by the way of 2740 letters and 5 site notices. The number of representations received from neighbours, local groups, etc in response to notification and publicity of the application were as follows:

Objections: 82
Support: 1
Representations: 5

- 5.2. The Director of the Engine Room Church and Community Centre has provided a link on a petition that insists that the HVLB is built, with over 1000 signatures.

Objections Material to Planning

- The proposal is not a suitable replacement for the HVLB which should be retained and constructed as part of the approved development, due to the benefits to the community and noting the increase in people living in the area (such as Hale Wharf). Benefits cited include uplift in harmonious living, safety, reducing congested traffic.
- The study of alternative options for the HVLB outlined in the Application was dated from 2019, before Hale Works and Hale Wharf were built. It is questioned whether outcome would be different in the current time.
- The Station requires more than one entrance, as it could not otherwise cope with the expansion the plan envisaged.
- The initial plan upon which Hale Village and other future developments were approved to go ahead was an enhancement on infrastructure such as the remodelling of the station and construction of a new footbridge between the Hale Village and the Station with an alternative direct access.
- Another bridge is required, or another such solution if the HVLB is not to be provided.
- The removal of a barrier between pedestrians and cyclists on the shared footpath raises concerns for safety. Having a shared path for pedestrians and cyclists would lead to conflict.
- Objection to the reduction in width of the southern footpath and cycleway on Ferry Lane Bridge

- Speed reductions on the road to 20mph should be considered to provide additional safety.
- The proposed changes to the footpath will not help disabled access, as there will be conflict between other users (cyclists and pedestrians) and will facilitate more accidents.
- The introduction of a floating bus stop will create conflict between pedestrians and cyclists.
- The proposal will not address pedestrian congestion, and may lead to impact on road safety as a result of pedestrians using roadways.
- Additional lighting should be provided on the bridge.
- The proposal does not address the escalating crime activity such as phone thefts that occurs on this footpath/ bridge.
- Resurfacing of the footpath/ bridge to be provided.
- The existing pedestrian route over the bridge is inadequate at peak times, and for people with disabilities or with pushchairs or the elderly. This is even worse.

Objection Non-Material to Planning

5.3. The proposed changes should have been done years ago, perhaps funded by development that has occurred within the area.

- Cyclists trying to cross from east to west on Ferry Lane use the northern side of Ferry Lane, causing conflict with pedestrians.
- Consultation and the meeting with TfL should have been better advertised and extended to Bream Close and Hale Wharf.
- People have invested in the area based on the original plan for the Station development, including the HVLB. Changing this is illegal.
- National Rail need to take responsibility for underestimating the traffic needs of the station.
- The proposal is an attempt to merge two different projects into one, i.e. the Station development and the need to refurbish Ferry Lane Bridge that was not part of the original project.
- Dissatisfaction with the quality of the pavement outside of the current entrance to the Station

Other points noted in responses:

- The proposed pedestrian crossing point is necessary and welcome.
- The changes to the east bound traffic lane to provide a bus only turn will help avoid aggressive driving.
- Support improved cycle lanes but are not equivalent to a new station entrance/ bridge.
- Removing the existing fence that separates pedestrian, and cyclists is supported as it will stop cyclists cutting through the footpath so much.
- The proposal could make a significant improvement to the area, with the wider pavement feeling much safer and more pleasant to walk on.
- A temporary parking space is needed on Gerry Lane near the Coppermill Heights entrance to flats 1-42 to address safety concerns.

6. MATERIAL PLANNING CONSIDERATIONS

The main planning considerations raised by the proposed development are:

- Scope of Section 73 application
- Principle of development
- Transportation

- Other matters

Assessment:

Scope of Section 73 Application

- 6.1. An application can be made under Section 73 (S.73) of the Town and Country Planning Act 1990 to vary or remove conditions associated with a planning permission. A S.73 application results in a new permission being issued.
- 6.2. Guidance for determining S.73 applications is set out in the National Planning Practice Guidance (NPPG) and recent case law has clarified that provided changes do not impact on the 'operative part' of a planning permission they can be considered through a S73 application.
- 6.3. Consequently, the extent of the material planning considerations is somewhat restricted and only the amendments being applied for should be considered at this stage. Having said that, when determining the application, the local planning authority (LPA) will have to consider the application in the light of current policy. The LPA therefore has to make a decision focusing on national, regional or local policies which may have changed significantly since the original grant of planning permission as well as the merits of the changes sought.
- 6.4. In the context of an approval with permission the provision of infrastructure to provide improved access to the Tottenham Hale Station forms part of the approved development, and the proposed changes would remain in accordance with the extant approval.
- 6.5. The S.73 application proposes to amend conditions 1 (Approved Plans) and 11 (provision of lift details). Determination of a S.73 amendment also requires other amendments made or details now approved to be consolidated to reflect the current approved documents.

Principle of the development

- 6.6. The principle of the improvements to the station interchange at Tottenham Hale were considered to support and contribute to the regeneration aims for this area in accordance with the policies of the time.
- 6.7. With the exception of the adoption of a new London Plan in 2021 and alterations made to the National Planning Policy Framework (NPPF) most recently in 2023 in this case since the granting of planning permission and amendments, the same policy documents used in the assessment of the proposal are currently adopted, and there are no further policy documents that have been adopted that materially alter the assessment of the current proposal.

The London Plan

- 6.8. The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. The London Plan (2021) sets a number of objectives for development through various policies. The policies in the London Plan

are accompanied by a suite of Supplementary Planning Guidance (SPGs) and London Plan Guidance (LPG) that provide further guidance.

The Local Plan

- 6.9. The Strategic Policies DPD sets out the long-term vision of how Haringey, and the places within it, should develop by 2026 and sets out the Council's spatial strategy for achieving that vision. The Site Allocations development plan document (DPD) and Tottenham Area Action Plan (AAP) give effect to the spatial strategy by allocating sufficient sites to accommodate development needs.

Tottenham Area Action Plan

- 6.10. The Tottenham AAP sets out a strategy for how growth will be managed to ensure the best quality of life for existing and future Tottenham residents, workers, and visitors. The plan sets area wide, neighbourhood and site-specific allocations.
- 6.11. Policy AAP7 states that the Council will support applications which enhance the transport interchange between tube, train, bus and pedestrian/ cycling modes at Tottenham's interchanges. Policy AAP7 further states that the Council will support future improvements in the levels of public transport accessibility and capacity, expecting development proposals to:
- a Seek improvements to connectivity and permeability for pedestrians whilst minimising the likelihood of conflicts with vehicular traffic.
 - b Consider opportunities for improving walking and cycling across the AAP area, which could include the introduction of a wider cycling and walking network; and
 - c Promote where appropriate, traffic calming, pedestrian accessibility enhancements, road safety measures and cycle facilities such as on street cycle parking.
- 6.12. The AAP Site Allocations 'TH2 Tottenham Hale Station' and 'TH8 Hale Village' for the site to the east of the station do not specifically require an eastern entrance or link bridge and instead provide more general requirements, though it is noted that the Development Guidelines for TH8 references the bridge landing included within Planning Permission HGY/2013, and to be taken into account for that development. TH2 requires the creation of a new station interchange to act as a new high-quality point of arrival, departure and interchange with links into routes which are easy, safe and pleasant for people to move through and support east-west and north-south movement. TH8 states more generally "The connection to Tottenham Hale station will be optimised, and a high-quality public realm will be created through this site". These AAP Site Allocation guidelines do specifically reference Planning Permission HGY/2013/2610, noting that the Council will support amendments to this permission, to improve access to and from the station, and facilitate the creation of Tottenham Hale as a District Centre.
- 6.13. The proposal will result in the removal of the requirement for Hale Village Link Bridge, with improvements to Ferry Lane for both pedestrians and cyclists. Whilst the removal of the HVLB will remove the direct pedestrian accessibility to the Station envisaged in the original permission the current proposal will nevertheless provide improvements of access to and from the Station from what currently exists for both

pedestrians and cyclists. The proposal will result in an enabling of additional benefits to the highway environment surrounding the Station to be delivered. The proposal is therefore considered to be supported in principle in line with the AAP the Local Plan and the London Plan.

- 6.14. The merits of the proposal, and the improvements to be provided as part of the s278 agreement, are assessed further below.

Transport impacts and Hale Village Link Bridge

- 6.15. The provision of the HVLB was one of several components of the original proposal (refer to Figure 1) and was noted in the Design & Access Statement for application HGY/2013/2063 as 'creating a much-needed pedestrian connection to Hale Village and the Lee River beyond' and as meeting the aspirations of both the Council and local landowners. At the time, this modification was considered to have a limited impact on the operational railway.
- 6.16. It is relevant to note that the application remains to be considered as a whole, i.e. alongside the other works included under the original permission HGY/2013/2610 to improve the Station, which have since been largely carried out. The assessment would then involve consideration of the question: would the HVLB have never been proposed, would the improvements outlined along Ferry Lane under the current application have resulted in the overall application being unacceptable?
- 6.17. The HVLB was noted in the original Planning Committee Report to 'improve the accessibility of the station from Hale Village and the Lee Valley', and which would be further enhanced by a condition to provide lift access to the HVLB. It was concluded that, 'along with the other improvements to the accessibility within the station will lead to a high level of accessibility in the long term'.
- 6.18. The HVLB would have provided some mitigation for the loss of the original subway (which ran under Ferry Lane) to the Station for those in the eastern parts of the Ferry Lane Estate that cross to the northern side of Ferry Lane using the Mill Mead Road and Jarow Road junction (Figure 5). The HVLB would also have provided additional connectivity and accessibility benefits to the users of Hale Village and others to the north of Ferry Lane from what currently exists.

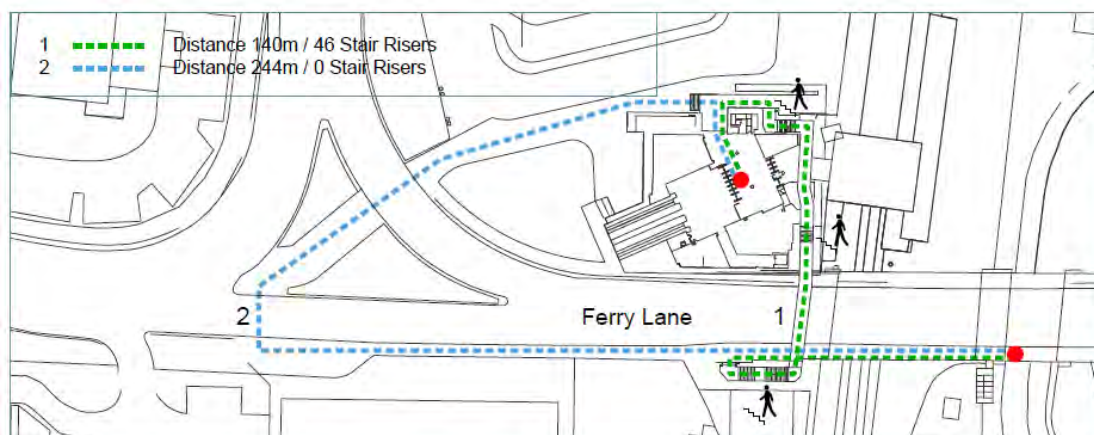


Figure 5 Pedestrian access to the Station via the subway (green) and pedestrian crossing in 2013.

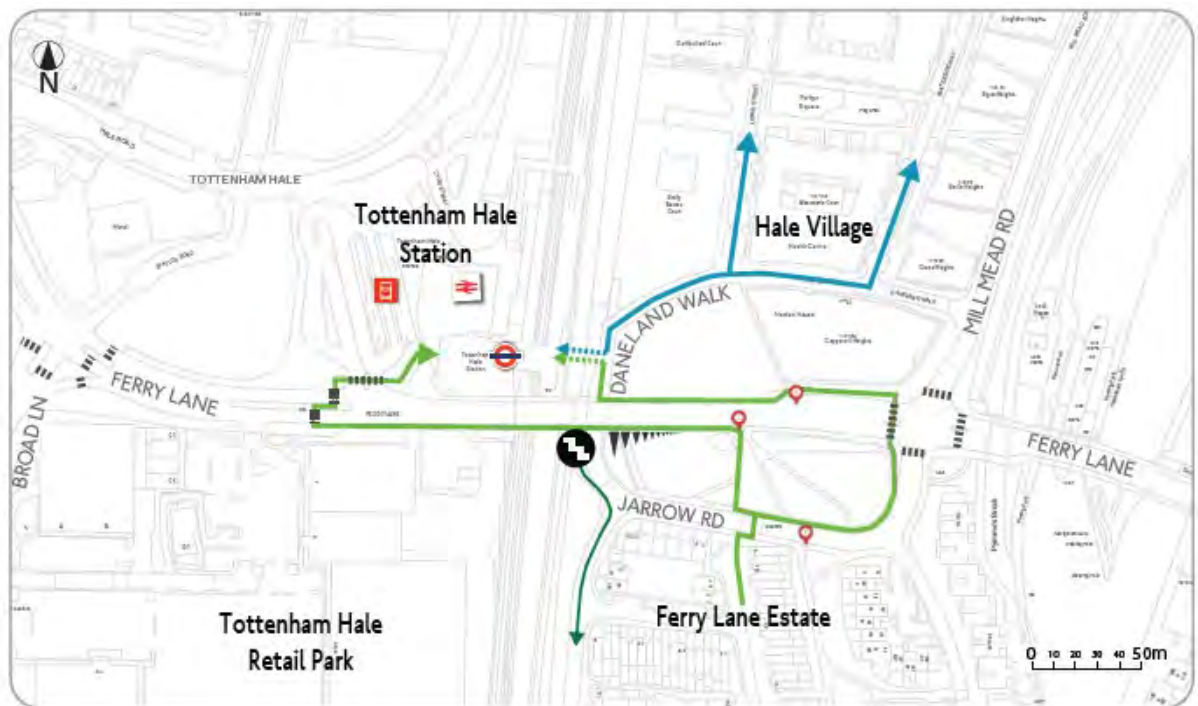


Figure 6 Pedestrian route to the Station with the HVLB. Green being to/from Ferry Lane Estate and blue being to/from Hale Village.



Figure 7 Pedestrian route to the Station under the current application. Green being to/from Ferry Lane Estate and blue being to/from Hale Village. Yellow indicates cycle infrastructure improvements.

- 6.19. With regard to the removal of the pedestrian subway under Ferry Lane, the following considerations were noted within para 8.4.5 of the Planning Committee Report HGY/2013/2063:

On the basis of the assessments by TfL and the Council's Transportation Team it is considered that, on balance, the loss of the subway is acceptable in this

instance. Alternative pedestrian crossings are available at the junction of Ferry Lane, Mill Mead Road and Jarrow Road to the east of the existing subway or the proposed new crossing to the west of the site opposite Hale retail park. The residents of the eastern parts of the Ferry Lane Estate will be able to use the Mill Mead Road/Jarrow Road crossing and the Hale Village Footbridge without a significant increase in their journey and those in the western parts of the Ferry Lane Estate will have to walk a further 100 metres to use the surface level crossing adding approximately 30 seconds to their journey time. Weighing this up against the transport benefits of the new station, the potential disbenefit to cyclists along Ferry Lane if a surface level crossing were provided and the support from the Met Police for the closure of the subway is considered acceptable.

- 6.20. The HVLB would have reduced the distance for those approaching the Station from the east and on the north side of Ferry Lane. It was noted within the original Transport Statement that this would decrease walking distance to the Station by those users by approximately 100m, representing a time saving of 80 seconds each way. Therefore whilst a desirable and positive enhancement to access, the loss of the HVLB does not have a substantial impact on pedestrian accessibility or journey times. The current route to the station for these users is fully accessible for all users.
- 6.21. As detailed within the submitted Design and Access Statement and summarised in the 'Background' section earlier in this report, funding to provide for the construction of the HVLB has been a matter of investigation and discussion for a number of years. Various options are stated as having been investigated to replace the HVLB, including to gate both ends of the link bridge with a lift to the ticketing hall, and a new pedestrian bridge from Perkyn Square to Watermead Way. Improvements to Ferry Lane Bridge road were identified as the most deliverable mitigation for the loss of the HVLB. However, TfL have confirmed their commitment to collaborate with borough, NR, and Landowners to deliver the Link Bridge or suitable alternative, if funding can be found/became available in the future.
- 6.22. With regard to those travelling from the south, works, to the public highway secured by a condition and implemented through a S278 agreement, will include an additional signalised pedestrian crossing to the west of Ferry Lane Bridge. Its location will result in a shortening of travel distance (by approximately 80m) and time for those accessing the Station from the Ferry Lane Estate, who currently use the existing pedestrian crossing south west of the Station (Figure 5 and Figure 6). This provides compensation for the loss of the pedestrian tunnel significantly reducing the walking distance to a crossing.
- 6.23. The works to be provided for under the S278 agreement will result in the improvement of cycle infrastructure within the locality of the Station, benefiting both users of the Station and non-users. Cycle lanes on Ferry Lane Bridge will be widened and separated from traffic, improving links to the existing east-west cycle network and Lee Valley Regional Park while improving cyclist safety. The reduction in traffic lanes at the Bus Station junction to provide a left-only bus lane will further improve cyclist safety moving through the junction.
- 6.24. The proposed improvements to cycle infrastructure will also provide an important link between the existing cycle infrastructure on Ferry Lane to the east and the proposed cycleway between Camden and Tottenham Hale to the west of the site. This will deliver a strategic improvement to cycling in North London.

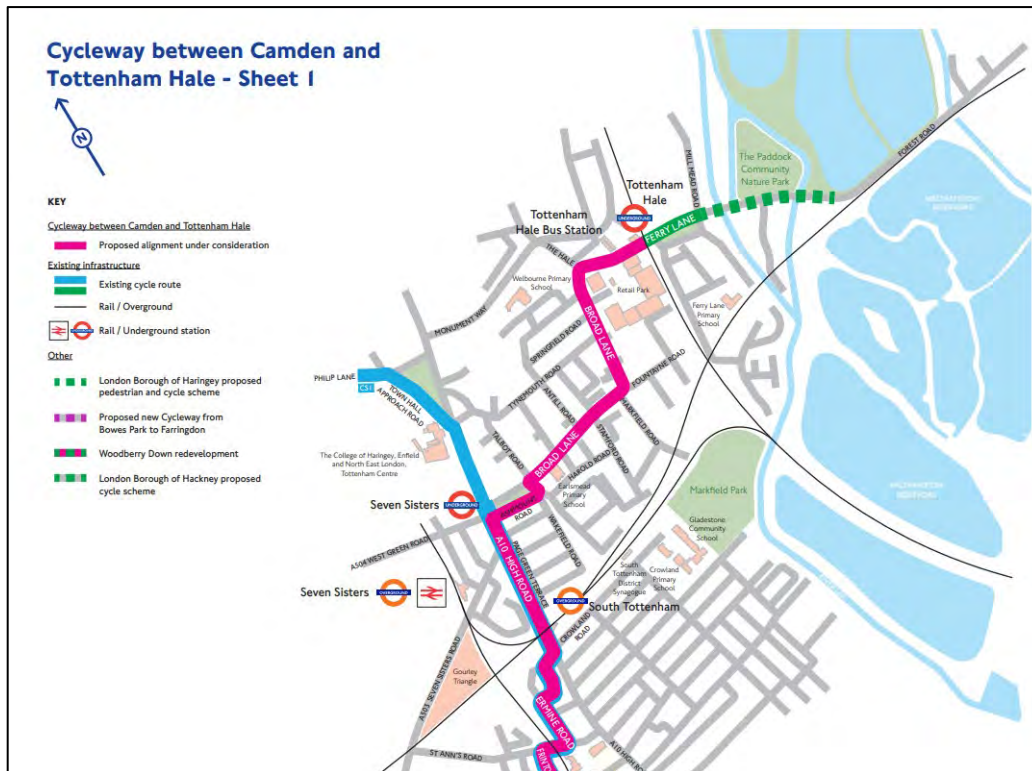


Figure 8 Draft Cycleway between Camden and Tottenham Hale route (source TfL 8.05.2019).

- 6.25. Many objections received raised concerns regarding the uplift in number of residents, and the resulting impacts upon safety, the quality of existing infrastructure, and accessibility to the Station. Objections also assert that the development of Hale Village and other future developments were approved on the basis of enhanced infrastructure, such as remodelling of the Tottenham Hale Station and the construction of the HVLB. The condition of the existing access to the Station along Ferry Lane from the east has been described as inadequate for people with disabilities, creating concerns that the proposal will amplify this issue and make the station even less accessible to those with mobility issues.
- 6.26. A Pedestrian Comfort Level Analysis (PCLA) has been conducted to assess that the proposals can accommodate the present and future levels of pedestrian congestion. The PCLA and associated guidance aims to ensure that footway designs are appropriate to the volume and type of users of the environment, with a PCL given on a scale of A (best) to F (worst) with the recommended PCL for most areas being a B+.
- 6.27. At present it is stated that the northern footway over the Ferry Lane Bridge has a rating of 'F', with the footway on the south side of Ferry Lane Bridge rated as 'F' for the majority of its length.
- 6.28. Adjustments have since been made to increase the width of the proposed southern footpath on Ferry Lane to 1.95m in width, compared to the 1.75m width indicated on plans submitted with the application, providing additional space for pedestrian movements. The current width of the southern footpath on Ferry Lane is approximately 2.07m. Following these revisions, both of the proposed northern and southern footways are stated to deliver pedestrian comfort levels equivalent of 'B+'.

- 6.29. Objections have noted the existing conflict between cyclists and pedestrians on the Ferry Lane Bridge and describe the need for a degree of separation to remain between cycling and pedestrian paths. Objections also raise, amongst other points, a reduction in speed limit on Ferry Lane to 20mph, better lighting, and addressing crime in the area.
- 6.30. The Applicant has provided a response to these points and other representations made concerning safety in Section 5 of the Briefing Note, which include:
- The feasibility of Raised Line Delineators being provided between the proposed cycle lanes and footpaths will be investigated. These serve as a visual and physical demarcation between cyclist and pedestrian space, while being low-profile and moderately sloped so as not to be a major trip hazard and reduce conflict with wheelchair or pushchair users.
 - The scheme will deliver improvements to existing footpath widths and quality, better accommodating the needs of users with disability, wheelchairs and pushchairs compared to the existing situation. Further discussions with key stakeholders will be undertaken at detailed design stage.
 - The principle of a reduction in road speed between Broad Lane and the boundary with Waltham Forest Borough to 20mph has been agreed.
 - The detailed design will consider measures to reduce and prevent crime, in consultation with relevant stakeholders.
- 6.31. With regard to potential impacts on the functioning of the Station, were the HVLB no longer to be provided, the Applicant has supplied modelling information undertaken as part of previous work to design the Access for All bridge, that has since been installed at the Station and which includes the provision of a lift. The modelling included the uplift from local developments such as Hale Wharf and Meridian Water. The revised modelling also conducted sensitivity testing which demonstrated that the station design could accommodate an uplift in passengers of between 20% and 30%. The modelling demonstrates that the removal of the HVLB would not result in the Station layout being compromised at peak levels, and will continue to operate within safe levels, with TfL noting that the modelling data was undertaken using pre-pandemic forecasts, which has higher predictions for passenger patronage that would be made now.
- 6.32. The non-delivery of the HVLB was also stated to have no impact on Tottenham Hotspur event days, as the event management plan for the station would involve closure of the HVLB to prevent people skipping to the front of the controlled queuing at the main station entrance.
- 6.33. With regard to lighting, the submitted Design & Access Statement states that the improvements along Ferry Lane will provide an improvement in street lighting and increasing the sense of safety at night. This matter and others raised in submissions will be further considered and addressed during the detailed works under the s278 agreement should the application be granted.
- 6.34. While the removal of the HVLB will result in a change to the way pedestrians access the Station from that originally envisaged in the approved development, the revised proposal provides improvements to both walking and cycling infrastructure to the Station and those not using the Station. The revised development will continue, on balance, to deliver on the policies of the AAP (in particular AAP7 relating to Transport) and support access to the Station.

- 6.35. Considering the points above, the changes in circumstance, design and funding from the time the HVLB was approved, and the scope of improvements to be secured via the s278 agreement, the proposal is on balance considered to be acceptable and in accordance with the relevant policies of the London Plan, and Local Plan documents including the AAP.

Other matters

- 6.36. The majority of works covered by the original Planning Permission (as varied) have either been constructed or are not impacted by the changes proposed as part of this application. Considering the scale and nature of the proposed changes, there are no significant impacts on the following matters as a result of the proposed removal of the HVLB:
- Design and Appearance of the area
 - Archaeology
 - Flood Risk
 - Biodiversity and Trees
 - Contaminated Land
 - Sustainability
 - Air Quality
 - Waste
 - Local Employment
- 6.37. Changes are also required to be made to conditions other than condition 1 and condition 11. The changes relate to consequential changes i.e. removing references of the HVLB, and updating current conditions where discharged/ discharged in part and so do not materially affect the existing permission.

Conclusion

- 6.38. The proposed amendments to the extant planning permission will provide holistic benefits along Ferry Lane, improving access to and from Tottenham Hale Station by both cyclists and pedestrians. While the loss of provision for a dedicated walking bridge for users east of the Station is acknowledged, considering all details of the case, this will be acceptable on balance.
- 6.39. Subject to the recommended planning conditions and s278 agreement to secure necessary mitigation and policy objectives, officers consider that the proposed scheme is acceptable on its own merits, when considered against the development plan and all other material considerations.

7. COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 7.1. The proposal does not introduce additional floor space. CIL would be applicable as per the requirements of the extant permission.

8. RECOMMENDATIONS

GRANT planning permission for the reasons set out in Section 2 above.