St Ann’s Hospital
in the London Borough of Haringey
planning application no. HGY/2014/1691

Strategic planning application stage II referral

The proposal
Hybrid planning application for the redevelopment of the St Ann’s Hospital site for a residential-led mixed use development comprising a full application for 106 flats and seven houses; and an outline application for up to 350 dwellings, 148 sq m of A1 retail and a new health campus with associated parking, highway and public realm works; access; and hard and soft landscaping.

The applicant
The applicant is Barnet, Enfield and Haringey Mental Health NHS Trust, the agent is Nexus Planning and the architect is Broadway Malyan.

Strategic issues
Strategic issues with respect to housing, affordable housing, inclusive access, climate change, urban design, transport and biodiversity are relevant to this application.

The Council’s decision
In this instance Haringey Council has resolved to grant permission.

Recommendation
That Haringey Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal or direct that he is to be the local planning authority.

Context
1 On 26 June 2014 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. This was referred to the Mayor under Categories 1A and 1C of the Schedule to the Order 2008:

• “1A: Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.”
1B: development outside Central London and with a total floorspace of more than 15,000 square metres.

2 On 6 August 2014 the Mayor considered planning report D&P/3178, and subsequently advised Haringey Council that the application did not comply with the London Plan, for the reasons set out in paragraph 65 of the above-mentioned report, but that the possible remedies set out in that paragraph could address these deficiencies.

3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. Since then, further information has been provided in response to the Mayor’s concerns (see below). On 16 March 2015 Haringey Council decided that it was minded to grant planning permission for the revised application, and on 23 March 2015 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged, direct Haringey Council under Article 6 to refuse the application or issue a direction to Haringey Council under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application and any connected application. The Mayor has until 6 April 2015 to notify the Council of his decision and to issue any direction.

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 decision on this case, and the reasons will be made available on the GLA’s website www.london.gov.uk.

Update

6 Since the stage 1 report, the Further Alterations to the London Plan (FALP) has been adopted.

7 At the consultation stage, Haringey Council was advised that the application did not comply with the London Plan, for the reasons set out in paragraph 65 of the above-mentioned report; but that the possible remedies set out in that paragraph could address these deficiencies:

Housing

8 The Council was asked at stage 1 to confirm that the chosen mix of units is based on local needs. The Council has responded, stating that Haringey has a demand for the high percentage of family accommodation (43% 3, 4 and 5 bed units). The Council therefore concludes that the proposed housing mix is appropriate, and GLA officers support this view.

Affordable housing

9 At stage 1, the applicant indicated that up to 50% affordable housing would be provided, in a split of 70:30 intermediate to affordable rent. As requested, the viability appraisal has been provided. This sets out that the maximum reasonable amount of affordable housing is 14% for both the detailed and outline elements of the proposals. The independent assessment of the viability appraisal, however, indicates that a higher proportion of affordable housing could be achieved.

10 In the committee report, the Council has explained that the priority is to generate the £39 million required to build the new hospital. The Council also sets out that the proposed development is unique, and that there is little basis for comparison in the immediate area as to sales values. The Council has, therefore, accepted the values in the applicant’s viability appraisal,
but only on the basis that there would be a review mechanism. This review mechanism would mean that if further capital receipt is generated it would be split with 60% going towards off-site affordable housing and 40% to provide additional health care provision on site.

11 The Council was also asked at stage 1 to confirm that the proposed affordable tenure split is based on local needs. The committee report requires 70% intermediate and 30% affordable/social rent housing.

12 GLA officers support the prioritisation of the hospital, and are satisfied that the review mechanism would ensure that the maximum reasonable amount of affordable housing would be provided.

Children’s playspace

13 At stage 1, officers requested more information regarding the provision of site-wide playspace. The committee report sets out that the overall anticipated child yield for the proposals is 158 children. This would generate a requirement of 1,580 sq.m. of playspace. Within this, there would be a requirement for 860 sq.m. for children under five years old.

14 The report sets out that, through the formal square of 4,000 sq.m., as well as private gardens and the community deck with a raised lawn on the first floor of block D, 860 sq.m. of playspace can be provided on site for under fives. A condition on the draft planning permission requires 10 sq.m. of playspace per child to be provided, which addresses the concerns raised at stage 1.

Social infrastructure

15 Officers advised at stage 1 that any contribution towards education and community facilities should be secured through the section 106 agreement. The Council’s committee report explains that the Council’s School Place Planning Report demonstrates that the anticipated child yield could be accommodated within both primary and secondary capacity. Notwithstanding this, the Council’s CIL, which has been adopted since the stage 1 report, levies a standard financial contribution towards social infrastructure. This addresses the points raised about social infrastructure at stage 1.

Urban design

16 At stage 1, officers raised concerns regarding the retained hospital wall around the site, as this could create the impression of a segregated community. In addition, officers were concerned that the stretch of wall could lack activity or overlooking.

17 The Council has assessed the impact of the wall on both the proposals and the surrounding area, and has concluded that the approach to retain some of the wall while opening it up in parts was the appropriate response. The Council has taken into account the positive contribution that the wall makes to the Conservation Area, and the harm that would be caused by its complete removal. Additionally, the Council has explained the importance of the wall in enclosing the rear gardens of the retained houses. GLA officers are satisfied that the stage 1 comments regarding the wall have been given consideration, and accept the Council’s assessment of the contribution that the wall makes to the Conservation Area.

18 At stage 1, GLA officers were concerned that there was not a design code for the outline element of the proposals. A design code has been secured by condition on the draft planning permission, which is welcomed.

19 Finally, officers raised the importance of a south west link to provide connections to the west of the site. This has also been secured by condition and will be provided by section 278 agreement.
All of the design concerns raised at stage 1 have been satisfactorily addressed.

Inclusive access

In response to stage 1 comments, the committee report confirms that all flats have been designed to meet ‘Lifetime Homes’ standards, which is welcomed. The draft planning permission also includes a condition requiring twelve residential units within the detailed application and 37 within the outline element to be wheelchair accessible, which equates to 10% of the total number of units.

At stage 1, officers recommended that the Council should secure a landscaping strategy for the homezone areas to ensure the safety of blind and partially sighted people, the elderly and children. A landscaping strategy has been required by condition, and is also a requirement of the reserved matters applications for the outline element. The Council should ensure that the submissions include details on these matters.

Climate change

In response to stage 1 comments regarding climate change mitigation, further information has been provided regarding carbon savings. Following discussions with GLA officers, a number of conditions have been attached to the draft planning permission to address matters of cooling, carbon savings from energy efficiency alone, a commitment to prioritise district heating and the requirement for all buildings to be connected to a single energy centre. Conditions have also been secured regarding surface water drainage.

Overall, the further information provided and the conditions attached to the draft planning permission address stage 1 concerns regarding climate change.

Transport for London’s comments

At Stage 1, TfL requested funding for Legible London signage and bus stop upgrades. The section 106 Heads of Terms provides overall funding of £110,000 for Legible London signage (ultimately) paid to TfL. Bus stop upgrades will be delivered as part of a section 278 agreement for highways works on St Ann’s Road.

Conditions have been secured for a travel plan, parking plan, construction logistics plan and electric vehicle charging point provision. Haringey Council has secured funding to investigate the implementation of a controlled parking zone on surrounding streets, and two years free car club membership will be available to residents. Haringey Council has also secured improvements for walking and cycling including a pedestrian and cycling connection at the south west of the site which is crucial in improving accessibility. In terms of cycle parking, the part of the scheme for which detailed consent is sought will have as a minimum provision in accord with the Revised Early Minor Alterations to the London Plan (2013). When details are submitted for discharge for the outline element, the applicant is encouraged to meet cycle parking to meet the increased FALP (2015) standards which are now adopted.

There will also be a section 278 agreement between applicant and TfL to increase the flare width at the junction of St Ann’s Road and High Road as part of the highways improvements package.

TfL is satisfied that the application scheme is in general accordance with the transport policies of the London Plan.
Response to consultation

29 The application was advertised by site notices, and 538 residents in the surrounding area were consulted, as well as a number of amenity groups. Overall, 153 neighbour responses were received, as well as responses from amenity groups; a joint letter from David Lammy MP and Catherine West, Labour candidate for MP; a letter from the Tottenham Constituency Labour Party; and a joint letter from Councillors Blake, Morton and Ozbeck. Two letters were also sent directly to the Mayor.

30 The two letters sent directly to the Mayor were both objections, summarised below:

- The application is controversial as it entails demolishing most of a site that features the highest number of historic public buildings in north London and one of the longest covered walkways in the UK. The Barnet, Enfield, Haringey Mental Health Trust have failed to establish health needs and show how the site is surplus to requirements.
- Request for the Mayor to call in the decision. Two thirds of the site has been granted planning for development, with 14% affordable housing is well below Haringey Council’s guidelines. As a site for NHS infrastructure, this site would bring much needed jobs to the area. Healthcare investment is needed desperately in Tottenham. Under TfL, St Ann’s Station could be reinstated.

31 The letter from David Lammy MP and Catherine West, Labour candidate for MP, set out the following concerns:

- Re-provision of acute care facilities is welcomed; extremely concerned at 14% affordable housing; 80% of market rent is not affordable; split should be closer to London Plan policy; homes for social and affordable rent should be limited to target rent in perpetuity; health and housing needs both need to be taken into account; current proposal does not take adequate account of the possibility to provide ‘step down’ housing for people with mental health problems who are in recovery; no evidence that visionary, health focused approach has been considered; application should be deferred.

32 The Council was also copied in to a letter to the Deputy Prime Minister from David Lammy MP, setting out the following:

- The proposal to improve mental health services at St Ann’s is not currently financially feasible without selling the majority of the site for private housing. In Haringey there is a desperate need for social housing, both for general needs housing and for people suffering poor mental health who need sheltered accommodation. High quality mental health services should not need to be fully funded by sale of land for private housing. Would the Deputy Prime Minister commit to the financing of high quality mental health services?

33 The letter from Cllrs Blake, Morton and Ozbek is summarised below:

- Support proposals to improve patient facilities; residents have raised following issues: concerns over proposed access route to Warwick Gardens and possible anti-social behaviour; entrance to St Ann’s too small to be an entrance route; proposals are car dependent; proposal near Warwick gardens should be no higher than existing; need for more park space; landscape, trees and planting should be maintained; design concept should relate to existing buildings; some positive contribution buildings on site should be retained or recycled; design competition should be organised; could project aspire to be carbon neutral; community should be mixed, cohesive and diverse; developer should be required to complete the project within a fixed timescale; noise pollution should be reduced as much as possible during demolition and construction; energy units should not cause
problems for local residents; if a developer is engaged there should be a residents board to meet with them regularly; funds raised should be used for patient care.

A letter was received from the Tottenham Constituency Labour Party:

- redevelopment proposals should include a walk-in urgent care centre, a new GP practice and improved mental health services; housing should be social housing at social rents; adequate infrastructure should be provided, including schools, transport and GPs; any development should be by a co-operative rather than a private developer.

The responses from the amenity groups are summarised below:

- **Garden residents association**: Object to application: requirement for mental health not quantified; loss of services not justified; pedestrian access from southwest corner of site could lead to security risks and should not be allowed, or sufficient conditions regarding lighting and surveillance are required; the existing entrance to St Ann’s appears too small to serve as primary entrance; car parking is excessive and misses opportunity for public park space; public transport and cycle improvements are required for the area; scale is too large; development should not be higher than existing housing on Warwick Housing estate where it abuts the estate and the architecture of the Gardens estate should be replicated; there will be a significant impact on St Ann’s Road and Chestnuts Park and view should be replaced with one from winter months; a nursery and primary school should be built on site; removal of trees contradicts local policy; architecture contradicts London Plan Policy regarding design being of the highest architectural quality and conserving the significance of heritage assets; development should be carbon neutral; UPVC windows embody CO2 and contain chlorine, contradicting London Plan Policy 5.2 regarding minimising carbon emissions; the entire housing provision could be affordable, or at least 50%; more of the existing building and structures should be reused or have their facades retained; the proximity of buildings to the CA should not be the defining factor over whether they are demolished; other buildings should be spot listed; condition should be attached requiring outline and detailed application timescales to be fixed; noise pollution during demolition and construction should be minimised; sound breakout from energy centres should not cause nuisance to local residents; considerable amount of study and analysis required for scheme to meet National, London Plan and local policies.

- **Tottenham Conservation Area Advisory Committee**: Pleased that perimeter wall, water Tower and various buildings at the front of the site are to be retained and restored; concerns over townscape views as housing blocks are too high; architectural quality is uninspiring; more of existing buildings should be reused as housing or have facades retained.

- **Woodland Park Residents Association**: concerns over consultation process.

- **St Ann’s Conservation Area Advisory Committee**: strongly object: concerns over political and consultation process; health needs for the site should be established; site has not been shown as surplus to requirements; Council has responsibility to submit the historical merit of the site and the buildings to the local listing process; further consultation should be carried out; the Trust has made insufficient effort to retain the site for health use; intensification of deprived areas leads to the collapse of vulnerable communities; inpatient building may never be delivered; St Ann’s site has the potential to employ thousands and become a regional health hub; proposal puts housing as primary objective; proposals almost identical to Seven Sisters Neighbourhood Plan proposals; Haringey housing target is too high; Victorian Walkway has not been given full regard for historic significance.

- **The Victorian Society**: Objects to application: buildings at St Ann’s are robust, historic, attractive buildings, in particular the diphtheria wards; group value is important, and important to character of area; retention of heritage assets provides a sense of place; NPPF states importance of taking all heritage assets into account; buildings at St Ann’s are
capable of re-use and could adapt to a new function; opportunity to retain more of the historic buildings should be taken to improve the character of the development.

- **Haringey Needs St Ann’s Hospital**: site is designated for hospital use; no evidence has been provided that the health related needs of the site have been established or that the element of the site for redevelopment has become surplus to requirements; Haringey Council and CCG have a legal duty to demonstrate how they have used to Joint Strategic Needs Assessment to inform decision making in development plans, which has not been met; Haringey Council has the duty to establish health care needs; concerns over how meetings were minuted; the London Plan and local plan contains policies that support the assertion that the future of St Ann’s Hospital cannot be taken without a thorough assessment of healthcare needs; healthcare needs of the future have not been considered.

- **Mental Health Support Association**: the building of the new mental health unit should go ahead as a matter of urgency; existing conditions are not fit for purpose; four wards should be proposed; the wards on two levels would have been preferable; open space should be provided; could the other two thirds of the site be leased?

- **Ladder Community Safety Partnership**: the sale of two-thirds of the site should not work to the detriment of the borough’s residents when seeking care facilities now and in the future; scale of development should take surrounding context into account; tall buildings will have dominating effect over St Ann’s Road and Chestnuts Park and within the site itself; concerns that a developer may seek to intensify the housing development; proposed residential accommodation is lacklustre and uninspired; the south west route could lead to security/crime problems.

- **Haringey Housing Action Group**: change of use is inappropriate; Healthcare Needs Assessment has not been undertaken; concerns over transfer from public land to private ownership; the entire housing provision could be affordable housing or at least 50%; social rent would have a positive effect on families currently in poor quality and expensive temporary accommodation; ask that the Council carry out an assessment into purchasing and developing the site themselves in order to directly provide local residents with the housing they need.

- **Haringey Solidarity Group**: lack of justification for change of use; no healthcare needs assessment has been carried out; Joint Strategic Needs Assessment has not informed the redevelopment; proposals contravene London Plan policies on addressing health inequalities, social infrastructure and health and social care facilities. Proposals also contravene local plan policies; potential to replace two storey health buildings with three to four storey buildings should be considered now; urgent care centre, GP surgeries, integrated child health centre and expanded acute mental health facilities are all required on site; any new housing must be truly affordable and is needed to make up for the lack of social housing in the Borough; detailed accessibility work must be undertaken.

- **Turners Court Residents Association**: Turner’s Road likely to be most affected by the development; increased traffic will add to congestion; reduce number of residential units; buses need to be increased; one bus stop should be removed and one repositioned; local schools would not be able to cater for increased number of children and a further school should be built in the area; GP surgeries should be provided; new homes are a positive step.

- **Haringey Cycling Campaign**: new pedestrian link to Green Lanes via Stanhope Gardens is supported however the landscape masterplan does not show an adequate width for shared use; more information should be required by condition; condition should also make clear that public access for walking and cycling across the site must be allowed.

- **Save St Ann’s Hospital Campaign Group**: no evidence that Trust has made effort to maintain or increase services and benefits to the community; concerns regarding configuration of Committee Members as five have expressed desire for housing on site; no comfort in Trust’s engagement with the public; design, accessibility, density, height and massing are not acceptable; allotments should be included; no mention of social housing; traffic concerns during construction; education concerns.
Overall, 153 neighbour responses were received. Of these, four were neutral:

- St Ann’s site is too large and dilapidated to be appropriate for modern mental health inpatient facilities, which this application will allow; by selling off useless land and buildings the trust will be better able to spend money on patients.
- Pedestrian access from Stanhope Gardens is supported; bus stop should be relocated
- Support splitting the site between health and residential; mental health building should go ahead as a matter of urgency; wall could be opened up to reduce stigma; design enhances area; there should be a formal link between the health and residential uses. Support for southwest link.
- Support new housing

The 149 objections to the application are summarised below:

- **Design**: five storey blocks too high; out of character with surrounding development; village atmosphere should be retained; concerns over loss of green lung; more of the historic buildings should be retained; houses facing Warwick Gardens should be no taller than existing; existing hospital wall should be kept; scale too large; impact on St Ann’s Road and Chesnuts Park; winter townscape views should be provided; trees should be retained; poor architectural design quality; open space important for mental health facilities.
- **Safety and security**: access route to south west strongly opposed as will become a crime route.
- **Amenity**: Noise pollution should be minimised; air quality; the green corridor should be preserved and enhanced for privacy and rights of light issues; overlooking on Warwick Gardens.
- **Housing**: should be family housing; housing should all be affordable or at least 50%; too many houses are proposed; housing should be provided to ‘lifetime homes’ standards.
- **Transport**: impact on parking stress; proposal too car dependent; impact and safety concerns for access point on Hermitage Road; impact on congestion and pollution; bus links should be improved; public park space should be provided instead of car parking; cycle and public transport network should be improved; proposed roads would be dangerous.
- **Social infrastructure**: existing schools at capacity; primary school and nursery should be provided on site; loss of open space for residents and patients; should be community facilities on site.
- **Loss of hospital**: hospital should be improved instead of providing flats; proceeds of sale should go directly towards improving health facilities for local people; requirement for mental health provision not quantified and loss of hospital not justified; need for healthcare facilities in the area; concern over loss of acute unit; an urgent care centre, addition GP surgeries, an integrated child health centre and expanded acute mental health facilities should be provide on site; hospital provides a vital service for Haringey; priority should be given to improving and increasing the amount of mental health provision in terms of wards.
- **Sustainability**: development should be carbon neutral; timber windows should be used as more sustainable than UPVC.
- **Biodiversity**: habitat loss; trees and shrubs should be retained; allotments should be provided.
- **Process**: concerns over consultation process; phasing plans are required.

In addition to the above, a petition with 840 signatures was also received, to retain, improve and expand St Ann’s medical services.

The Council’s committee report provides a thorough assessment of the concerns raised and, in particular, the principle of the proposed land uses. It explains that, although there is a reduction in floorspace of the health facilities, all existing healthcare services and providers would be accommodated within the new campus. Furthermore, the Committee report’s addendum sets out
NHS England’s position with regard to St Ann’s hospital. It states that NHS England would not be seeking to utilise any redevelopment of the St Ann’s hospital site to locate primary care services.

40 The other statutory consultees responded as follows:

- Commercial environmental health: Conditions regarding contaminated land and air quality are proposed.
- English Heritage: No objection subject to conditions
- Environment Agency: No objection subject to conditions
- Metropolitan Police: Concerns over link to Warwick Gardens/Stanhope Gardens; foot entrance off St Ann’s Road opposite Black Boy Road is isolated; any boundary on St Ann’s Road should not compromise permeability; route passing x-ray building should be more defined as a main walkway; parking bays should not be located near to residential back gardens; condition recommended
- Natural England: No objection; standing advice should be followed.
- Network Rail: No objection subject to various criteria being met.
- Thames Water: No objection, however concerns about capacity with regards to water supply and waste water. Conditions recommended
- London Fire Brigade: Satisfactory with regards to Fire Brigade Access.

41 The strategic issues raised have been considered in this report and the Stage 1 report. As set out above, the Council has thoroughly assessed the principle of the development, and has also assessed the design the proposals in the committee report, including the impact of the proposals on the surrounding area. The Council has also responded to the concerns raised by statutory consultees, including Stage 1 comments, and appropriately worded conditions, informatives and section 106 obligations have been secured where necessary.

**Article 7: Direction that the Mayor is to be the local planning authority**

42 Under Article 7 of the Order the Mayor could take over this application provided the policy tests set out in that Article are met. In this instance the Council has resolved to grant permission with conditions and a planning obligation, which satisfactorily addresses the matters raised at stage I, therefore there is no sound planning reason for the Mayor to take over this application.

**Legal considerations**

43 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. He also has the power to 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. The Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice. If the Mayor decides to direct that he is to be the local planning authority, he must have regard to the matters set out in Article 7(3) and set out his reasons in the direction.
Financial considerations

44 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government Planning Practice Guidance emphasises that parties usually pay their own expenses arising from an appeal.

45 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

46 Should the Mayor take over the application he would be responsible for holding a representation hearing and negotiating any planning obligation. He would also be responsible for determining any reserved matters applications (unless he directs the council to do so) and determining any approval of details (unless the council agrees to do so).

Conclusion

Further information has been provided and revisions made to the proposals which address the outstanding issues that were raised at Stage 1. Having regard to the details of the application, the matters set out in Haringey Council’s committee report, its draft decision notice and the draft section 106 agreement, the scheme is acceptable in strategic terms.

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planning report D&P/3178
6 August 2014
St Ann’s Hospital in the London Borough of Haringey
planning application no. HGY/2014/1691

**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**
Hybrid planning application for the redevelopment of the St Ann’s Hospital site for a residential-led mixed use development of up to 470 dwellings, 148 sq m of A1 retail and a new health campus with associated parking, highway and public realm works; access; and hard and soft landscaping.

**The applicant**
The applicant is Barnet, Enfield and Haringey Mental Health NHS Trust, the agent is Nexus Planning and the architect is Broadway Malyan.

**Strategic issues**
Strategic issues with respect to housing, affordable housing, inclusive access, climate change, urban design, and transport should be addressed before the application is referred back to the Mayor at his decision making stage. Strategic issues with relation to biodiversity are also relevant.

**Recommendation**
That Haringey Council be advised that the application does not comply with the London Plan for the reasons set out in paragraph 65 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

**Context**
1 On 26 June 2014 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 6 August 2014 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 1A of the Schedule to the Order 2008:
• 1A: 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 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 site comprises 11.25 hectares and is occupied by the existing St Ann’s Hospital campus. This comprises a number of buildings, some of which are Victorian in style and two of which are locally listed (Mayfield House and Orchard House). The majority of the buildings are one to two storeys in height, although the Water Tower building in the south west of the site is the equivalent of four/five storeys. St Ann’s hospital was first built as a series of temporary structures following an outbreak of scarlet fever in 1892. Permanent buildings were built on the site from the late 1800s to early 1900s and the temporary buildings were replaced with permanent buildings in the second half of the 20th century. The hospital became part of the NHS in 1948. The site includes landscaping and a number of mature trees.

7 The site is bounded by St Ann’s Road to the north, beyond which is Chestnuts Park. A Victorian brick wall also bounds the site on this boundary. The site is bounded by Hermitage Road to the east, the London Overground railway line to the south (Barking to Gospel Oak branch) and Warwick Gardens to the west. The site’s surroundings are predominantly residential to the north, east and west, with some commercial uses to the south of the railway line. Although the surrounding residential buildings are varied in age and character, the majority are interwar terraced houses. There are more recent flatted blocks abutting the north-west and south-west corners of the site. Turners Court is an eight storey development on St Ann’s Road which partially overlooks the site.

8 The site is identified in Haringey’s saved Site Specific Proposals policy for mixed use development including residential, health and a school. Haringey’s consultation draft Site Allocations Development Plan Document identifies the site for the rationalisation and improvement of the existing health care use to provide a more specialist function on a smaller footprint, and enable residential development on the site.

9 The northern part of the site falls within the St Ann’s Conservation Area. There is a Site of Important Nature Conservation (SINC) on the southern boundary of the site, which forms part of a wider ecological corridor.

10 The application site lies between the Haringay Green Lanes (London Overground) and Seven Sisters (National Rail and Victoria Line) stations, both of which are a 15 – 20 minute walk. While this could be considered a significant walking distance from the site, these stations do provide good links to central London, as well as east–west links. Additionally, the site is served by a 24 hour bus service to Central London up to every six minutes (route 341) and Aldgate and Wood Green up to every eight minutes (route 67). Overall the site has a Public Transport Accessibility Level (PTAL) of 1b, with 1 being the least accessible by public transport and 6b being the most accessible.
Details of the proposal

11 A hybrid application has been submitted for the redevelopment of the site for mixed use development, including a new health campus that retains all of the existing services in a smaller space.

12 The full application seeks approval for 106 flats of 4-5 storeys and seven 2 storey houses. It also seeks permission for the conversion of the existing Mayfield House, East Gate Lodge, West Gate Lodge and Mulberry House to provide a further 7 houses. The flats will be arranged in four blocks (A-D), with 148 sq.m. of retail floorspace (Use Class A1) at the ground floor of Block C. The proposals also include 83 parking spaces, including one for each wheelchair accessible unit.

13 The outline planning application seeks approval for the conversion of the existing admin building and water tower as well as the construction of new buildings ranging in height from 2 to 5 storeys to provide up to 350 residential units, as well as the retention of a number of healthcare buildings in healthcare use, and the construction of a number of new buildings to provide healthcare floorspace. All matters are reserved except for access for the outline application, apart from the new mental health inpatient building where approval is sought for scale and layout. The proposed building would be up to three storeys and would provide up to 3,550 sq m of health (Use Class C2) floorspace. Parameter plans have been submitted for the outline part of the application to determine maximum heights for the proposed buildings.

14 Open space is also proposed as part of the application, including a formal park and square to the centre and areas behind St Ann’s Road school. Approval is also sought for upgrading the existing access point from Hermitage Road.

15 Overall, the health use on the site will reduce from 41,500 square metres to 25,204 sq.m. (a loss of 16,296 sq m) and the proposals will provide up to 470 residential units as well as 148 sq m of retail floorspace. All of the existing health uses on site will continue to operate.

Case history

16 A pre-application meeting was held on 18 June 2013 at City Hall where verbal comments were provided to the applicant relating to boundary treatment, pedestrian routes, layout and space between buildings and around the ‘Square’ in particular. Officers were generally supportive of the principle of consolidation of the hospital and providing new homes, including affordable homes on this site, in line with local ‘Area of Change’ policies. No formal written comments were provided to the applicant, at their request.

Strategic planning issues and relevant policies and guidance

17 The relevant issues and corresponding policies are as follows:

- Land use principles London Plan
- Housing London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG
- Affordable housing London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy
- Density London Plan; Housing SPG
• Urban design  
  * London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; London Housing Design Guide; Shaping Neighbourhoods: Play and Informal Recreation SPG

• Mix of uses  
  * London Plan

• Regeneration  
  * London Plan; the Mayor’s Economic Development Strategy

• Employment  
  * London Plan; Land for Industry and Transport SPG

• Biodiversity/Geodiversity  
  * London Plan; the Mayor’s Biodiversity Strategy; Tree and Woodland Strategies

• Access  
  * London Plan; Accessible London: achieving an inclusive environment SPG;

• Equal opportunities  
  * London Plan; Planning for Equality and Diversity in London SPG; Equal Life Chances for All (Mayor’s Equalities Framework); Equalities Act 2010

• Historic Environment  
  * London Plan;

• Health  
  * London Plan; Health Inequalities 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

18 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 Haringey Local Plan: Strategic Policies (2013), saved policies from the Haringey Unitary Development Plan and the 2011 London Plan.

19 The following are also relevant material considerations:

• The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework

• The draft Further Alterations to the London Plan (2014)

• The draft Development Management Development Plan Document (consultation stage) and the Site Allocations Development Plan Document (consultation stage).

**Principle of Development**

20 As described above, the site is currently in healthcare use. The amount of healthcare floorspace will reduce from 41,500 sq.m. to 25,204 sq.m., which is a loss of 16,296 square metres. Policy 3.16 of the London Plan supports development proposals which provide high quality social infrastructure and resists a loss of social infrastructure without realistic proposals for re-provision. Policy 3.17 supports the provision of high quality health and social care and expects replacement facilities to be in place before the original facilities are closed.

21 While the proposals would result in a loss of healthcare floorspace, the proposed comprehensive healthcare campus would allow for all existing healthcare services and providers on the site to continue operating in modern facilities. As the applicant for the scheme, the NHS Trust has set out that all of the existing healthcare facilities on the site can operate from the proposed consolidation of facilities, with potential to expand to meet future needs. The healthcare facilities would remain operational throughout the redevelopment of the site and therefore the re-provision of the healthcare facilities is supported in strategic planning terms.
Policy 3.3 recognises the pressing need for more homes in London. Haringey’s annual housing target, set out in table 3.1, is 820 units and this target has been increased to 1,502 per annum for the period 2015 -2025 in the draft Further Alteration to the London Plan (FALP) 2014. The proposal for up to 470 residential units on the site represents 31% of this target and is welcomed. The 148 sq.m. of retail (Class A1) space is ancillary and would serve the proposed uses on the site. Overall, the development is supported in strategic terms.

**Housing**

**Housing Choice**

The detailed element of the proposals would provide 120 residential units. The housing mix for the outline part of the application is not currently fixed. The applicant has provided the following mix of unit sizes, taking both the full and indicative outline unit mix into account:

<table>
<thead>
<tr>
<th>Size</th>
<th>Full application</th>
<th>Indicative mix for outline</th>
<th>Indicative total for hybrid application</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>%</td>
<td>Number</td>
</tr>
<tr>
<td>1 bed</td>
<td>36</td>
<td>30</td>
<td>51</td>
</tr>
<tr>
<td>2 bed</td>
<td>64</td>
<td>53</td>
<td>115</td>
</tr>
<tr>
<td>3 bed</td>
<td>17</td>
<td>14</td>
<td>124</td>
</tr>
<tr>
<td>4 bed</td>
<td>2</td>
<td>2</td>
<td>37</td>
</tr>
<tr>
<td>5 bed</td>
<td>1</td>
<td>1</td>
<td>23</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>120</strong></td>
<td><strong>350</strong></td>
<td><strong>470</strong></td>
</tr>
</tbody>
</table>

The unit mix of the residential units for the detailed application is:

<table>
<thead>
<tr>
<th>Size</th>
<th>Flat</th>
<th>House</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 bed</td>
<td>36</td>
<td>0</td>
</tr>
<tr>
<td>2 bed</td>
<td>60</td>
<td>4</td>
</tr>
<tr>
<td>3 bed</td>
<td>10</td>
<td>7</td>
</tr>
<tr>
<td>4 bed</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>5 bed</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>106</strong></td>
<td><strong>14</strong></td>
</tr>
</tbody>
</table>

London Plan policy 3.8 ‘Housing Choice’ encourages a choice of housing based on local needs. Before the application is referred back at Stage 2, the applicant will need to fully justify
the chosen mix of units, and the Council will need to be satisfied that it is based on local housing needs, taking into account local and London Plan policy requirements.

**Affordable Housing**

26 Policy 3.12 requires councils to seek the maximum amount of affordable housing when negotiating on individual private residential and mixed-use schemes. The exact amount of affordable housing for the proposed application is unknown at this stage as this is subject to viability, and to the final unit mix of the outline part of the application. The applicant has indicated in the planning statement, however, that up to 50% affordable housing will be provided and that 70% of this will be shared ownership units and 30% will be affordable rent, following discussions with the Council. Before the application is referred back at Stage Two, the applicant should provide details of the affordable housing provision and relevant supporting viability information for the application as a whole. The Council should be satisfied that the proposed affordable tenure split is based on local housing needs and emphasis should be given to family affordable units, in line with Policy 3.8. Given the outline nature of part of the scheme, detailed s106 terms would need to be provided as part of the Stage 2 referral. Consideration should be given to the need for a review mechanism, depending on the agreed affordable housing provision, and conclusions of the Council’s independent review of the viability appraisal.

**Housing quality**

27 The Design and Access Statement demonstrates that all proposed residential units would be in accordance with the space standards set out in table 3.3 of the London Plan. The majority of apartments would be dual aspect and where possible corner balconies would be provided. The proposed houses would each have a private garden.

**Density**

28 Policy 3.4 seeks to optimise housing potential. The site is urban in character, with a PTAL of 1b. The appropriate density for the site, as set out in table 3.2 of the London Plan, is 150 – 250 habitable rooms per hectare or 35 – 95 units per hectare. The applicant’s density study shows that the area is characterised by densities of 45 to 83 units per hectare. The proposed hybrid application, taking the indicative units into account for the outline application, has a density of 66 units per hectare. This is within the density guide set out in the London Plan and is considered to be appropriate for the site.

**Children’s play space**

29 Policy 3.6 of the London Plan sets out that housing proposals should make provision for play and informal recreation. Using the methodology within the Mayor’s supplementary planning guidance ‘shaping Neighbourhoods: Play and Informal Recreation’ it is anticipated that the detailed application would yield approximately 17 children. The guidance sets a benchmark of 10 sq.m. of useable child playspace to be provided per child, with under-5 child playspace provided on-site. As such the development should make provision for 170 sq.m of playspace, with playspace for 10 under 5s (100 sq.m.) on site. Taking the site as a whole, the development would yield up to 158 children, with 860 sq m of playspace required on site for under 5s.
30 The detailed application includes a 0.4ha publically accessible open space, the ‘Formal Square’, including 120 sq.m. of doorstep playable space. This would include climbable objects such as balancing beams, which meets the requirements of the Mayor’s SPG for doorstep playable space for under 5’s. A 500 sq.m. communal deck with a raised lawn is also proposed on the first floor of Block D, which would provide a communal amenity space for all residents. The applicant has suggested that any remaining playspace could be met through the private gardens, in line with the Mayor’s playspace SPG which allows for under 5s provision to be met through private gardens. Each of the proposed 14 houses would have a private garden and each flat would have a balcony, resulting in 2052 sq.m. of private amenity space. In addition, there is a park directly opposite the application site, Chestnuts Park, which includes an equipped play area, playing fields and tennis courts.

31 The proposed 224 houses in the outline application are shown with private gardens in the illustrative masterplan which could provide playspace for the under 5s, although the exact layout is unknown at this stage. There is a proposed communal garden deck at Block F which could provide doorstep playable space. As well as the 0.4 ha Formal Square, a further 0.8ha of open space is proposed site wide. While a large amount of publically accessible open space, it is unclear from the information provided whether this will provide genuine opportunities for play.

32 The applicant should provide further information on the provision of site wide playspace before the application is referred back for Stage 2, and the Council should confirm if the off-site provision at Chestnuts Park is appropriate before it can be confirmed that the proposed playspace meets London Plan requirements. Any contributions to off-site provision will need to be secured in the Section 106 agreement.

Social infrastructure

33 London Plan Policy 3.16 ‘Protection and Enhancement of Social Infrastructure’ seeks to protect and enhance social infrastructure, with more specific policies on health and social care (Policy 3.17), education (Policy 3.18), and sports facilities (Policy 3.19). St Ann’s Hospital provides a range of health care which would be on site, and the Laurels Healthy Living Centre is nearby, on St Ann’s Road. The Environmental Statement (ES) accompanying the application sets out that this Centre will cater for an increase in local population of up to 10,000 up to 2018 and can therefore serve the demand created by the proposed development.

34 There are five primary schools and two secondary schools within a 15 minute walk of the site. The ES, however, states that there is insufficient capacity at primary and secondary school level to accommodate the additional pupils that the development would yield and therefore a financial contribution is proposed. The Council should ensure that any financial contribution towards education facilities is adequate for the provision of educational facilities to the pupils generated by the development and is secured by S106 agreement.

35 Chestnuts Park, directly opposite the site to the north, provides open space with an equipped play area, tennis courts, a basketball court and a community centre. The ES anticipates that support will be provided for the community centre in light of the increased use generated by the residents of the proposed development. The Council should ensure that any contributions to the community centre required to mitigate the impact of the increased population are secured by S106 agreement.
Urban Design

36 The simple street-based layout of the proposals is supported. The retention of the hospital wall around the site, however, raises concerns as it creates the impression of a segregated gated-development to Chestnuts Park and St Ann’s Road. Whilst officers accept the historic value of the wall and its role in the character of the conservation area, this can be celebrated whilst allowing additional openings to be created along the length of the wall. This approach, combined with the retention of a number of historic buildings on site, which is strongly supported, would deliver significant improvements to the quality of the public realm and address the segregated nature of the current proposal, without undermining the heritage value of the wall.

37 The need for development to maximise activity, contribute to people’s sense of safety and security and ensure a positive relationship with street level activity is fundamental to policies 7.1, 7.3 and 7.4 of the London Plan. The current proposal results in a stretch of nearly 400m of St Anne’s Road that will lack any activity or overlooking critical to making both the street and park feel safe, attractive and well used. Some sections of the wall have been reduced in height and railings have been placed to improve visual permeability. In addition, three vehicular and two pedestrian openings are provided along the wall which is welcomed in principle, however further access points and treatments should be considered.

38 Officers do not consider that the right balance between the heritage value of the wall and the qualitative impact it has on the surrounding area has been achieved. Officers recognise that the proposals seek to retain a number of mature trees within the Conservation Area, which is supported. The applicant could, however, give further consideration to the removal of greater sections of the wall than currently proposed to the west of the site. Given the uses proposed to the east, the majority of the wall here could be retained. This would improve the critical frontage along the park whilst retaining significant sections of the historical wall. Officers would happily engage with the developers to discuss these alternatives in more detail.

39 There is a lack of prominence given to the connection to the residential streets to the west. Whilst a connection has been shown on the indicative plans, further work is required to illustrate how the council owned site may be redeveloped to encourage this connection and how the SINC will be landscaped to ensure this will be active and well used.

40 The absence of a design code for the outline element also raises concern. It is fundamental to the acceptability of the proposal that the standards set out in the Housing SPG are appropriately secured and design priorities are established in line with London Plan Policy. Given that the majority of units are self-contained houses, officers are prepared to accept this in the development specification, which should include but not be limited to a commitment to meeting London Plan space standards, ensuring that apartment blocks will have no more than 8 units per core, no north facing single aspect units, and the provision of direct entrances to ground floor flats.

Inclusive Access

41 The Design and Access Statement accompanying the application states that all proposed units would be built to Lifetime Homes standards, in accordance with policy 3.8, with the converted buildings meeting the standards wherever possible. The applicant should provide further information on how lifetime homes standards are being met in the converted houses and justification where this is not feasible.

42 The applicant states that 10% of units will be wheelchair accessible, which would equate to 12 units for the detailed application, however only 10 units in the schedule of accommodation and detailed drawings are shown to be wheelchair accessible. These are all one
and two bedroom apartments. The applicant should confirm the number and mix of wheelchair units and the applicant should demonstrate that at least 12 units in a mix of unit types and sizes are wheelchair accessible or easily adaptable to wheelchair accessible units, in accordance with policy 3.8 and the Mayor’s Housing SPG. Conditions should be attached to any planning permission to secure lifetime homes standards and the provision of 10% wheelchair accessible units within the development.

43 The Design and Access statement sets out that the completed development would be fully inclusive and would meet the needs of all users, in line with policy 7.5. The Council should secure by condition a landscaping strategy for the homezone areas shown in the indicative masterplan to ensure the safety of blind and partially sighted people, the elderly and children. The retail and healthcare uses on the site would also need to comply with the principles of accessible and inclusive design. Further guidance can be found in the Mayor’s draft Accessible London SPG.

**Climate Change**

**Energy strategy**

44 The applicant has submitted an Energy Strategy with the application, in accordance with policy 5.2. Currently the strategy assesses the residential element of the application separately from the health campus. The energy strategy should assess the site as a whole, albeit with consideration for phasing and type of development proposed, and demonstrate the regulated carbon emissions at each step of the Mayor’s energy hierarchy, although the retained elements of the scheme could be considered separately. Guidance on the information to be provided within the energy statement can be found here: [http://www.london.gov.uk/sites/default/files/GLA%20guidance%20on%20preparing%20energy%20assessments%20April%202014%20final_2.pdf](http://www.london.gov.uk/sites/default/files/GLA%20guidance%20on%20preparing%20energy%20assessments%20April%202014%20final_2.pdf)

45 While the applicant has broadly followed the Mayor’s energy hierarchy set out in policy 5.2, a single preferred approach should be presented rather than a number of options.

46 The Energy Strategy sets out that 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, variable speed pumps and mechanical ventilation with heat recovery. Further information should be provided on how the demand for cooling will be minimised in line with policy 5.9. The applicant should demonstrate that the buildings meet Part L 2010 and, given the programme of delivery for the proposals, ideally Part L 2013 by energy efficiency alone.

47 The applicant has identified that the Upper Lea Valley district heating network is proposed to extend to the vicinity of the development. Evidence of correspondence with the network developers including information on timing for extension and the phasing of the application site should be provided. Should a site heat network be proposed, the applicant should provide a commitment to ensuring that all building uses on site are connected to the network and that the development is designed to allow future connection to a district heating network, in line with policy 5.5. The applicant should also confirm the location and size of the energy centre proposed.

48 Further information should be provided on the proposed installed capacity of the CHP system, the proportion of heat to be met and proposed management arrangements. A CHP system should be optimised by considering the site as a whole and facilitate future connection.
to district heating. A standalone micro-CHP for the mental health unit is not considered to be effective in meeting the objectives of policy 5.6.

49 The applicant is proposing to install solar PV. The applicant should demonstrate the extent of PV proposed, with a roof plan, and confirm the carbon savings associated with the installation.

Overall carbon savings

50 The comments above should be addressed before the proposals and carbon savings can be verified and assessed for compliance with London Plan energy policy.

Climate change adaptation

51 The Environmental Statement includes a Flood Risk Assessment, in line with Policy 5.12. The FRA sets out that as the site is in Flood Zone 1, the main issue to address on the site is surface water drainage. Currently the surface water runoff drains to the public Thames Water sewage system via seven connections, and it is proposed that the entire residential element of the site drains into the system via the northern connection at a rate of 64 l/s, to be confirmed following detailed drainage design. Further information should be provided on how the site would achieve green field run off rates in line with Policy 5.13.

52 The Mayor’s Sustainable Design and Construction SPG states that the majority of applications referred to the Mayor have been able to achieve at least 50% attenuation of the site’s (prior to re-development) surface water runoff at peak times. This is the minimum expectation from development proposals. The applicant should provide further information demonstrating how the proposed attenuation beneath the home zone areas meets the objectives of the SPG. No separate attenuation measures are proposed for the healthcare campus as the proposed development would lead to a reduction in the total impermeable area drained to the public sewer via existing connections. The Council should be satisfied that this is appropriate in line with policy 5.13.

Transport

53 Policy 6.10 of the London Plan aims to increase walking in London through emphasising the quality of the pedestrian and street environment. The improvements identified in the PERS audit within the Transport assessment should be secured through the section 106 agreement. The proposed connection at 67 – 69 Warwick Gardens should be safeguarded in order to support future provision of walking and cycling.

54 TfL welcomes the proposed wayfinding strategy as it will encourage walking, cycling and use of public transport, in line with policy 6.9. TfL’s preferred way-finding system is Legible London, and therefore would expect the applicant to contribute towards Legible London signage.

55 There are two existing bus stops within walking distance of the development site both on St Ann’s Road and serving route 67. Given the currently poor public transport accessibility of the site, TfL considers that the developer should contribute towards enhancement and encourage the use of the existing buses, in line with policy 6.7. TfL welcomes real-time facilities being provided in communal areas of the development site. TfL requires that the eastbound and westbound bus shelters along St Ann’s Road are upgraded to TfL’s Landmark London Model, and a financial contribution will be required for this, capped at a maximum of £10,000 per stop.
TfL is satisfied that this development will not adversely affect the TLRN at the junction to Seven Sisters Road and St Ann’s Road. The travel plan should be secured, enforced, monitored and reviewed as part of the S106 agreement.

The proposed car parking is in accordance with London Plan standards. While the cycle parking provision is in line with London Plan standards, the applicant should aim to achieve the higher cycle parking standards set out in the Further Alterations to the London Plan (2014) into account. The Transport Assessment states that 20% of the residential parking will be allocated for electric vehicle use with a further 20% allocated for passive provision for future use, which is in accordance with policy 6.13 of the London Plan. A condition requiring car parking management plan should be attached to any planning permission.

The Transport Assessment sets out the parking provision for the hospital use as 275 employee spaces, 71 visitor spaces, 19 disabled spaces, 2 HGV spaces and 3 pick up/drop off spaces. While there are no parking standards set out for healthcare uses in the London Plan, the Council should be satisfied that this represents appropriate provision for the drop off and pick up of patients by car, ambulance and mini bus. The layout of phase 1 of the proposed development should take account of future requirements and a condition imposed on any planning permission to secure subsequent provision of these facilities (and car parking).

**Community Infrastructure Levy (CIL)**

The Mayor’s CIL charging rate for Haringey is £35/sq.m for the residential and retail element and nil for the healthcare use. 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](http://www.legislation.gov.uk/ukdsi/2010/9780111492390/contents) as amended by the 2011 regulations: [http://www.legislation.gov.uk/uksi/2011/987/made](http://www.legislation.gov.uk/uksi/2011/987/made)

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 which is yet to be adopted. See the council’s website for more details.

**Biodiversity**

There are no nationally designated Sites of Importance for Nature Conservation (SINC) on the site, however there is a locally designated SINC to the south of the site (St Ann’s Woodland) which is part of a wider ecological corridor and this would be retained in the proposals. Chestnuts Park SINC is immediately to the north of the site. The applicant has submitted an Environmental Statement which sets out that while there is the potential for adverse impacts on the SINC through the construction and operation of the proposals, with appropriate mitigation measures there will be a negligible impact. This is broadly in accordance with Policy 7.19 of the London Plan, which seeks to minimise impact on sites of nature conservation.

**Local planning authority’s position**

The Council intends to formally consider the application at a planning committee meeting in September.
Legal considerations

63 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

64 There are no financial considerations at this stage.

Conclusion

65 London Plan policies on housing, social infrastructure, playspace, climate change, inclusive access, urban design, transport and biodiversity are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Housing:** The principle of a residential-led redevelopment is acceptable in strategic planning terms, however: further justification should be provided on the proposed housing mix, taking account of local need; the Council should confirm if off-site provisions for children’s play space are appropriate and any contributions to off-site provision will need to be secured in the Section 106 agreement; and details of Section 106 social infrastructure contributions should be provided.

- **Affordable housing:** The viability of the scheme should be fully assessed at the local level to ensure that the maximum reasonable amount of affordable housing is provided in accordance with London Plan Policy 3.12.

- **Inclusive design:** Further information should be provided on lifetime homes for the converted buildings, and the applicant should demonstrate 10% of wheelchair units to be wheelchair accessible. A parking management plan should be secured by condition.

- **Urban design:** The applicant should reconsider the extent of the permeability of the boundary wall to create a more open environment on St Ann’s Road. Further information should be provided on the residential connections to the west of the site. A design code should be provided to ensure the quality of the outline element of the proposals.

- **Climate Change:** The applicant should re-submit the energy statement, assessing the site as a whole. A single preferred option should be identified. Clarification should be provided on surface water run-off and attenuation.

- **Transport:** TfL requires contributions towards Legible London signage and upgrades to bus shelters along St Ann’s Road; the travel plan should be secured, enforced, monitored and reviewed as part of the S106 agreement; the applicant should aim to achieve the higher cycle parking standards set out in the Further Alterations to the London Plan (2014); and future requirements for drop off and pick up should be considered and secured by condition.
The application does not yet comply with the London Plan, however the changes stated above could lead to the application becoming compliant with the London Plan.

for further information, contact GLA Planning Unit (Development and Projects Team):

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