

Apex House, Seven Sisters Road

in the London Borough of Haringey

planning application no. HGY/2015/2915

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

Full planning application for the demolition of the existing building and construction of a 22 storey building, a 7 storey building and four 3 storey townhouses, comprising 163 residential (private and affordable) units, with 875 sq.m. of market (sui generis) or A2 (financial & professional services), A3 (food and drink), B1 (office) flexible commercial floorspace at ground floor, public courtyard, servicing yard and associated landscaping.

The applicant

The applicant is **Grainger Seven Sisters Ltd**, the architect is **John McAslan & Partners**, and the agent is **DP9**.

Strategic issues

The proposed development is supported in strategic planning terms; however issues with respect to **housing, affordable housing, urban design, inclusive design, transport and climate change** should be addressed before the application is referred back to the Mayor at his decision making stage. London Plan policies on **retail and town centre uses, employment, and historic environment** are also relevant.

Recommendation

That Haringey Council be advised that the application does not yet comply with the London Plan, for the reasons set out in paragraph 79 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 6 October 2015, 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 16 November 2015 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 Categories 1A, 1B(c) and 1C(c) of the Schedule to the 2008 Order:

- 1A “Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.”
- 1B(c) “ Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres.”
- 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 environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 has been taken into account in the consideration of this case.

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

Site description

6 The 0.39 hectare triangular shaped site includes a four storey brick building dating from the 1980’s, containing Haringey Council offices. It sits at the apex of Seven Sisters Road and the A10 High Road, and includes a contemporaneous public toilet block topped by a clock tower, and a 33 space car park to the rear. The site is bounded to the south-west by Stonebridge Road, and a pedestrian footpath linking Stonebridge Road to Tottenham High Road. To the south are a number of three storey residential blocks of the Stonebridge Road Estate. Immediately adjacent to Apex House on the High Road is Mary Seacole House, a three storey block of flats managed by Circle Housing Association.

7 Part of the site (the pavement along the High Road and the area in front of the existing building, including the public toilets and clock tower) are within the Seven Sisters/Page Green Conservation Area.

8 The site lies just outside West Green Road/Seven Sisters District Centre, which lies across Seven Sisters Road to the north. It is within the Upper Lee Valley Opportunity Area and the Tottenham Housing Zone.

9 The wider area is primarily in residential use, with commercial and community uses along the High Road and Seven Sisters Road, with development of up to four storeys.

10 Both Seven Sisters Road and the High Road form part of the Transport for London Road Network (TLRN), with Amhurst Park, 1 kilometre south of the site, the nearest part of the Strategic Road Network (SRN). Seven Sisters station is approximately 60 metres to the north of the site and provides access to Victoria line services and London Overground services between Liverpool Street and Cheshunt/Enfield Town. In addition, South Tottenham station is located 250 metres to the south and provides access to services on the Overground - Gospel Oak to Barking line. The area is served by 11 bus services. Accordingly, the site records an excellent public transport accessibility level (PTAL) rating of 6b, where 6 is the highest and 1 is the

lowest. Cycling Superhighway 1 (CS1), currently under construction on the High Road next to the site, will link the area with the City (terminating at Liverpool Street to the south).

11 This applicant secured planning permission in 2012 for a major redevelopment on the Wards Corner site, on the opposite side of Seven Sisters Road, with new retail space and 196 new homes. The Ward's Corner Community Coalition was granted planning permission in 2014 for an alternative scheme for the site, including the restoration of the former Ward's Department Store to provide space for the existing neighbouring market.

Details of the proposal

12 The proposal is to demolish the existing building and construct a 22 storey building with a single basement, a 7 storey building and four 3 storey townhouses, comprising 163 residential units (private and affordable). A total of 875 sq.m. of market space (sui generis) or A2 (financial & professional services), A3 (food and drink), B1 (office) flexible commercial floorspace is proposed at ground floor, fronting onto Seven Sisters Road and the High Road, with access to a public courtyard in the centre of the site. A servicing yard is proposed at the south end of the site, accessed from Stonebridge Road.

Case history

13 On 2 April 2015, a pre-application meeting was held at City Hall for full planning permission for the demolition of existing building and redevelopment with buildings of up to 22 storeys for residential uses, with flexible commercial space at ground floor. The GLA's pre-application advice report of 20 April 2015 concluded that the principle of the proposal was supported; however concerns were raised relating to market use, housing, urban design, inclusive access, climate change, waste and transport.

Strategic planning issues and relevant policies and guidance

14 The relevant issues and corresponding policies are as follows:

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| • Regeneration | <i>London Plan; the Mayor's Economic Development Strategy</i> |
| • Retail/town centre uses | <i>London Plan; Town Centres SPG</i> |
| • Employment | <i>London Plan; Land for Industry and Transport SPG</i> |
| • Housing | <i>London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG</i> |
| • Affordable housing | <i>London Plan; Housing SPG; Housing Strategy</i> |
| • Density | <i>London Plan; Housing SPG</i> |
| • Historic Environment | <i>London Plan</i> |
| • Urban design | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG</i> |
| • Tall buildings/views | <i>London Plan, London View Management Framework SPG</i> |
| • Inclusive design | <i>London Plan; Accessible London: achieving an inclusive environment SPG;</i> |
| • Transport | <i>London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG</i> |
| • Parking | <i>London Plan; the Mayor's Transport Strategy</i> |

- Crossrail *London Plan; Mayoral Community Infrastructure Levy; Use of planning obligations in the funding of Crossrail and the Mayoral Community infrastructure levy SPG*
- 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*

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 made up of Haringey's Strategic Policies (2013), Haringey's Development Management DPD, the Saved Policies within the Unitary Development Plan and the 2015 London Plan (Consolidated with Alterations since 2011).

16 The following are also relevant material considerations:

- The National Planning Policy Framework and accompanying Planning Practice Guidance.
- The Upper Lee Valley Opportunity Area Planning Framework (ULV OAPF) (July 2013).
- The Tottenham Area Action Plan (Preferred Option Consultation) (February 2015).

Principle of development

Regeneration

17 The site falls within a Regeneration Area (within the 20% most deprived areas), as identified by the London Plan and Haringey's Local Plan. The development will assist the regeneration of this part of Haringey in accordance with London Plan Policy 2.14 'Areas for Regeneration'.

Residential use

18 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. Haringey's Tottenham Area Action Plan (Preferred Option Consultation) (February 2015) identifies the site, together with the neighbouring Mary Seacole Court site, for residential-led mixed use development, with scope for a taller landmark building.

19 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 within the Tottenham Housing Zone, which has a target of approximately 2,000 new homes. The provision of residential use on the site is supported in principle.

Retail and town centre uses, and employment space

20 The existing building includes 3,487 sq.m. of B1 office space and the proposal includes 875 sq.m. of market space (sui generis) or A2 (financial & professional services), A3 (food and drink), B1 (office) flexible commercial floorspace. Whilst the London Plan does not specifically protect office uses, Policy 4.2 'Offices' does support rejuvenation of office stock in viable locations. The intention is to move the Council's existing Customer Service Centre to Tottenham Green and it is recognised that there is unlikely to be alternative local demand for office space of this scale in this location, even if sub-divided. Given the site's location in an area primarily of residential use and the proposed re-provision of a proportion of employment floorspace, the loss of the existing office space is acceptable in strategic planning terms.

21 London Plan Policies 2.15 'Town Centres', 4.7 'Retail and town centres', and 4.8 'Supporting a successful and diverse retail sector' provide the strategic policy context in which the proposals for 875 sq.m. of floorspace for market or flexible commercial uses. This includes frontage to both Seven Sisters Road and the High Road, set around an internal courtyard. The applicant's planning consent for the neighbouring Wards Corner site across Seven Sisters Road includes a requirement to provide alternative space for the existing Wards Corner market, if the existing market traders are in agreement. The proposed ground floor space at Apex House could be used for this purpose; however if the market traders choose not to take the new space, it is proposed that the commercial use would instead become a flexible A2, A3 or B1 use, dependent on market requirements and local need.

22 London Plan policies state that retail and commercial development should be focused in town centres and Policy 4.8 gives specific support to markets. The site is only just outside of the District centre, the amount of proposed floorspace is limited, and the need for any market relocation to be as close as possible to the existing market is recognised. This provides sufficient support for the proposed market use and does not raise concerns over its impact on the existing centre. Concerning the flexible A2, A3, or B1 uses, taking account of the small amount of floorspace, and the need to activate the ground floor elevations on these busy roads, these uses are supported. The Council should ensure that detailed design and management arrangements are secured for all possible uses. Subject to this, and resolution of suitable servicing arrangements as discussed under 'transport' below, the provision of market or flexible commercial space is supported.

Housing

23 The breakdown of housing is as follows:

	Affordable	Market	Total
Studio	0	2	2 (1.5%)
One bed	24	46	70 (43%)
Two bed	23	36	59 (36%)
Three bed	8	20	28 (17%)
Four bed	4	0	4 (2.5%)
Total	59	104	163

Affordable housing

24 London Plan Policy 3.9 seeks to promote mixed and balanced communities by tenure and household income and Policy 3.12 seeks the maximum reasonable amount of affordable housing.

25 The applicant is proposing 61% market housing and 39% affordable housing, by habitable room, with the affordable described as intermediate tenure. The proposal to provide a significant element of affordable housing on the site is strongly supported; however in accordance with London Plan Policy 3.12, the Council's independent assessment of the applicant's financial viability assessment should be shared with GLA officers before it can be confirmed if this is acceptable.

26 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; however the applicant describes all of the affordable housing as intermediate. The applicant states that justification for this is that social housing is not the priority in Tottenham due to the existing high levels of social housing, and that in order to improve the balance in the area, the Council is seeking higher levels of market and intermediate homes. This may be acceptable in this case; however the Council should confirm that this is their strategy.

27 It is understood that the market units will be private rented sector (PRS) tenure, which is supported by London Plan Policy 3.8 'Housing Choice'. Paragraph 3.1.24 of the Draft Interim Housing SPG states that PRS should be subject to *"a covenant of, for example 15 years, which ensures the units will stay as private rent for at least this period (overall ownership may change over this period but the units must be retained by a single owner)"*. Other guidance on PRS is contained in paragraphs 3.1.22-3.1.31 of the Draft Interim Housing SPG. The applicant should provide further details on the proposed tenure, including the affordable tenure, noting that the Draft Interim Housing SPG recognises that discounted market rent (DMR) could be used as the affordable housing offer, for example where viability appraisals show that covenanted PRS cannot support affordable or social rented units. However, to be considered as intermediate affordable housing, DMR would need to meet the definition set out in the London Plan, for example to be affordable to, and allocated to, those eligible for intermediate housing through the London Plan income thresholds. It should also comply with the definition set out in the glossary of the NPPF. The guidance confirms that the applicant does not need to be a registered provider or local authority to provide intermediate housing, as per London Plan and NPPF definitions.

Housing Choice

28 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. The mix of units is 43% one-bed, 36% two-bed, and 19.5% three-four bed. It is recognised that a large proportion of one and two bed units are likely to be more appropriate in this highly accessible location; however the inclusion of family sized units is welcomed, in particular the 12 affordable family-sized units, including 4 four-bed houses. The Council should confirm that this meets local housing needs.

29 Policy 3.8 also requires all new housing to be built to 'Lifetime Homes' standards. In order to bring the London Plan into line with new national housing standards, the draft Minor Alterations to the London Plan (MALP) proposes to replace this with "ninety percent of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings'". Policy 3.8 also requires 10% of units to be wheelchair accessible or easily adaptable, which the draft Minor Alterations to the London Plan proposes to replace this with "ten per cent of new housing meets Building Regulation requirement M4(3) 'wheelchair user dwellings', i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users". In advance of the MALP, a Housing Standards Policy Transition Statement sets out how the existing housing standards should be applied from October 2015. This is also set out in the draft Interim Housing SPG, alongside the other London standards which are not affected by the introduction of national standards.

30 The application states that units will meet Lifetime Homes requirements the 10% will be wheelchair accessible; however greater clarity should be provided as discussed under 'inclusive design' below. The Council should secure M4(2) and M4(3) requirements by condition,

including the submission of a plan to identify which units will be 'wheelchair user dwellings', prior to commencement, to ensure the design of a scheme has considered the standard.

Density

31 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 200-700 habitable rooms, or 45-260 units, per hectare. The applicant states that the density proposed is 436 *habitable rooms* per hectare; however GLA officers calculate the density to be approximately 418 *units* per hectare (163/0.39). Although above the density range, the London Plan notes that these ranges should not be applied mechanistically and local factors should be taken into account. This density may be appropriate in this highly accessible location, directly next to Seven Sisters Underground station; however in order for such a density to be acceptable, the application needs to be exemplary in all other respects and provide a high quality living environment for occupiers, including adequate provision of amenity and play space, an appropriate level of affordable housing, an appropriate mix of unit sizes, high quality design, and resolution of all transport and climate change issues. As detailed elsewhere in this report, further work is required in some of these areas.

Residential quality

32 London Plan Policy 3.5 'Quality and Design of Housing Developments' promotes quality in new housing provision, with further guidance provided by the Housing SPG. The treatment of London Plan housing standards in relation to new national housing standards is set out above.

33 Further discussion on housing quality is included under 'urban design and tall buildings' below.

Children's play space

34 Policy 3.6 of the London Plan seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor's supplementary planning guidance 'Shaping Neighbourhoods: Play and Informal Recreation', which sets a benchmark of 10 sq.m. of useable child play space to be provided per child, with under-5 child play space provided on-site as a minimum.

35 The child yield is expected to be 20, with 12 under-five's, requiring 200 sq.m. of play space. The proposals include both formal and informal play, with 165 sq.m. provided for under-five's and 136 sq.m. for older children, on podium 1, podium 2 and in the courtyard. A larger area of play space is located at Brunswick Road Open Space, 500 metres from the site. The proposed play provision is acceptable; however the Council should ensure that detailed design secures play space that is fully useable as play space.

Historic environment

Heritage assets

36 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. The proposal will have an impact on designated heritage assets in terms of the Seven Sisters/Page Green Conservation Area, which runs along the High Road and part of which

is within the site (the public toilets and clock tower); the Grade II listed former bank on the corner of the High Road and Broad Lane, approximately 150 metres to the north of the site; and the Tottenham Green Conservation Area, approximately 200 metres to the north of the site. These heritage assets are considered to be of high (national) significance. Other designated heritage assets in terms of listed buildings and Conservation Areas are a greater distance from the site, and the impact of the proposal will be negligible.

37 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should “*have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*” and in relation to conservation areas, special attention must be paid to “*the desirability of preserving or enhancing the character or appearance of that area*”.

38 The NPPF states that when considering the impact of a proposal on the *significance* of a designated heritage asset, great weight should be given to the asset’s conservation, and the more important the asset, the greater the weight should be. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset’s physical presence or its setting. Where a proposed development will lead to ‘substantial harm’ to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to ‘less than substantial harm’, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Recent judgements have provided detailed consideration of the duty imposed on local planning authorities. The Court of Appeal in *Barnwell Manor* held that a finding of harm to a listed building or its setting is a consideration to which the decision-maker must give considerable weight, and that there should be a strong presumption against granting permission that would harm the character or appearance of a conservation area.

39 Policy 7.8 also applies to non-designated heritage assets, chiefly in the form of locally listed buildings within the Seven Sisters/Page Green Conservation Area. This non-designated heritage asset is considered to be of medium (district) significance. The NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application, and a ‘balanced judgement’ is required having regard to the scale of any harm or loss and the significance of the heritage asset.

40 The applicant has provided a Townscape, Heritage and Visual Impact Assessment (THVIA), which provides some analysis of heritage assets, including a views assessment.

41 Haringey Council’s Tottenham High Road Corridor Conservation Area Appraisal (adopted 2009) covers all of the High Road Conservation Areas. Near to the site, the Appraisal highlights the uniform Victorian terraces lining the western side of the High Road, including locally listed buildings at 1A and 1B West Green Road, and 227 High Road and 725 Seven Sisters Road (Wards Corner); and the grand Victorian residential terraces and Victorian buildings on the western side, including the locally listed former Salvation Army Citadel, opposite the site.

Impact on heritage assets (designated and non-designated)

42 The current building is considered to detract from the character and appearance of the Conservation Area, and it is noted that the Council’s Conservation Area Appraisal makes no reference to the building or the clock tower. Its demolition is therefore supported. The impact of the replacement buildings, and in particular the 22 storey building, on the Conservation Area

and the locally listed buildings within it is illustrated in Local Views 1, 2, 4 and 5 in the applicant's THVIA. This demonstrates that the building will have some impact, since it is of a greater height compared to the lower rise, horizontal emphasis of the Conservation Area. In views from north and south within the Conservation Area the building will appear as a tall slender form, marking the junction of two major roads, as well as Seven Sisters Station. As discussed below, it is also recognised that there is justification for a tall building in this highly accessible location within the Opportunity Area. Although the building is visible in the town centre the setting of the Conservation Area, the setting of the locally listed buildings, and the setting of the Grade II listed former bank, GLA officers do not consider this to harm the significance of these heritage assets. The tower is well proportioned and the architectural detail well considered. Notwithstanding the comments in paragraphs 44-53, the proposed building has a good relationship to the ground floor, clearly marks the station, and does not dominate the setting of the Conservation Area or listed buildings, unlike the current building, which is considered to be harmful to those settings. In coming to this conclusion, GLA officers have taken account of the strong presumption against granting permission that would harm the character or appearance of the Conservation Area, and have placed considerable importance and weight to the harm caused to the setting of the listed buildings.

43 The proposals will not impact on any strategic views.

Urban Design

44

45 The scheme proposes to redevelop a spatially constrained site on the prominent corner of Seven Sisters Road and the High Road. The proposals include three linked blocks arranged around a triangular shaped courtyard. The four terraced houses in the south-west block are accessed directly from Stonebridge Road, providing passive surveillance along this edge of the site and an attractive street frontage.

46 The Seven Sisters Road affordable housing block has one core accessed from Stonebridge Road and the other from the internal courtyard, proposed to have public access during the day (for entrance to the commercial units), and secured for residents only access at night. The prominent corner on Stonebridge Road and Seven Sisters Road is undermined by the location of a refuse store, cycle storage and a plant room and the applicant should reconsider this arrangement.

47 The taller High Road block also proposes residential access from the internal courtyard. It is accepted that the focus of residential access in the courtyard will provide activity, although this is limited as both access points are to the north side of the courtyard. GLA officers consider that residential access should also be possible from the street-facing elevations, contributing to levels of activity. It is therefore recommended that residential lobbies are also accessed from both Seven Sisters Road and the High Road, providing through access between the courtyard and the street. This will also provide residents with a street based address and provide more accessible and legible entrances, defined as best practice in the Mayor's Housing SPG.

48 The proposed arrangement also relies on the Seven Sisters Road and High Road frontages to be activated by commercial units. A residents lounge and gym is proposed at the most prominent northern part of the ground floor High Road block, nearest to the shops within the District Centre. GLA officers are concerned that these uses will not provide sufficient activity on this important frontage and the applicant should provide further information on measures to ensure active use in the northern-most units.

49 The final use of the ground floor commercial units is undecided, and consequently the application materials present three scenarios. The first option includes one large commercial space fronting onto Seven Sisters Road and a second commercial space fronting onto the High Road, with both spaces having access to the shared courtyard space to the rear. The second option allows subdivision of the large commercial space, with A2/A3 uses proposed along Seven Sisters Road and B1/D1 uses, accessed from the internal courtyard. The third option allows all of the ground floor commercial space to be for use by the market, with access from the road frontages and the internal courtyard. All three options propose for the internal courtyard to have public access during the day, and secured for resident only access at night. The need to design the spaces to allow flexible use is recognised; however these options suggest a wide variation in levels of daytime activity of the courtyard, with lesser use suggesting more restricted access in order to ensure security and promote resident ownership. The applicant should provide further details on the proposed management arrangements for the different scenarios.

50 The residential quality of the scheme is generally of a high standard. Residential cores are evenly distributed to achieve efficient core to unit ratios and the taller element is orientated to optimise east/west views and daylight/sunlight penetration, which is welcomed.

51 The intention to provide additional internal floorspace in place of external balconies is recognised, in response to the impacts of traffic noise and air quality on Seven Sisters Road and the High Road, in line with London Plan Policies 7.14 'Improving Air Quality' and 7.15 'Reducing and Managing Noise', and paragraph 2.3.6 of the Draft Interim Housing SPG, which allows this in *exceptional* circumstances. Additional internal floorspace is provided for units below level 6, which is acceptable; however, the applicant should provide further justification for this arrangement on the courtyard side of the taller building, as well as units above level 6, some of which have external balconies and some of which have additional internal floorspace. In addition, although the area schedule indicates that additional space is provided, the drawings contradict this in some places and the applicant should clarify this.

52 The form and massing strategy is broadly supported, with the taller element of up to 22 storeys positioned towards the north of the site at the junction of Seven Sisters Road and the High Road. This results in a slender and elegant building form when viewed from the north and the south, which has the potential to act as a landmark to Seven Sisters Station as part of a sequence of emerging developments along the High Road. The stepping down of the heights of the proposed blocks towards the south of the site results in a distinctive appearance and relates the scale of the development to the lower rise residential development to the south, which is supported. The height of the proposal is not of strategic concern in this highly accessible town centre location.

53 The architectural response results in a simple and refined appearance, the success of which will be dependent on high quality brickwork. The use of lighter coloured facing materials and varying brick tones helps to ensure an elegant and subtle appearance in this sensitive location.

Inclusive design

54 The aim of London Plan Policy 7.2 'An Inclusive Environment' is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum). Inclusive design principles, if embedded into the development and design process from the outset, help to ensure that all of us, including older people, disabled and Deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity.

55 The applicant's Design and Access Statement does not discuss accessibility in terms of Lifetime Homes requirements or wheelchair accessibility. As discussed under 'Housing choice' above, the applicant should provide further detail, and as a minimum it should detail how the proposals respond to Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and M4(3) 'wheelchair user dwellings'. The wheelchair accessible units should be identified on floorplans and typical flat layouts provided. These should be distributed across tenure types and sizes to give disabled and older people similar choices to non-disabled people.

56 The design and access statement should also show how disabled people access the entrances safely, as well as outside amenity space at upper levels. This should include details of levels, gradients, widths and surface materials and how any level changes on the routes will be addressed.

57 As discussed under 'Transport' below, further information is required on the 16 proposed on-street Blue Badge parking spaces.

Transport

58 The 'car free' nature of the scheme is welcomed. The applicant has also undertaken a parking capacity study for the local area with the aim to convert on-street residential bays on Stonebridge Road to Blue Badge use only. This is considered reasonable; however the applicant should provide further detail on the distances and routes from Blue Badge parking to wheelchair accessible units. In addition, 20% of the spaces should have electrical vehicle charging points with a further 20% fitted with passive provision. All residents should be exempt from applying for a local parking permit and this should be secured by the Council.

59 Sufficient cycle parking spaces are provided; however, the applicant should revise the parking design to meet with the London Cycle Design Standards, available at: <https://tfl.gov.uk/corporate/publications-and-reports/cycling>. For example, external access doors should be 2.2 metres wide with internal doors 1.2 metres wide. The applicant states that there will be shower and changing facilities, which is welcomed; however these facilities should be clearly identified on the floor plan and should be available for all users.

60 The proposal is not expected to have any detrimental impact on the local public transport network. However, the applicant should engage in further discussions with TfL to ensure that the proposed public realm works does not conflict with CS1 works in the area.

61 It is proposed that a service yard and two on-street loading bays would facilitate the servicing arrangements. Refuse access would be via Stonebridge Road and the commercial space (market or other uses) would be serviced from Seven Sisters Road and Stonebridge Road. The indicative proposals provided do not present the best arrangement at this location and the applicant should engage in further discussions with TfL to agree an alternative solution.

62 Fire access and access to replace plant (once every five years) is proposed from the High Road. In such circumstances, it is proposed that fire tenders would mount the footway adjacent to the site. It should be noted that this would conflict with the operation of CS1, which offers a segregated cycle lane at this location. The applicant should therefore engage in further discussions with TfL as this arrangement is not appropriate.

Community infrastructure levy

63 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 rate for Haringey is £35 per square metre. The required CIL should be confirmed by the applicant and Council once the components of the development have been finalised.

Climate change

Energy strategy

64 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting and mechanical ventilation with heat recovery.

65 The demand for cooling will be minimised by shading through balconies and solar control glazing. The applicant has undertaken a dynamic thermal modelling study using CIBSE TM52 methodology and CIBSE TM49 weather files to assess the risk of overheating, which is welcomed. The results of the study show that all of the bedrooms modelled will meet the CIBSE criteria for each of the climate scenarios modelled; however, it was noted that none of the living areas meet the CIBSE criteria for any of the climate scenarios. The applicant has investigated further measures; however these were found to be insufficient for reducing the overheating risk. The applicant should investigate further passive measures in line with Policy 5.9 'Overheating and Cooling' in order for all of the areas within the dwellings to meet the CIBSE criteria. The applicant should also provide the solar gain checks for the commercial areas to demonstrate that the requirements are being met.

66 The development is estimated to achieve a reduction of 16 tonnes per annum (7%) in regulated CO₂ emissions through the first step of the energy hierarchy ('Be Lean'), compared to a 2013 Building Regulations compliant development. It was noted that the applicant has assumed that the corridors are heated spaces due to the heat loss from the communal heating pipes. Under SAP, the modelling should treat corridors as sheltered walls rather than party walls, unless they are intentionally heated (i.e. through radiators). The applicant should update the modelling/results accordingly. Heat losses from the pipework should also be reduced to a minimum.

67 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development; however the applicant has provided a commitment to ensure that the development is designed to allow future connection to a district heating network, should one become available.

68 A site heat network is proposed; however, the applicant should confirm that all apartments and non-domestic building uses will be connected to the site heat network. The site heat network will be supplied from a single energy centre. Further information on the floor area and location of the energy centre should be provided.

69 The applicant is proposing to install a 25 kWe gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating. A reduction in regulated CO₂ emissions of 45 tonnes per annum (20%) will be achieved through the second step of the energy hierarchy ('Be Clean'). The savings appear high for the size of the CHP proposed and the applicant should provide the system efficiencies for the CHP. CHP efficiencies should be based on the gross fuel input for

gas and not the net value commonly used by manufacturers. The carbon emission figures should be updated where appropriate.

70 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 40 sq.m. of roof mounted photovoltaic (PV) panels. A roof layout drawing has been provided, which suggests that there could be space for additional PV panels and the applicant should therefore investigate the potential for a larger PV array using more efficient panels in order to maximise the on-site carbon emission savings.

71 A reduction in regulated CO₂ emissions of 2 tonnes per annum (1%) will be achieved through this third step of the energy hierarchy ('Be Green').

72 Based on the energy assessment submitted, a reduction of 63 tonnes of CO₂ per year in regulated emissions, compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 29%. The carbon dioxide savings fall short of the target within Policy 5.2 of the London Plan and the applicant should consider the scope for additional measures aimed at achieving further carbon reductions.

Climate change adaptation

73 The site is within Flood Zone 1 and is not affected by any significant surface water risks, therefore the proposals are acceptable in terms of London Plan Policy 5:12 'Flood Risk'.

74 However, surrounding areas in the local vicinity of the site are at risk of relatively serious surface water flooding. Therefore the application of London Plan Policy 5.13 'Sustainable Drainage' is an important consideration for this site. The applicant's Flood Risk Assessment sets out that surface water will be attenuated to at least 50% of the existing discharge rate by the use of a sub-surface attenuation tank. Given the nature and location of the proposals, this approach to surface water drainage is considered to be acceptable in terms of London Plan Policy 5:13.

Local planning authority's position

75 Haringey Council's position is not yet known.

Legal considerations

76 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.

77 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

78 There are no financial considerations at this stage.

Conclusion

79 London Plan policies on retail and town centre uses, employment, housing, affordable housing, historic environment, urban design, inclusive design, transport and climate change are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Retail and town centre uses, employment:** The loss of the existing office space and the provision of market or flexible commercial space is supported in principle.
- **Housing:** The provision of residential use on the site is supported in principle. The Council should confirm that the proposed unit sizes meet local housing needs and secure Building Regulation M4(2) and M4(3) requirements by condition. Further work is required in some areas before such the density of the scheme can be considered acceptable.
- **Affordable housing:** The Council's independent assessment of the applicant's financial viability assessment should be shared with GLA officers before it can be confirmed if this is acceptable. The Council should confirm that the provision of intermediate housing as the affordable offer is acceptable in this location. The applicant should provide further details on the proposed tenures.
- **Historic environment:** GLA officers do not consider that the proposals will cause harm to the significance of heritage assets.
- **Urban design:** The applicant should reconsider the ground floor layout on the corner of Stonebridge Road and Seven Sisters Road; reconsider the ground floor layout of the High Road block; provide further details on the proposed management arrangements for the internal layout for the different use scenarios; provide further justification for the additional internal floorspace in place of external balconies on the courtyard side of the High Road building, and above level 6; and clarify contradictions between the area schedule and the drawings.
- **Inclusive design:** The applicant should provide further detail on residential accessibility, wheelchair units, and site-wide accessibility.
- **Transport:** The applicant should provide further detail on Blue Badge parking and cycle parking to wheelchair accessible units. The applicant should engage in further discussions with TfL to ensure that the proposed public realm works does not conflict with CS1 works. The indicative servicing proposals do not present the best arrangement and the applicant should engage in further discussions with TfL to agree an alternative solution. The proposal for fire tenders to mount the footway adjacent to the site would conflict with the operation of CS1 and the applicant should engage in further discussions with TfL on this subject.
- **Climate change:** Further information is required concerning the energy strategy for the site. The carbon dioxide savings fall short of the target within Policy 5.2 of the London Plan and the applicant should consider the scope for additional measures aimed at achieving further carbon reductions.

80 On balance, the application does not yet comply with the London Plan, for the reasons set out above; however the possible remedies set out above could address these deficiencies.

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