



4<sup>th</sup> March 2016

Planning Policy  
Level 6  
River Park House  
225 High Road  
Wood Green  
N22 8HQ

Submitted via email only to: [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk)

Dear Sirs,

**Representation on behalf of Jigsaw Student Living Ltd**

**Comments on Draft Tottenham Area Action Plan Development Plan Document - March 2016**

Haringey Council are consulting on the final drafts of four Development Plan Documents (DPD), which make up Haringey's Local Plan. The regulation 19 consultation is running for 8 weeks from 8 January to 4 March 2016.

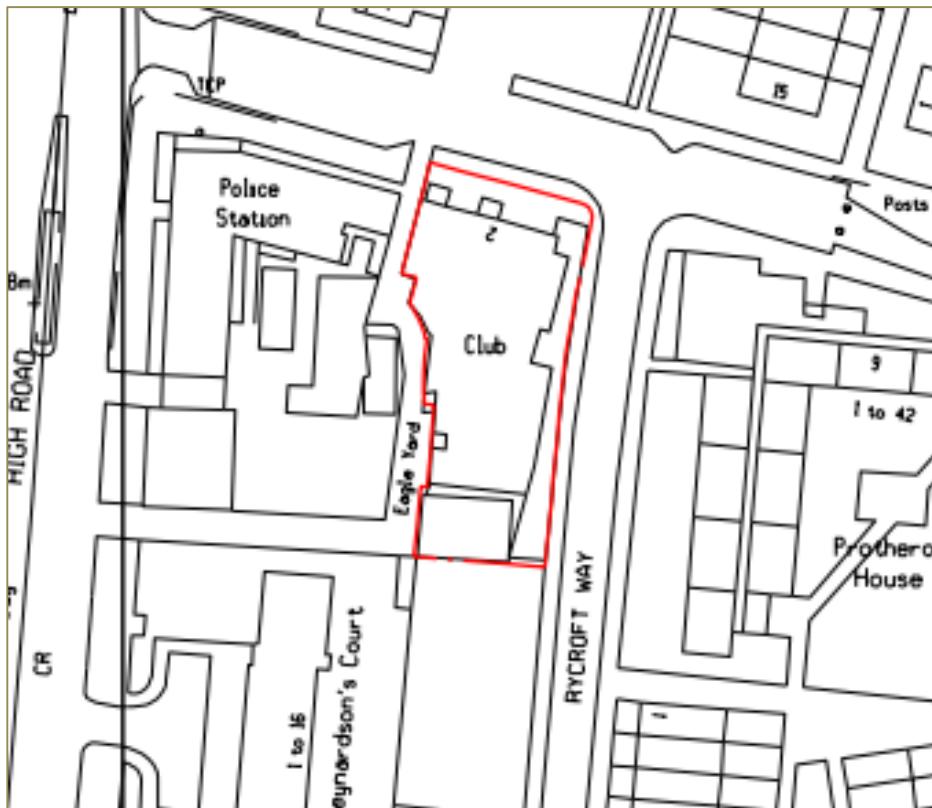
SF Planning Limited has been instructed by our Client to make representations to the Draft Tottenham Area Action Plan Development Plan Document, prior to its submission to the Secretary of State.

***Background***

By way of background, our Client, Jigsaw Student Living Ltd owns 2 Chesnut Road, to the west of High Road and to the northwest of Tottenham Hale station as outlined on the site plan overleaf. This is part of a wider site allocation within the draft document (site allocation - TG3), which is discussed later within the representation.

Our Client's site comprises of the remains of a mid-19th century villa with a frontage onto Chesnut Road which has a lawful nightclub use (*sui generis*). The Rycroft Way frontage comprises of various unattractive single storey additions to the original building over recent years. To the west of the site is Tottenham Police Station the western boundary fronts Eagle Yard and its eastern boundary fronts onto Rycroft Way.

To the south of the site is open green space lined by semi mature trees followed by a car park between Rycroft Way and Reynardson Court fronting the High Road.



Site Location Plan – 2 Chesnut Road

### **Planning Designations**

In terms of its planning designations, the site is located within the Tottenham Green Conservation Area, Tottenham High Road "Corridor", within an archaeological priority area and is adjacent to locally listed buildings. The site is also within the Upper Lee Valley Opportunity Area Planning Framework (2013).

The site is within walking distance of the Tottenham High Road bus corridor, Bruce Grove Rail station and Tottenham Hale underground station. There is also the presence of several local and strategic cycle routes including LCN+ Link 79 which connects the site with Enfield and Waltham Forest.

Chestnut Road is a key corridor within the Tottenham area providing an important link between Tottenham Hale and Lea Valley Regional Park in the east and the High Road in the west. The area does therefore have very good public transport accessibility with a PTAL rating of 6a.

## **Planning History**

The site has some significant planning history in recent years within the table set out below. These applications have failed to have been referenced within the draft Tottenham AAP.

<b>Planning Reference</b>	<b>Description</b>	<b>Decision</b>
HGY/2009/1665	<i>Demolition of existing structures and erection of 3 storey building comprising of 1 x 3 bed flat, 2 x two bed flat with balconies, bin and cycle store</i>	Granted 27-07-10
HGY/2009/1667	<i>Demolition of existing structures and erection of four storey building comprising of 1 x 3 bed flat and 2 x 2 bed flats with balconies, erection of bin and cycle store (amended scheme).</i>	Granted 27-07-10
HGY/2013/0155	<i>Partial demolition of existing buildings, retaining existing historical facade, construction of student accommodation over 3 and 4 floors to provide 64 student rooms and amenity areas.</i>	Granted 26-03-13



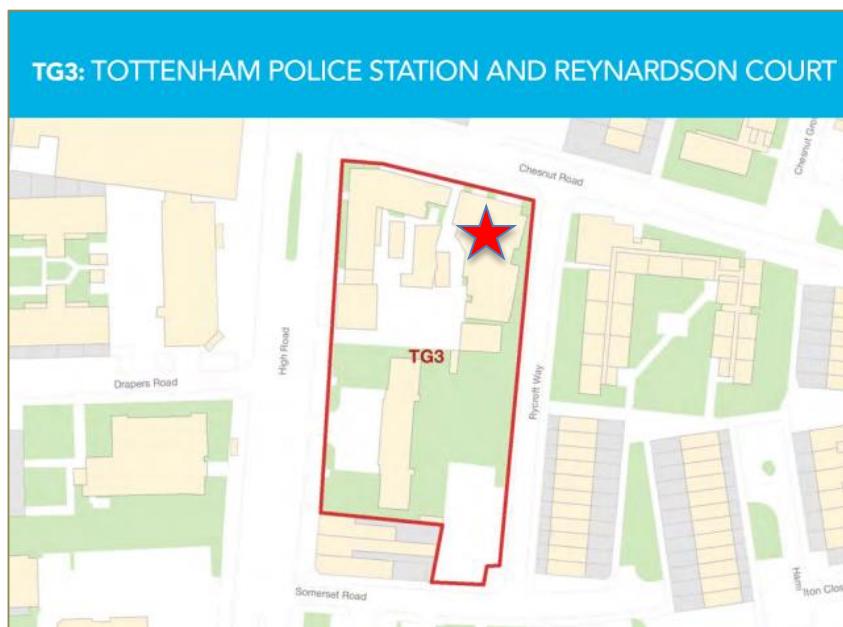
*Approved student accommodation scheme for the extensions and redevelopment of 2 Chesnut Road (Ref: HGY/2013/0155)*

## **Policy TG3 - Tottenham Area Action Plan Development Plan Document**

Our Client's site is located within the wider proposed site allocation (TG3) as set out on the site plan below. Paragraph 5.56 sets out the site allocation;

*"Subject to re-provision of the Police Station locally, conversion of the existing police station to include commercial space for SME and startup businesses. Redevelopment of Reynardson Court, and the car park to the rear, for improved housing stock and improved/enhanced open space."*

The allocation, as previously set out, fails to mention no.2 Chesnut Road and its relevant planning history as highlighted within the table above. This is a significant material consideration, since the principle of student accommodation has already been found to be acceptable via planning application HGY/2013/0155 which is in the process of being implemented.



Our Client would therefore request the policy is updated to acknowledge the previous planning history of the site since this has been demonstrated to compromise an acceptable reuse of this sustainably and underutilized site.

### **Potential other suitable uses for no.2 Chesnut Road**

Our Client is exploring the possibility of other suitable uses for the site which would help achieve the aims and aspirations of the draft Tottenham AAP and would replace the student accommodation within the redevelopment scheme.

In this regard, our Client has engaged with key stakeholders and Harringey Council regarding the potential need for other uses within this area. Alongside this, a full review of national, London Plan and emerging local policy has been undertaken to determine the suitability of potential uses for the site. This additional work has determined there is an identified need within the London Plan for short term hotel / visitor accommodation and at a local level a pressing need for specialist housing.

- *Visitor Accommodation*

In relation to relevant planning policy which concerns visitor accommodation, the National Planning Policy Framework (NPPF - Part 2) recognises that other economic development can play an important role in ensuring the vitality of centres and encourages the development of visitor accommodation on appropriate sites.

At a London level, the London Plan is a Spatial Development Strategy which covers the social, economic and environmental strategies for London up to 2036. London Plan Policy 2.7 is relevant given the sites sustainable location within the outer London Borough of Harringey and relates to 'Outer London: Economy' requiring outer London Boroughs to identify and bring forward capacity in areas with good public transport accessibility to accommodate leisure, retail and civic needs.

London Plan Policy 4.5 relates to 'London's Visitor Infrastructure' with Boroughs required to;

*"support London's visitor economy and stimulate its growth, taking into account the needs of business as well as leisure visitors and seeking to improve the range and quality of provision especially in outer London." [Our Emphasis]*

Policy 4.5 goes on to note beyond the Central Activities Zone (CAZ), visitor accommodation should be focused in town centres and opportunity and intensification areas, where there is good public transport access to central London. As previously set out the site is highly accessible and therefore an appropriate location for much needed visitor accommodation.

Part (C) of London Plan Policy 4.5 notes Local Authorities LDFs should promote and facilitate development of a range of visitor accommodation, such as hotels, bed and breakfast accommodation, self-catering facilities, youth hostels and camping and caravan sites as well as supporting and encouraging development of good quality budget category hotels, especially in outer London.

A Hotel / Apart-Hotel scheme would include a reception and concierge area at ground floor level to provide a checking in and out facility for guests as well as luggage storage and back of office facilities for staff of the Apart-Hotel. The upper floors would provide a total rooms for guests including separate en-suite and basic cooking facilities if required for longer stay guests.

The proposed Apart-Hotel by its nature would provide visitor accommodation which would reduce the likely pressure on residential housing within the Borough to be used as visitor accommodation, whilst retaining an employment element on site.

A proposed Hotel / Apart-Hotel on the site to provide self-contained hotel accommodation (C1 use class) that provides for short-term occupancy for visitors (in line with former ODPM Circular 03/2005) in accordance with the London Plan definition of an Apart-Hotel (Ref: London Plan Glossary – P386), is therefore fully supported at national, regional and local level.

- *Specialist Housing Accommodation*

Like many other boroughs, Haringey's Housing Strategy confirms the Council are finding it increasingly difficult to secure good quality, sustainable and affordable temporary accommodation of all types in London. Competition for private rented

homes has driven up prices, sometimes further fuelled by suppliers who actively inflate the market. Meanwhile, the council is dealing with rising levels of homelessness, with households often spending longer in temporary accommodation.

The housing strategy sets out to meet the challenge on demand, and to contain costs, the council are working in different ways and are;

*"Forging new partnerships with investors offering long-term investment to provide affordable, good quality, secure homes to help homeless households as well as additional, less expensive temporary accommodation. P25 – para.2"*

Haringey's emerging policy DM15 relates to "Specialist Housing" and is relevant in this case. The policy sets out the Council will support proposals for new special needs housing where it can be shown that there is an established local need for the form of special needs housing sought having regard also to the aims and recommendations of Haringey's Housing Strategy and Older People Strategy.

To establish whether there is a local need for specialist accommodation, discussions have been held with Andrew Billany, Managing Director of Homes from Haringey. These discussions have confirmed there is a need for specialist accommodation which is capable of the meeting the needs of the local authorities housing demands Haringey Homes would in principle be willing to enter into a lease agreement to take over the building as a whole.

The new building which already has consent and is located within an area with good public transport links, has the potential to provide suitable temporary accommodation and, subject to appropriate management and safeguards for occupiers and neighbouring residents, will help to integrate vulnerable people, and special needs groups into the community.

### ***Conclusion***

The regeneration and improvement of this site will bring back into use a key site along Chestnut Road. As it has been demonstrated above, the site is within close proximity to good public transport links and there is a need for visitor accommodation and / or specialist housing. These uses should therefore be integrated into the site allocation Policy TG.3.

Chestnut Road is a key corridor within the Tottenham area providing an important link between Tottenham Hale and Lea Valley Regional Park in the east and the High Road in the west. One of the key objectives for the regeneration of Tottenham is to see high quality development along this route that helps to define it as a safe and secure route between the High Road, Tottenham Green and Tottenham Hale. Furthermore, the site falls within an area with high public transport accessibility level PTAL (6a).

We would appreciate an acknowledgement of this representation letter in due course and hope these matters will inform the final drafting of the Tottenham AAP.

Please do get in touch with any queries.

Yours sincerely

**Paul Jenkins MRTPI**