

Comments to Haringey Council on Application by the Canal and River Trust (CART) to Develop Land at Hale Wharf, Tottenham Hale (Application Reference HGY/2016/1719), 28 October 2016

1. Introduction

I am writing on behalf of the Tottenham Civic Society to object to this planning proposal, and in particular to that part of it which concerns the construction of a 21-storey tower next to Tottenham Lock at the south end of the site, adjacent to Ferry Lane and the Paddock Community Park, and immediately across the Lea Navigation from the riverside pavilions of the Hale Village development; and its companion, the 15-storey block immediately to its north. This objection is made on the grounds of the development's failure to respect the context and environment in which the tower and the companion block would be situated; the height and massing of the proposed tower and the companion block; and their design and the materials of which they would be constructed.

2. Failure to Respect the Context and Environment

The Design and Access Statement provided by the applicant makes a number of statements about the context in which the proposed 21-storey tower and the companion 15-storey block immediately to its north would sit, all of which claim that the proposed development responds to and respects the sensitivity of the open green space to the east and northeast of the site: the Lea Valley, the Walthamstow Wetlands and the Paddock Community Park. However, these claims are then capped by a statement which openly contradicts them and transparently ignores the environmental context, suggesting either that the applicants have failed to check their document for consistency or are aware that it is inconsistent but are hoping that hand-waving and misdirection (never mind exhaustivity of detail) might lead its readers to overlook this.

The following statements in particular assert respect for the surrounding environment. In the third bullet point of paragraph 1.4.1 on the Objectives, it is claimed that the Hale Wharf development as a whole is intended to be "sensitive in terms of scale, character and appearance to its surrounding urban and ecological context, in particular to areas of environmental importance such as the Paddock Community Park, Lee Valley Park and Walthamstow Wetlands"; in the second bullet point of paragraph 1.4.2 on the Residential Masterplan it is claimed that the design "responds appropriately to its context"; in paragraph 1.5.6 on the Tottenham Area Action Plan it is claimed that the design guidelines provide for "building heights to respond to the Green Belt"; in the second bullet point of paragraph 2.7 on Site Constraints it is again claimed that "The sensitivity of any development in relation to the ecological assets of the Lee Valley Park, Paddock and Walthamstow Reservoirs is of upmost (sic) importance"; and in the second bullet point of paragraph 4.5.1 on Urban Design Principles it is claimed that "Buildings near the reservoir and Paddock are lowered to soften the edges of adjacent green spaces and to interface with adjacent parklands and ecological sites".

However, all five of these claims are flatly contradicted by the statement at paragraph 2.7.2 on the Ecology of the site, which states that the building massing "ascends from the closest parts of the designated sites at the northern end of the application site increasing in height with distance from the SPA/SSSI towards Ferry Lane at the south end of the site" -- in other words, that the buildings are not "lowered" and "softened" to respect the open spaces of the Lea Valley to the east and northeast of the site. Indeed, we are presented instead with a 21-storey tower and a 15-storey companion block which would stand out like giant sore thumbs from their surroundings: visually intrusive, overscale, shadow-casting objects which would not just loom menacingly over the Paddock but into the bargain would also be visible from (a) the Reservoirs to both the northeast of the site as well as those to the southeast, on the south side of Ferry Lane, and indeed (b) from as far away as Stonebridge Lock at the northern end of Tottenham Marshes and from Springfield Marina adjacent to the southern end of the southernmost reservoir. The only positive point which might be made about their visibility from Stonebridge Lock is that they might eclipse the view of the top of Canary Wharf which can also be had from that spot.

Our contention, therefore, is that the 21-storey tower and the companion the 15-storey block proposed for the southern end of the site are entirely inappropriate for their context and would be quite out of keeping with the nature and character of the open land around it. Tottenham Lock, at the southern end of the site, is the gateway to the Lee Valley and Tottenham Marshes for those travelling

eastwards on Ferry Lane: an experience and a vista which would be completely and irrevocably damaged by such a construction. A 21-storey tower and a 15-storey companion block at this location would transform Tottenham Lock from the gateway to a significant area of open land on the borders of East Tottenham area -- open land in which Tottenham, as the council will be well aware, has been previously assessed as deficient -- into another anonymous, depersonalised location dominated by two very tall buildings of a kind that might be found in (and would be considerably more appropriate for) the City of London.

For these reasons, the proposed 21-storey tower and its companion 15-storey block should be rejected.

3. The Height and Massing of the Proposed Tower

As indicated (at some length) above, a proposed tower of 21 storeys in height and a proposed 15-storey block immediately to its north would be entirely inappropriate for the environmental context in which they would be situated and quite out of keeping with the grain of the buildings around them, particularly those of the riverside pavilions of the Hale Village development on the other side of the Lea Navigation and the low-rise residential units of the Ferry Lane Estate to the south of Ferry Lane. But the proposal should also be considered in relation to policy DM1 of the council's Local Plan, on Delivering High Quality Design, which states that "All development is required to be of a high standard of design and compatible with, and contributing to, the distinctive character and amenity of the local area. The Council expects proposals to be design-led, and will support proposals for new development that (a) make a positive contribution to a place, improving the character and quality of an area; (b) relate positively to neighbouring structures, new or old, to create a harmonious whole; and (c) confidently address feedback from local consultation."

Taking these requirements for new developments in reverse order, we are aware of the consultation exercise undertaken by the applicants, to which the Society responded. From the applicant's Consultation Statement, however, it would appear that very little account has been taken of the objections previously made to the height of the tower; a token reduction from the 25 storeys proposed in the original draft of the site plan has been made, but other concerns about the height and massing of the development appear to have been waved away with trivial concessions on soft landscaping, a new public open space, premises for the consumption of food and beverages, and views through the development into the Lea Valley if one stands in the correct place and squints hard enough. The consultation feedback seems to have been not so much confidently addressed as largely ignored.

The applicants also appear to have ignored the second requirement, that the development "relate positively to neighbouring structures...to create a harmonious whole", which the construction of a 21-storey tower and a 15-storey block in this location would violate, because it would be wholly contrary to both policy AAP6 in the Tottenham Area Action Plan and policy 7.7 in the Mayor of London's London Plan (both of which are quoted in paragraph 5.3 on the Design and Access Statement, on Tall Buildings Guidance). Policy AAP6 states that "The Council expects the highest density development to be located adjacent to public transport nodes, and in Growth Areas and Areas of Change. At their boundary, development is expected to transition between these areas and the suburban areas of the AAP through appropriate transition/scaling of heights", while policy 7.7 requires that tall buildings should "only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall building; [and] relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm, particularly at street level." Although there are tall buildings close to the Tottenham Hale transport interchange further to the west, the heights of the other buildings in the Hale Village development decrease towards the east, to 9 storeys for the riverside pavilions alongside the Lea Navigation. The buildings on the far side of the Hale Wharf site, and in the Ferry Lane Estate to the south of Ferry Lane, are much lower rise. It should therefore be expected that -- to be consistent with the grain of these buildings and to meet the requirements of the council's policy AAP6 and the Mayor's policy 7.7 -- any (and all) building(s) on the Hale Wharf site should be intermediate between those of Hale Village and the Ferry Lane Estate: in other words, not only much lower than 21 storeys, but even lower than 9 storeys.

It follows from the failure to meet the second requirement, and from the failure to respect and respond to the surrounding environment (our first set of objections above, to this tower), that the proposed 21-

storey tower and its companion 15-storey block would fail to make a positive contribution to the Hale area. Additionally, however, they would fail to make a positive contribution to the Hale area because they would run counter to policy 7.24 of the Mayor of London's London Plan, concerning the Blue Ribbon Network, which includes the Lea Navigation. The policy states that the network, which is multi-functional, should provide "a transport corridor, drainage and flood management, a source of water, discharge of treated effluent, a series of diverse and important habitats, green infrastructure, heritage value, recreational opportunities and important landscapes and views. The starting point for consideration of development and use of the Blue Ribbon Network and land alongside it must be the water."

(It is notable that the only substantive reference to water in the Design and Access Statement is that in paragraph 2.71, concerning the flood risks, which the applicants assert is minimal because in their view "comparison of topographical site survey data with the Environment Agency modelled flood levels" shows that the site is "above the 1 in 1,000 year (0.1% annual probability) flood level". Aside from the mildly diverting issue of the level of weather and climate expertise on which the applicants choose to challenge and dismiss the flood risk, it should be clear that ongoing climate change through human agency (anthropogenic global warming) has invalidated previous assessments of the probability of severe flood events. Recent weather events -- from Storm Abigail in November 2015 through to Storm Katie in March this year -- and not-so-recent weather events, such as the flooding of large parts of the West Country in the winter of 2013-2014, suggest that what were once thought to be 1-in-100-year events are now occurring with 1-in-10-year frequency; the likely frequency of 1-in-1,000-year events will have been altered accordingly, and not in favour of the applicants.)

We might also mention policy DM6 of the council's Local Plan, on Locally Important Views and Vistas, although suggestions during the consultation on this draft of the plan that views of and from the Lea Valley should be considered of importance were not included in the eventually adopted draft. It should nevertheless be borne in mind that an increasing number of people will be using and visiting the open areas of the Lea Valley, as a consequence of growth in both local population numbers and visitors to new attractions such as Walthamstow Wetlands; views of and from the Lea Valley will therefore be increasingly important. A 21-storey tower and a 15-storey block would clearly impede, interfere with and result in the overall degradation of these views.

For these reasons, the proposed 21-storey tower and its companion 15-storey block should be rejected.

4. The Design and Materials of the Proposed 21-Storey Tower

Paragraph 4.7.2 of the Design and Access Statement, on Historical Industrial and Wharf-Side Precedents, states that the external appearance of the 21-storey tower has been influenced by "historical wharf side precedence (sic)", and is accompanied by a number of illustrations of buildings of this type: mills, warehouses, other industrial structures. However, this precedent does not derive from the previous history of the site and has been imported from elsewhere: as the applicants themselves demonstrate in their history of the site and its accompanying illustrations at paragraphs 2.3.1 and 2.3.2 of the Design and Access Statement, on Site History, buildings of this nature and character have not hitherto been present in the Hale area. During the Harris Lebus years, in the decades before and after the Second World War, the industrial units then present on the site of what is now Hale Village were entirely low-rise (no more than three storeys in height) and of a longitudinal shed-like construction, as may be confirmed by examination of the photographs in the Gallery section of the dedicated Harris Lebus website -- <http://www.harrislebus.com/> -- which are themselves sourced from the archive of historical photographs compiled at the Britain From Above website -- <http://www.britainfromabove.org.uk/>. The applicants themselves even acknowledge the Harris Lebus website as the source of their photographs; but having referenced this history, they then appear to ignore it in favour of mill and wharf-side structures modelled on those to be found in Leeds, along the Regents Canal, on the Greenwich Peninsula ("Lower Ordnance Wharf", illustrated on page 102) and Wapping Wall (also illustrated on page 102). These are structures which are quite alien to and have never been present in the Hale area, and to introduce such buildings would therefore be a significant departure from the site's history and previous character.

Paragraph 4.7 of the Design and Access Statement, on Appearance, summarises the "overall strategy" (sic) adopted for the materials to be used in the construction of the 21-storey tower and its

companion 15-storey block, stating an intention to "produce a visually harmonious palette of robust materials coupled with well proportioned window and door openings with reveals appropriate in depth in relation to the mass of each building". A visually harmonious appearance is of course to be desired in any construction, irrespective of its height and mass, but the choice of brick as "the primary material" on the grounds that it would "give buildings a robustness appropriate to their scale and use" means that visitors to or travellers through the area would effectively be presented with two giant brick walls, one of 21 storeys in height and the other of 15 storeys, little mediated by the addition of (to quote from paragraph 4.7.1 on Materiality: Facades and Robust Detailing) "simple and elegant balustrades" and "precast concrete sills and fins to windows" to "establish a degree of contrast to the predominant brick surface". Such walls, howsoever decorated, would be both intimidating in appearance and entirely out of keeping with the extensively-glazed riverside pavilions of the Hale Village development on the other side of the Lea Navigation.

We would also question certain other aspects of what the applicants describe as the appearance masterplan. Paragraph 4.7.12 on Building Materials: Flexible Residential/Workspace Block states that the "primary facade material" for a building used predominantly should be of either brick or timber -- but to suggest the use of timber for external cladding takes no account of the UK's prevailing climate system and weather patterns. Irrespective of the preservative treatment applied to the timber, it would in a few years be rendered discoloured and shabby, to the detriment of the building to which it was applied, and require to be replaced following inevitable further degradation. Paragraph 4.7.7 on Roofs: All Typologies states that pitched roofs "must be metal of a complimentary colour to the roofing materials of buildings in the detail application"; according to paragraph 4.7.1 (quoted from just a few lines ago), the metal should be zinc. But the Design and Access Statement is silent on the question of why pitched roofs should be of metal rather than tile, and indeed the use of metal conflicts with the historical industrial and wharf-side buildings cited as precedents by the applicants as the influence for the proposed 21-storey tower and the companion 15-storey block: all such buildings have tiled roofs.

For these reasons, the proposed 21-storey tower and its companion 15-storey block should be rejected.

5. Other Issues

There appears to be one single reference in the Design and Access Statement to affordable housing, at paragraph 4.3.4 on Tenure Distribution, which states that "The affordable units are placed along the north and eastern edges of the site and are largely comprised of family homes" -- but this concerns the masterplan for the Hale Wharf site, which does not form part of the consideration of the application for planning permission for the proposed 21-storey tower and its companion 15-storey block and the construction of which may not be embarked upon for many years to come. The proposed 21-storey tower and its companion 15-storey tower would not therefore deliver the council's required proportion of affordable housing -- indeed, paragraph 4.3.4 states that the proposed tower will consist "entirely [of] private for sale units and that its companion block will comprise entirely "Market Rent or Private Rental Sector units". The conclusion that we inevitably draw from the tenure distribution of the proposed tower and block is that all of their residential units would be purchased as investments, either as buy-to-let or buy-to-leave, which would mean that the applicants (and their proposed development) have utterly failed to address the council's housing priorities.

Similarly, there are limited references in the Design and Access Statement to car parking, at paragraph 4.8.4 on Vehicular Access and Car Parking and at paragraph 6.5.2 on Car Parking. The former states that because of the "highly accessible site location and the restricted availability of on-street parking opportunities in the surrounding streets", parking spaces will be restricted to 58 spaces, and the latter states that although this parking will be provided throughout the site it will be prioritised, because of site constraints for use by residents of wheelchair accessible accommodation (sic). (Although we note that "Access to these spaces will be managed by the use of short-term leases", suggesting that the applicants do not expect disabled residents to occupy any of their units for long periods.) However, the applicants do not appear to address the issue of traffic movements on and off, and along Ferry Lane, which is already heavily congested at peak hours; nor do they explain how they expect to prevent on-street parking in the new street which the masterplan indicates is to run through the spine of their development (other than warning, in the fifth bullet point of paragraph 4.3.5 on Building Uses, that the ground floors of the buildings in the masterplan "may not be used solely (sic) or largely (sic)" for parking, which "includes undercroft parking"). There is accordingly a

strong case for suggesting that, other than parking spaces for disabled residents, the development should be car-free.

6. Conclusion

We have set out above, at some length and with reference to the Design and Access Statement prepared by the applicants, our detailed critique of the proposal to construct a 21-storey tower next to Tottenham Lock at the south end of the site, adjacent to Ferry Lane and the Paddock Community Park, and immediately across the Lea Navigation from the riverside pavilions of the Hale Village development; and to construct a companion 15-storey block immediately to its north. In our view, these proposed buildings fail to respect the context and environment in which they would be situated; their height and massing is inappropriate and out of line with both the surrounding built context and the requirements set down in both the council's Local Plan and the Mayor of London's London Plan; and their design and the materials of which they would be constructed would constitute a significant departure from the history and character of the Hale area and be entirely at odds with the materials and appearance of the buildings to their west and south.

For these reasons, the Tottenham Civic Society considers that the proposed 21-storey tower and its companion 15-storey block should be rejected.