

420-424 Seven Sisters Road

in the London Borough of Hackney

planning application no. 2015/0844

Strategic planning application stage 1 referral

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

The proposal

Demolition of existing buildings and advertisement hoardings and erection of a part-five part-nine storey building with lower ground floor and partial basement to provide a 140 room hotel (C1); 35 room hostel (sui generis); 371 sq.m. retail (A1); 261 sq.m. restaurant (A3); 74 sq.m. drinking establishment (A4); hard/soft landscaping and amended access from Seven Sisters Road; cycle/car parking.

The applicant

The applicant is **Lets Buy Ltd**, and the architect is **Papa Architects**.

Strategic issues

The **principle of the redevelopment** of this site for an **intensification** and consolidation of **hostel** and **hotel** uses is supported in strategic planning terms. Further information is required with regards to **urban design, inclusive design, energy** and **transport** before the scheme can be recognised as meeting the objectives of the London Plan.

Recommendation

That Hackney Council be advised that, whilst the principle of the redevelopment of this site for a mix of hotel, hostel and ground floor A1/A3 uses is supported in this location, the application does not comply with the London Plan, for the reasons set out in paragraph 56 of this report. However, the resolution of those issues could lead to the application becoming compliant with the London Plan.

Context

1 On 30 March 2015 the Mayor of London received documents from Hackney 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 8 May 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 the following Category of the Schedule to the Order 2008:

- **Category 1C:** “Development which comprises or includes the erection of a building more than thirty metres high and outside the City of London”.

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

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

Site description

5 The site is bounded to the north west by the A503 Seven Sisters Road, which forms part of the Transport for London Road Network (TLRN), to the north east by the A105 Green Lanes and to the south east and south west by existing development. The site is adjacent to Manor House London Underground (LU) station, which provides services on the Piccadilly Line. London Overground services are also accessible from Haringey Green Lanes station, 800m to the north. Seven bus routes are accessible on Seven Sisters Road and Green Lanes adjacent to the site. As such, the site records an excellent Public Transport Accessibility Level (PTAL) of 6a, the highest banding available.

6 The site consists of a group of four storey Victorian buildings currently in use as a hostel and located along the southern edge of Seven Sisters Road at the junction with Green Lanes to the east. To the west, the site is adjoined by a three storey Victorian building in use as a hotel and to the south by a Victorian terrace in use as residential flats. A small parcel of land bounds the site to the east and contains a number of advertising hoardings.

Details of the proposal

7 The proposals involve the demolition of two existing Victorian villas and advertising hoardings on site and the subsequent redevelopment of the site to include a basement and lower ground level with a part-five, part-nine storey building. The building is subdivided to provide a 140 bed hotel (C1), a 35 bed hostel (Sui Generis), and a mix of ground floor retail and restaurant type uses. The proposal includes public realm upgrade works along the Seven Sisters Road and Green Lane edges of the site, with car and cycle parking contained to the rear of the building, access directly from Seven Sisters Road.

Case history

8 The application site has no previous strategic planning history.

Strategic planning issues and relevant policies and guidance

9 The relevant issues and corresponding policies are as follows:

- Tourism/leisure *London Plan*
- Urban design *London Plan*
- Access *London Plan; Accessible London: achieving an inclusive environment SPG*
- 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*

- Transport

London Plan; the Mayor's Transport Strategy

10 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 2010 Hackney Core Strategy, the 1995 Unitary Development Plan and The London Plan (Consolidated with Alterations since 2011).

11 The Council's Manor House Area Action Plan (2013) and the National Planning Policy Framework and Technical Guide to the National Planning Policy Framework, are also relevant material considerations.

Principle of development

12 The site is located within Inner London, recognised as having the potential to 'sustain and enhance its recent economic and demographic growth while also improving its distinct environment, neighbourhoods and public realm.' This area is also recognised as having the potential to support 'new and emerging sectors of the economy with particular clustering and accommodation requirements.' The site lies within an area highlighted in the Council's Manor Park Area Action Plan (2013) as having the potential for intensification around the junction between Seven Sister's Road and Green Lanes, linking with the emerging Woodberry Down scheme to the north east, and the scale and scope of the proposals therefore aligns with both local and London Plan policies in this regard.

13 London Plan Policy 3.14 'Existing Housing' details how the loss of housing, including hostels and staff accommodation will be resisted unless the existing floorspace is satisfactorily re-provided to an equivalent or improved standard. Policy 3.1B provides that development proposals should protect and enhance facilities and services that meet the needs of particular groups and communities. In this instance, the applicant proposes to replace the hostel floorspace with an uplift of five units. This is welcomed and satisfies London Plan policy requirements however, further detail on the operation of the hostel should be included as part of the application to ensure that its use is secured as part of any future permission. This should include access criteria for residents and the length of time that they will be eligible to stay.

14 In respect of the hotel use, Policy 4.5 provides that the Mayor will support London's visitor economy and stimulate its growth while ensuring that new accommodation is located in appropriate locations. In this instance, the site lies outside of the Central Activities Zone but close to good transport connections into Central London. The hotel element of the proposal is supported in this policy context and will contribute towards the Mayor's target of providing 40,000 net additional hotel bedrooms by 2036.

15 The proposal includes a small proportion of retail, restaurant and bar uses located at ground level in order to promote street based activity, which is welcomed. These uses help to support the aspirations of the Manor House AAP and area of intended intensification close to the tube station. In this context, the level of these uses is recognised as meeting the objectives of London Plan Policy 4.7.

16 It is understood that the existing Victorian semi-detached properties on site are not locally listed and are recognised as having minimal heritage or townscape value. Notwithstanding this, it is noted that this section of Seven Sisters Road has a distinctive character made up of a series of double fronted Victorian villas of varying architectural styles. While the need to intensify uses in this location is not disputed, and retaining the buildings would be likely to hinder this the applicant should provide further information to form part of the application that demonstrates how the proposals will respond to and complement the historic context of this section of Seven Sisters Road in terms of scale, plot widths and materials.

Urban design

Layout

17 Good design is central to all objectives of the London Plan. It is noted that the scheme has been subject to pre-application discussions with Council officers and the current proposal demonstrates a well-developed ground floor layout with active frontages maximised to both public facing edges which is welcomed. The building is arranged in two wings which broadly align with established building lines along Seven Sisters Road and Green Lanes, while creating a secure parking and servicing area within the site. This is supported, however the applicant is encouraged to explore means of repositioning refuse storage away from the Green Lanes frontage and further within the site, to enable retail frontage to be extended to the full extent of the site's north east boundary. Further consideration should also be given to access arrangements for guest from the rear parking area, and in particular those with disabilities. The proposed access route is currently via a narrow and enclosed service corridor and further work is needed to provide a more suitable and welcoming access route towards the main reception area.

18 The proposed works to the surrounding public realm are welcomed in principle however further detail is needed to demonstrate how the proposals will result in a high quality pedestrian environment that are designed to meet the capacity requirements of this prominent and evolving location. A full landscaping strategy should be included with the application providing further detail on level changes, surface treatments and visuals of the building in context. It is noted that the junction's proximity to the mature trees and greenery of Finsbury Park provides the opportunity for further greening along the site edges to optimise the quality of the immediate environment while providing a degree of screening from traffic.

19 The building's layout arrangement provides a simple configuration of hotel and hostel accommodation with rooms orientated along a broadly east/west axis to optimise daylight/sunlight penetration which is welcomed. Confirmation on the sizes and room layouts of two person hostel rooms in particular is needed to ensure that a high standard of accommodation is secured, and shared rooms are usable and not cramped. Further clarity is also needed in relation to the need for inward facing windows to hostel rooms along the western building frontage. This is likely to result in a feeling of enclosure for residents while also creating a largely blank street facing frontage.

20 As detailed in the Transport section of this report, confirmation is needed on whether the proposals include the removal of any existing street trees and further information should be provided to establish the proposal's impact on existing street trees in general. The applicant should have due regard to London Plan Policy 7.21 as the landscape proposals evolve.

Form, massing and architecture

21 The massing and heights strategy is broadly supported and aligns with the scale of neighbouring development while introducing a taller landmark element at the prominent corner of the site. This nine storey element is sufficiently expressed in relation to the main body of the building and introduces a vertical emphasis. Having established an appropriate scale that sits comfortably with both the existing and emerging context, the applicant is strongly advised to continue to work with GLA and Council officers to explore means of further refining the building's appearance. The building's appearance and architectural integrity currently fails to meet the required exemplary standard of design for a building in this prominent location. This is particularly important given the Council's aspirations for intensifying development around the Manor House junction and this scheme should aspire to set an exemplary design benchmark for future development in the immediate area. Particular attention should be given to how the taller element meets the ground and responds to the wider landscaping strategy. Further work is also needed with regards to the detailing and appearance of the canopy structure with the aim of achieving a refined and clean-lined roofline

to the tower. The rear elevations, while not likely to be fully visible from the street currently appear poorly resolved and would benefit from further work with the aim of achieving a unified and consistent architectural language, based on the proportions of each individual massing element. GLA officers would welcome further discussion on these points with the objective of meeting the requirements of London Plan Policy 7.6.

22 The use of high quality brickwork is supported and draws on the predominant use of the material along Seven Sisters Road. This also offers the opportunity to experiment with varying brick tones and brick coursing to introduce a further layer of complexity and richness to the building. The Council is encouraged to secure key details such as window reveals, ground floor frontages and parapet lines to ensure the highest quality of architecture is built through.

Inclusive design

23 The aim of London Plan Policy 7.2 is to ensure that proposals achieve the highest standards of accessibility and inclusion. 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.

24 The design and access statement should demonstrate that inclusive design principles have been applied to the design from the outset. It should explain the design rationale behind the proposals and demonstrate how the principles of inclusive design, including the specific access needs of disabled people, have been integrated into the proposed development, and how inclusion will be maintained and managed. There is a questionnaire on the web site which the applicant address: www.london.gov.uk/sites/default/files/Access%20statement%20content%20guidance_0.pdf

25 As described in the Urban design section, the applicant should provide further detail on access arrangements from the rear parking area to demonstrate how fully accessible and inclusive access will be designed into the scheme, meeting the specific needs of vulnerable groups such as blind or partially sighted people. Details should also be included within the landscaping strategy to indicate how entry points will be clearly delineated and with sufficient degrees of separation from traffic.

26 The provision for two Blue Badge parking bays for the hotel use is welcomed however the applicant should provide an access management strategy for the hotel to include details of the points raised previously. The applicant has confirmed that ten per cent of all hotel and hostel rooms will be designed to be wheelchair accessible and these should be distributed evenly across the hotel to provide choice for disabled guests. Consideration should be given to the provision for at least one room designed to accommodate a hoist and where feasible, accessible rooms should include through access to linked rooms to accommodate carers.

Energy

Energy efficiency standards

27 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 with controls and Mechanical Ventilation with Heat Recovery (MVHR).

28 The applicant should provide evidence of how policy 5.9 has been addressed to avoid overheating and minimise cooling demand. Dynamic overheating modelling in line with CIBSE Guidance TM52 and TM49 is recommended.

29 Based on the information provided, the proposed development does not appear to achieve any carbon savings from energy efficiency alone compared to a 2013 Building Regulations compliant development.

30 The applicant should model additional energy efficiency measures and commit to the development exceeding 2013 Building Regulations compliance through energy efficiency alone.

31 The applicant should note that the baseline emission target is determined using a gas boiler for heating and electric cooling (if included) instead of ASHPs which is a renewable technology. ASHP should be removed from this element of the hierarchy and the figures updated accordingly. The baseline should be the Building CO₂ Emissions Rate (BER). The applicant should review the latest GLA guidance on preparing an energy assessment (see link below) and update the report to comply with the outlined procedure:

<https://www.london.gov.uk/sites/default/files/GLA%20guidance%20on%20preparing%20energy%20assessments%20April%202015.pdf>

District heating

32 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant has been in contact with the local energy officer who has confirmed that there are no heat networks in the vicinity. Evidence of this correspondence should be provided. The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

33 The applicant is proposing to install a site heat network. However, the applicant should confirm that all non-domestic building uses will be connected to the site heat network. A drawing showing the route of the heat network linking all buildings on the site should be provided.

34 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.

Combined Heat and Power

35 The applicant is proposing to install a series of mini gas fired CHP to provide 75% of the domestic hot water load. The applicant should follow the energy hierarchy in developing the energy strategy and ensure that the CHP system proposed is optimised. The heating system should be designed to be suitable for easy retrofit of district heating. The proposed CHP should be optimised before considering renewables and it is expected to meet all the domestic hot water demand and at least a proportion of the space heating demand for the site. It should be confirmed that both space heating and domestic hot water systems will be compatible (e.g. wet central heating) for future connection to a district heating network.

36 The applicant should confirm how many CHP units will be installed and include the proposed engine sizes. The applicant should provide monthly heat load profiles, the CHP engine capacity that could be justified by the demand profiles and further investigate the potential for this technology. The applicant should also consider installing a single larger CHP to maximise the carbon savings for this element of the hierarchy.

37 A reduction in regulated CO₂ emissions of 77 tonnes per annum (19%) will be achieved through this second part of the energy hierarchy.

Renewable energy technologies

38 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 100 sq.m. of PV panels on the roof of the hotel. The applicant should provide a roof layout plan with the proposed PV array. Information on the size of the PV array in kWp should also be provided.

39 The applicant has stated that the Travelodge specification requires the use of air source heat pumps within the foyer, reception and offices to provide heating and cooling. It is also proposed for air source pumps to additionally provide heating and cooling to the bedrooms. In line with the energy hierarchy, the use of CHP should be optimised before considering the use of renewable technologies and therefore this approach is not supported. The applicant should confirm that the CHP will be the lead heat source for all building uses (including space heating), with the ASHP acting as a top up.

40 A reduction in regulated CO₂ emissions of 7 tonnes per annum (2%) will be achieved through this third element of the energy hierarchy.

Overall carbon savings

41 Based on the energy assessment submitted at stage 1, the table below shows the residual CO₂ emissions after each stage of the energy hierarchy and the CO₂ emission reductions at each stage of the energy hierarchy.

Table 1: CO₂ emission reductions from application of the energy hierarchy

	Total residual regulated CO ₂ emissions (tonnes per annum)	Regulated CO ₂ emissions reductions	
		(tonnes per annum)	(per cent)
Baseline i.e. 2013 Building Regulations	390		
Energy Efficiency	413	-23	-6%
CHP	336	77	19%
Renewable energy	329	7	2%
Total		61	16%

42 A reduction of 61 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 16%.

43 The carbon dioxide savings fall short of the target within Policy 5.2 of the London Plan. The applicant should consider the scope for additional measures aimed at achieving further carbon reductions. The comments above should be addressed before compliance with London Plan energy policy can be verified.

Transport

44 As described in the Urban design chapter, it appears that some elements of the proposed development may extend beyond the site's red line boundary and into the public highway, potentially resulting in the loss of TfL street trees. Clarification on this is required but should this be the case, this is not acceptable and revisions to the design of the development are required. Further information on the impact of the development on street trees is required in any case, as the submitted arboriculture assessment does not properly consider this.

45 Although the intention of the applicant to enhance the public realm around the site is noted and supported, any such improvements must be to a design agreed by TfL and delivered through a Section 278 agreement. Dependent on the agreed specification for these works, a commuted sum to

cover the cost of future maintenance may also be sought. Conditions or planning obligations to secure this should be secured on any consent.

46 The location and form of the vehicle access from Seven Sisters Road seems appropriate but a safety audit of the proposals and swept paths to demonstrate that a refuse vehicle can safely enter and leave the site are required. Provided this further information raises no issues, the alterations to access would need to be delivered through a Section 278 agreement with TfL, to be secured on any consent.

47 It is welcomed that low levels of car parking are proposed, with two operational car parking spaces and two for blue badge use. However, cycle parking needs to be increased by two spaces in order to meet London Plan standards. It is also noted that no coach facilities are proposed. The applicant has suggested that a condition could be secured on any consent preventing the hotel from taking coach bookings, which should be imposed by the Council. This is likely to be difficult to enforce and therefore the final Travel Plan should also identify a location for pick up, drop off and parking should a coach arrive on site.

48 It is accepted that a development of this size and with low parking provision will not result in an unacceptable impact on the local transport network in this location. However, the site is located in close proximity to Manor House station and as such infrastructure protection conditions would need to be secured on any consent. Suggested wording for these conditions has been provided to the Council.

49 Service arrangements should be formalised through a delivery and servicing plan (DSP), to be secured by condition on any consent. In addition, no consideration has been given to construction of the proposed development. In accordance with TfL guidance, a construction logistics plan (CLP) should be submitted and secured on any consent.

50 A Travel Plan has been provided as part of the application and is generally of a good quality. However, TfL it does not appear that the mode share targets set out are mathematically achievable and these should be reconsidered.

51 Hackney Council adopted its CIL on 1 April 2015 and it charges £55 per square metre of hotel use. The Council's Regulation 123 identifies specific transport improvements that the CIL can be used on, including pedestrian, cycling and public realm improvements.

52 The Mayor of London introduced his Community Infrastructure Levy (CIL) on 1 April 2012. Most development that receives planning permission after this date will be liable to pay this CIL. The proposed development in the London Borough of Hackney has a charging rate of £35 per square metre of floorspace. Further details can be found at: <http://www.london.gov.uk/publication/mayoral-community-infrastructure-levy>

Local planning authority's position

53 The Council has yet to consider a report on this application at its planning committee.

Legal considerations

54 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the

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

Financial considerations

55 There are no financial considerations at this stage.

Conclusion

56 London Plan policies on hotel/hostel use, urban design, inclusive design, climate change, and transport are relevant to this application. Whilst the proposal broadly complies with the London Plan, the following issues should be addressed before the application is referred back to the Mayor:

- **Principle of development:** The proposed hotel use and intensification of the hostel use is supported in this well connected location and in the context of the Council's Manor Park AAP objectives.
- **Urban design:** The layout and massing approach is broadly supported. Further work is however needed to ensure that the building meets the highest standards of architecture and place making as detailed above.
- **Inclusive design:** Further detail is needed to demonstrate disabled access arrangements from the rear parking area to the main hotel reception. An access management strategy should be included with the application to describe how the proposal will be designed to promote a fully inclusive service for guests with a range of needs and specific requirements.
- **Energy:** The applicant has broadly followed the energy hierarchy and sufficient information has been provided to understand the proposals as a whole. Further revisions and information are required before the proposals can be considered acceptable and the carbon dioxide savings verified.
- **Transport:** The proposal is broadly supported however confirmation on the position of the site boundary is needed alongside further detail and justification with regards to the street tree removal and planting strategy. Other measures, as detailed above, are to be secured within a Section 278 agreement.

for further information, contact GLA Planning Unit (Development & Projects team):

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