

9 January 2017

1 Station Square, Tottenham Hale

in the London Borough of Haringey

planning application no. HGY/2016/3932

Strategic planning application stage 1 referral

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

The proposal

Demolition of existing buildings and erection of a 22 storey building, providing 434 sq.m. (GEA) of commercial floorspace (Class A1/A3), 128 residential units (Class C3), landscaped amenity space, cycle parking and associated works.

The applicant

The applicant is **Micuber Estates Limited**, the architect is **John McAslan & Partners**, and the agent is **Nathaniel Litchfield & Partners**.

Strategic issues summary

Affordable housing: 90% (by habitable room) on-site, based on £28,000 per unit grant funding as set out in the Mayor's draft Affordable Housing and Viability SPG, made up of 117 shared ownership units. 35% affordable housing without grant. The high proportion of affordable housing is strongly supported. The Council has identified that the Opportunity Area site is well-suited to smaller intermediate tenure units, particularly as Tottenham has a large proportion of social rent tenure. Therefore, the provision of all of the affordable units as shared ownership tenure is acceptable. The section 106 agreement should specify the affordable housing % both with and without grant funding, as well as eligible household income limits for each shared ownership unit size (Para's 17-19).

Urban design and tall buildings: The height, layout, massing and architecture of the building is supported, and residential quality is good (Para's 26-30).

Recommendation

That Haringey Council be advised that while the application is generally acceptable and supported in strategic planning terms, it does not yet comply with the London Plan for the reasons set out in paragraph 47 of this report; however the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 30 November 2016, the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor has until 10 January 2016 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1C(c) of the Schedule to the 2008 Order:

- *1C(c) "Development which comprises or includes the erection of a building that is more than 30 metres high and is outside the City of London."*

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

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

Site description

5 The 0.22 hectare site occupies a prominent corner at the junction of Hale Road and Station Road, with a recently constructed 96-bed Premier Inn hotel on the western boundary of the site. On the northern side of Hale Road lies a two storey residential terrace and a petrol station. Ashley Road to the north is predominately in industrial use, including the locally listed Berol House, although proposals are coming forward for residential-led mixed uses. To the south of Station Road are large shed-type retail units and associated car parking, with Tottenham Hale Retail Park further to the south. To the east is Tottenham Hale Bus and Railway Station, with Tottenham Hale Village further to the east. Further to the west is a predominately residential area consisting of terraced housing. The site was formerly in industrial use and it includes two small one storey buildings and a yard used for informal parking. A small parking area occupies the corner of the site adjacent to the junction with Hale Road and Station Road.

6 The site lies within a potential District Centre, as identified in the Tottenham Area Action Plan (Pre-Submission Version, January 2016). The site is also within the Tottenham Housing Zone and the Upper Lee Valley Opportunity Area.

7 The nearest section of the Transport for London road network is The Hale, 80 metres to the west. Tottenham Hale bus station is located to the south-east of the site, which serves 6 routes. Tottenham Hale Station provides access to the Victoria line, which operates a 24 hour service on Friday and Saturday; in addition to national rail services. A taxi rank is also available at the station. As such the site records a public transport accessibility level (PTAL) of 6a, on a scale of 1 to 6b, which indicates an excellent level of accessibility. Cycle Superhighway 1 can also be accessed on Tottenham High Road, 750 metres to the west.

Details of the proposal

8 The application seeks to demolish the existing buildings and erect a 22 storey building including 434 sq.m. (GEA) of commercial floorspace (Class A1/A3) at ground/mezzanine level, 128 residential units (Class C3), landscaped amenity space at levels 1 and 7, cycle parking and associated works.

Case history

9 On 7 September 2016, a pre-application meeting was held at City Hall for a detailed application for 129 residential units and ground floor retail of approximately 380 sq.m., in a building of up to 22 storeys. The GLA's pre-application advice report of 19 September 2016 concluded that the principle of the proposal was supported; however issues relating to affordable housing, housing, urban design and tall buildings, inclusive design, transport, and climate change should be addressed in any application.

Strategic planning issues and relevant policies and guidance

10 The relevant issues and corresponding policies are as follows:

- Employment *London Plan*
- Town centre uses *London Plan; Town Centres SPG*
- Housing *London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG*
- Affordable housing *London Plan; Housing SPG; draft Affordable Housing and Viability SPG; Housing Strategy*
- Density *London Plan; Housing SPG*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Tall buildings *London Plan*
- Historic Environment *London Plan*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG*
- Parking *London Plan; the Mayor's Transport Strategy*
- Transport *London Plan; the Mayor's Transport Strategy*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy*
- Climate change *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*

11 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is made up of Haringey's Strategic Policies DPD (2013), the Saved Policies within the Unitary Development Plan, and the 2016 London Plan (Consolidated with Alterations since 2011).

12 The following are also relevant material considerations:

- The National Planning Policy Framework, Technical Guide to the National Planning Policy Framework and National Planning Practice Guidance.
- The Upper Lee Valley Opportunity Area Planning Framework (ULV OAPF) (July 2013).
- The Tottenham Area Action Plan (Pre-Submission Version, January 2016).
- The Site Allocations DPD (Pre-Submission Version, January 2016).
- The Development Management DPD (Pre-Submission Version, January 2016).
- Alterations to Strategic Policies (Pre-Submission Version, January 2016).

Principle of development

Residential/town centre uses/employment

13 The site lies within the boundary of the Upper Lee Valley Opportunity Area, as identified in London Plan Policy 2.13 and Table A1.1, which states that the Opportunity Area is capable of accommodating at least 20,100 homes up to 2031. London Plan Policy 3.3 'Increasing Housing Supply' recognises the pressing need for new homes in London and Table 3.1 gives an annual monitoring target of 1,502 new homes per year in Haringey between 2015 and 2025. The site is also located within the Tottenham Housing Zone, which has a target for approximately 2,000 new homes. The Tottenham Area Action Plan (AAP) identifies the site as part of site TH4 Station Square West, with a target of approximately 300 net residential units.

14 The site is designated as a Local Employment Area, although it is currently largely unused, other than for car parking. London Plan Policy 4.4 'Managing Industrial Land and Premises' provides a strategic aim for boroughs to adopt a rigorous approach to industrial land management, but recognises that managed release may be required to provide other uses in appropriate locations. The Tottenham AAP proposes to remove the Local Employment Area designation and identifies the site for new District Centre uses at ground and first floor, with residential and commercial above. The site is also within the potential District Centre identified in the AAP.

15 The proposal for a residential led mixed-use development is consistent with London Plan policies and emerging local policies and is therefore supported. The inclusion of 434 sq.m. ground/mezzanine floor retail uses are in line with London Plan Policies 2.15 'Town Centres', 4.7 'Retail and town centres', 4.8 'Supporting a successful and diverse retail sector' and supplementary planning guidance 'Town Centres'.

Housing

16 The unit numbers proposed are as follows:

Units	Market	Intermediate (shared ownership)	Total
One-bed	3	68	71 (55%)
Two-bed	6	42	48 (38%)
Three-bed	2	7	9 (7%)
Total	11	117	128
		90% by habitable room	

Affordable housing

17 London Plan Policy 3.9 'Mixed and Balanced Communities' seeks to promote mixed and balanced communities by tenure and household income. Policy 3.12 'Negotiating Affordable Housing' seeks to secure the maximum reasonable amount of affordable housing. The Mayor's recently published draft Affordable Housing and Viability SPG introduces a threshold approach, whereby schemes meeting or exceeding 35% affordable housing without public subsidy are not required to submit a viability assessment. London Plan Policy 3.11 'Affordable Housing Targets' requires that 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale, with priority given to affordable family housing. The Mayor's draft Affordable Housing and Viability SPG sets out a preferred tenure split of at least 30% low cost rent, at least 30% intermediate, and the remaining 40% to be determined by the LPA; however more flexibility is encouraged in Opportunity Areas.

18 The application proposes 90% affordable housing. Further discussions have taken place with the Registered Provider (RP) involved, which has confirmed that 35% affordable housing without grant is expected to be committed to as a minimum with any future grant of planning permission; and 90% to be secured based on £28,000 per unit grant funding as per the Mayor's draft Affordable Housing and Viability SPG. All of the affordable units will be in the form of intermediate shared ownership units.

19 The high proportion of affordable housing is significantly above the Council's strategic target for 50% affordable housing and is strongly supported. The Council's AAP encourages alternative affordable tenures to the social rented accommodation that currently dominates Tottenham, and its pre-application advice has identified that the site is well-suited to smaller intermediate tenure units. Therefore, the provision of all of the affordable units as shared ownership tenure is acceptable. As per the draft SPG, the section 106 agreement should specify the affordable housing % both with and without grant funding; include a review mechanism to be triggered if an agreed level of progress on implementation is not made within two years of permission being granted; and include an agreed Benchmark Land Value. The shared ownership units should also meet the affordability requirements of paragraphs 2.36-2.43 of the draft SPG.

Housing choice

20 London Plan Policy 3.8 'Housing Choice' encourages a choice of housing based on local needs, while affordable family housing is stated as a strategic priority. Policy 3.11 also states that priority should be accorded to the provision of affordable family housing.

21 The mix of units is for 93% to be two-bed or smaller and 7% family-sized units. It is recognised that a large proportion of one and two bed units are appropriate in a high density scheme in this highly accessible location, and smaller intermediate units are also likely to encourage 'entry-level' access to home ownership, which is welcomed. During pre-application discussions, the Council has agreed that this site is well-suited to smaller intermediate tenure units, with other sites in Tottenham Hale coming forward with a higher proportion of family-sized units. The housing mix is therefore supported.

Density

22 London Plan Policy 3.4 'Optimising Housing Potential' states that taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output within the relevant density range shown in Table 3.2. The site is within an 'urban' setting where the density matrix sets a guideline of 45-260 units or 200-700 habitable rooms per hectare with a PTAL of 4-6.

23 The density proposed is approximately 1,454 units per hectare. While this is considerably above the density range, it is recognised that this is a reflection of the very small and constrained site. The site is also highly accessible, being located immediately next to Tottenham Hale Station. The site is also in close proximity to a significant open space in the form of Down Lane Park, which lies across Hale Road, immediately to the north of the site, with Lee Valley Regional Park in close proximity. Quality considerations are particularly important for high density schemes, and as discussed in this report, the quality of the scheme supports the proposed density.

Children's play space

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

25 The proposals indicate a child yield of 9, which is below the trigger point for on-site play space as defined in the Mayor's SPG. Notwithstanding this, the proposals include 54 sq.m. of play space targeted to under-fives within the level 7 external amenity area, which is welcomed, and it is noted that the play facilities of Down Lane Park are in close proximity.

Urban design and tall buildings

26 The proposals involve the redevelopment of a challenging spatially constrained and prominent corner site, forming part of a wider 'island' site surrounded by roads, with Victoria Line service tunnels running beneath its eastern edge. The applicant has engaged in pre-application discussions with the GLA and the Council and has responded positively to officers comments.

27 The inclusion of a corner retail unit positively addresses adjacent streets and provides the potential to encourage street-based activity. In response to GLA officers concerns about the extent of inactive frontage along the proposed Hale Road frontage, a secondary residential access has been introduced, which is welcomed. Although an element of inactive frontages remain, including refuse, plant and cycle storage, it is recognised that alternative arrangements are not possible due to the spatial restrictions of the site, which also limits any potential to introduce a basement level.

28 The internal layout on residential levels achieves an efficient floorplan that provides separation from the northern elevation of the hotel, and deck access to provide a degree of dual aspect to residential units that are close to north-facing. There are 26 single aspect units that are north-east-facing; however it is recognised that this is the result of the spatially constrained site, and is alleviated to a certain degree by projecting bays that will increase light and ventilation to the units. The application includes a daylight/sunlight assessment, which shows that very good levels of interior daylight will be achieved for the residential units, in both the existing context and the District Centre Framework massing. Internal corridors benefit from natural ventilation and lighting, which is strongly supported. Deck access, residential layouts, as well as a planted visual amenity space on level 1 will provide a degree of separation and privacy between the neighbouring hotel and the residential units to the west of the site. A level 7 external residential amenity space is also provided, with direct access from the core. External amenity space is not provided for units overlooking Hale Road in recognition of traffic impacts; however sufficient additional interior living space is provided in line with Housing SPG requirements. Overall, residential quality is of a good standard.

29 A tall building is supported in this prominent location, close to the station and within the proposed district centre, and the proposals are of a good quality. At pre-application stage, it was recognised that the proposals relate well to the District Centre Framework proposed layout and massing, as demonstrated by the applicant's heritage, townscape and visual impact assessment; however some concerns were raised about the relationship to the forthcoming Argent-led scheme to the east. It is recognised that the proposals for that site are at an early stage of development; however the applicant has engaged with Argent and in direct response to those proposals, revisions have been introduced since pre-application stage, including setting back the eastern elevation from level 8 and above, which is welcomed. The blank western elevation adjacent to the existing hotel has also been relieved by the addition of window openings allowing light into the core, which is welcomed.

30 In summary, the height, layout, massing and architecture of the building is supported, and residential quality is good.

Historic environment

31 London Plan Policy 7.8 'Heritage Assets and Archaeology' states that development should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate. Locally listed Berol House lies approximately 50 metres to the north; while Markfield Pumping Station Building and Engine (Grade II), Ferry Boat Inn (Grade II), 62 High Cross Road (Grade II), Tottenham High Cross (Grade II), and The Green School, 2 Cooperative Workshops (Locally Listed) lie 500-750 metres away. Approximately 500 metres to the west of the site are a cluster of conservation areas located around Tottenham High Road.

32 The applicant has provided a heritage, townscape and visual impact assessment (HTVIA), which provides an analysis of heritage assets, including a views assessment. The HTVIA finds that the proposed development would preserve the settings of the heritage assets identified. It would be only partially visible in views from the identified listed buildings, largely screened by intervening development and seen within the context of existing new and taller development. There would be limited visibility of the scheme from Tottenham High Road, and due to the intervening distance the proposal would not detract from the conservation areas. GLA officers agree with this assessment. In coming to this conclusion, officers have taken account of the strong presumption against granting permission that would harm the character or appearance of the conservation areas, and have given considerable importance and weight to the assessment of harm to the setting of listed buildings. The proposals will not impact on any strategic views.

Inclusive design

33 Policy 3.8 'Housing Choice' requires that 90% of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and 10% meets Building Regulation requirement M4(3) 'wheelchair user dwellings', that is, designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. The application demonstrates that these requirements will be met and the plans identify the location of the 13 wheelchair accessible homes. The Council should secure M4(2) and M4(3) requirements by condition.

34 As discussed under 'transport' below, all wheelchair units would normally be expected to have access to a Blue Badge parking space, which in this case would be 13 spaces (10% of units). It is recognised that the proposal is car free, and the scheme will utilise nearby Blue Badge parking spaces; however further detail should be provided as discussed under 'transport' below.

Transport

35 The applicant proposes a car free development, with three Blue Badge parking bays provided at the hotel next to the site and on Ashley Road to the north. Whilst a car free development is strongly supported in principle, the provision of Blue Badge parking is below London Plan standards, and therefore the applicant should provide further details on how these will be managed. Residents should also be prevented from accessing on-street permits for any existing or future controlled parking zone (CPZ), to be secured through section 106 agreement.

36 The applicant should provide further detail on the design/layout of the 185 long-stay and 4 short-stay cycle spaces for the residential element, and 3 long-stay spaces for the commercial use. Details of end of journey facilities for commercial uses should also be provided. Full details of cycle parking, with reference to the London Plan and London Cycling Design Standards, should be secured by condition.

37 The site is identified as a key location within an emerging district centre and should therefore contribute to a high quality pedestrian environment and the 'Healthy Streets' agenda. A pedestrian environment review system audit is required to identify any deficiencies in the public realm. In liaison with the Council, the applicant should provide further details on an overarching wayfinding strategy, and a contribution towards Legible London signage may be required.

38 The applicant has submitted a multi-modal impact assessment using a combination of TRICs sites and Census data. The applicant should justify the high pedestrian mode split of 44%.

39 Part of the site lies above Victoria Line tunnels. The applicant has proposed a bridging structure and should continue to develop this with TfL.

40 The applicant has provided an outline delivery and servicing plan, which states that servicing will take place from Station Road or Hale Road. This plan should prioritise the use of Station Road as it is less busy. A full delivery and servicing plan should be secured by condition. The applicant has provided an outline construction logistics plan, and given the proximity to the Lea navigation, consideration should be given to water freight for demolition and construction related trips. A full construction logistics plan should be secured by condition. A residential travel plan has been submitted and a full travel plan should be secured by section 106 agreement.

Climate change

41 Based on the energy assessment, an on-site reduction of 65 tonnes of CO₂ per year in regulated emissions is expected, compared to a 2013 Building Regulations compliant development, equivalent to an overall saving of 41%; however the applicant should provide the carbon emissions for domestic and non-domestic elements separately in light of the zero carbon target for residential elements.

42 Although there are no existing district heating networks, one planned network is within the vicinity of site and the applicant should provide further information on the proposed links to this network. Further information on the combined heat and power (CHP) system should be provided, including the size of the engine proposed, the total space heating and domestic hot water demand, the efficiency of the engine, and the proportion of heat met by the CHP. The applicant is proposing to install 100sq.m. of photovoltaic (PV) panels; however there is additional space available for PV installation, which the applicant should utilise. Full details of the further information required has been provided direct to the applicant.

Local planning authority's position

43 Haringey Council has been in pre-application discussions with the applicant since July 2016. Officers are understood to be generally supportive.

Legal considerations

44 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.

45 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

46 There are no financial considerations at this stage.

Conclusion

47 London Plan policies on town centre uses; employment; housing; affordable housing; urban design and tall buildings; historic environment; inclusive design; transport; and climate change are relevant to this application. While the application is generally acceptable in strategic planning terms, it does not yet comply with the London Plan for the following reasons:

- **Residential/town centre uses/employment:** The principle of the proposed residential led mixed-use development is consistent with London Plan and emerging local policies and is supported.
- **Housing:** The principle of residential use is consistent with London Plan policies, and is supported. The housing mix, density, and play space proposals are supported.
- **Affordable housing:** 90% (by habitable room) on-site, based on £28,000 per unit grant funding, made up of 117 shared ownership units. 35% affordable housing without grant. The high proportion of affordable housing is strongly supported. The Council has identified that the site is well-suited to smaller intermediate tenure units, particularly as Tottenham has a large proportion of social rent tenure. Therefore, the provision of all of the affordable units as shared ownership tenure is acceptable. The section 106 agreement should specify the affordable housing % both with and without grant funding, as well as eligible household income limits for each shared ownership unit size.
- **Urban design and tall buildings:** The height, layout, massing and architecture of the building is supported, and residential quality is good.
- **Historic environment:** The proposed development would preserve the settings of heritage assets.
- **Inclusive design:** The proposals are acceptable in relation to inclusive design, subject to confirmation of Blue Badge parking arrangements. The Council should secure M4(2) and M4(3) requirements by condition.
- **Transport:** The applicant should justify the mode split in the transport assessment; address concerns regarding Blue Badge parking; continue to work with TfL regarding the bridging structure; provide further details of cycle parking; and provide a pedestrian environment review system audit. A full delivery and servicing plan and a full construction logistics plan should be secured by condition. A full travel plan should be secured through the section 106 agreement.
- **Climate change:** Further information is required in order to verify the carbon savings.

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