

GREATER LONDON AUTHORITY
Development, Enterprise and Environment

Emma Williamson
Haringey Council
Civic Centre
High Road
Wood Green
London
N22 8LE



Our ref: D&P3045MC02
Your ref: HGY/2013/0061
Date: 24 June 2013

Dear Emma,

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

**St Lukes Woodside Hospital, Woodside Avenue, N10 3JA
Local Planning Authority Reference: HGY/2013/0061**

I refer to the copy of the above planning application, which was received from you on 15 January 2013. I also refer to the subsequent amendments received on 13 May 2013. On 24 June 2013, Sir Edward Lister, Deputy Mayor and Chief of Staff, acting under delegated authority, considered a report on this proposal, reference D&P/3045/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that the application does not comply with the London Plan, but that the possible remedies set out in paragraph 56 of this report could address these deficiencies.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is James Forrest, e-mail JamesForrest@tfl.gov.uk telephone 020 3054 7090.

Yours sincerely,



Colin Wilson

Senior Manager- Development & Projects

cc Joanna McCartney, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Alex Williams, TfL
Mr Scott Hudson, 57 Lansdowne House, London W1J 6ER

St Luke's Hospital, Muswell Hill

in the London Borough of Haringey

planning application no. HGY/2013/0061

Strategic planning application stage 1 referral (new powers)

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Redevelopment and refurbishment of the former St Luke's Hospital for 165 residential units including basement parking and landscaped gardens.

The applicant

The applicant is **Hanover** and the architect is **Pollard Thomas Edwards Architects**.

Strategic issues

The key strategic issues to consider are residential development on former **healthcare facility, housing and affordable housing, housing for older people, design, access and the impact on heritage assets, and transport.**

Recommendation

That Haringey Council be advised that the application does not fully comply with the London Plan, but that the remedies set out in paragraph 56 of this report could address those deficiencies.

Context

1 On 31 February 2013, the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor had until 13 March 2013 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. In this particular case the applicant indicated at an early stage the intention to make amendments to the proposals. The GLA agreed with Haringey Council to defer comments on the case until receipt of the amended application. These were subsequently received on 13 May 2013. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1A.1 of the Schedule to the Order 2008:

1A.1 - "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."

3 Once Haringey Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The site is the former St Luke's Hospital which is predominantly vacant but still partially occupied by Camden & Islington NHS Foundation Trust, currently used for administration only, and Simmons House which is occupied by the Whittington Hospital NHS Trust which provides in-patient and day-patient psychiatric care to adolescents. Simmons House is a more recent addition to the site and is excluded from the redevelopment area.

6 The site includes a series of hospital buildings set in mature landscape which is designated as part of the Muswell Hill Conservation Area and as a Historic Park and Garden. There is one statutory listed building to the south of the site, the Administration building (grade II listed) and two other locally listed buildings of heritage value, Roseneath and Norton Lees.

7 The site is bounded by Treehouse School to the west, the B550 Muswell Hill Road to the east, Woodside Avenue to the south and Grand Avenue to the north. All these roads fall within Haringey jurisdiction as the highway authority. The A1 Archway Road, located 1 kilometre to the south of the site, is the nearest part of the Transport for London Road Network (TLRN).

8 The nearest rail or underground station to the site is East Finchley underground station, approximately 1.2 kilometres to the west of the site and served by the Northern line. Two bus services operate along Muswell Hill Road adjacent to the site; Route 43, between Halliwick Park and London Bridge, and Route 134, between North Finchley and Tottenham Court Road. A further two services, the 102 (Edmonton Green – Brent Cross) and the 234 (High Barnet – Highgate Wood) are also accessible from Muswell Hill Road and Fortis Green Road, approximately 275 metres to the north-east of the site. As such, the site has a low Public Transport Accessibility Level (PTAL) of 2, on a scale from 1 to 6 where 6 is excellent.

Details of the proposal

9 The application proposes comprehensive redevelopment of the existing site and with the retention of some existing heritage buildings including the Administration building, Roseneath and Norton Lees buildings.

10 At present the proposal is for 165 residential units including a mix of houses as private sale accommodation and a series of apartments for private sale and affordable rent. The proposals also includes a co-housing scheme which will be for private sale and further private sale within the four retained heritage buildings which will be refurbished and converted for residential use. A new basement parking level is proposed and the layout provides for the retention of mature trees and creation of a new central landscaped garden area.

11 The buildings will be arranged as a series of 9 blocks, three retained listed buildings and terraced houses along the north and east boundary. The layout is set out below:



Figure 1 masterplan layout

12 Applications have also been made to the Council relating to listed building consent and conservation area consent. These are relevant in the analysis of the heritage impacts arising from the proposed development as considered in further detail later in this report.

Case history

13 On 16 October 2012 the GLA met the applicant to discuss the proposed redevelopment of the site. At that time the applicant was exploring the provision of housing for older people including a proportion of affordable housing for over 55's. The GLA expressed general support for the provision of housing for older people, but raised the need for a robust strategy to deal with the Council's concerns regarding its priority of general needs affordable housing in this part of the borough. A strategy to target the under occupied units was suggested by the GLA in order to deal with the Council's objection – or a mixed approach including some general needs affordable was suggested.

Strategic planning issues and relevant policies and guidance

14 The relevant issues and corresponding policies are as follows:

- Affordable housing *London Plan; Housing SPG; Housing Strategy*
- Density *London Plan; Housing SPG*
- Urban design *London Plan;*
- Regeneration *London Plan; the Mayor's Economic Development Strategy*
- Transport *London Plan; the Mayor's Transport Strategy*

- Biodiversity *London Plan; the Mayor's Biodiversity Strategy; draft Tree and Woodland Strategies*
- Access *London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Tall buildings/views *London Plan, Revised View Management Framework SPG*
- Historic Environment *London Plan; Circular 07/09*
- Ambient noise *London Plan; the Mayor's Ambient Noise Strategy;*
- Air quality *London Plan; the Mayor's Air Quality Strategy;*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*

15 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2013 Haringey Local Plan: Strategic policies, 2006 Haringey UDP and the 2011 London Plan.

16 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework.
- The draft Revised Early Minor Alteration to the London Plan.
- The draft 2013 Haringey Development Management Policies DPD.

Principle of development

17 The site has previously provided acute inpatient mental health provision, more recently for Camden & Islington NHS Foundation and continues to function in part under a separate trust in the Simmons House building. The remainder of the site has since been identified as surplus to the requirements of the Camden and Islington NHS Foundation following the decision to relocate provision to more central and accessible parts of Camden and Islington. Whilst limited weight can be attached to it, the consultation draft of the Haringey Site Allocations DPD identifies the site as having the potential for redevelopment for housing and community facilities.

18 In terms of the Mayor's priorities, London Plan Policy 3.17 Health and Social Care Facilities Part B notes that where local health services are being changed, the Mayor will expect to see replacement services operational before the facilities they replace are closed. The principle of development is therefore broadly supported given the Foundation has undertaken relocation/consolidation of the site to more central locations thus deeming it surplus.

19 Furthermore, Chapter 3 of the London Plan sets out the Mayor's priority to increase housing supply in London (Policy 3.3) and therefore the principle of a residential scheme is broadly supported subject to other policies in the Plan, considered in further detail below.

Affordable housing

20 The housing offer is yet to be agreed and is subject of viability testing. At this stage the planning statement sets out the following bedroom size mix which is based on the original total of 173 units. The applicant is yet to confirm the amended bedroom size mix for the revised 165 unit scheme.

	1 Bed	2 Bed	3 Bed	4 Bed	Total
Houses	0	0	9	12	21
Apartments	41	81	29	1	152
Total	41	81	38	13	173

	1 Bed	2 Bed	3 Bed	4 Bed	Total
Affordable Rent	4	3	4	0	11
Shared Ownership	6	4	0	0	10
Private Sale	31	74	34	13	152
Total	41	81	38	13	173

Figure 2 housing mix originally proposed: source planning statement (Savills)

21 In terms of affordable housing therefore at this stage the overall tenure split will be approximately 88% private, 6% shared ownership and 6% affordable rent.

22 The process of reviewing the applicant's viability submission has been commissioned by Haringey Council. The Council has agreed to share the conclusions of the viability review with the GLA to inform discussions on matters of affordable housing and other section 106 requirements. This will need to be confirmed before the application is reported back to the Mayor for final determination.

23 As set out in the case history, the applicant originally proposed that approximately 70% of the residential provision would be for over 55's accommodation and that a proportion of that would be affordable over 55's accommodation. The Council has maintained its position that the priority remains for general needs affordable housing in this part of the borough, as such the block located along the west boundary behind Simmons House has been identified for the provision of currently 21 affordable units.

24 It is disappointing that the overall strategy to deliver a mix of housing for older people, including affordable housing for older people and general needs affordable housing has not been pursued. The viability outcome will dictate the final housing offer which will be reported to the Mayor at the determination stage.

Density

25 The applicant advises that scheme provides a density of 69 units per hectare, which falls within the target range for an urban location identified in the London Plan (between 45-170 units per hectare in areas where public transport accessibility is between 2). The approach is based on the amended unit provision of 165 and whilst this is at the lower end in terms of density, the approach is broadly acceptable in the context of this particularly sensitive site.

Urban design

26 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within chapter seven which address both general design principles and specific design issues.

27 The general layout is well considered and provides a careful integration of new buildings into the surrounding urban environment, including managing the change in level from north to south, internally within private houses on the northern boundary. Retention of pedestrian access onto Grand Avenue is also supported.

28 Key urban design principles appear to be well established, such as the backs of new buildings facing the backs of the existing units that surround the site; good use of natural surveillance and defensible space. This creates a fairly traditional layout of units and blocks accessed via a central circular vehicle route.

29 At pre application the GLA noted that whilst the general layout seems positive, the resolution of the 'L' shaped block to the south east corner and its relationship to Simmons House was unfortunate. GLA officers also noted that this part of the site needed some further consideration, and should also have regard to the school adjacent to the site.

30 The design team has responded by increasing a small area of open space between the L block and Simmons House and through careful layout design provided angled windows to those units that overlook the school site to the east. The changes, albeit minor, are generally supported.

31 Since the submission, the Council also raised concerns regarding the location of block in front of Norton Lees and the impact on its setting. GLA officers were generally satisfied with the arrangement of blocks, however given the Council's concerns and wider concerns raised in response to the consultation, the applicant has removed this block in the amended scheme. Its removal is understood in design terms and will create significant and generous opens space in the setting of the site from Woodside Avenue.

Design quality standards - residential

32 The design is well considered in terms of the Mayor design quality standards in the Housing SPG. The number of units accessed off a single core is generally low – between 3-6. Space standards are generous and units benefit from large balconies. Many of the flats are also double aspect. The quality of units is generally high.

Play space

33 The design team need to confirm the bedroom size mix by tenure to establish the expected child population for the site. The latest response from the applicant notes 42 children on the basis of a general needs affordable housing approach. Less where the scheme is providing for over 55 private and affordable housing. In any case, there is generous provision of opens spaces largely due to the heritage setting and park and gardens, which is publically accessible in the centre of the site and elsewhere. Formal play area should however be identified to meet the needs arising within the development based on the guidance in the Mayor SPG. The doorstep play is insufficient to meet the needs of the expected child population and should be reconsidered on a more formal basis. This could be conditioned by the Council to ensure suitable play and equipment to meet the sensitive setting of the site is achieved.

Block massing

34 There is a clear consistency of materials (brick) which is supported. Integration of the scheme within the historic park and garden and heritage assets in terms of scale is successful.

Conservation area and listed buildings

35 PPS5 (now deleted and superseded by the NPPF) introduced the term 'heritage assets' which covers both designated and non-designated historic buildings and areas including conservation areas. It also introduced the concept of 'significance' which recognised that not all heritage assets are of equal significance and that some are more capable of accommodating change and places the onus on the applicant to submit reports on significance and impact on asset and settings.

36 These themes are carried through into the NPPF (section 12) and Policy 7.8 C and D of the London Plan which specifically picks up on both and states for planning decisions "*Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate*" and "*Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.*"

Heritage assets within the site

37 The retention of Norton Lees (locally listed), Roseneath (locally listed), and the Administration building (grade II listed) is supported and the use of brick materials in the new blocks complements these existing assets and the setting of the park and garden. The extension to Norton Lees in particular matches the proportion and pattern of windows and is honest in its modern appearance whilst using sympathetic brick materials. Overall the proposals would preserve the setting of the listed building, locally listed assets and the character and appearance of the conservation area. Some of the walkway structures will also be reused as storage areas reconfigured, within the new development.

Heritage assets outside the site

38 The locally listed pumping station on Woodside Avenue and wider conservation area will also be preserved in terms of the new scheme which is generally low in scale.

Access

39 All the new homes have been designed to meet the Lifetime Home standards and 10% will be for wheelchair accessible or easily adaptable. The management of level change internally through the north row of terraced houses is well considered. The rest of the development and public spaces will be level. The approach is therefore supported.

Climate change mitigation

40 The applicant is aspiring to high standards of building fabric and modelling indicates that a 5-10% saving in regulated carbon dioxide emissions will be achieved. This is welcomed. It is understood there is a desire for the Co-housing community, which is part of the scheme, to meet passivhaus accreditation as part of the design process. This ambition is supported. All dwellings (new and refurbished) will be connected to a single site heat network served by combined heat and power (CHP) plant located in a single energy centre on the development. This is projected to save 30% of the regulated carbon dioxide emissions.

An initial review of existing and proposed heat networks in the area has been undertaken and although none are available the applicant has stated that future connectivity of the heat network will be built into development. The proposals include 100 sq.m. photovoltaic panels adding a further 2% saving in carbon dioxide emissions. The proposals will exceed the 25% target in Policy 5.2 for savings in regulated carbon dioxide emissions beyond 2010 Building Regulations baseline.

Climate change adaptation

41 The passive measures are shown within the design and access statement in terms of the layouts proposed in the residential component of the scheme. The use of multi aspect apartments is maximised in order to reduce the potential for overheating. Green and brown roofs should be secured by condition by the Council, consistent with London Plan policy 5.11. In terms of policy 5.15 of the London Plan which sets a maximum water use target of 105 litres per person per day for residential dwellings, this can be secured by condition by the Council. The site is not at risk of flooding and therefore the land use approach is supported.

Transport for London's comments

42 The proposals include space for 133 car parking spaces equating to a provision of 0.83 spaces per unit. Given the nature of the development, its location and associated public transport accessibility, this provision seems appropriate and in line with London Plan policy 6.13. TfL also welcomes the applicant's commitment to provide a car club bay at surface level, with potential for a second space to be accommodated within the basement dependent on demand. This should be secured through condition.

43 There will be 20 spaces designated for blue badge use, all of which would be at surface level. While this is welcomed, the applicant should note that the Housing SPG recommends one space for each wheelchair accessible unit, and confirmation that this standard can be met should therefore be provided. The detailed design of these spaces should also be reviewed as the submitted tracking drawings show vehicles entering the clear zone required around some of the spaces whilst driving through the site. The applicant will also need to confirm the number of Electric Vehicle Charging Points (EVCPs) proposed, and it is expected that this will be in accordance with London Plan standards.

44 The applicant has carried out an assessment of the pedestrian environment around the site in the latest revision to the Transport Assessment, which is welcomed. It appears that with the exception of the site access, which will be rebuilt as part of the proposals, the footways around the site are generally in good condition. However, it has highlighted that the bus stop closest to the site on Muswell Hill Road provides no bus shelter or seating. TfL would therefore encourage Haringey Council to secure £12,500 within the section 106 towards bus stop upgrades to improve access to public transport, particularly for the mobility impaired and in line London Plan policy 6.7.

45 Cycle parking is proposed below the minimum London Plan standards, at 210 spaces. Should the scheme progress on the basis of the over 55's model with the provision of secure parking for mobility scooters, TfL considers the current level of cycle parking may be acceptable. Should the scheme be pursued as general market and affordable housing, the applicant will need to consider provision that is in line with the London Plan standards.

46 A Travel Plan has been submitted with the application and should be secured as part of the section 106 agreement for the site. The Travel Plan has passed an assessment using the ATTrBuTE tool, and the measures included within it, such as funding a year's membership of a car club for residents of the development, are all welcomed.

47 As well as the Travel Plan, measures to minimise the impact of construction should be dealt through a construction logistics plan (CLP), to be secured by an appropriate condition on any consent. This is required in order to comply with London Plan policy 6.3 (C).

48 To summarise, whilst TfL has no objections to the principle of the redevelopment, issues regarding EVCPs and blue badge parking need to be resolved, a Travel Plan secured as part of a legal agreement, and a CLP secured by condition before the development can be considered in accordance with the transport policies of the London Plan.

Biodiversity

49 There is very limited commentary in relation to the ecological impacts of the proposals. The sustainability statement notes that an ecologist has been appointed to provide recommendations on improving the ecological value and biodiversity. The same report also notes 'some loss of ecological value will occur with the proposed development. It is intended to mitigate this loss based on the appointed Ecologist's recommendations'. The GLA would welcome details regarding the extent of loss, the impacts and the mitigation or recommendations proposed.

Community Infrastructure Levy

50 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3. The Mayoral CIL formally came into effect on 1 April 2012, and it will be paid on commencement of most new development in Greater London that was granted planning permission on or after that date. The Mayor's CIL will contribute towards the funding of Crossrail.

51 The Mayor has arranged boroughs into three charging bands. The rate for Haringey is £35/sq.m. The required CIL should be confirmed by the applicant and council once the components of the development or phase thereof have themselves been finalised. See the 2010 regulations: <http://www.legislation.gov.uk/ukdsi/2010/9780111492390/contents> as amended by the 2011 regulations: <http://www.legislation.gov.uk/uksi/2011/987/made>

52 London borough councils are also able to introduce CIL charges which are payable **in addition** to the Mayor's CIL. Haringey has consulted on a draft charging schedule. See the council's website for more details.

Local planning authority's position

53 The officer recommendation is currently unknown.

Legal considerations

54 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at

this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

55 There are no financial considerations at this stage.

Conclusion

56 London Plan policies on health issues, housing, design, access, energy, and transport are relevant to this application. The application complies with some of these policies but not with others. On balance the application does not comply with the London Plan. The reasons and potential remedies to non compliance are set out below:

- **Principle of development:** The principle of redevelopment and replacement of surplus healthcare facilities and for residential development is consistent with the Local Plan and the objective of the London Plan.
- **Affordable housing quantum, mix and density:** The housing offer remains to be agreed and is subject to further viability testing.
- **Urban design:** the design approach is generally supported subject to a robust strategy for play space being secured by condition.
- **Access:** The proposal has been designed to a high standard in terms of accessibility.
- **Climate change mitigation:** The energy strategy is broadly supported subject to suitable conditions.
- **Climate change adaptation:** Broadly acceptable subject to conditions set out in this report.
- **Biodiversity:** The applicant needs to confirm the impacts on the ecological value of the site and suggested mitigation.
- **Transport:** A number of transport matters are raised as set out in this report.

for further information, contact Planning Decisions Unit:

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